

November 19, 2021

George Bridgers
U.S. Environmental Protection Agency
Office of Air Quality Planning and Standards
109 T.W. Alexander Drive
Research Triangle Park, NC 27711

Submitted electronically to: bridgers.george@epa.gov

Re: Revised Draft Guidance for Ozone and Fine Particulate Matter Permit Modeling

Dear Mr. Bridgers:

The Northeast States for Coordinated Air Use Management (NESCAUM) appreciates this opportunity to comment on the *Revised Draft Guidance for Ozone and Fine Particulate Matter Permit Modeling*, which EPA released for comment on September 20, 2021. NESCAUM is the regional association of air pollution control agencies representing Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. Our member state agencies have the primary responsibility in their states for implementing clean air programs that achieve the public health and environmental protection goals of the federal Clean Air Act. Appropriate modeling procedures are essential for achieving those goals.

NESCAUM supports the “Holistic Approach” specified in the current draft guidance. That approach requires modeling analyses conducted to demonstrate compliance with ozone and fine particulate matter (PM_{2.5}) National Ambient Air Quality Standards (NAAQS) and Prevention of Significant Deterioration (PSD) increments to include a full accounting of the emissions of all precursors, as well as direct emissions of PM_{2.5}. This approach is responsive to comments by states and non-governmental organizations on the 2020 draft of this guidance, which required modeling of only the precursor and direct PM_{2.5} emissions that were greater than their respective significant emission rate thresholds. This change is essential for the determination of whether a proposed source or modification will cause or contribute to a NAAQS or PSD increment violation and reflects good science.

NESCAUM states have the following suggestions for clarification of the guidance document:

1. Section II.2, footnote 6 (page 11) should be revised to state that some state-approved regulations may have different applicability procedures other than those listed in 40 CFR 52.21(a)(2).

2. Section II.3 should clearly state that State/Local/Tribal significant impact level (SIL) values for annual $PM_{2.5}$ may differ from those recommended by EPA in Tables II-1 and II-2 (pages 15 and 16). The current wording in this document does not indicate that states are granted the discretion to retain EPA's previously recommended annual $PM_{2.5}$ SIL of $0.3 \mu\text{g}/\text{m}^3$ for Class 2 areas.
3. Is the parenthetical statement in Section V.3.1, page 70, "(rather than a source or cumulative impact analysis that is compared to the appropriate $PM_{2.5}$ SILs)" a typo? The results of a cumulative impact analysis are not typically compared with the SILs.
4. The following typos were identified in Appendix C:
 - In the notes to Equation 4 (page C-7), " $SO_2_MERP = SO_2$ Emissions from Table 7 (tpy)" should be " $VOC_MERP = VOC$ Emissions from Table 7 (tpy)."
 - The header of the third column of Table 8 (page C-8), "3 Year Avg. 4th High 8-Hr Ozone Conc. (ppb)" should be "MERP (tons/year)."
 - In the notes to Equation 6 (page C-8), " $SO_2_MERP = SO_2$ Emissions from Table 7 (tpy)" should be " $VOC_MERP = VOC$ Emissions from Table 7 (tpy)."

Thank you for your responsiveness to state comments concerning a full accounting of precursor and direct emissions and your work in preparing this document.

Sincerely,



Paul J. Miller
Executive Director

cc: NESCAUM Directors
NESCAUM Permit Modeling Committee