



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

JUL 01 2016

Robert A. Kaplan
Acting Regional Administrator
Attn.: R-I9J
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604-3507

Dear Acting Administrator Kaplan:

I am writing to submit Ohio's list of applicable sources under "Subpart BB – Data Requirements for Characterizing Air Quality for the Primary Sulfur Dioxide (SO₂) National Ambient Air Quality Standard (NAAQS)" (Data Requirements Rule (DRR)) and the approach that will be utilized for each listed source to characterize ambient air quality, or alternatively, demonstrate the intent to adopt federally enforceable limits below 2,000 tons per year (TPY) of SO₂. On January 15, 2016, Ohio submitted to U.S. EPA a list of sources meeting the applicability criteria of the DRR, and received a letter of concurrence from U.S. EPA on March 18, 2016.

Ohio's strategy for addressing these sources falls into three categories:

1. Modeling
2. Restricting below 2,000 TPY
3. Federally enforceable restrictions providing for attainment

There are no sources in Ohio following the monitoring path.

Modeling

The following sources in Ohio will have ambient SO₂ air quality characterized via dispersion modeling:

1. Miami Fort Station Dynegy, Facility ID 1431350093, Hamilton County

2. Bay Shore First Energy and BP Husky Refining LLC, Facility IDs 0448020006 and 0448020007, Lucas County
3. Conesville AEP, Facility ID 0616000000, Coshocton County
4. W.H. Sammis First Energy, Facility ID 0641160017, Jefferson County
5. J.M. Stuart DP&L and Killen DP&L, Facility IDs 0701000007 and 0701000060, Adams County
6. Carmeuse Lime Inc. Maple Grove, Facility ID 0374000010, Seneca County

Pursuant to 80 FR 51054, a protocol detailing the procedures Ohio EPA will follow when characterizing these sources via refined dispersion modeling accompanies this letter.

Restricting below 2,000 TPY

Sources under this category will be adopting federally enforceable permit limits such that SO₂ emissions will be sufficiently below 2,000 TPY that further characterization of ambient air quality will be unnecessary. These facilities and the relevant federally enforceable emission limits are detailed below.

1. The Medical Center Company, Facility ID 1318003059
Located in Cuyahoga County, the Medical Center has been permitted to shutter its two coal-fired boilers and replace them with natural gas boilers by January 13, 2017. These natural gas-fired boilers will be limited to burning No. 2 fuel oil for a maximum of 48 hours per year. In addition, the facility has adopted a federally enforceable facility-wide synthetic minor permit limit of 76.56 tons per year of SO₂.
2. The City of Orrville, Department of Public Utilities, Facility ID 0285010188
Orrville, located in Wayne County, is opting to convert three of the four coal-fired boilers at the facility to limited-use boilers and convert the fourth coal-fired boiler to a natural gas-fired boiler. Additionally, the facility is requesting an annual facility-wide SO₂ emission limit of 1,475 tons, effective January 13, 2017.
3. The Morton Salt, Inc., Facility ID 0285020059
Morton Salt, located in Wayne County, is shutting down the two coal-fired boilers at the facility and replacing them with natural gas fired boilers, with each having a federally enforceable SO₂ emission limit of 0.00059 lbs/MMBtu. These coal-fired boilers have historically emitted more than 99% of the total SO₂ from the Morton Salt facility. The conversion to natural gas at these units

will, based on the heat input rating of each boiler, result in a combined potential to emit of 0.76 tons of SO₂ per year, a significant reduction from the combined potential to emit, as coal-fired boilers, of 8,585 tons per year. The only other significant source of SO₂ at the facility is an existing natural gas fired boiler, which has a federally enforceable permit limit of 0.1 tons per year of SO₂.

4. The P.H. Glatfelter Chillicothe, Facility ID 0671010028

P.H. Glatfelter, located in Ross County, is currently in the process of converting its two coal-fired boilers to natural gas. The two coal-fired boilers have historically accounted for approximately 99% of all SO₂ emissions from the facility. The conversions will establish federally enforceable permit limits on these units that will limit the facility to well below 2,000 tons per year of SO₂.

Federally enforceable restrictions providing for attainment

A single facility, the NRG Avon Lake Power Plant in Lorain County (Facility ID 0247030013), will be accepting federally enforceable limits on both coal fired boilers that provide for modeled attainment. Modeling will be conducted similar to that conducted for attainment demonstrations, using Good Engineering Practice (GEP) stack heights and five years of meteorological data, to develop federally enforceable limitations that will not result in a modeled exceedance of the 1-hour SO₂ standard.

