From:	Anderson, Tom
To:	Bridgers, George
Cc:	Porter, Matthew k; Yoder, Jon M; Jones, Nancy
Subject:	Fwd: draft comments on EPA DRAFT Guidance for Ozone and Fine Particulate Matter Permit Modeling
Date:	Friday, April 17, 2020 1:11:48 PM
Attachments:	ATT00001.txt

George, our comments on the Draft Guidance for Ozone and Fine Particulate Matter Permit Modeling are provided below.

TA

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From: Porter, Matthew k <Matthew.Porter@ncdenr.gov>
Sent: Friday, April 17, 2020 11:47:00 AM
To: Anderson, Tom <tom.anderson@ncdenr.gov>; Jones, Nancy <nancy.jones@ncdenr.gov>; Yoder, Jon M <Mark.Yoder@ncdenr.gov>
Subject: draft comments on EPA DRAFT Guidance for Ozone and Fine Particulate Matter Permit Modeling

Tom et. al,

Here's my draft comments I propose sending to George Bridgers today:

Comment 1. Section II.4 Source Impact Analysis (pg. 14)

The phrase "source's significant emissions increase as proposed in the PSD permit application" should be replaced with something equivalent to "source's *allowable emissions increase* as *indicated* by the PSD permit application". Reference to 40 CFR 51.166(k) (or 52.21(k)) should then be added as a footnote to this statement to ensure that the reader understands the scope of the single source impact analysis includes demonstration that the permitted "allowable emissions increase" as defined in 40 CFR 51.166(b)(16) would not cause or contribute to air pollution in violation of the NAAQS or PSD increments. The phrase "significant emissions increase" is undefined in the draft wording and does not address the regulatory requirements under PSD rules. Furthermore, any air quality concentration increase resulting from the undefined "significant emissions increase" can be misconstrued as meaning the air quality concentration increase from the actual emissions increase from the PSD applicability analysis is the regulatory equivalent of the air quality concentration increase from the allowable emissions increase that may or may not be indicated in the PSD application. It is critical to distinguish between projected actual emission increases and permitted allowable emission increases in the single source impact analysis to show that any final permit decision is supported by analysis of the full measure of a source's primary and secondary *maximum potential impacts* (reference App. W Section 8.2 Source Data (b)) on ozone and PM2.5 concentrations. Consideration of NOX and SO2 permit allowable emissions increases in the application of MERPs is especially important, given the very broad range of hypothetical sources and regional trends in emissions and atmospheric chemistry assumed in predicting secondary ozone and PM2.5 formation.

Comment 2. Section II.5.2 PM2.5 PSD Increments Compliance (pg. 17, paragraph 2)

This paragraph should include a statement to address the case where large increment-consuming sources may consume increment beyond the county-level baseline concentration area. Often, large sources are located on or very near county lines, and as such, may affect increment in adjoining county-level or township-level baseline concentration areas.

Comment 3. General

This guidance should address the issue of intermittent source operating scenarios as they pertain to the single source impact analysis of primary and secondary PM2.5 impacts. Does the intermittent source guidance provided in the EPA Additional Clarification Regarding Applicability of Appendix W Modeling Guidance for the 1-hour NO2 NAAQS document apply to 24hr and annual PM2.5 modeling demonstrations?

Comment 4. Section V.1.2 PSD Baseline Area and Key Baseline Dates

The minor source baseline date for a baseline area or adjacent baseline area may also be triggered based on the single source impacts greater than or equal to annual SILs for NO2, SO2, PM10, or PM2.5 (see 40 CFR 51.166(b)(15)(i)). Other than a complete PSD application received in a target baseline area, exceedance of annual SILs can trigger the minor source baseline date in adjacent counties or baseline areas.

Comment 5. General (direct or primary PM2.5?)

What, if any, is the distinction between “direct” and “primary” PM2.5 emissions and/or impacts? Please provide a discussion or statement indicating the equivalence of these terms, or update guidance throughout to use one term or the other. Additionally, perhaps a distinction between these terms in the contexts of both modeling and emissions source testing (e.g., condensables) should also be made and discussed.