

Questions from the States and Answers from Region 5 on Designation Modeling- June 3, 2015

- When using actual emissions in the modeling demonstration, would it be appropriate to also use actuals, rather than allowed, in the off-site emissions inventory?

Yes, it would be appropriate to use actuals for the off-site, nearby sources. That's consistent with the overall recommendation in the modeling TAD.

- If a nearby utility was not listed in the consent order because it will be retired, should we include its past 3 year's emissions as part the off-site emissions inventory?

If the source is retired (through a federally enforceable shutdown) by the time EPA promulgates a designation for the area (i.e., July 2, 2016) the emissions would not need to be included in the modeling. This is consistent with language in the proposed Data Requirements Rule when talking about working with sources to implement controls and/or lower their limits prior to designation.

- A monitor currently has a Design Value of 69.4 ppb. The number is being driven by Canadian sources across the river. How do we deal with international sources when they have this much of an impact?

If the monitor is considered representative of the background air quality, it should be included in the attainment demonstration even if the Canadian sources are driving the design value. However, Section 179B would likely apply and the Regional Office could approve the submittal if the State can show that the attainment plan would be adequate but for the emissions emanating from Canada.

- A source is interested in using an allowable SO<sub>2</sub> emission rate in the designation modeling. The facility has a lb/MMBtu permit limit based on 30-day rolling average. What's the base approach from coming up with an allowed hourly limit for the SIP modeling?

The allowable emission rate used in the modeling should be adjusted to reflect the added stringency of a 1-hour limit, as explained in Appendices B and C from the NAA Guidance. It may be worth checking on the basis of the current limit, in accordance with discussion in Section 6.1 of the April 2014 Nonattainment Area SIP guidance.

- Are we modeling all SO<sub>2</sub> emission units for each of the consent decree sources? Combustion turbines, auxiliary boilers, emergency generators, fire pumps, cooling towers have come up. Actual emissions from these types of operations are extremely low, mostly due to the low number of hours they are operated per year or season. If they need to be included, we would want a good method to determine the emissions to model.

The intermittent source policy should be applied as noted in the modeling TAD. That likely won't address all the sources and in those situations, we'll have to determine emissions case by case, keeping in mind the purpose of the analysis is to evaluate actual emissions.

- We are going to rely on hourly emissions data submitted from the source as this seems to be the most accurate portrayal of emission characteristics during the time period. With the varying stack parameters and missing data Part 75 protocols being followed by the sources, we feel these emissions data sets will be the most accurate to model. We are having trouble finding flow rate and stack temperature information in CAMD. Plus, the source can help identify blocks of missing data.

It's quite acceptable, and perhaps preferable, to use data directly from the source rather than relying on CAMD data.

- We're assuming there is no requirement to public notice the updated designation recommendation for the Consent Decree sources.

That is correct. States are welcome to public notice that information but there is no requirement to do so.