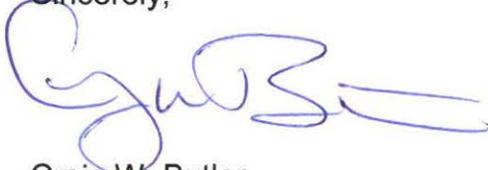
In addition to the above, three other sources fall under the requirements of 40 CFR 51.1202 but these sources were already analyzed using dispersion modeling under the U.S. EPA Consent Decree requirements:

1. General James M. Gavin AEP and Kyger Creek OVEC, Facility IDs 0627010056 and 0627000003, Gallia County
2. W.H. Zimmer Dynegy, Facility ID 1413090154, Clermont County

Lastly, our January 15, 2016 submitted list identified a pair of sources, Graymont Dolime (in Ottawa County) and Martin Marietta Magnesia Specialties (in Sandusky County) which each emit less than 2,000 TPY but which U.S. EPA had raised concern that they may be in sufficient proximity to raise questions about their combined impacts. We indicated we would be analyzing the combined impacts of these sources and indicated a preference that these sources not be listed pending completion of that analysis. On March 18, 2016, U.S. EPA provided a response stating our request was appropriate and U.S. EPA would therefore defer any decision on whether to list these sources pending receipt of further information on whether these sources warrant listing. Ohio EPA has completed an analysis and believes inclusion of these sources is not warranted. Ohio EPA will be providing additional information in the near future.

I appreciate the opportunity to provide our list of sources with the approaches that will be used to address the DRR requirements. We look forward to continuing to work cooperatively with U.S. EPA Region 5 staff as we both continue the process of fulfilling the DRR obligations. If you have any questions concerning this submittal, please feel free to contact Jennifer Van Vlerah of the Division of Air Pollution Control at (614) 644-3696.

Sincerely,



Craig W. Butler
Director, Ohio EPA

Cc: Robert F. Hodanbosi, Chief Division of Air Pollution Control

Modeling Protocol: Dispersion Modeling for 2010 SO₂ NAAQS Recommended Designations under the Data Requirements Rule

June 15, 2016

Purpose

Dispersion modeling is an acceptable methodology for informing area designations for the 2010 National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO₂). U.S. EPA recommends the use of the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) modeling system for this purpose. The purpose of this document is to detail the procedures to be followed by Ohio EPA in conducting air quality modeling for designation recommendations for the 2010 SO₂ standard.

Guidance on Air Quality Models

To assist states in conducting modeling with respect to designations under the SO₂ standard, U.S. EPA has provided several guidance documents:

- February 2016 DRAFT SO₂ NAAQS Designations Modeling Technical Assistance Document (*Modeling TAD*)
- Guideline on Air Quality Models, 40 CFR Part 51, Appendix W
- March 20, 2015 Memorandum: Updated Guidance for Area Designations for the 2010 Primary Sulfur Dioxide National Ambient Air Quality Standard (*Guidance Memorandum*)

In addition to the above guidance documents, Ohio EPA relied on information from the *Data Requirements Rule for the 1-Hour Sulfur Dioxide (SO₂) Primary National Ambient Air Quality Standards; Final Rule*, herein referred to as the Data Requirements Rule (DRR). Additionally, U.S. EPA Region 5 provided two response documents to questions raised by Region 5 states with respect to modeling to be performed for the requirements of the March 2015 Consent Decree; the first answered questions posed by the Indiana Department of Environmental Management and distributed by Region 5 to all Region 5 states, herein referred to as the Region 5 IDEM Q & A response; the second was a response to questions from the Region 5 states collectively, herein referred to as the Region 5 States Q & A response. These Q & A documents are provided as Appendices A and B to this document, respectively. Note that although these response documents were provided prior to the promulgation of the final DRR, Ohio EPA understands that there is little difference in the modeling requirements of the Consent Decree and the final DRR, and therefore considers these documents relevant to this protocol.

The preamble to the final rule for the SO₂ standard states that any modeling guidance released with respect to the SO₂ standard will follow Appendix W “with appropriate flexibility for use in implementation”. Ohio EPA has followed U.S. EPA’s guidance in the

preparation of this document and will do so for the development of modeling analyses for the purposes of informing recommended designations.

