
State/Local Agency Issues: Overview

2009 R/S/L Workshop

Philadelphia, PA

May 12, 2009

Outline

- OAQPS requested input from State/Local agencies on issues/question
 - Provide brief overview of input
 - Many questions have or will be addressed elsewhere during workshop
 - Time for interactions on specifics and/or define needed followup
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Met Data/Surface Characteristics

- Problem of determining representativeness of the met site vs the facility site:
 - No real guidance on how to do this
 - Issues between using on site and off site met data with on site characteristics
 - Impact of the recommended approach for determining surface characteristics.
 - States are seeing significant increases in concentrations using the 1 km radius. Can this be loosened to 3 km?
 - Brief discussion requested on handling variable and low speed wind data
 - Will EPA be updating their Meteorological Monitoring Guidance for Regulatory Modeling Applications?
 - Example: calculating P-G Stability for the Joint Recovery statistics. Guidance is needed on auditing of pyranometers above the Arctic Circle. Do we need 90-percent capture of “daytime” solar during the arctic winter?
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Lead Modeling

- The 3-month averaging period may be overly conservative, while the annual average may under estimate impacts
 - Like to see Lead related discussions on:
 - Significant Lead Emission rates that trigger PSD review
 - Impact level which will require a refined NAAQS analysis
 - Monitoring de Minimus threshold above which applicants maybe required to conduct preconstruction monitoring under PSD
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AERMOD Modeling System

- Questions about “Toxics option”
 - Affect on estimated concentrations
 - Regulatory/nonregulatory applications
 - Depletion and deposition
 - Questions about deposition and evaluation/validation
 - Use of above normal exit velocities wrt original permit.
 - Suggest using original permit and adding flag to AERMOD for exit velocities greater than 20 m/s. May require stack monitoring on sources with excessive velocities.
 - AERMOD appears to underestimate the mechanical mixing height under stable conditions and low wind speeds compared to the theoretically based formula.
 - Request to add BLP, CALPUFF-like calm wind processing and 3-D prognostic met data merging to AERMOD
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Miscellaneous

- Is EPA still planning on adding Plume Volume Molar Ratio Method (PVMRM) as a Guideline method?
 - Need input sources and receptors referencing a common elevation
 - How are we supposed to model secondary particulate? There will be situations where this could be important in the near field and in most cases it is important in long-range modeling.
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State Representative Role

- Plan and organize “State issues” and “State presentations” sessions at annual R/S/L modelers workshop
 - Periodically participate (2-3 times/yr) in EPA OAQPS/RO monthly conference call
 - Update on state issues & status of workshop
 - Poll states to gain information or state input on issues as requested by EPA
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State Representative Role

- Rotating role with 2 year term of service

Process to fill role

- Nominations to ROs within next month
 - EPA OAQPS/ROs to discuss and then make selection
 - Formal letter to your mgmt requesting time
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