

Response to Comments on the 2014 NEI Plan (July, 2014)

We would like to thank everyone who responded to the Draft 2014 NEI Plan. Below are the major comments that were received, and their responses.

Schedule

TCEQ development of the onroad and nonroad inputs and emissions estimates for 2014 will not be complete by June 1, 2015. The work is completed by July/August in preparation for the upload and quality assurance process in the fall. A more reasonable date to know the format and content required for the 2014 submissions would be January 1, 2015.

RESPONSE: SLT AGENCIES WILL HAVE SIX MONTHS (JUNE 2015 TO JANUARY 2016) TO SUBMIT INPUTS FOR EPA'S ONROAD AND NONROAD MODELING. WITH MOVES 2014 STILL UNRELEASED AND UNCERTAINTY IF IT WILL BE READY TO RUN NONROAD, EPA CANNOT CONFIRM THAT THE PROCESS AND FORMAT CAN BE READY EARLIER. WHEN PLANS HAVE BEEN FINALIZED, WE WILL GIVE A WEBINAR ON SPECIFIC CHANGES TO THE FORMAT USED FOR 2011.

Connecticut would like to ask if there will be an opportunity for early review of Commercial Marine Vessel activity inputs, similar to the opportunity that was given to stakeholders regarding aircraft. This section seemed to be a bit unclear, as the plan only mentions "Posting commercial marine vessel shape file fractions to CHIEF: and does not appear to allow the opportunity for early stakeholder review of activity data. We would like to have an early look into this area to ensure accuracy in EPA's estimates.

RESPONSE: THIS IS A GOOD. SINCE 2002, WE HAVE NOT USED ACTIVITY TO ESTIMATE CMV EMISSIONS. INSTEAD WE HAVE BEEN USING OTAQ'S EMISSION CONTROL AREA 2002 ESTIMATES GROWN TO THE NEI BASE YEAR FOR CATEGORY 3 VESSELS; AND NATIONAL ESTIMATES ALLOCATED TO COUNTY/SHAPES FOR CATEGORY 1/2 VESSELS. WE ARE REQUESTING FUNDING FOR BOTTOM UP ESTIMATION FOR CMV FOR 2014 NEI, BUT IT IS NOT YET KNOWN IF WE WILL HAVE RESOURCES. ONCE WE KNOW HOW THE ESTIMATES WILL BE DERIVED, WE INTEND TO INCLUDE SLTs IN THE REVIEW PROCESS EARLIER.

The term "2015 NEI" is very confusing. Does this refer to the 2015 Type A EIS Point Source submittals (i.e. 2015 EIS Submittals) or is there a true NEI planned for 2015? Why does 2015 v1 Public Release appear without any draft release or comment period?

RESPONSE: THE 2015 SUBMISSION PERIOD (FOR THE LARGEST, TYPE A, SOURCES ONLY) OCCURS DURING THE 2014 NEI CYCLE. THIS LINE ITEM IS JUST A REMINDER. THE INTERIM-YEAR INVENTORIES (NOT THE TRIENNIAL INVENTORIES) ARE COMPILED BY THE EPA FOR POINT SOURCES ONLY AND STORED IN EIS FOR VARIOUS USES BY THE EPA AND THE STATE, LOCAL, OR TRIBAL AGENCIES. POSSIBLE USES INCLUDE Pb MONITORING PLAN REVISIONS OR SO2 NAAQS IMPLEMENTATION. TO CREATE THE 2015 INVENTORY, WE WILL USE ANY NEW DATA SUBMITTED FOR TYPE A POINT SOURCES TO REPLACE 2014 NEI DATA, AND PULL FORWARD THE REMAINING POINT SOURCE DATA FROM 2014,

WITH THE EXCEPTION OF FACILITIES MARKED IN EIS AS NOT OPERATING OR CLOSED DURING 2015. FOR THESE INTERIM-YEAR INVENTORIES, WE WORK DIRECTLY WITH THE SUBMITTING AGENCIES TO RESOLVE ANY IDENTIFIED QUALITY ISSUES AND DO NOT PUBLISH A DRAFT.

