

Pennsylvania Department of Environmental Protection
AIR QUALITY TECHNICAL ADVISORY COMMITTEE MEETING

Draft Minutes 1/11/2024

Air Quality Technical Advisory Committee (AQTAC or Committee) Members Present (via Teams or in-person)

Rob Altenburg	<input checked="" type="checkbox"/>	Joseph Guzek	<input checked="" type="checkbox"/>	Marianne Payne	<input type="checkbox"/>	John Tissue	<input checked="" type="checkbox"/>
Scott Brown	<input checked="" type="checkbox"/>	Christine Heath	<input checked="" type="checkbox"/>	Richard Shaffer	<input checked="" type="checkbox"/>	Shaun Vozar	<input checked="" type="checkbox"/>
Kimberly Coy	<input type="checkbox"/>	Charles McPhedran	<input checked="" type="checkbox"/>	John Shimshock	<input checked="" type="checkbox"/>	John Walliser	<input checked="" type="checkbox"/>
Joseph Duckett	<input type="checkbox"/>	Mohamed Mellaouch	<input type="checkbox"/>	John Slade	<input checked="" type="checkbox"/>		
Josephine Gaskey	<input checked="" type="checkbox"/>	Michael Nines	<input checked="" type="checkbox"/>	Kevin Stewart	<input checked="" type="checkbox"/>		

CALL TO ORDER & ADMINISTRATIVE ITEMS

Chair John Tissue convened the meeting at 9:15 am.

Approval of Minutes

John Tissue requested a motion to approve the 10/12/23 meeting minutes with the following revisions:

- John Slade marked as “present”
- John Shimshock marked as “not present”
- Charlie McPhedran’s remarks regarding the 2024 schedule be rephrased as “had a question regarding the frequency of the meetings.”

Kevin Stewart made a motion to approve. John Walliser seconded. John Shimshock abstained. John Tissue, hearing no opposition, so moved to approve the minutes.

PRESENTATION

Hallie Weiss, Air Quality Program Specialist, presented on the New Potential PM2.5 National Ambient Air Quality Standards (NAAQS).

Discussion

Kevin Stewart asked for clarification regarding EPA’s timeline to complete the rulemaking. Hallie Weiss and John Krueger responded that on January 2, 2024, the U.S. EPA filed a motion with the U.S. Court of Appeals for the District of Columbia to extend abeyance of the lawsuit brought by the State of California, the American Lung Association, and the Center for Biological Diversity against the 2020 rule that retained the NAAQS until January 30, 2024. The final reconsideration rule may make petitioners’ claims moot. This motion gives the U.S. EPA until the end of the January 2024 to finalize the PM2.5 NAAQS rule. It can take an additional one to two weeks for the final rule to be published in the *Federal Register*.

Kevin Stewart asked about the representativeness of the Lancaster downwind site. Sean Nolan clarified the Lancaster downwind site is located in eastern Lancaster County. The site is located in predominately an agricultural area and home to several Amish communities. He mentioned possible ambient air quality influences from ammonia, emissions from alternate fuels, etc. The DEP Bureau of Air Quality (BAQ) considers these microscale emissions in its evaluation of appropriate siting for ambient air monitoring stations. BAQ is currently researching the impact of these local emissions sources on the Lancaster downwind site.

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Charlie McPhedran asked whether existing regulatory programs (i.e., transportation) are sufficient to achieve compliance should the PM_{2.5} standard be lowered to 9 ug/m³. John Krueger responded BAQ is performing a source apportionment analysis to evaluate potential emission contributions by source sector.

Christine Heath asked about the impact of the 2023 wildfires on PM concentrations and corresponding attainment designations. Hallie Weiss responded that 2023 PM_{2.5} data is available in the EPA database, Air Quality System, (AQS) through September 2023. The deadline for submittal of 2023 PM data is March 31, 2024, with data certification due May 1, 2024. BAQ is developing an exceptional event demonstration for ozone due to the wildfire influence. Prior to calculating a final 2023 design value for PM_{2.5}, BAQ is considering developing an exceptional event demonstration for PM_{2.5}. Sean Nolan noted that once the PM_{2.5} standard is finalized; states have one year to submit designation recommendations to EPA. After working with the states, EPA will designate an area as meeting the standard (attainment/unclassifiable) or not meeting the standard (nonattainment). Wildfire smoke impacted 2023 PM_{2.5} annual average concentrations. Since most wildfire events occurred during the second quarter in 2023, PM_{2.5} average concentrations for this quarter are likely biased high. BAQ is considering evaluation of the wildfire smoke on PM_{2.5} concentrations collected during these wildfire events for exceptional event purposes.

