To: Gunasekara, Mandy[Gunasekara.Mandy@epa.gov]
From: Dave Flannery
Sent: Mon 6/26/2017 3:25:19 PM
Subject: Midwest Ozone Group
Assessment of International Transport and Improved Ozone Air Quality 6.22.17.docx
Assessment of International Transport and Improved Ozone Air Quality 6.22.17.ppt

Mandy

Given the Administrator's letter of June 7, 2017 extending the deadline for making nonattainment designations related to the 2015 ozone NAAQS and calling for an assessment of international transport and other considerations related to the 2015 ozone NAAQS, I am providing a link and an attachment involving both a white paper and PowerPoint presentation prepared by the Midwest Ozone Group which assess the significance of international transport impact in 2017 and provide an overall assessment of improvements in ozone air quality:

White paper:
http://www.midwestozonegroup.com/files/Assessment_of_International_Transport_and_Improved_Ozone_Air_

PowerPoint:
http://www.midwestozonegroup.com/files/Assessment_of_International_Transport_and_Improved_Ozone_Air_

We would be pleased to comment on these in a meeting with the Administrator. In the meantime, if you have any questions about these documents, please contact me.

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From: Dave Flannery
Sent: Friday, June 02, 2017 2:54 PM

To: 'Mandy Gunasekara (Gunasekara.mandy@epa.gov)'
Subject: Midwest Ozone Group

Mandy

Thanks for taking some time with me on May 31, 2017, to discuss the Midwest Ozone Group (MOG) and its interest in meeting with Administrator Pruitt to discuss both its Petition to Reconsider the CSAPR Update filed on December 23, 2016, and its Regulatory Reform comments filed on May 15, 2017. These documents (both of which are attached) describe MOG's concerns about the technical and legal issues associated with the modeling and development of the CSAPR Update and the general implementation of the ozone NAAQS. Among these concerns are the failure to have considered existing on-the-books control programs, the failure to have accounted for the effects of international emissions and the imposition of control requirements solely on electric generating units, resulting in prohibited "over control" of sources in many states.

MOG members and participants operate some 80,000 MW of coal-fired and coal-refuse fired generation in more than ten states. The members of and participants in the MOG include: American Coalition for Clean Coal Electricity, American Electric Power, American Forest & Paper Association, Ameren, Alcoa, ARIPPA, Associated Electric Cooperative, Citizens Energy Group, Council of Industrial Boiler Owners, Duke Energy, East Kentucky Power Cooperative, FirstEnergy, Indiana Energy Association, Indiana Utility Group, LGE / KU, Ohio Utility Group, Olympus Power, and the Springfield (IL) City Water, Light & Power.

Dates that are available for a meeting with the Administrator include:

June 12, 13, 14, 15, 19, and 20.

July 11, 12, 13, 14, 24, 25, 26, and 27.

If need anything more from us related to the scheduling of this meeting, please let me know.

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Assessment of International Transport and Improved Ozone Air Quality

Prepared by the

Midwest Ozone Group

June 22, 2017

The Clean Air Act requires EPA to establish primary National Ambient Air Quality Standards at levels that "allowing an adequate margin of safety, are requisite to protect the public health." In addition, the Act recognizes that the States have primary authority for designing and administering the plans that bring areas into attainment, and maintain those standards. And in certain areas States are authorized by the Act to demonstrate that those plans would be adequate to attain and maintain those standards if the standards would be achieved "but for" emissions emanating from outside the U.S.

On June 6, 2017, the EPA Administrator extended the deadline for promulgating designations related to the 2015 ozone NAAQS and in doing so stated that states have made "tremendous progress and significant investment cleaning up the air." The same letter also identified international transport as one of the complex issues that it would be reviewing during the extension period.

