**From:** Ashton, Brad
**To:** Bridgers, George
**Subject:** Comments on the DRAFT Guidance for Ozone and Fine Particulate Matter Permit Modeling
**Date:** Wednesday, March 11, 2020 1:25:17 PM

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George,

We have two comments on the draft guidance:

- There are multiple references to NAAQS or Increment "violations" throughout the document. In some places the word "violation" is prefaced with "modeled," while in others it is not. Distinguishing these as "modeled violations" is a good idea so the guidance is not misconstrued as referring to actual violations of the standards. We suggest that all references to a "violation" be modified to read "modeled violation."
- The guidance states that ozone is only created via precursor emissions of VOC or NOx. Sources of direct ozone emissions do exist (corona treaters, odor control). While secondary formation is the main source of ozone, it might be a good idea to at least point out that there are sources of direct ozone. If the intent is that direct emissions should be ignored, this should be explicitly stated.

Thank you for the opportunity to review and comment.

- Brad

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