To: Magee, Melanie[Magee.Melanie@epa.gov]; Snyder, Erik[snyder.erik@epa.gov]
Cc: Toups, Brad[Toups.Brad@epa.gov]
From: Mohr, Ashley
Sent: Wed 7/29/2015 7:42:28 PM
Subject: RE: Modeling Question Related to the LOOP Draft Permit

As Melanie and I discussed at AWMA, the current EPA preferred model is AERMOD and not ISC. However, it appears that they did no trigger PSD for any pollutant except for VOC (ozone). So, the other NAAQS and Increment modeling analyses appear to be state-only analyses. So, this case would fall into what, if anything, we would comment with respect to modeling in support of a state-only analysis. Erik may be able to weigh-in more on this… maybe there is some example of why this may or may not be OK. Based on the available info, I am actually quite surprised that modeling was conducted given the fact that increases are not expected as part of the project.

With respect to the ozone analysis, I am not sure if Erik may have had discussions with LDEQ on this particular project. With the PSD trigger tied to VOCs and NOx emissions not increasing, the level of analysis isn't expected to be significant – but again Erik may have talked with LDEQ on this project or a similar one that may align with the approach used for LOOP.

Thanks,

Ashley

THE POSITIONS or VIEWS CONTAINED IN THIS EMAIL DO NOT REPRESENT OFFICIAL EPA POLICY.

From: Magee, Melanie
Sent: Monday, July 27, 2015 1:34 PM
To: Snyder, Erik <snyder.erik@epa.gov>
Cc: Toups, Brad <Toups.Brad@epa.gov>; Mohr, Ashley <Mohr.Ashley@epa.gov>
Subject: Modeling Question Related to the LOOP Draft Permit

Thank you so much for your review input. As I mentioned earlier, the statement of basis for the PSD/TV permit states the following:

NAAQS Analysis Section: Because ISCST3 modeling analyses indicated concentrations of each pollutant would be below its PSD ambient significance level, refined NAAQS modeling was not required.

PSD Increment Analysis: Because ISCST3 modeling analyses indicated concentrations of each pollutant would be below its PSD ambient significance level, PSD increment modeling was not required.

Brad and I were wondering if the ISCST3 model is appropriate to use and if the applicant should have chosen another model such as AIRMOD? This permitting action triggered PSD permitting for VOC. Below is the emission table summary associated with this action.

Pollutant	Baseline Actual Emissions	Projected Actual Emissions/PTE	Contemporaneous Changes	Net Emissions Increase	PSD de minimis	Review required?
PM_{10}	2.34	0.49	0	-	15	No
$PM_{2.5}$	2.34	0.49	0	-	10	No
SO_2	1.88	0.43	0	-	40	No
NO_X	51.23	10.15	0	-	40	No
CO	10.01	2.24	0	-	100	No
VOC	182.59	437.54	0	254.95	40	Yes

For additional information, the permit application includes the following for the modeling:

4.6 Ozone Impact Analysis

Provisions of 40 CFR 52.21, Prevention of Significant Deterioration (PSD) of Air Quality and LAC 33:III.509.I.5.a allow an exemption from ambient monitoring requirements for ozone if the following requirement is met.

Any net increase of 100 tons per year or more of volatile organic compounds or nitrogen oxides subject to PSD requires the performance of an ambient impact analysis including the gathering of ambient air quality data.

The proposed project-related emissions for this project are 255.47 tons per year for VOC. As such, an ozone impact analysis, including the gathering of ambient air quality data, has been conducted and is described below. There is no proposed increase in nitrogen oxides emissions.

Effective March 12, 2008, the primary NAAQS for ozone is an 8-hour average of 0.075 ppm. This value represents the annual fourth-highest daily maximum 8-hour ozone concentration, averaged over a three year period.

To assess the impacts of the proposed project on the regional ozone level, LOOP utilized the background concentrations from the closest existing monitoring station located in Thibodaux, Lafourche Parish, LA (AQS Site ID: 22-057-0004). This monitoring station is approximately 38 miles north-west of the site location. It is operated and maintained by the Louisiana Department of Environmental Quality.

Since ozone is regarded as a regional issue, LOOP believes that the date from this monitoring station, by virtue of its location and proximity, is representative of the ozone level surrounding the LOOP facility. Also note that the prevailing wind from the site is toward this monitor (from the southeast).

If you need any additional information, please let Brad or myself know.

Thanks, Melanie

Melanie Magee

Environmental Engineer

Air Permits Section (6PD-R)

U.S. Environmental Protection Agency, Region 6

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