Codes

The development of the onroad model input files, the emissions estimates, and the inventory results files for the 2014 NEI will be done as part of standard inventory development process. The inventory results files cannot be developed if SCCs are not known. The new list of onroad SCCs, and the mapping of previous to new SCCs, will be needed as soon as possible, no later than July 2014, to write the computer utilities that will be used by some states to process the MOVES output. The update of the MOVES inventory development utilities are already planned as part of the implementation of MOVES2014. The inventory development utilities updates must be completed by fall of 2014 in order to prepare for development of onroad inventories for state implementation plans in late 2014 and the 2014 NEI/PEI beginning in early 2015.

RESPONSE: EPA HAS PLANNED THE SCC REVISIONS. HOWEVER, NEW AND OLD SCCS WILL NOT BE ONE-TO-ONE MATCH. EPA HAS DECIDED TO RUN MOVES 2014 FOR THE 2011NEIV2 TO TEST THE SCCS BEFORE RELEASE SO THAT THEY WILL BE MORE STABLE. WE EXPECT THIS TO BE COMPLETED IN THE JULY/AUGUST 2014 TIMEFRAME.

TX has reviewed the SCC that EPA has proposed to retire and noticed we actively use some of those codes. Most have a "map to" SCC associated with them, but several have none, like landfills and residential residual oil combustion. In cases where there are not SCCs to map to, and the SCC is still used by the State, what do you propose the State do?

IN CASES WHERE WE DO NOT HAVE A "MAP TO," WE DON'T BELIEVE ANY STATES REPORT NON-ZERO EMISSIONS TO THESE SCCS. IF YOU FIND THAT THIS IS NOT THE CASE, PLEASE LET US KNOW. WE DID TAKE A LOOK AT TEXAS' 2011 SUBMISSION AND FOUND NO EMISSIONS REPORTED TO THOSE SCCS.

The "Other Information" column for Code 131-Thermal Oxidizer does not provide a mapping to another code. If the EPA is retiring Code 131-Thermal Oxidizer, then the replacement options cannot include choosing this same Thermal Oxidizer code. Can the EPA please provide clarification for this situation?

RESPONSE: THERE IS OVERLAP IN THE DEFINITIONS OF AFTERBURNERS AND THERMAL OXIDIZERS. IT IS NOT A 1-1 MAPPING. CHOOSE THE MOST APPROPRIATE ALTERNATE CODE (317- "RECUPERATIVE THERMAL OXIDIZER" OR 319 "REGENERATIVE THERMAL OXIDIZER") FOR THE SITUATION.

EPA has proposed the elimination of six control codes on the basis that the controls are not needed because information can be extracted from the assigned SCC, if correct. Connecticut is concerned that we not take a step backwards in easy access to information and data quality. We are particularly focused on Control Codes 90 - Variable Vapor Space Tank, 91- Floating Roof Tank, 92 - Pressurized Tank, and 94 - Underground Tank.

RESPONSE - WE (NEI TEAM) DISAGREE ON THIS BECAUSE IT IS CONFUSING TO HAVE IT IN BOTH PLACES, WHERE IT IS REALLY THE CHARACTERIZATION OF THE SOURCE AND NOT A "CONTROL". YES, THESE WILL HAVE LESS EMISSIONS THAN A REGULAR ABOVE GROUND TANK, BUT THE EMISSIONS ARE

CHARACTERIZED IN THE INVENTORY. WE HAVE DISCUSSED THE PROPOSED CONTROL CODE RETIREMENTS AND CONCERNS WITH SECTOR EXPERTS HERE, WHO, IN SHORT SAY: "WE AGREE THAT THE SCC DESCRIPTORS AND THE CONTROL CODES ARE DUPLICATIVE, AND THERE ISN'T ANY MORE INFORMATION TO BE HAD BY INCLUDING BOTH."

I CHECKED THE 2011 NEI AND FOUND THESE CODES (NONE IN CT) AT SCCS THAT INDICATED "...FLOATING ROOF TANK..." OR "...PRESSURIZED..." SO, WE (NEI TEAM) DON'T SEE HOW RETIRING THESE CODES WOULD BE A PROBLEM FOR THE NEI SUBMITTERS. IF A SOURCE WAS RECENTLY CONVERTED TO "FLOATING ROOF TANK" (FOR EXAMPLE), THEN IT SHOULD BE REFLECTED IN THE SCC.