Model Selection

EPA guidance, including Appendix W and the Modeling TAD recommend the use of the most recent version of AERMOD for the majority of modeling demonstrations.

Ohio EPA intends to utilize AERMOD version 15181 for all modeling analyses performed in support of submitting recommendations for area designations. The most up-to-date versions of the regulatory components of AERMOD will also be used; AERMET version 15181, and AERMAP version 11103. Further, Ohio EPA will utilize the most up-to-date versions of the non-regulatory components of the AERMOD modeling system, as follows:

- AERSURFACE version 13016
- BPIPPRIME version 04274
- AERMINUTE version 14337 or 15272 (if necessary to incorporate 5 minute ASOS data)

According to Appendix W, AERMOD is appropriate for the following applications:

- Point, volume, and area sources
- Surface, near surface, and elevated releases
- Stacks less than good engineering practice (GEP) height
- Primary pollutants and continuous releases of toxic and hazardous pollutants
- Rural or urban areas
- Simple or complex terrain
- Transport distances up to 50 km

Ohio EPA will utilize the regulatory default option, which requires the use of terrain elevation data and stack-tip downwash, and assumes a four-hour half-life for SO₂ in urban areas. Deviations from regulatory practice are described in the appropriate subsections of this document and will be applied according to the recommendations in the Modeling TAD and the Guidance Memorandum.

U.S. EPA guidance (Appendix W) provides for the use of alternative models and for the use of measured data in lieu of model estimates, on a case-by-case basis. Ohio EPA maintains this flexibility in this protocol. The Nonattainment SIP Guidance states that *“Appendix W allows flexibility to consider the use of alternate models on a case-by-case basis when an adequate demonstration can be made that the alternative model performs better than, or is more appropriate than, the preferred model”*.

Section 10.2.2 of Appendix W discusses the use of measured data in lieu of model estimates. It is acknowledged in Appendix W that there are some conditions where measured data may lend credence to modeling results, and that certain criteria should be considered, as follows:

1. Applicable to NAAQS demonstration for an existing source
2. Network exists for the pollutants and time periods of concern
3. Monitors sited to capture points of maximum impact
4. Monitors should meet U.S. EPA storage and quality control standards
5. Monitor should be able to capture source specific impacts
6. Full year of data available
7. Demonstrated that model results are not representative of monitor data

As such, and in accordance with the guidance above, Ohio EPA considers well-sited monitors to be an important tool in assessing the impact of facilities, assessing model performance, and the development of area designations, and maintains this flexibility for area recommendations, where appropriate.

Modeling Framework

U.S. EPA does not provide a prescriptive approach to a modeling framework for the purposes of characterizing ambient air quality in areas with significant SO₂ sources in the Modeling TAD or other guidance, as dispersion modeling is only one component of a five-factor approach to determining area designations. As such, Ohio EPA created the following general framework for designation modeling that is informed by relevant U.S. EPA guidance, the modeling framework detailed in the *Guidance for 1-Hour SO₂ Nonattainment Area SIP Submissions*, and Ohio EPA's considerable modeling experience. Deviations from this framework are described in the area or source-specific modeling analysis documents, where applicable.

1. *Gather information about SO₂ sources in the source areas.*

Ohio EPA conducted facility outreach on June 15, 2015, wherein Ohio EPA supplied identified facilities with the most up-to-date and available information with respect to stack parameters, federally enforceable emission limits, building information, coordinates, and additional pertinent modeling information, and requested that the facilities review and revise this information. Ohio EPA requested actual hourly emissions or emissions on the finest temporal scale available, for the 2012-2014 period. Per the Region 5 States Q & A response document, data reported to the U.S. EPA's Clean Air Markets Database under Part 75 reporting requirements do not contain variable velocities and stack temperature data, and that it is acceptable to use emissions data directly from the facility. Further, Ohio EPA understands that the conservative data substitutions required under Part 75 reporting requirements are not appropriate and overly-conservative with respect to modeling 1-hour standards. That same response document cited above as well as the Data Requirements Rule indicate that sources which will have converted to natural gas or shut down prior to the promulgation of that area's designation may be excluded from consideration under either a modeling or monitoring approach to designation.