Shaun Vozar asked if BAQ has performed a design value calculation using only 2021 and 2022 data, to eliminate the 2020 COVID year. Hallie Weiss and Sean Nolan responded that BAQ's focus is on quality assurance of 2023 data and therefore a design value calculation using only 2021 and 2022 has not been considered.

PRESENTATION

Daniel VanLenten, Air Quality Program Specialist, presented on 2023 Ozone Year in Review.

Discussion

Kevin Stewart asked for clarification regarding the number of the 114 ozone exceedances measured in 2023 that may have been associated with the wildfire events. Sean Nolan responded that during an exceptional event, such as the wildfires, many monitors within a geographical region will have similar elevated readings. For example, comparing the total exceedances to the number of days in which those exceedances occurred, (Slide 8), the ratio is higher for 2023 when compared to 2022 or 2021. The higher value in 2023 indicates the influence of an exceptional event occurring throughout the region. Sean indicated that BAQ will review this data and calculate an approximate number of exceedances (represented as a fraction) due to the wildfire events.

[BAQ follow-up response: On June 1-2, the Commonwealth had 27 ozone exceedances. On June 29-30, the Commonwealth had 46 ozone exceedances. For the 4-day period, the Commonwealth had 73 ozone exceedances (out of a total of 114 ozone exceedances). Therefore, 64% of the ozone exceedances in 2023 across the Commonwealth occurred during these four days.]

John Tissue asked about the influence of NO_x emission transport from upwind states during the periods with excessive exceedance during the wildfire events. Sean noted the exceptional event demonstration and the requirement to establish a causal relationship between the ozone concentration and the exceptional event. During the two wildfire events, ozone exceedances occurred during maritime flow and with wind trajectories directly from Quebec. These wind

patterns are not normally associated with ozone exceedances, and therefore will be defined as exceptional in the demonstration. Sean mentioned the May 2016 Fort McMurry fire exceptional event demonstration. He referenced the EPA Clean Air Markets Division (CAMD) 2023 vs. 2016 NO_x emissions (Slide 13), indicating this will also be considered in the demonstration.

John Krueger indicated the NO_x reductions as shown in Slide 13 have not occurred in upwind states. The stay of the Good Neighbor Rule is significant to SIP planning within Pennsylvania.

Robert Altenburg asked for clarification regarding techniques used in previous modeling to distinguish VOC vs. NO_x-limited monitoring. Sean responded that BAQ is looking at these datasets to better understand correlations. Sean referenced the PM_{2.5} speciation data and its value to understanding PM_{2.5}. Sean indicated the importance of organic carbon to the ozone exceptional events demonstration, specifically its association with smoke plume intensity. Speciation monitoring is performed on 1-in-6 schedule. Data will be shared at an upcoming AQTAC meeting.

Christie Heath asked BAQ to explain the exceptional event process, and its implications to monitoring results and design values, should the demonstration be approved. Sean referenced EPA's 2016 revision to the exceptional events rule. The final 2016 exceptional events rule, supporting documents and updated FAQs are located [The Final 2016 Exceptional Events Rule, Supporting Guidance Documents, Updated FAQs, and Other Rule Implementation Resources | US EPA](#). Sean identified the following:

- Need to establish a clear causal relationship between the event and the measured air monitoring concentration
- Must be of regulatory significance to the NAAQS
- The demonstration requires a 30-day public comment period
- BAQ submits the demonstration to EPA Region III for review after responding to all public comments
- EPA will take action to concur, not concur, or defer approval.

Christie Heath asked if neighboring states are completing similar analyses. Sean noted other states are completing similar analyses. BAQ is working with these neighboring states to coordinate efforts.

Michael Nines asked if AQTAC could be of assistance to these efforts. Michael asked BAQ to explain causality of 2022 ozone exceedances occurring at the Bristol, PA site. Sean indicated that AQTAC does not typically request AQTAC review or comment on exceptional event demonstrations. He will discuss this further with BAQ management. Sean noted that the 2023 ozone design value for Bristol will represent data collected in 2021, 2022, and 2023. Similar ozone concentrations were not observed throughout the region in 2022, as were observed during the 2023 during the wildfire events. BAQ continues to analyze the Bristol 2022 data to establish causal relationships.