International Transport

To illustrate the significance of the role of international transport on ozone air quality in the U.S., the Midwest Ozone Group has reviewed EPA's modeling data in support of the Cross State Air Pollution Rule (CSAPR) projections for 2017 to identify boundary conditions, initial conditions, Canadian, and Mexican emissions from 2011, all of which can be fairly viewed as constituting international emissions.

When this data is plotted on the attached map of the U.S., it can be seen that but for international transport no monitor in the United States would have an ozone concentration in 2017 greater than 66 ppb – well below the 2015 ozone NAAQS of 70 ppb.

Given the fact that any area in nonattainment with standard NAAQS is subject to significant restrictions on economic development and job growth, given the significant role of international emissions, and given the dramatic reductions already undertaken across the U.S., it is imperative that implementation of the 2015 ozone NAAQS be undertaken in a way that does not unreasonably burden States with further control obligations, and reward international competitors at the expense of American workers.

Improved Ozone Air Quality

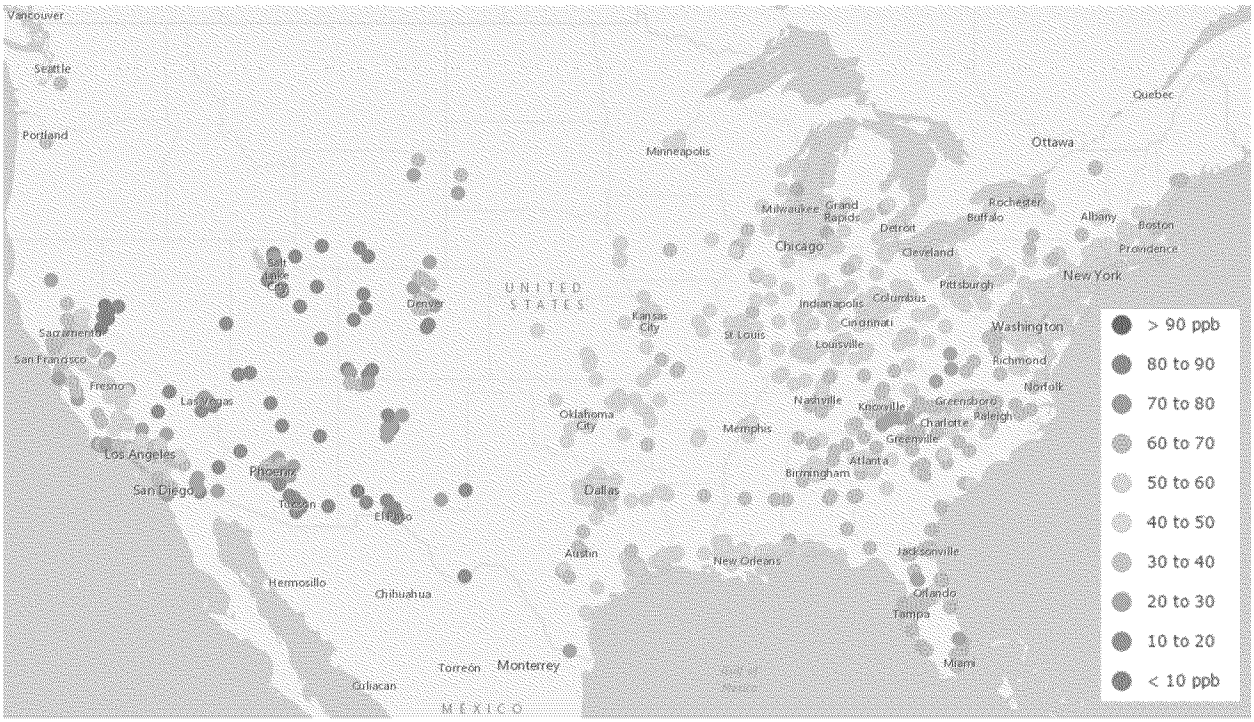
To illustrate the progress that states have made to reduce ozone concentrations, MOG has taken the most recent monitoring and modeling data and applied it to a series of maps to illustrate the monitors that remain in nonattainment at ozone concentrations from 70 to 75 ppb. These maps may be found at: http://www.midwestozonegroup.com/files/Assessment_of_International_Transport_and_Improved_Ozone_Air_Quality_6.22.17.ppt.