2. *Identify sources to explicitly model and those to include as background components*

As described in the **Modeling Domain** section of this document, Ohio EPA spent considerable effort in identifying major SO₂ sources using emissions reports, meteorology patterns, and other engineering judgment in selecting sources to explicitly model. Facilities meeting the criteria detailed in the Data Requirements Rule are presumed to be subjected to a designation based on either a modeling or monitoring approach. Other sources not meeting the Data Requirements Rule criteria were screened as described above when determining whether to explicitly model some sources or account for their impacts via background. This approach is consistent with Appendix W, which recommends that all sources expected to cause a significant concentration gradient should be explicitly modeled and that the number of such sources is expected to be small except in unusual cases.

3. *Determine actual emissions and temporal variability.*

The Data Requirements Rule, Modeling TAD, and the Guidance Memorandum provide for designations based on modeling of actual emissions data, where modeling serves as a surrogate for ambient monitoring. The Modeling TAD suggests the use of actual emissions from the most recent three years will be the best representation of emissions that would cause the impacts monitored in a three-year period under most circumstances. Via facility outreach, Ohio EPA obtained variable emissions, years 2012-2014, for relevant facilities at the finest temporal scale available to that facility. Variable exit velocities and temperatures were included in the modeling analyses, where available and applicable. Inclusion of these parameters more accurately represents the emissions characteristics of the explicitly modeled sources. This is consistent with the Region 5 States Q & A response document and section 5.2 of the Modeling TAD.

The Modeling TAD recognizes the unique and case-by-case nature of modeling analyses conducted for the purposes of designations. With respect to emissions, Section 5.2.1 of the Modeling TAD recommends that the reviewing authority work closely with each facility to determine the accuracy of emissions data. The guidance is not prescriptive with respect to substitution methodologies, but suggests averages of surrounding non-missing hours, peak emissions substitutions, use of emission factors, and others. Ohio EPA understands that data substitutions performed for the fulfillment of Part 75 monitoring and reporting requirements are in many instances conservative. To ensure that modeling presents the most accurate surrogate to monitoring for the purposes of designation, Ohio EPA intends to utilize a case-by-case approach to data substitution, including, but not limited to, Part 75 substitutions, valid hour-before hour-after averaging, mathematical interpolation across valid surrounding hours, and engineering methods.

Lastly, U.S. EPA guidance maintains flexibility for air agencies to model allowable or potential emissions. Ohio EPA maintains this flexibility to consider these emissions where warranted and applicable.

4. *Input actual emissions along with receptors, representative meteorology, and background concentrations into the model and calculate design values based on cumulative concentrations.*

U.S. EPA guidance is clear that designations modeling be based on three years of emissions data and representative meteorology. Thus, the form of the standard is the 99th percentile of maximum daily one-hour concentrations averaged over three years. This is a departure from Appendix W guidance, which calls for the use of five years of representative meteorological data. Ohio EPA intends to consider background at all receptors with respect to determining design values. Background concentrations will typically be added to modeled design values external to AERMOD, although Ohio EPA maintains the flexibility to include background concentration as an additional source within AERMOD itself. Ohio EPA will fully utilize those enhancements to AERMOD, such as the MAXDCONT output option, developed for use with the new one-hour standards, where appropriate.

5. *Evaluate the maximum modeled impacts and the distribution of modeled values across the modeling domain to inform the area designation as part of the five factor analysis.*

The Guidance Memorandum of March 20, 2015 indicates that area designations be based on a five factor analysis approach. A five factor analysis would consist of ambient air quality data or dispersion modeling, emissions and emissions related data, meteorology, geography/topography, and jurisdictional boundaries. Ohio EPA intends to conduct a five factor analysis for each source area. The Guidance Memorandum also suggests that dispersion modeling accounts for multiple factors simultaneously, either in part or in full. Ohio EPA agrees fully with this assessment, but maintains the flexibility to include additional information beyond dispersion modeling analysis with respect to each of the five factors when warranted or applicable.

Ohio EPA's modeling framework provides for a logical approach to a designation modeling strategy for each source area and as part of a five-factor designation approach. Ohio EPA's modeling framework serves as a guideline for modeling source areas and is not prescriptive. Deviations from this framework will be detailed and justified in the area specific modeling analysis documents submitted in support of Ohio's recommended designations, where necessary and appropriate.