PUBLIC COMMENT

Jim Herr, Chief Administrative Officer, Alliance Technical Group, provided comments related to standard protocols for source testing. He commented that standard protocols provide: (1)

Standardized, predictable submission and review timelines for new and prior-approved protocols, (2) Consistent testing methods, (3) Predictable and timely report reviews.

PRESENTATION

Chuck Zadakis, Division Chief, DEP, gave a presentation on Source Testing Standard Protocols

Background

- The Division of Source Testing and Monitoring (DSTM) implemented a business process management plan starting around 2017. This was largely driven by the large increase in testing, especially with oil and gas related activities. The plan involved the continual evaluation of the business process and periodic implementation of changes to enhance the effectiveness, productivity, and consistency of operations. Changes centered around the DSTM's review processes, division of labor, workflow prioritization, uniform submittal procedures, and standardizing workflow and reporting.
- In 2020-21, this initiative was broadened and repackaged as Source Test Re-engineering. This plan is ongoing and involved a restructuring of the DSTM, development of standard protocols, identifying and revising problematic permit conditions and permit maps.

Division Reorganization

- A reorganization of the DSTM occurred in 2023 to position BAQ for future success. The changes were made to better allocate staff to meet current and future needs.
- Changes:
 - The Source Testing Section was split, and a new Natural Gas Industry Testing Section was created. The new Section was created last summer/fall and Bryon Richwine was selected as the manager. Bryon has a staff of 6 (one vacancy). Bryon has over 30 years of experience, much of it in natural gas industry related testing. The addition of another manager also provides additional bandwidth for planning which is something that had been a real challenge. Bryon is focused on improving consistency of protocols. He is meeting with testing companies to convey requirements. The goal is to achieve one-pass outcomes for protocol submittals. Additionally, Bryon is working with staff to standardize the internal protocol review process. Other process improvements include development of countermeasures that address reduction of backlog and reduction in protocol review times. Bryon anticipates a one-year review cadence for standard protocols.
 - The Source Testing Section continues to be led by Rick Szekeres who now has a staff of 5 (one vacancy). His one vacancy that will handle PFAS and emerging pollutants of concern. Having such a resource will be valuable as the team collectively learns more about these pollutants.
 - The Pennsylvania Source Test Information Management System, PSIMS, Administrator position now reports directly to the DSTM manager (Chuck Zadakis) as they collectively work with staff from the two sections: Source Testing and Natural Gas Industry Testing. Ken Kuschwara will train this individual, and Ken will ultimately return to the Source Testing Section.

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- The DSTM is in the process of updating the content on the external webpages. The CEMS Section will continue to have its own webpage. The Source Testing Section and the new Natural Gas Industry Testing Section will share the same webpage.
- DEP's public-facing website has been experiencing availability issues due to migration to a newer version of SharePoint late last week. Work is being done to resolve these issues.

Source Testing FAQ's

- Chuck has an updated Frequently Asked Questions (FAQ) Document for Source Testing/Natural Gas. This updated copy will be posted to the external webpage shortly.

IT Projects

- PSIMS FileNet to OnBase Conversion – The underpinnings of PSIMS were based on FileNet. DSTM was instructed to change this to OnBase as that is the platform being adopted by the Commonwealth. This conversion process took over a year (2022 – 2023) and was completed in July 2023. This required an “all-hands” approach for programming resources and staff time.
- Incorporation of Access database functionality integrated within PSIMS for tracking work and data metrics, anticipated 2024.
- PSIMS Online, anticipated to begin 2025.
- PSIMS Enhancements.