Conclusion

International emissions are a significant contributor to ozone concentrations to all monitors in the U.S. But for international emissions, no monitor in the U.S. is predicted by EPA to have an ozone concentration greater than 66 ppb in 2017. Given the tremendous progress that has already been made by states in improving air quality, properly addressing international emission will eliminate the negative impact of the ozone NAAQS on economic development and job growth.

A copy of this paper may be found at:
http://www.midwestozonegroup.com/files/Assessment_of_International_Transport_and_Improved_Ozone_Air_Quality_6.22.17.docx

But for international emissions, no monitor in the US would exceed 66 ppb of ozone in 2017



No monitor with dv greater than 66 ppb

Only 11 monitors with dv greater than 60 ppb

Data source: http://www.epa.gov/sites/production/files/2015-11/2017_ozone_contributions_transport_noda.xlsx

Assessment of International Transport and Improved Ozone Air Quality

Prepared by the

Midwest Ozone Group

June 22, 2017

Introduction

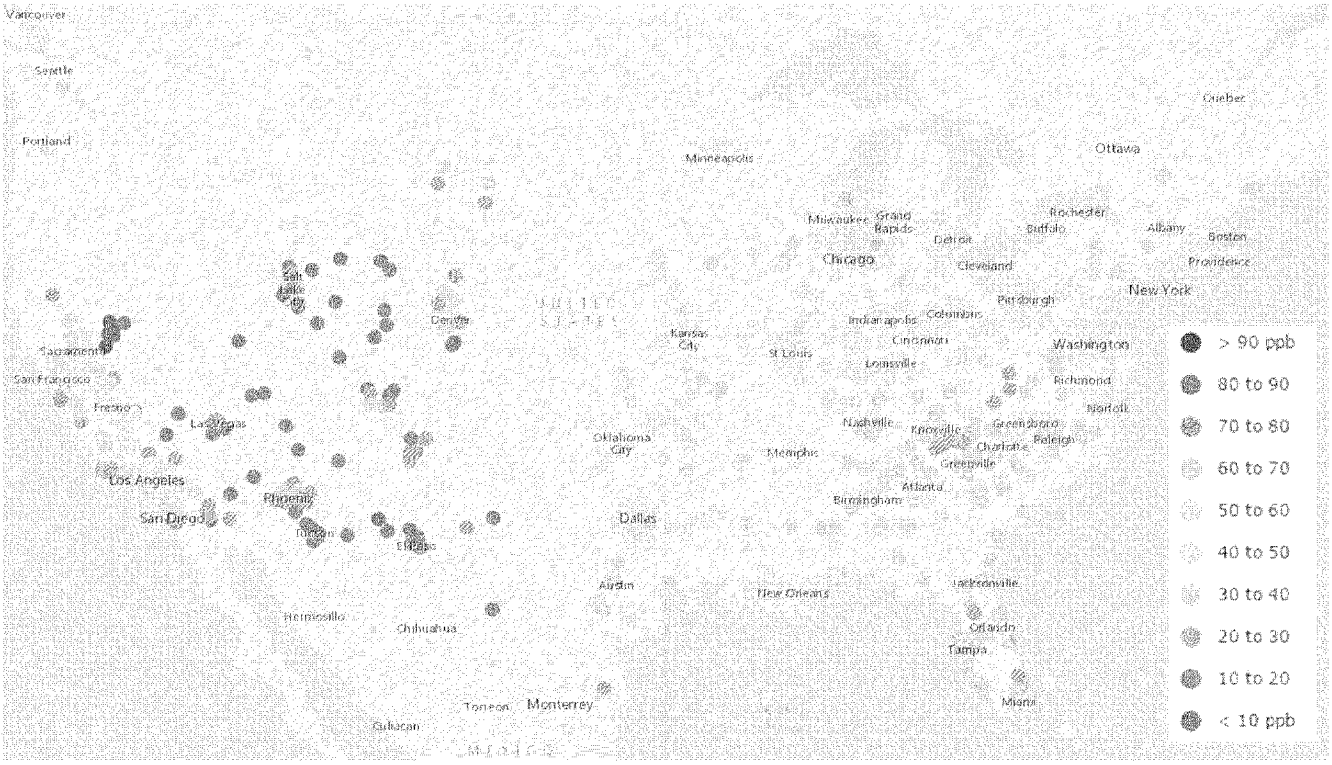
- Midwest Ozone Group (MOG) members own or operate more than 80,000 mw of fossil fuel-fired or coal refuse-fired electric generating capacity and have been active in the development of EPA's rules related to the establishment and implementation of the national ambient air quality standard (NAAQS) for ozone. In the following comments MOG stated its specific concern about the need for EPA to address international transport:
  - 2015 ozone NAAQS (http://midwestozonegroup.com/files/MOG_OZONE_NAAQS_COMMENTS.pdf),
  - CSAPR Update: (http://midwestozonegroup.com/files/MOGCommentsonProposedCSAPRUpdate-Final.PDF), and the
  - 2015 ozone implementation rule (http://www.midwestozonegroup.com/files/2015OzoneNAAQSImplementationRuleLetterandComments.PDF).
- On June 6, 2017, the EPA Administrator extended the deadline for promulgating designations related to the 2015 ozone NAAQS and in doing so noted that states have made "tremendous progress and significant investment cleaning up the air." The same letter identified that as part of the review process to be undertaken during the extension, EPA will be focusing on "appropriately accounting for international transport".
- This presentation is being offered to provide data to help inform the discussion of these issues.