Modeling Domain

For all relevant source areas, Ohio EPA intends to follow the Modeling TAD when developing modeling domains. According to that guidance, the modeling domain should be created on a case-by-case basis, considering multiple factors as described below. Of primary consideration will be how to center the modeling domain and the size of the modeling domain. Further, the Modeling TAD suggests that the selection of the modeling domain should consider the number of sources to explicitly model and the receptor network to create. Ohio EPA will utilize the following approach to both the selection of sources to model and the creation of the receptor network in all modeled areas. It should be noted that Ohio EPA will utilize 1/3 arc-second resolution National Elevation Database (NED) data to determine the elevation of all receptors included in the modeling domain.

Determining Sources to Explicitly Model

All sources within 50 km of each source area will be initially considered as potential sources. Sources will be selected for inclusion in the modeling based upon the level of emissions, meteorology, and other engineering judgment factors. Sources not selected for explicit modeling due to their insignificance will be included in background concentrations used in the modeling. Ohio EPA reviewed more recent inventory data and consulted individually with facilities to determine if any recent changes warranted inclusion or exclusion from the modeling domain beyond the 2012 emissions inventory.

Receptor Grid

The Modeling TAD recommends that receptors be placed in areas considered ambient air and placed throughout the source area with sufficient resolution to capture any potential violation. The Modeling TAD also indicates that receptors should be placed with sufficient density to detect significant concentration gradients. Although Ohio EPA does not have a prescriptive receptor placement strategy, a general strategy has been used for all NSR and PSD modeling in Ohio. This strategy is to place fence-line receptors no more than 50 meters apart, and incorporate a closely spaced receptor grid of 50 meter spacing from the fence-line to approximately 1 km from the facility. A second, 100 meters spaced grid is then generally placed, extending from the facility to approximately 2 to 3 km, and additional, less densely-spaced grids incorporated as needed. These, again are only guidelines, and Ohio EPA will utilize screening methods to ensure that the area of maximum impact is located within the densest portion of the receptor grid, where practical.

Ohio EPA intends to utilize this facility-centered approach in all source areas, ensuring that adequate density close to those facilities included in each modeling domain are present to detect significant concentration gradients. A prescriptive placement strategy will not be developed, to allow for flexibility within each area. The specific receptor placement strategy used in the individual areas will be described in the area-specific recommendation documents. Based on the Modeling TAD, Ohio EPA maintains the flexibility to eliminate or not place receptors based on the feasibility of monitor placement on a case-by-case basis.

Source Inputs

Emissions

Variable actual emissions will be modeled for each source included in the modeling domain at the finest temporal scale available to the facility. The use of actual emissions is pursuant to U.S. EPA guidance whereby modeling is intended to be treated as a surrogate to ambient monitoring.

Ohio EPA will analyze whether actual emissions should be adjusted based on factors such as the permanent shut down of sources, fuel switching, or installation of controls. Where these adjustments are warranted, they will be included and justified in the appropriate modeling analysis documents for each specific source area.

Good Engineering Practice Stack Height

The Modeling TAD and Guidance Memorandum indicated that actual stack heights may be used instead of good engineering practice stack heights. Ohio EPA intends to model actual stack heights for all stack-type egress points.

Dispersion Techniques

As stated in the Nonattainment SIP Guidance, U.S. EPA generally prohibits the use of dispersion techniques to inform or determine allowable emission rates. Such techniques include:

- Using the portion of the stack in excess of GEP
- Varying pollutant emission rates based on ambient conditions
- Selective handling of exhaust gas streams to increase plume rise

These prohibitions are generally not applicable for the purposes of designation modeling. Several exceptions to this are detailed in the above guidance, notably:

- Merging of gas streams in original design and construction, or as part of a change that includes installation of controls and a net reduction in allowable emissions affected by the change
- Utilizing techniques which increase final, exhaust' gas plume rise, provided facility-wide allowable emissions of SO₂ are less than 5,000 tons per year
- Smoke management techniques involved in agricultural or silvicultural programs
- Episodic restrictions on residential wood burning and open burning and,
- Reheating after a pollution control system

The above exceptions are likely also not applicable to designations modeling, but Ohio EPA is including them here for completeness and to maintain case-by-case flexibility for non-typical emission sources. As stated above, Ohio EPA intends to model all stack-type

egress points at actual stack height. Ohio EPA maintains the flexibility to consider alternate parameterizations and source characterizations, such as accounting for plume rise from volume or fugitive-type releases. Where appropriate, Ohio EPA will provide the rationale and methodology for these alternative characterizations.