Standard Protocols

- Staff from the Source Testing and Natural Gas Industry Testing Sections have been working on standard protocols. These are being developed to standardize the testing conducted throughout the Commonwealth and to reduce the number of test protocols that would require Department review. DSTM anticipates having a standard protocol for each general permit (GP). The GP numbering system will be applied to the standard protocol numbering system. If no GP exists, standard protocols will be identified using a “100” series. For example, the standard protocol (SP-101) for Bulk Loading Terminals is posted on the Source Testing/Natural Gas Industry Testing Section webpage.
- Rick indicated interaction with trade groups as the standard protocols are developed. Consider:
 - SP-013 (GP-013 Asphalt Plants), Pennsylvania Asphalt Paving Association, PAPA
 - SP-102 (Landfills), Pennsylvania Waste Industries Association, PWIA.
 - SP-001 (GP-1 Small Boilers), Small Business Ombudsman.
- Chuck requested AQTAC members review and provide feedback on the standard protocols, once drafted.
- For the Natural Gas Industry Testing Section, the following standard protocols are considered:
 - SP-005 (GP-005 Compressor Engines)
 - SP-005 Update (GP-005 Glycol Dehydrators)
 - SP-005 Update (GP-005 Turbines)

Bryon indicated wanting to consult with members from the Marcellus Shale Coalition during protocol development.

Requested action

- BAQ requests a list of AQTAC members interested in reviewing and commenting on these documents.

Discussion

Joseph Guzek asked Bryon to provide an update on the backlog. Bryon responded progress is occurring, with a goal to be within a 1-year backlog for all reviews in the next few years. Joseph asked about use of a template protocol for oil and gas, i.e., engines and compressor stations. Bryon responded tests performed per the standard protocol may not require a protocol submission; rather, a testing company possibly could submit an agreement that the test will be conducted as detailed in the standard protocol. Any variation from the standard protocol will require a review process. BAQ is obtaining feedback from testing companies as standard protocols are being developed. Bryon anticipates a 1-year review cadence once the standard protocols are developed and implemented. Joseph suggested use of review waivers in instances where current testing is identical to previous testing. Bryon agrees. Chuck indicated current efforts to establish a baseline.

Rick noted that testing companies can request approval to reuse protocols previously approved by DEP. This is detailed in the Source Testing Manual, 2000, [Source Testing Manual Revision 3.3](#)

John Shimshock asked if DSTM might consider using a standard protocol format similar to Ohio EPA's "Intent to Test Notification" form, [Emission Monitoring Unit \(Testing Group\) | Ohio Environmental Protection Agency](#). Rick indicated that reviews include identification of the test method used at the facility as well as supporting information specific to operations, span range, logistics, etc. Rick expressed concerns that use of a one-page notification form may be insufficient to convey all needed information. Joseph Guzek concurred.

John Tissue suggested a balanced approach that reflects sufficient detail with consideration for review timeliness. John noted the importance of DEP presence during testing.

Chuck concurred with John's comment. Richard Shaeffer also restated the importance of being on-site.

Michael Nines asked DEP to consider organizing outreach activities for the source testing and regulated communities, specifically training webinars. Chuck referenced BAQ's internal training initiative and will take Michael's comment under advisement.

The following AQTAC members offered to participate in the standard protocol review process:

- John Tissue
- John Shimshock
- Michael Nines
- Joseph Guzek

PRESENTATION

Mark Houser, Environmental Group Manager, DEP, presented on Instructions for Submitting Air Quality Emission Inventory

Mark informed AQTAC the instructions were revised for the 2023 submission year. The revised document was posted to the e-Library November 2023. Mark referenced the following revisions:

- Section 3.4 – Update reporting thresholds
- Removal of Accidental Release Pollutants
- Section 9.4 and 9.5 – Update to include a link to the EPA list of pollutants
- Removal of Sections 9.6 and 9.7

Mark asked AQTAC members to review the document and provide feedback for consideration in future revisions. He noted that feedback will need to be completed by July to be considered in an October publication. DEP will host a SharePoint site for AQTAC members. The purpose of the site is to provide a collaborative space for members to use while reviewing draft documents. Interested AQTAC members are asked to contact the AQTAC liaison to request access to the site.

Discussion

John Tissue provided a brief summary, noting that the instruction document will be uploaded to a SharePoint site and available for AQTAC members to review and comment. Feedback will need to be completed in June – July to be considered for the October 2024 publication. John referenced the October 12, 2023, list of interested AQTAC members.

John Krueger clarified that DEP is seeking input on clarity, readability, and content completeness. John reminded AQTAC members of the March 1, 2024, emission inventory submittal due date.

PRESENTATION

Kirit Dalal, Division Chief, DEP gave a presentation on Rulemakings/State Implementation Plan (SIP) Revisions.

Discussion

John Tissue asked for an update regarding the State’s appeal of two Commonwealth Court decisions that struck down Pennsylvania’s participation in the Regional Greenhouse Gas Initiative (RGGI). Susan Foster, Division Chief, read the following message from DEP Counsel.