International Transport

Impact of International Transport

- EPA's Cross State Air Pollution Rule (CSAPR) projections for 2017 contain CAMx/APCA modeling data for significant contribution calculations (EPA-HQ-OAR-2015-0500-0459).
- In addition to identifying upwind state contributions, EPA tagged boundary conditions, initial conditions, Canadian, and Mexican emissions from 2011 all of which can be fairly viewed as constituting international emissions.
- The following slide denotes the impact on air quality projections if international emissions are eliminated from the calculation.
- As can be seen of the slide, but for international emissions no monitor in the United States would exceed 66 ppb in 2017.
- Clean Air Act Section 179B provides the legal basis for relief from requirements to submit implementation plans in such a situation. Moreover, EPA v. EME Homer City Gen.. 134 S.Ct. 1584, 1606 (April 29, 2014) prevents EPA from imposing controls on upwind states that are more than necessary to eliminate that state's contribution to nonattainment. In either case, accounting for international emissions should result in eliminating the need for states to impose new controls to address interstate transport.

But for international emissions, no monitor in the US would exceed 66 ppb of ozone in 2017



No monitor with dv greater than 66 ppb

Only 11 monitors with dv greater than 60 ppb

Data source: http://www.epa.gov/sites/production/files/2015-11/2017_ozone_contributions_transport_noda.xlsx

