



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
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JUL 02 2015

Ms. Tricia Jackson
Air Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118

RE: EPA Comments on the Draft NAAQS SIP/Minor NSR Permitting Guidance Document

Dear Ms. Jackson:

Thank you for the opportunity to review and provide comments on the draft National Ambient Air Quality Standards (NAAQS) State Implementation Plan (SIP)/Minor New Source Review (NSR) Permitting guidance document. We understand that the Arkansas Department of Environmental Quality (ADEQ) has developed this document to summarize and discuss the various proposed approaches and measures to address Minor NSR NAAQS demonstration requirements that were identified through the NAAQS SIP development stakeholders' process.

The EPA agrees with ADEQ's statement in the guidance document that the Department is required to ensure that the construction of new stationary sources or modification of existing stationary sources, including Minor NSR permitting actions, do not cause or contribute to an exceedance of the NAAQS or interfere with the maintenance of the NAAQS. Our enclosed comments provide feedback on the specific approaches and measures proposed in the document to assist ADEQ in meeting this requirement. We also identify our concerns regarding elements and/or requirements that are not addressed by the draft guidance document.

We look forward to working with you as you address our comments and continue to develop the referenced NAAQS SIP and any associated guidance document(s). Please note that our comments today do not constitute final determinations concerning the approvability of any associated revisions to the Arkansas SIP or the appropriateness of any final guidance document

developed by ADEQ. If you have any questions about the EPA's review of the draft guidance document, please feel free to contact Ms. Ashley Mohr of my staff at (214) 665-7289.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeff Robinson". The signature is fluid and cursive, with the first name "Jeff" and last name "Robinson" clearly distinguishable.

Jeff Robinson
Section Chief
Air Permits Section

Enclosure

cc: Tammy Harrelson, Arkansas Department of Environmental Quality
Stuart Spencer, Arkansas Department of Environmental Quality

Enclosure

Comments on Enhanced Planning Measures and Approaches

1. The draft guidance document references regional-scale modeling to aid in assessing impacts of projected growth on ambient air quality, as well as, to identify areas that may be sensitive to potential NAAQS exceedances as a result of emission increases. We do not believe that the resolution of a regional-scale modeling analysis provides sufficient information to assess the local-scale ambient impacts, specifically localized concentration gradients or “hotspots”, resulting from a single facility or to quantify the cumulative local-scale impacts on ambient air from a group of facilities. While regional modeling may be helpful in certain situations, such as regional air quality planning, this scale of modeling does not have sufficient resolution to appropriately characterize or evaluate local-scale impacts.
2. The draft guidance document discusses the importance of existing monitoring network reviews and the potential measure to utilize temporarily installed monitors in areas identified as at risk of NAAQS exceedances. We agree that the AAQM Network and its annual and 5-year monitoring reviews are important pieces in determining attainment status. We also support ADEQ in taking the initiative to identify areas at risk of exceeding the NAAQS and considering the option to install temporary monitors to assess ambient air quality. Please note, a monitor may be operated temporarily, however, if the monitor is above or near the NAAQS continued NAAQS comparable monitoring may be necessary.
3. Periodic multi-source modeling is discussed as a possible enhanced planning approach in the guidance document. While additional periodic multi-source modeling may be a useful tool to help ensure that cumulative impacts from existing sources and/or the addition of new sources do not result in NAAQS exceedances, it is not clear in the guidance document if this intended to take the place of multi-source modeling that may be required as part of a refined, cumulative NAAQS analysis in support of a Minor NSR permit action. We would like to point out that Minor NSR NAAQS compliance requires that a new or modified stationary source does not cause or contribute to a NAAQS exceedance. Therefore, we do not believe that periodic multi-source modeling should be considered as an alternative to or replacement of ADEQ’s ability to require that a Minor NSR permit action include a cumulative modeling analysis, as necessary, to demonstrate that the source will not cause or contribute to a NAAQS exceedance.
4. Regular reviews of the NAAQS SIP are proposed in the guidance document to re-evaluate attainment status issues due to increases in emissions and NAAQS revisions. We agree that these types of reviews are necessary to ensure that the NAAQS SIP requirements continue to ensure compliance with the NAAQS. However, additional information regarding the frequency of these reviews, as well as, how a review of the SIP would be triggered as a result of a revision to a NAAQS should be included within the guidance document and the developed NAAQS SIP.

Comments on Minor NSR Evaluation Flowchart

5. The proposed Minor NSR NAAQS Evaluation Flowchart, as presented, does not contain sufficient information to determine if the proposed approach is protective of the NAAQS for all Minor NSR actions. As discussed below, additional information, including technical supporting documentation, is needed to support the proposed flowchart.
- The flowchart indicates that only those projects with a net increase in emissions would trigger potential additional analysis. It is unclear how Minor NSR projects that do not include net emissions increases but do contain other proposed changes (i.e., stack parameter changes) that may impact ambient impacts will be evaluated to ensure compliance with the NAAQS.
 - The flowchart indicates that net emissions increases will be compared with specific values (SERs) to determine if additional analyses may be required. Additional information regarding the SERs and how they are developed is needed. If this flowchart, or a similar one, were included in the NAAQS SIP, additional technical information to support the SERs would be required to demonstrate the values are protective of the NAAQS and to support approval into the Arkansas SIP.
 - Similar to Comment 5(a), additional information to support the referenced “historical modeling data,” “standard conditions,” and “control strategies” would be necessary if the NAAQS SIP submittal contained this evaluation flowchart, or a similar flowchart. The current documentation is not sufficient to determine if the proposed approach is protective of the NAAQS for all Minor NSR actions.
 - The flowchart and draft guidance document do not clearly describe what would trigger additional refined/quantitative analysis. In addition, the flowchart does not explicitly reference the potential requirement for a case-specific air dispersion modeling. While we agree that an air quality analysis in support of a Minor NSR permit action may not always require a refined/quantitative analysis, such as air dispersion modeling, we do believe that ADEQ should retain the authority to require case-by-case air dispersion modeling when more qualitative or generic approaches are not adequate to demonstrate compliance with the NAAQS and that the guidance document should clearly reference this authority.

Comments on Approaches to Assess Cumulative Impact

6. As stated above in Comment 1, we have concerns regarding the use of a regional modeling to develop growth allocations intended to be protective of the NAAQS with respect to local impacts from emission sources. We agree with ICF and do not believe that regional modeling has sufficient resolution to characterize and evaluate local-scale impacts necessary in developing growth allocations for Minor NSR permitting.

7. While the Emissions-Distance Threshold approach may be useful in specific cases as a way to screen out of a more robust analysis, including air dispersion modeling, we agree that additional information and detailed technical analysis to support any developed distance threshold(s) would be required to determine if the approach was protective of the NAAQS. If the approach is included as part of the NAAQS SIP, this information would need to be included in the SIP submittal to support the proposed revision. This documentation should also clearly describe what type(s) of analysis would be potentially triggered if the threshold value was exceeded.