Completeness

In the past, EAP (Forsyth County, NC) has had to explain its "lack of completeness" to EPA due to our agency's (and other agencies) practice that includes emissions inventory data from all permitted facilities. A majority of these facilities are not required to be submitted under the AERR. However, these emissions provide EAP and EPA a more comprehensive emissions profile for Forsyth County. EAP requires smaller permitted facilities to submit their emissions inventory at the time of their permit renewals. Although this time frame may seem excessive, we believe that the emissions gathered during the permitting process provides a better estimate of county-wide emissions than nonpoint source estimates. We don't believe this practice should "count against a completeness percentage." One remedy to this issue may be to include a classification code as a qualifier for calculating this completeness determination.

RESPONSE - THE COMPLETENESS CHECK IS DONE ON ALL FACILITIES WITH A FACILITY SITE STATUS CODE OF "OP - OPERATING." EIS DOES HAVE AN ALTERNATIVE CODE, "ONRE" - OPERATING BUT NOT REPORTING", WHICH MAY BE USED ON FACILITIES WHICH ARE EITHER UNDER THE REPORTING THRESHOLD OR WILL NOT BE REPORTED BY THE AGENCY FOR THAT REPORTING PERIOD. ONCE THE FACILITY SITE STATUS CODE HAS BEEN CHANGED TO ONRE , IT WILL NOT BE CONSIDERED IN OUR COMPLETENESS CHECK AND THE STATUS CODE WILL REMAIN ONRE UNTIL CHANGED. WHEN YOU ARE READY TO SUBMIT EMISSIONS, YOU WILL THEN NEED TO CHANGE THE FACILITY SITE STATUS CODE BACK TO OP. ANOTHER ALTERNATIVE IS IF THE FACILITY IS BEING REPORTED UNDER YOUR NONPOINT SUBMISSION, YOU MAY CHANGE THE FACILITY SITE STATUS TO "ONP-OPERATING BUT REPORTING IN NP." AGAIN A FACILITY WITH THIS TYPE OF STATUS CODE WILL NOT BE CONSIDERED IN THE COMPLETENESS CHECK.

Percent of completeness feedback reports may not be accurate if EPA is basing them off of expected emissions values for each process in Iowa's point emissions file.

RESPONSE: FOR POINT, THE COMPLETENESS CHECK IS ON WHETHER OR NOT EMISSIONS WERE REPORTED AT ANY PORTION OF THE FACILITY. THE CHECK IS NOT AT THE UNIT OR RELEASE POINT LEVEL. THIS IS THE SAME PROCESS WE USED FOR THE 2011 COMPLETENESS CHECKS.

Point

Missouri is concerned about the amount of work one new protected field will have on the point source inventory. We agree that certain point source locational fields (FIPS State & County code, location address, locality name, state and ZIP) are best locked after verification. However, locking the Facility

Name field after verification will cause more work for states and EPA because corporate names do change with some frequency from year to year. For example, name changes at one electric generating parent company triggered over 5 facility name changes for 2013. Another facility has changed names four times in ten years. Missouri would ask that EPA, at a minimum, not begin protecting the facility name field for the 2013 data submissions. With further discussion and analysis of the amount of work required for states and EPA, it may be possible for states to incorporate these protected fields into their processes for the 2014 data submission.

RESPONSE: THESE LOCKED FIELDS, WHILE AVAILABLE, WILL NOT BE UTILIZED FOR THE 2013. SEVERAL AGENCIES COMMENTED NEGATIVELY ON THE LOCKED FACILITY NAME. WE AGREE THAT THIS PROPOSED APPROACH COULD CAUSE UNNEEDED PROBLEMS. WE ARE REVISITING THE DECISION TO LOCK FACILITY NAMES AND WILL UPDATE THE PLAN WHEN AN ALTERNATIVE APPROACH IS FOUND.

Emission Factor Compendium

Missouri appreciates EPA's efforts to modernize emission factors in the WebFIRE database. While we support the idea of the Emission Factor Compendium planned for release in October, 2014, the approach should be transparent so that both state air pollution specialists and the regulated facilities have confidence in the changes. In the interest of clarity, Missouri asks that documentation of the factors be provided with the compendium, hopefully with the details outlined in the Emissions Factor Program Improvements proposal from 2009. Missouri will evaluate the compendium emission factors against factors currently in use to see if facilities should be requested to use the updated factors.

RESPONSE: WE WILL PROVIDE REFERENCES TO DOCUMENTATION WHERE AVAILABLE.

Iowa DNR believes the emission factors scheduled to be listed in the compendium should also be included in WebFIRE. WebFIRE and AP-42 have long been recognized as main emission factor retrieval systems. Listing emission factors in a compendium that is not well known will potentially go unnoticed by facilities and consultants who submit emission inventories and therefore the inventory data may not include the best emission factor.