Source Configurations and Source Types

The Modeling TAD stresses the need for accurate source parameters, building information, coordinates, and other parameters critical with respect to refined dispersion modeling. Ohio EPA will collect all necessary parameters via facility outreach, requesting each facility to be explicitly modeled provide up-to-date and accurate parameters. These parameters will be cross-referenced with recent permits, past inventories, and past modeling applications. Locations of sources and buildings will be confirmed using Google Earth Pro and ArcGIS mapping software. Corrections to coordinates, if necessary, will be performed both manually where applicable, and using the United States Army Corps of Engineers software CORPSCON if larger datasets need correction for improper or out of date projection information.

With few exceptions, the majority of sources to be explicitly modeled in the source areas are traditional stack-type release points characterized as point sources. In circumstances where Ohio EPA has to account for capped stacks, horizontal releases, area sources, or other release point characterizations, the guidance in Appendix W and Ohio's *Engineering Guide #69: Air Dispersion Modeling Guidance* will be followed. Those sources which require an alternative characterization and the methodology to do so will be described in the area-specific analysis documents.

Urban/Rural Determination

Ohio EPA, in accordance with Appendix W, has carefully considered the URBAN vs. RURAL characterization of each source explicitly modeled in the source areas. Appendix W recommends two methods to determine whether a source is characterized as URBAN or RURAL. The first, and preferred, methodology is the land use method, which characterizes the land use in a 3 km radius of the source. The second, and less preferred option, classifies a source as URBAN if the population density within a 3 km radius is 750 people/km² or greater. As described in the Nonattainment SIP guidance, Ohio EPA also considered the impact of tall stacks on the URBAN/RURAL determination for each source. Further, Ohio EPA has extensive modeling and technical experience in the source areas considered under the data requirements rule. The full URBAN/RURAL determinations for those sources in question will be described in the area-specific analysis documents. At the time of this submittal, Ohio EPA has not identified any sources to be explicitly modeled for which the URBAN characterization is necessary or applicable.

Source Groups

Ohio EPA will utilize the source group options available in AERMOD extensively in the modeling designation process, to assess both the total impacts of a facility and the

individual impacts of specific units. Ohio EPA will also utilize various source groups, in conjunction with the MAXDCONT output option, to assess impacts. Final modeled designation results will utilize the source group ALL to show the full combined impact of all facilities explicitly modeled in the source area.

Meteorological Data

Surface Characteristics and Representativeness

Ohio EPA has extensive background and expertise in the selection of meteorological data for modeling purposes. Ohio Engineering Guide #69¹, a document created to provide guidance to consultants and facilities with respect to dispersion modeling, provides a recommended and representative meteorological station and upper air station for each county in Ohio. Ohio EPA intends to follow the recommendations of that guidance as closely as possible. While these recommendations are typically prescriptive for PSD/NSR modeling, Ohio EPA maintains here the flexibility to evaluate alternate meteorological stations when it is determined that an alternate station is more representative of a source area. Ohio EPA determined the surface characteristics of each meteorological station using the AERSURFACE version 13016 module and 1992 land cover data, as described in the Model Selection portion of this document. Monthly surface characteristics were calculated for 12 sectors, and informed by comparing monthly precipitation records at each representative station to 30-year precipitation norms.

Ohio EPA will also attempt to follow Ohio Engineering Guide #69 with respect to selecting representative upper air sounding data for each source area, but maintains the flexibility to consider alternative upper air data sources.

Meteorological Inputs

Per the Modeling TAD, Ohio EPA will utilize three years of representative National Weather Service data, processed with the most up-to-date version of AERMET. Ohio EPA intends to utilize the AERMINUTE module to process ASOS data to limit missing periods in the resultant SFC meteorological input files. In situations where on-site meteorological data are available, Ohio EPA will utilize three full years of meteorological data. Per the Nonattainment SIP Guidance, which states “if 1 or more years (including partial years) of site-specific data are available, those data are preferred.” Ohio EPA interprets this to mean that partial years of on-site meteorological data can be used, provided that a minimum of 8760 hours of contiguous data can be assembled. The flexibility to utilize such an approach is maintained here.

Background Concentrations

Ohio EPA will consider background concentrations of SO₂ in all modeling analyses to be performed for the purposes of designations. U.S. EPA guidance suggests that a “first tier” approach to applying a background concentration should be considered by adding

¹ <http://www.epa.ohio.gov/Portals/27/sip/document/2014-07-17%20FINAL%20Revised%20EG69.pdf>

the overall highest hourly background value from a representative monitor to the modeled design value, but acknowledges that this approach may be overly conservative in many cases and could be prone to reflecting source-oriented impacts. While Ohio's SO₂ monitoring network is extensive, there are few SO₂ monitors not sited specifically to monitor facility-specific impacts.

