

The following pages represent a summary of the discussions that took place during the March 14, 2005 NSR Reform Workshop. The opinions from this review will be combined with those from past workshops, any formally submitted comments from the review, and any comments submitted at the public information sessions and hearings. All of the opinions will be taken in total and will be used in the decision to accept the Federal Rule or in the development of a draft rule to be presented in Spring 2005. The items below are simply a summary of the discussions that took place; they in no way represent any official opinion of the Georgia EPD.

## **Summary of Review of EPD Preliminary Position Outline (PPO) (March 14, 2005)**

### Applicability Test/Baseline Actuals/Projected Actuals

- EPD noted that the proposed Georgia state-specific study to determine look-back period was dropped due to time constraints and the level of detail necessary. It was decided that EPA's study would be used in the mean time.
- EPD proposes to add a definition for "basic design and operational parameters or characteristics." Also, EPD noted that adding this definition would provide the real actual to actual emissions from the project in question.
- A few members requested clarification on the "basic design" definition. EPD explained that it came from the stayed Routine Maintenance Repair and Replacement rule.
- One member asked if the "basic design" definition incorporates throughput changes that the unit was capable of previously.
- One member asked if prior agreement with EPD would be required so the facility would know if what they are submitting in regard to this new definition is accurate. EPD explained that the definition should be clear.
- A few members asked about the Demand Growth exclusion. Demand Growth exclusion will have to be estimated upfront. EPD doesn't know if it can be revisited once the process is started. EPD also noted that an application utilizing the Demand Growth Exclusion would take longer to process.
- It was clarified that 2 years means 24 consecutive months.
- One member noted that "basic design and operational parameters or characteristics" seemed to discourage voluntary controls.

### Clean Unit

- EPD noted that an internal study found that Georgia BACT determinations were on average with the BACT/LAER Clearinghouse. One member requested the results of this study. It should be provided in the documents for this workshop on the website.

### Pollution Control Project (PCP)

- One member inquired if all Pollution Control Projects would require modeling. EPD stated that the rule doesn't specify modeling, but would probably be required.
- One member applauded the removal of the Primary Purpose test.

### Plant-Wide Applicability Limits (PAL)

- EPD requested comments on the two different options for renewal of a PAL – Option A would be to recalculate the baseline upon renewal. Option B – if the actual emissions are greater than 80% of the PAL limit, then renew at same level, or if emissions are less than 80%, to recalculate the baseline.
- One member felt that EPD's modifications to the proposed rule made PALs un-PALatable.
- One member commented that it should be up to the facility to decide how to meet the PAL limit.

### Miscellaneous Issues

- No comments

### Moving Forward

- The Stakeholders asked to see the draft rule before EPD goes to the DNR Board.
- EPD noted that the rule will be adopted by reference in the Georgia Rules with only the exceptions noted.
- EPD specifically asked for comments on certain items – definition of “basic design and operational parameters or characteristics,” Demand Growth exclusion, PAL renewal options, and BACT on new significant units under a PAL.

-WSWT