From: Bridgers, George
To: Paine, Bob
Subject: RE: clarification question regarding the draft guidance on ozone and PM2.5 permit modeling
Date: Wednesday, April 01, 2020 4:18:00 PM
Attachments: image001.png

Bob,

First, I think that you are correct that the footnote reference is incorrect and should be to Section 8.3.2.c instead of 8.3.2.b. I tried to go back and see if the reference stated was to the 2015 proposed Appendix W or the 2005 version… but I think we just got the reference wrong all the way around. At least it got you in the correct ballpark. We will make the appropriate update when we finalize the guidance later this year. So, thanks for catching that!

Now… to your more specific question about what this all means and how to apply. Well… it's complicated… or every situation could be complicated. Yes in some cases, you could probably make a case for only modeling new emissions (direct and precursor) along with use of background monitoring and any necessary nearby sources (direct) for a cumulative analysis. However, there will be cases where the reviewing authority will want the whole facility modeled (direct and precursor) based on how the permit is being updated and issued. In that case, you will have the potential for double counting and may need to consider options along the lines of Appendix W, Section 8.3.2.c. My recommendation is reaching out to the reviewing authority and appropriate Regional Office if there is some thought that the background monitoring data needs to be adjusted such that everyone is better in the loop and can agree on the process.

Having said all of this… I'm not overly happy with my re-read of Footnote 18. There seems to be some broken logic in the Footnote… possibly do to editing done in the later rounds of review of the draft guidance. It definitely needs some clarification when we go final. This is why we put these things out for public review… catch incorrect references and help us where we've made things confusing.

-George

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From: Paine, Bob <bob.paine@aecom.com>
Sent: Wednesday, April 01, 2020 3:43 PM

To: Bridgers, George <Bridgers.George@epa.gov>
Subject: clarification question regarding the draft guidance on ozone and PM2.5 permit modeling

George, I hope that you are doing well during these trying times. On page 45 of the draft permit modeling guidance for ozone and PM2.5, there is a footnote 18 that is somewhat confusing to me; maybe you can clarify what it means. It states:

"Please note in the case of an existing source seeking a permit for a modification, there is potential overlap across secondary impacts from monitored background and from precursor emission from the existing source. In such cases, recommendations for excluding monitored values when the source in question is impacting the monitor in section 8.3.2.b of the 2017 Guideline may need to be modified to avoid overcompensating in cases where the monitored concentrations are also intended to account for the existing source's impacts on secondary PM2.5."

Section 8.3 of the 2017 Guideline provides recommendations for the determination of monitored background concentrations to include in cumulative impact assessments for NAAQS compliance. The background levels should account for impacts from existing sources that are not explicitly included in the modeled inventory as well as natural sources. However, it is Section 8.3.2 (c) (i) that discusses excluding monitored data due to source impacts to avoid double-counting, not Section 8.3.2 (b). Also, since the monitor is assumed to account for secondary impacts from existing sources (as stated elsewhere in the draft guidance), it seems that the "dilemma" of overlapping impacts could be avoided simply by modeling only the new emissions from the proposed source and using the monitor to account for the existing emissions.

If you believe that this potential comment would address the issue noted in Footnote 18, we will proceed with this approach. If, however, we have misconstrued the meaning of the footnote, let me know what I am missing.

Regards,

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