As such, Ohio EPA will consider other approaches to the determination of appropriate background concentrations. Section 8.2.2 of Appendix W provides an approach in which source specific impacts can be identified and eliminated from monitor data prior to determining a background concentration. This section of Appendix W (as paraphrased in the Nonattainment SIP Guidance) states:

Use air quality data collected in the vicinity of the source to determine the background concentration for the averaging times of concern. Determine the mean background concentration at each monitor by excluding values when the source in question is impacting the monitor. The mean annual background is the average of the annual concentrations so determined at each monitor. For shorter averaging periods, the meteorological conditions accompanying the concentrations of concern should be identified. Monitoring sites inside a 90° sector downwind of the source may be used to determine the area of impact.

Based on the guidance and the lack of "regional" ambient air quality monitors in Ohio, Ohio EPA intends to consider and apply multiple approaches, including the elimination of readily identifiable source-specific impacts, statistical analysis of available monitoring data, and engineering judgment to determine conservative and appropriate background concentrations for each source area. Ohio EPA maintains the flexibility to consider the use of temporally varying backgrounds where appropriate. Given the varied terrain, sources, and meteorological conditions between the identified source areas and the technical detail involved, the specific background determination for each area will be detailed in the recommended designation submittal for each source area.

Determining Design Value Metrics

U.S. EPA guidance indicates that refined dispersion modeling for designations should provide design values at all receptors and be inclusive of all sources in the modeling domain, including background. For the 2010 SO₂ NAAQS, the modeled design value for each receptor is to be calculated as the 99th percentile of the annual distribution of daily maximum 1-hour concentrations, averaged across the modeled years. Ohio EPA will follow these recommendations for all modeling analyses performed in support of area designations.

Ohio EPA intends to utilize the MAXDCONT enhancement to the AERMOD modeling system, which determines the design value at each receptor at user specified ranks, as well as the contribution of each source group included in the analysis.

The Modeling TAD allows for the flexibility to perform separate AERMOD runs in situations where the simultaneous modeling of all explicitly modeled sources is not possible. With respect to these situations, the Nonattainment SIP Guidance states, “the use of hourly POSTFILES, which can be quite large, and external post-processing would be needed to calculate design values”.

Beta-options

Ohio EPA understands that several beta options have been developed for the AERMOD modeling system to improve model performance under low-wind conditions. Ohio EPA and others have presented multiple demonstrations to U.S. EPA indicating improved performance of the AERMOD model, without the introduction of under-predictive bias. These options are not yet approved by U.S. EPA, and Ohio EPA does not intend to utilize these options for any designations modeling. However, should one or more of these options be approved by U.S. EPA after the submission of this protocol, then Ohio EPA is reserving the flexibility to incorporate these new components into any and all modeling analyses for the purposes of designation.

Documentation

Ohio EPA will provide as part of the designations submittal all necessary information, including the following elements specifically enumerated in the Modeling TAD:

- Characterization of the modeled area
- An emissions analysis of the source area
- Methodology for preparing air quality and meteorological inputs
- Summary and analysis of modeling results
- Provision of modeling data inputs and outputs in electronic form
- Summary of the emissions data used.

Supplemental Analysis

Ohio EPA understands that the modeling portion of the recommended designation submittals represent only part of a more extensive five-factor analysis. As such, any such supplemental analysis will be included in each recommended designations submittal, where relevant.

Indiana Department of
Environmental Management
Questions and U.S. EPA Region
5 Responses

Questions from Indiana Department of Environmental Management on the Consent Decree “Down Payment” modeling and answers from EPA Region 5 (*in red italics*).

- 1) One overriding question: are the approaches mentioned at the end of page 4 through page 7 of the March 20, 2015 memo “Updated Guidance for Area Designations for the 2010 Primary Sulfur Dioxide National Ambient Air Quality Standards” all associated with the consent decree and required by September 18th deadline?

Yes, the modeling and boundary information in the March 20th Updated Guidance memo is applicable to the recommendations due Sept. 18th.

