From: Healy, David
To: Bridgers, George
Subject: NH Comments on the Ozone and Fine PM Permit Modeling Guidance
Date: Wednesday, April 08, 2020 9:39:43 AM

Hi George,

Thanks as always for the update during yesterday's NACAA call and I hope everyone's doing OK down there in NC. Below, please find my comments on the Feb 10, 2020 Draft Guidance for Ozone and Fine PM Permit Modeling.

Thanks a lot and please let me know if you have any questions, ~Dave

Section IV. PSD Compliance Demonstrations for the O3 and PM2.5 NAAQS: Cumulative Impact Analysis
At the bottom of p41, the second bullet (Nearby sources) says that impacts on O3 from precursors are typically accounted for through representative monitored background. This bullet seems redundant with the third bullet which states "Monitored level of background O3 that accounts for O3 impacts from regional transport and nearby sources". The second bullet's premise of using monitored background to account for nearby sources also seems counter to the discussion in *IV.1 Modeling Inventory*. It also seems counter to the typical practice outlined in Appendix W of accounting for appropriate nearby sources by explicitly including them in the cumulative modeling. Note that the same comment applies to the bullets for PM2.5 on p42.

Section IV.4 Determining Whether Proposed Source Causes or Contributes to Modeled Violations
Near the bottom of p55, the first bullet states "For a predicted violation of the O3 NAAQS, the average of the predicted annual (or episodic) 98th percentile daily maximum 8-hour averaged O3 concentrations at the affected receptor(s) should be compared to an appropriate O3 NAAQS SIL". Is this correct? should it simply be the predicted maximum 8-hour average O3 concentration that is compared with the SIL?

Appendix A: Draft Conceptual Description of O3 and PM2.5 Concentrations in the U.S.
The discussion and figures in this appendix generally revolve around monitored data through 2015. Granted, a lot of statistical analysis and mapping has already been done in the appendix using the data from this time period. However, final quality-assured O3 and PM2.5 data is available through at least 2018. It might be more relevant and interesting if Appendix A was updated with the most recent data.
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Appendix C: Example of a tier 1 Demonstration of the Potential for O3 and Secondary PM2.5 Formation
Does Note 3. to Table 3 actually belong with Table 4?

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