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Chet Wayland, Director
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Mr. Wayland:

The Ozone Transport Commission (OTC) and Mid-Atlantic Northeast Visibility Union (MANE-VU) appreciate the opportunity to comment on the Draft Modeling Guidance for Demonstrating Attainment of Air Quality Goals for Ozone, PM_{2.5}, and Regional Haze (December 3, 2014).

The OTC is a multi-state organization created under the Clean Air Act (CAA), required to advise the U.S. Environmental Protection Agency (EPA) on practical and cost effective solutions to the environmental and public health problem of ground-level ozone transport that negatively impacts the Northeast and Mid-Atlantic regions. MANE-VU was formed by the Mid-Atlantic and Northeastern states, tribes, and federal agencies to coordinate regional haze planning activities for the region and also assists its members in regional multi-pollutant planning.

Modeling Attainment Test Changes

There is a concern that by simplifying the calculations some problematic ozone days may not be properly projected. As an example if a monitor were to experience 20 ozone exceedances and the exceedances were due to two different meteorological regimes, one that resulted from local emissions and one that resulted from transport. If most of the top 10 were occurring in the regime that resulted in local ozone production and the next 10 were occurring in a regime that resulted in transported ozone, it likely that future ozone levels would still be exceeding the standard if no upwind reductions were to occur, but projected ozone would meet the standard because the transport heavy days were ignored in the calculations.

Due to situations like this the OTC calls upon EPA to ensure that attainment tests are not so rigid as to only rely on 10 exceedances unless it can be demonstrated that those 10 exceedances are representative of all potential ozone exceedances. Furthermore OTC wants to ensure that flexibility is available so projected ozone can be calculated from multiple standpoints in cases where transport is occurring in different patterns.

Weight of Evidence

EPA should still create a two-step weight of evidence process as outlined in OTC's June 2011 recommendation. The first step, or basic WOE, would be available to all nonattainment areas submitting an attainment demonstration and primarily would allow for all areas to use other supplemental technical analysis and evidence to, within certain bounds, address the overall uncertainty associated with photochemical modeling. Basic WOE would be restricted to certain bounds that must be met because EPA believes that if there are additional, reasonable, and or feasible traditional control programs that can be implemented in the nonattainment area, then these measures should be pursued before the use of expanded WOE (Step 2). In Step 2, where state or local agencies are implementing all feasible traditional control programs in the nonattainment area (this determination would be based on discussions between the Regional EPA Office and the state), a broader, expanded use of WOE would provide an optional approach during the development of attainment demonstrations. Expanded WOE would allow states to demonstrate how additional regional controls (outside of the state's control) to reduce transport could help with attainment. In addition, OTC supports allowing states to show ranges of potential future design values that are consistent with the uncertainty in the modeling and data analysis process and to use the probability of attainment, not a bright-line approach for demonstrating attainment under the expanded WOE. As part of expanded WOE the EPA would work with the affected state or states to conduct an assessment to determine whether or not a mid-course review and consultation would be required. This mid-course consultation would ensure that an area is progressing towards attainment and will include an analysis of design values to demonstrate this.

The OTC supports the effort for continuing to encourage states to perform both modeling and data analysis as part of the WOE provisions of the attainment demonstration process. Over time, it is our hope that the entire attainment demonstration be a WOE-based demonstration (not modeling supported by WOE) where the modeling, the data analysis and other scientific information are blended together to generate the most scientifically credible analysis to show whether or not an area is likely to meet air quality standards.

Regional Haze Planning Horizon

Both organizations support allowing the use of 2025 or 2028 for modeling purposes to set reasonable progress goals for visibility improvements. The former option makes technical sense given that data from 2023-2027 will be employed to demonstrate progress in meeting future visibility goals. Furthermore since 2025 is being modeled for the purpose of ozone planning by EPA this will allow the states to reduce the resources needed for demonstrating reasonable further progress in Regional Haze SIP submissions. The latter option also allows for consistency between planning periods and is also technically sound. This is a great example of technically sound decision making being used to ease regulatory burdens by increasing flexibility and OTC and MANE-VU urge EPA to retain this in the final draft.

Summary

OTC and MANE-VU are supportive of many changes to the modeling guidance outline in the December 3, 2014 draft. They demonstrate EPA's use of technically sound approaches to both ease onerous regulatory hurdles the states face in demonstrating attainment while also providing

increased flexibility for the states to demonstrate how they will solve the complex problem that is regional air pollution. If you or your staff has any questions please feel free to contact Dave Foerter at (202) 508-3840.

Sincerely,

A handwritten signature in black ink, appearing to read "David Foerter", written in a cursive style.

David Foerter
Executive Director

Cc: OTC Air Directors
MANE-VU Air Directors