Werner, Christopher

From: Arra, Sarah
Sent: Monday, December 17, 2018 6:02 PM
To: Werner, Christopher
Subject: FW: EPA Comments on Illinois 2015 Ozone Transport SIP

Follow Up Flag: Follow up
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Categories: Ozone transport

Minor tweaks to #2.

From: Aburano, Douglas
Sent: Monday, December 17, 2018 4:49 PM
To: Bloomberg, David E. <David.Bloomberg@Illinois.gov>
Cc: Arra, Sarah <Arra.Sarah@epa.gov>; Leslie, Michael <leslie.michael@epa.gov>
Subject: EPA Comments on Illinois 2015 Ozone Transport SIP

Dear Mr. Bloomberg,

Good evening, David. Thank you for notifying us of the public comment period. Below are EPA's comments on the Illinois 2015 Ozone Transport SIP.

Key Comments
(comments related to issues that could affect approvability)

1. On page 16 of the draft SIP, Illinois identifies contributions of over 1 ppb to two different monitors (Sheboygan, WI and Allegan, MI). The state then includes a paragraph potentially intended to fully represent a steps 3 and 4 analysis. The state appears to only commit to addressing any interstate transport issues with respect to these monitors in the future and through a separate organization. However, the good neighbor provision requires state plans to "*contain adequate provisions . . . prohibiting* . . . any source or other type of emissions activity within the State from emitting any air pollutant in amounts which will . . . contribute significantly to nonattainment in, or interfere with maintenance by, any other state with respect to" the NAAQS. Thus, it is not sufficient to commit to work with EPA and other organizations to address issues in the future since the statute requires the SIP to prohibit appropriate levels of emissions. The state's analysis could be greatly strengthened in several ways, including but not limited to the inclusion of a comprehensive assessment of all of the NOx emitting EGU and non-EGU facilities, including their NOx emissions sources/units, reduction potential, and cost of any potential control options. Demonstrating whether there are, or are not, available cost-effective reductions at EGU and non-EGU sources will bolster the strength/approvability of the submittal.

2. The air quality aspects of the proposed SIP focuses on receptors and contributions at monitoring sites in the Northeast and Midwest. However, the SIP does not address the contribution from Illinois to the receptors in Brazoria and Harris, TX. The contribution from Illinois to these receptors based on EPA's modeling is over 1.0 ppb. The LADCO modeling TSD indicates that Illinois contributes 1.76 ppb to a monitoring site in Texas, but the TSD does not name the site. It would be helpful if the Illinois SIP addressed the linkage to receptors in Texas.

General Comments
(comments and questions related to document enhancement)

1. On page 9 of the draft SIP, Illinois describes the four-step framework for evaluating interstate ozone transport and states that steps 3 and 4 "are relevant only if emissions from Illinois contribute significantly to nonattainment or interfere with maintenance at downwind monitors in another states." Similarly, Illinois refers to a threshold of 1% of the NAAQS as "the default definition of significant contribution to nonattainment or interference with maintenance." This is not an accurate characterization of the EPA's four-step framework. This threshold has been used in past EPA actions to indicate whether upwind states are linked, and therefore *contribute*, to downwind air quality problems in step 2 of EPA's framework, whereas a determination of whether any portion of the contribution is *significant* or *interferes with maintenance* is determined in step 3 using cost and other air quality factors. Similar mischaracterizations appear in several other places in the document.

   Furthermore, the EPA disagrees that it has identified 1% of the NAAQS as the "default" threshold for purposes of determining that an upwind state is linked to a downwind nonattainment or maintenance receptor. While the EPA has used the 1% threshold in prior regional rulemakings to address the 1997 and 2008 ozone NAAQS (in CSAPR and the CSAPR Update), the EPA has not made a final determination regarding the appropriate threshold to use for the 2015 ozone NAAQS. Rather, as acknowledged later on page 15 of the draft SIP, in August 2018, the EPA issued a memorandum entitled *Analysis of Contribution Thresholds for Use in Clean Air Act Section 110(a)(2)(D)(i)(I) Interstate Transport State Implementation Plan Submissions for the 2015 Ozone National Ambient Air Quality Standards*. The memorandum indicates that the EPA believes it may be reasonable and appropriate for states to use a contribution threshold equivalent to 1 ppb to identify states that are "linked" to downwind air quality problems with respect to the 2015 ozone NAAQS.