Are the next steps necessary to meet the requirement of the consent decree to model allowable emissions for an attainment demonstration to identify Attainment Areas, as listed in Page 5 and submit this analysis by the September 18th deadline? The way the March 20th guidance is set up, it is unclear whether this is a multi-step process: model actuals then model allowables to determine either nonattainment boundaries or identify attainment areas or are we only modeling actuals to determine source impacts and that is all that is necessary.

The updated recommendations you submit on September 18th would include information on nonattainment areas including boundaries along with any attainment area recommendations. Using allowable emissions isn't necessary to recommending attainment based on modeling. That can be done using actual emissions as discussed in the Modeling TAD. Although it's not a final rule, the proposed Data Requirement Rule also discusses several options for ensuring continued compliance if actuals are used in the modeling. The final rule is due out late summer/early fall. One way to ensure continued compliance is to use allowable emissions.

- a. If the actual emissions are modeled and indicated no violation of the 1-hour SO₂ NAAQS, is there any additional analysis necessary, such as any meteorological or other weight of evidence analyses?

EPA will consider all available evidence in promulgating its designations. Nevertheless, in absence of contrary information (e.g. monitored violations), additional information is generally not necessary to confirm results based on modeling using actual emissions that the area is attaining. Additional analyses could be conducted and submitted as weight of evidence but that isn't required. However, additional analyses would be needed to determine boundaries.

- b. On the flip side, if 1-hour SO₂ violations are modeled using actual emissions, would the area automatically be assumed nonattainment or would we want to work with sources to come up with a strategy to lower modeled concentrations? We want to make sure

the intent of this process is to evaluate the most current emissions to determine concentrations for area designation purposes only.

The proposed Data Requirement Rule discusses the possibility of working with sources to implement controls or lower limits if that would eliminate the modeled violations. Since designations are intended to reflect current air quality, EPA considers such emission reductions only if they have occurred by the time EPA promulgates the designation, enough in advance of the designation to be able to confirm that emissions are reduced, and perhaps only if the reduction is enforceable. The state should consult the region in any case where such emission reductions are under consideration.

- 2) We assume we will use background concentrations in the actual emissions modeling results, similar to the adjusted 1-hour SO₂ background used for the 1-hour SO₂ nonattainment area modeling? Pick the nearest SO₂ monitor or a representative SO₂ background monitor?

Representative background concentrations should be added to the modeled analysis to represent the SO₂ contribution from small sources not being explicitly modeled as well as distant sources and natural background. Additionally, nearby significant sources should be included in the modeling. Guidance is available in the modeling TAD. This would be something to include in the protocol.

- 3) Along with the hourly CEM emissions data, would EPA prefer to have the corresponding varying hourly stack parameters such as stack temperature and flow rate from the CEM data modeled as well?

Our preference is to include the temperature and velocity hourly data if it's available. It would more accurately represent the impacts from the source in question and would provide a more realistic assessment.

- 4) Consent Decree source: there are two other sources in the county with SO₂ emissions exceeding 475 tons/yr. Is there a threshold for emissions and/or distance from the sources listed that we could use to screen out other sources from the impact area?

There is no emission threshold bright line that would be used to screen out sources. Modelers' judgment, along with applying the guidance available in the TAD document, and associated references, should be used to determine if nearby sources cause a significant concentration gradient in the area of interest around the primary source. This decision needs to be made in conjunction with the determination of an appropriate background monitored value. Again, this is something to include in the protocol document.

- 5) Initial modeling will be using 2011 -2013 emissions and meteorology until 2014 emissions and meteorology is available, hoping by mid-summer. We will be contacting sources to get 2011

through 2014 hourly CEMs data and will be finishing the 2013 and 2014 meteorological data very soon.

FYI, the updated version of AERMET should be available around the time that the App. W changes are proposed...approximately late May/early June?? I'd recommend using the most recent version of AERMET. Or, if met data has already been processed, I'd recommend evaluating whether the changes in the most recent version are likely to be significant to your application when deciding whether to reprocess. The most recent version of AERMOD should be used.

- 6) Guidance mentioned placing receptors only in locations where a monitor could be placed (assuming bodies of water, other company properties, etc)? Are there other areas that a monitor could not be placed that we could consider?

No other areas come to my mind but I'm sure this question will come up as we examine source specific modeling applications.

Questions from Region 5 States
on Designations Modeling and
U.S. EPA Region 5 Responses

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 SO₂ 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 SO₂ 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.