“Pennsylvania has attempted to join RGGI since 2019. In 2020 the court issued an injunction preventing the state from participating in the program. As of November 2023, the PA Commonwealth Court vacated the PA RGGI regulation. The Shapiro administration has since filed a notice of appeal of the Commonwealth’s decision with the PA Supreme Court and should have a hearing scheduled for some time in 2024. The two main issues that remain are: (1) Whether the governor’s steps to join was an overstep of executive power and

(2) Whether this regulation constitutes a tax or a licensing fee. The Commonwealth Court previously denied the NGOs from intervening in this case; however, the NGOs, (non-governmental organizations), are still seeking to intervene in the proceedings before the Supreme Court. This is the status of the case; there are no further updates that we can provide at this time, but we will let the Committee know in the future if there are any updates that we can share.”

Christie Heath asked if DEP was reviewing OOOOb/c rules. John Krueger responded that DEP is looking very closing at these rules and deciding how the DEP can best implement them. Christie Heath asked if DEP was planning to include this as an AQTAC agenda item for a future meeting. John Krueger indicated that these would be included at a future AQTAC meeting. EPA, however, has not yet published the final rules in the *Federal Register*.

John Tissue offered AQTAC member assistance as DEP works through the requirements of OOOOb/c.

OLD & NEW BUSINESS / OPEN DISCUSSION

John Tissue opened the meeting for other AQTAC business/open discussion.

New Business:

Louie Krak discussed the Proposed Reducing Industrial Sector Emission in Pennsylvania (RISE-PA) Grant Program; Request for Information (RFI), [Pennsylvania Bulletin \(pacodeandbulletin.gov\)](https://www.pacodeandbulletin.gov). Responses to the RFI must be received no later than Monday, January 22, 2024. [Editor’s Note: A *Pa. Bulletin* notice was published on January 20, 2024, extending the deadline to provide comments to the RFI through January 29, 2024, [Pennsylvania Bulletin \(pacodeandbulletin.gov\)](https://www.pacodeandbulletin.gov)]

Any questions concerning the RFI should be directed to Louie Krak at lkrak@pa.gov or (717) 787-6107.

Discussion

John Tissue asked about the applicability of the Clean Air Act Section 111(d) requirements to use clean hydrogen for combustion sources. Louie responded there is a category for low carbon fuel switching; however, funding opportunities are focused on projects that can be implemented in the near-term. It’s unlikely the final program design would award funding to this type of project given the lack of clean hydrogen, expense, and long-time period associated with hydrogen fuel switching. Louie suggested AQTAC members respond to the RFI, to include details exchanged during the discussion.

John Tissue asked about eligibility of renewable natural gas. Louie noted any project funding award is contingent upon DEP receiving funding. He noted responses to the RFI will assist DEP with development and design of RISE PA. Louie again encouraged the Committee submit comments to the RFI.

John Tissue asked about project applicability for electrification of the transportation sector. Louie responded this specific source sector is not part of the industrial sector emission profile, based upon DEP’s greenhouse gas inventory.

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Louie commented qualifying emissions include:

- industrial fossil fuel combustion
- industrial electricity usage
- natural gas and oil systems
- industrial processes
- emissions from coal mining and abandoned coal mines.

Significant opportunity, however, exists with electrification of low-temperature process heat in the industrial sector.

Louie anticipates DEP issuing a press release on the RFI shortly. [Editor's note: DEP issued a press release on the RFI on January 12, 2024, [Article Viewer \(pa.gov\)](#)]

Old Business:

No old business was discussed.

MOTION TO ADJOURN

With no further business before AQTAC, John Tissue requested a motion to adjourn the meeting. Joseph Guzek made a motion to adjourn. Sean Vozar seconded. John Tissue, hearing no opposition, so moved to adjourn the meeting. The meeting adjourned at 1:04 pm.

The next AQTAC meeting is April 4, 2024.

Minutes prepared by Joseph Martini Air Quality Program Specialist (AQPS). For additional information about AQTAC, please contact the AQTAC Liaison (RA-EPAQTAC@pa.gov) or by visiting the AQTAC Web page at:

<http://www.dep.pa.gov/Business/Air/BAQ/AdvisoryGroups/Air-Quality-Technical-Advisory-Committee/Pages/default.aspx>