

From: [Gesser, Ryan](#)
To: [Jackson, Tricia](#); [Hemann, Chris](#)
Cc: [Ruppel, Mark S.](#); [Thomas, Alan](#)
Subject: Arkansas NAAQS SIP Comments
Date: Thursday, July 02, 2015 2:21:44 PM

Dear Ms. Jackson...

Thank you for allowing the opportunity to provide the following comments on Arkansas' NAAQS SIP guidance...

- GP generally agrees with DEQ's approach to the NAAQS SIP for minor source permitting by promoting planning measures that focus on regional trends in air quality. This emphasis is particularly important for ozone and fine particulate matter, for which the NAAQS are typically most challenging to attain due to the increasing stringency of the standards relative to existing and background conditions, and that are affected by significant emissions of precursor pollutants to a far greater extent than emissions from minor sources and modifications. Items 1 through 4 of "Enhanced Planning Measures and Approaches" appropriately examine statewide air quality by recognizing that emissions from major sources within Arkansas, upwind sources outside the state, and non-road, on-road, non-major, and natural episodic emissions (e.g., forest fires and prescribed burns) are best managed using sound data collected through emissions inventories, monitoring networks, and regional-scale modeling that reflect actual emissions and impacts on air quality.
- Periodic Multi-source Modeling (Item 5) may be a useful tool; however, the guidelines for conducting such modeling should be made clear and generally conform to current (at the time of analysis) EPA modeling guidance, tools, and data resources. GP suggests such analyses be limited to circumstances that suggest a review is necessary, such as when a concentrated number of minor sources locate or increase emissions in a certain area. Otherwise, benefits are more likely realized from regional-scale modeling or cumulative PSD modeling from a major source or modification. GP encourages ADEQ to notify sources considered in multi-source modeling in advance of such analyses being conducted and provide the opportunity to review and refine model inputs that may be important due to changes in emissions factors and other relevant modeling parameters. GP recognizes that EPA guidance provides for use of monitoring in lieu of modeling in limited and constrained circumstances and as a tool to inform, interpret, and validate the modeling analyses because ambient monitors better reflect the inherent variability of emissions, background concentrations (i.e., unmodeled sources), and atmospheric conditions that are critical to characterizing ambient air quality but are approximated (and in the case of variable emissions and background concentrations, ignored) in dispersion models. When used for any purpose, DEQ should make clear that the use of temporary monitors could be used only to identify areas of interest because Federal Reference (or Equivalent) Method ambient monitoring of sufficient quality and duration would be necessary to designate an area as nonattainment. Just as when multi-source modeling is initiated, GP recommends that ADEQ notify sources in advance of temporary monitoring so that sources can provide information that may be meaningful in siting the temporary monitor and potentially collect operational

data that might not otherwise be recorded but would assist in interpreting measured concentrations. The preceding comments also apply to “Risk-based Monitoring” (item 6) deployed temporarily on a stand-alone basis or in conjunction with regional-scale or multi-source modeling.

- GP generally supports the evaluation process represented by the Minor NSR NAAQS Evaluation Flowchart and the opportunity to qualitatively assess ambient concentrations without modeling. This approach is appropriate because, by definition, minor sources and emissions increases that are less than significant emission rates are not expected to cause or contribute to NAAQS exceedances or otherwise interfere with maintenance of attainment. DEQ should be aware of, and its guidance flexible enough to incorporate, emerging EPA methods for assessing significant emissions and impacts through new “modeled emission rates for precursors” (“MERPs”) that are critical for regional pollutants like ozone and PM_{2.5} and pending rulemaking to re-establish significant impact levels (and any associated changes to significant emission rates) for PM_{2.5} and any other criteria pollutants and precursors. GP is concerned that ADEQ suggested the flowchart would be included in the SIP insofar as that may make it difficult by minimizing flexibility to revise the procedures as frequently as may be appropriate in response to changes in federal and state permitting requirements and modeling techniques.

GP supports the use of net changes in potential emissions relative to significant emission rates (SERs) and qualitative assessment of emission unit characteristics to support a determination that “no further analysis” would be required. GP has seen this approach applied reasonably and successfully in other states that rely on information other than dispersion modeling for minor source permitting. GP is not aware of the referenced “Dispersion Guidance” being available for review, but based on preliminary discussion during the SIP development process and experience in other states, we anticipate that good engineering design and operating practices and vertical exhaust discharges would be examples of acceptable criteria. We urge DEQ to make these criteria available for review and comment before finalizing the policy.

GP encourages ADEQ to clearly establish the SERs that would be used for such a comparison to avoid confusion among the federal PSD SERs (e.g., 40 CFR 52.21) or other *de minimis* thresholds that may exist in federal and Arkansas regulations. The federal PSD SERs would be an appropriate basis because, again by definition, minor sources and emissions increases that are less than these SERs are not expected to cause or contribute to NAAQS exceedances or otherwise interfere with maintenance of attainment.

By convention, we recommend against describing “modeled NAAQS *violations*” and instead suggest “potential exceedances” or “high concentrations” because attainment or nonattainment demonstrations can only be made through ambient monitoring with an approved reference or equivalent method.

Please let me know if we can provide and additional information to support the preceding recommendations and comments. Thank you once again for the opportunity to provide comment

and we look forward to continuing to participate in the NAAQS SIP development process.

...Ryan

=====

Ryan A. Gesser, CCM

Air Quality Manager

Georgia-Pacific LLC

133 Peachtree Street NE

Atlanta, GA 30303

404-652-6933 (office)

404-314-7931 (mobile)

ryan.gesser@gapac.com

From: Hemann, Chris [<mailto:HEMANN@adeq.state.ar.us>]

Sent: Monday, June 15, 2015 10:40 AM

Subject: NAAQS SIP Development Stakeholders' Feedback Solicited by July 2, 2015

Sent by an external sender

Over the past several months, the ADEQ Air Planning and Permitting staff has conducted meetings with stakeholders to discuss and develop concepts for National Ambient Air Quality Standards State Implementation Plan (NAAQS SIP) development.

After a series of meetings with the NAAQS SIP Development stakeholder "Modeling Subgroup", ADEQ staff and stakeholders have identified a number of proposed approaches and measures that resulted in the development of a NAAQS SIP/Minor NSR permitting guidance draft document attached.

ADEQ's Air Planning Branch is soliciting comments and feedback on the merits and utility of each approach and/or combination of proposed approaches to ensure that minor source construction or modification activities do not cause or contribute to an exceedance or interfere with the maintenance of the NAAQS, and on any other alternative approaches not proposed in this document.

Please provide feedback on the proposed guidance document by July 2, 2015, to Tricia Jackson at jacksonp@adeq.state.ar.us.

<http://www.adeq.state.ar.us/air/planning/#naaqsFeedback>

http://www.adeq.state.ar.us/air/planning/naaqs_sip/