RESPONSE: THE REASON WE HAVE DECIDED TO CREATE THE COMPENDIUM IS BECAUSE THESE ARE KNOWN EMISSION FACTORS THAT HAVE NOT YET MADE IT THROUGH THE LONG VETTING PROCESS TO BE ADDED TO THE WEBFIRE DATABASE, AND WOULD LIKE TO MAKE THEM AVAILABLE TO OUR USER COMMUNITY.

Nonpoint

The 2011 survey was confusing when it was first provided to the states and resulted in the survey having to be re-submitted. The EPA should send out a draft survey template for review and comment. Some states will begin planning for the updating of nonpoint inventory development as early as September of 2014. Releasing the default development list in the fall of 2014 would allow states more time for planning and research.

RESPONSE: WE CAN DEFINITELY MAKE THE DRAFT NONPOINT SURVEY AVAILABLE FOR COMMENT PRIOR TO BEING SENT OUT FOR COMPLETION. WHILE WE WILL NOT SEND THE FINAL SURVEY PRIOR

TO JANUARY 1,, 2015, WE CERTAINLY CAN POST A LIST OF SECTORS FOR WHICH EPA INTENDS TO ESTIMATE EMISSIONS BY SEPTEMBER, 2014.

Onroad/Nonroad

If the states prepare the MOVES and other model inputs for submission, may the corresponding emissions also be uploaded? It is unclear whether or not emissions submissions are required or allowed for onroad and nonroad sources. It is recommended that all references to submission requirements be complete and consistent. It is also recommended that the requirements for the NEI submission be consistent with the reporting requirements of the AERR, including the requirement to submit emissions for all source categories.

RESPONSE: THE TEXT IN THE PROPOSED AERR REVISIONS STATES, "WE ARE PROPOSING TO REPLACE THE CURRENT REQUIREMENT FOR STATES TO REPORT EMISSIONS FOR ONROAD AND NONROAD SOURCES WITH A REQUIREMENT THAT THEY REPORT THE INPUT PARAMETERS THAT CAN BE USED IN THE EPA MODELS TO GENERATE THE EMISSIONS VALUES. REPORTING THE EMISSIONS VALUES WOULD BECOME VOLUNTARY."

The EPA should allow the states to submit emissions subtotals to satisfy the AERR requirements. The states could provide modeling inputs at a later date once EPA has decided on the required format.

RESPONSE: 2014 NONROAD WILL RELY ON THE NONROAD MODEL AS IT HAS IN PAST YEARS, AND WILL BE RUN EITHER WITHIN MOVES 2014 OR NMIM. THE REQUIRED INPUTS TO NONROAD IN EITHER CASE ARE ALREADY KNOWN. THUS IT IS ONLY A QUESTION OF FORMAT WHICH WILL BE EITHER IDENTICAL TO THAT USED FOR 2008 OR 2011 NEIS, OR JOINTLY SUBMITTED IN MOVES FORMAT WITH SHARED INPUTS FOR ONROAD AND NONROAD WHERE RELEVANT (E.G., FUELS). EMISSION WILL CONTINUE TO BE ALLOWED IN ADDITION TO INPUT SUBMITTAL.

Events

How/where are pile burns to be reported (SCC 2810005001)? Much of the prescribed burning in WA is accomplished as pile burns. Should we submit them in the nonpoint NEI, or not at all?

RESPONSE: CONTINUE REPORTING THEM TO THE NONPOINT DATA CATEGORY UNDER THE ABOVE SCC.

Appendix 1 - Suggested State/Local Tribal Timeline and QA Checks

WE RECEIVED MANY COMMENTS ON THIS SUGGESTED TIMELINE. WE REALIZE THAT THIS TIMELINE MAY NOT BE REALISTIC FOR YOUR AGENCIES BUSINESS PRACTICES. THIS TIMELINE IS ONLY A SUGGESTION. THE POINT THAT SHOULD BE TAKEN FROM APPENDIX 1 IS THAT IT IS VERY IMPORTANT THAT YOU START AS EARLY AS POSSIBLE IN ORDER TO AVOID UNFORESEEN PROBLEMS SUCH AS DIFFICULTY SUBMITTING OR LAST MINUTE CORRECTIONS.