Message

From: Stauffer, Panah [Stauffer.Panah@epa.gov]
Sent: 6/14/2019 10:36:43 PM
To: Andrews, Paul@ARB [Paul.Andrews@arb.ca.gov]
CC: Mays, Rory [Mays.Rory@epa.gov]
Subject: RE: Emergency Episode Plan follow up

Hi Paul,

Thanks for sending these questions along. I'll be able to look closely at them when I get back, as Rory mentioned. It would help me to understand the thought process behind the questions a little more.

Is the district exploring the exemptions in 40 CFR 51.152(d)? If so, is it leaning towards one exemption over the other? Some of the questions seem related to that, but I wasn't sure.

Also, do you know if the district is using the Placer emergency episode plan as a framework or if they are taking a different approach? I'll have to look back at what was done there when I get back from leave to see if it helps with the question about which inventory to use.

Thanks again,
Panah

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From: Mays, Rory
Sent: Thursday, June 13, 2019 3:09 PM
To: Andrews, Paul@ARB <Paul.Andrews@arb.ca.gov>
Cc: Stauffer, Panah <Stauffer.Panah@epa.gov>; Mays, Rory <Mays.Rory@epa.gov>
Subject: RE: Emergency Episode Plan follow up

Hi Paul,

Thanks for the questions on ozone emergency episode planning in Northern Sierra AQMD. We'll work towards getting you answers on the various questions. I'm copying my Air Planning colleague, Panah, who is leading our work on the California infrastructure SIP for the 2015 ozone NAAQS. Panah will be out next week, so perhaps we could get you some initial responses towards the end of this month. How does that sound for now?

All the best,

Rory

P.S. Good to bump into you briefly as we collected our visitor badges this past Tuesday!

From: Andrews, Paul@ARB <Paul.Andrews@arb.ca.gov>
Sent: Thursday, June 13, 2019 11:36 AM

To: Mays, Rory <Mays.Rory@epa.gov>
Subject: FW: Emergency Episode Plan follow up

Rory, the following questions were summarized by me (in blue) and clarifying information was added by Sam (in black) from Northern Sierra. Would you be able to provide some input on his questions?

Is it necessary for Northern Sierra to include emissions, in their emergency episode plan, from areas outside of the nonattainment area but within the district?

In addition to the question of whether or not emissions from outside the nonattainment area should be included, there is the question of the geographical scope of the plan itself. That is, should it apply in attainment areas as well as the ozone nonattainment area. I should mention that we have never done a thorough analysis of the areawide and mobile source emissions inventory in the attainment areas, so we would be dealing with very rough estimates there.

RE: Industrial Abatement Plans. Northern Sierra has 3 wood-fired power plants. Is it necessary that they submit IAPs to prevent ozone from reaching 600 ppb? Do you have more information on this requirement?

Note that all 3 of the wood-fired power plants are in Sierra and Plumas County. None are in the nonattainment area or the attainment portion of Nevada County. Is there any IAP exemption for power plants? It should also be noted that shutting down a wood-fired power plant and then starting it back up later could result in greater emissions than just keeping it going at a steady state.

I believe other areas are utilizing the most recently available inventory, although Jenette may be able to offer some insight with regards to what she has seen on the draft plans she is reviewing for other areas.

In other words, the question is what vintage of the inventory should be used, or can we choose from among multiple years? Is it best to use a National Emission Inventory year, the most recent SIP modeling year or the most recent year? Here are more inventory questions. Should the inventory use tons per day, tons per summer day or annual emissions? Is it ROG, VOCs or something else that is used? Should biogenic emissions be included?

You should probably mention to EPA that there are no designated "urbanized areas" in the district.

Also, there are no emergency episode planning requirements for PM2.5 nonattainment areas, are there?