2. On page 9 of the draft SIP, Illinois asserts that EPA "considers controls associated with the most recent set of transport modeling as only partial remedy for the 2015 NAAQS." The EPA notes that it has not spoken—either in guidance or in a final action—to the appropriate level of controls for purposes of addressing the requirements of the good neighbor provision for the 2015 ozone NAAQS. The EPA recommends that Illinois remove this sentence.

3. On page 10 of the draft SIP, Illinois states that the range of acceptable modeling performance is defined in terms of specific criteria based on normalized mean bias and normalized mean error. The SIP does not provide the rationale and/or point to other references that provide a basis for these performance criteria. The statement in LADCO's modeling TSD that a 15% normalized mean bias performance criteria is based on EPA's attainment demonstration modeling guidance in not correct. EPA's modeling guidance recommends not using "bright line" performance criteria for determining the acceptability of model performance for a particular application.

4. On page 11 of the draft SIP, Illinois states that the EPA's March 2018 memo "outlined several flexibilities that could be considered in developing Good Neighbor SIPs for the 2015 standard." The EPA notes that the primary purpose of the memo was to provide information to the states regarding air quality modeling projections for 2023 and contribution modeling results. While the memo also included an attachment with potential flexibilities in analytic approaches for evaluating good neighbor obligations for the 2015 ozone NAAQS, the EPA included these ideas for the purpose of engaging in further discussion with the states to evaluate these and other potential flexibilities further. The EPA did not make any determinations in that document regarding the appropriateness of the ideas presented nor did the EPA specifically recommend any of the ideas presented in the document.

5. On page 14 of the draft SIP, Illinois explains with respect to identifying maintenance receptors: "If any **individual** year has a DV of [greater than or equal to] 71.0 ppb, but are in attainment, that monitor Is deemed to be in maintenance." It is unclear what Illinois means by the phrase "but are in attainment" and recommends the state clarify this statement. If Illinois means to refer to the average design value, the EPA agrees that a maintenance receptor can be identified if the maximum design values exceeds the NAAQS, even if the average design value does not. If Illinois means to refer to the current monitored data, the EPA also agrees that a maintenance receptor can be identified if the maximum design values exceeds the NAAQS, even if the monitor is currently measuring clean data. In general, however, the EPA believes this clause is unnecessary. While Illinois is correct that the EPA has historically identified maintenance receptors based on the maximum design value in the future analytic year, it has done so

regardless of the current measured data. In other words, a monitor can be identified as a maintenance receptor whether or not it is currently violating the NAAQS. Moreover, because areas with average design values exceeding the NAAQS also necessarily have maximum design values exceeding the NAAQS, the EPA has also identified such areas as maintenance receptors (in other words, all nonattainment receptors are also maintenance receptors, but not all maintenance receptors are nonattainment receptors). Depending on the intent with the language in this section of the SIP submittal, it may be appropriate to cite to EPA's October 19, 2018, memo *Considerations for Identifying Maintenance Receptors for Use in Clean Air Act Section 110(a)(2)(D)(i)(I) Interstate Transport State Implementation Plan Submissions for the 2015 Ozone National Ambient Air Quality Standards*, which describes additional considerations for identifying maintenance receptors.

6. On page 15 of the draft SIP, Illinois includes several discussion points surrounding the 1.0 ppb level of the PSD SIL. It should be noted that, while EPA agrees that a 1.0 ppb threshold may be appropriate to apply for purposes of evaluating interstate transport for the 2015 ozone NAAQS, EPA disagrees with the applicability of the PSD SIL to ozone transport because EPA's technical analysis to support the selection of 1 ppb as the ozone SIL does not contain information that can be used to evaluate the collective contribution from upwind states at downwind receptors, which is a key element for consideration in view of the regional nature of ozone transport.

7. On page 15 of the draft SIP, Illinois should state that the design values and contributions in Table CC are based on LADCO's air quality modeling.

Please let me and/or Sarah Arra know if any of these comments need additional explanation or if you would like to discuss these comments.

Thank you for the opportunity to comment on this submittal.

Doug

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