Permit Modeling Committee Quarterly Conference Call Thursday, September 4, 2008 10:00-11:00 AM

Those in attendance:

Ian Cohen (EPA I), Annamaria Coulter (EPA II), Alan Dresser (NJ), Tom Downs (ME), Kathleen Fahey (NESCAUM), Rich Fields (MA), Gina Friedman (RI), Dave Healy (NH), Brian Hennessey (EPA I), Kevin Ostrowski (ME), Dan Riley(VT), Sam Sampieri (CT), Leon Sedefian (NY), Steve Snook (VT), Margaret Valis (NY), Martha Webster (ME)

Agenda Topics and Summary:

1. CT DEP updates on modeling guidance and other LEAN objectives (S. Sampieri)

They would like to streamline the permitting process at the CT DEP and make modeling guidance and preprocessors/background data readily available on the web. Thus far they have eradicated the FOIA request requirement for emission inventory requests and implemented a modeling tracking spreadsheet that tracks a project from pre-application meeting through completion. They are presently working on modeling guidance updates (3-4 months), 24-hr PM_{2.5} DVs for the web, and hope at some point in the future to post emission inventory data on the web as well.

2. PM2.5 modeling guidance and background development

CT DEP is developing background $PM_{2.5}$ values, but they are not ready yet. R. Fields from MassDEP gave a brief summary of what they are doing with $PM_{2.5}$ in MA. They are in a transition period and have not yet developed final guidance. They do interactive modeling and add background values. They use the NESCAUM interim SILs for $PM_{2.5}$. They are currently in the process of updating guidance. Currently they recommend that when applying for permits applicants need to consider $PM_{2.5}$ and look at condensables. B. Hennessey (EPA I) advises those seeking major source permits now to avoid interactive modeling and use $PM_{2.5}$ monitoring data in conjunction with single source modeling. Condensables are not considered now for $PM_{2.5}$.

Final regulations have been constructed and condensables and secondary $PM_{2.5}$ have been removed from consideration. The focus is on direct filterable $PM_{2.5}$.

A. Coulter (EPA II) added that, in the final regulations, while the EPA cannot require consideration of condensables, states can recommend it, especially if they have done this in the past. $PM_{2.5}$ SILs will likely not be finalized until March 2009.

A. Dresser (NJ DEP) spoke about a current project near Camden and associated difficulties with trying to quantify impacts of SO_2 offsets on a nonattainment area for $PM_{2.5}$.

L. Sedefian (NY DEC) mentioned a conference call that NACAA is having next week (Sep. 10?). OAQPS will be available on the call and can address questions if submitted in advance.

A. Coulter suggests that this area is a good topic for the PMC as everyone in the group will have to deal with similar issues. Offsets for $PM_{2.5}$ are complex, and there are many questions (e.g., contribution tests, how do you show if source is eligible, etc.)

3. Class I Area modeling – FLAG Guidance

A. Dresser spoke briefly about the project mentioned earlier. They consider class I impacts in the above for Brigantine. They have yet to submit the modeling analysis to the FLM.

T. Downs (ME DEP) summarized a NACAA conference call from earlier in the week. On July 8, the National Parks Service posted the FLAG 2008 report on the federal register for comments. The comment period ends on September 8. There are a number of updates and changes that are summarized in the executive summary of the posted report

(<u>http://www.nature.nps.gov/air/permits/flag/docs/FLAG_RevisedFinalDraft20080624.p</u> <u>df</u>) He stressed that this is meant to serve as "guidance". It remains to be seen whether the EPA will fully support this guidance.

The 9^{th} modeling conference on October 9^{th} and 10^{th} in RTP was mentioned/promoted by L. Sedefian and A. Coulter.

4. Near-field CALPUFF memorandum

This memorandum was released following the posting of the VISTAS report. The other two references that support the memorandum have yet to be released. There was some concern that the "door is shut" on using CALPUFF for near-field modeling. Essentially one will be able to use CALPUFF for near-field modeling (in complex wind situations, for example) but going through the approval process/showing justification will be necessary, and it will likely be difficult. There are many switches that you need to set appropriately in order for the model to work well. Once the references for the memo are released and it is clear what is wrong with CALPUFF, people might be able to figure out how to employ CALPUFF effectively in near-field applications. The group may want to revisit this topic following the 9th modeling conference.

5. AERSCREEN/AERMET/AERMAP/AERSURFACE status

I. Cohen (EPA I) updated the group on the status of updates to the suite of above software/processors. Updates are coming soon. OAQPS ran into unforeseen problems with AERSCREEN and currently cannot run it with AERMOD. There may be a draft version of AERSCREEN by the end of the year. Ultimately, OAQPS would like to build a more flexible system that incorporates all of the above into AERMOD.