Progress in Improving Ozone Ambient Air Concentrations

Progress in Improving Ozone Ambient Air Concentrations

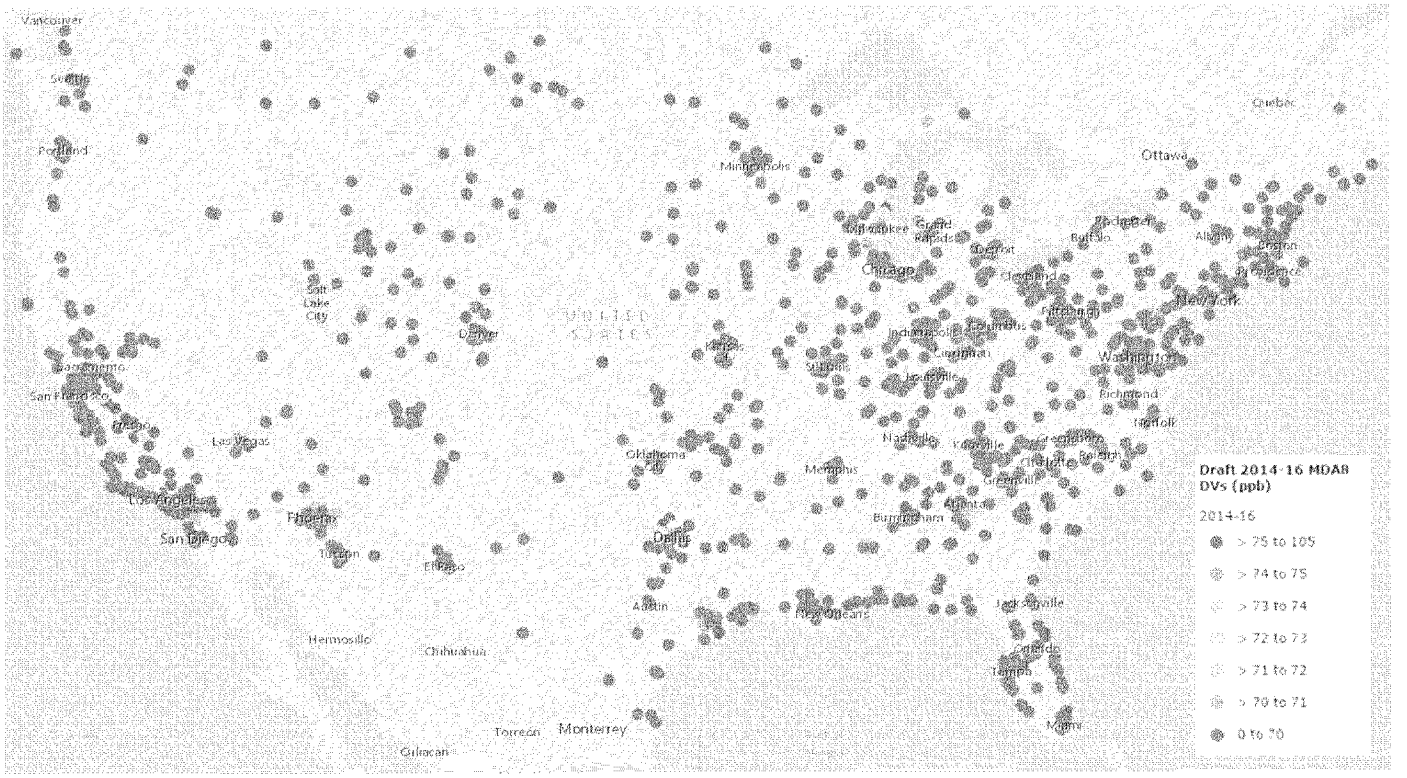
- The following maps use two methods to illustrate the progress that is being made by states in achieving lower ozone concentrations by identifying which monitors exceed ozone concentrations from 70 to 75 ppb.

- Monitored Data Method: These slides apply the current 2014-16 MDA8 DVs monitored data (calculated from AFS Data Mart draft 2016 4th high values, January 2017 download). This is the data used to support nonattainment designations.

- Final CSAPR Method: These slides apply the same 2014-16 MDA8 DVs monitored data in combination with the 2017 modeling data from the final CSAPR Update rule (maximum daily 8-hour average design values (ppb) and source apportionment results obtained from file EPA-HQ-OAR-2015-0500-0459). This is the type of data used by EPA in the development of transport rules or Good Neighbor SIPs.

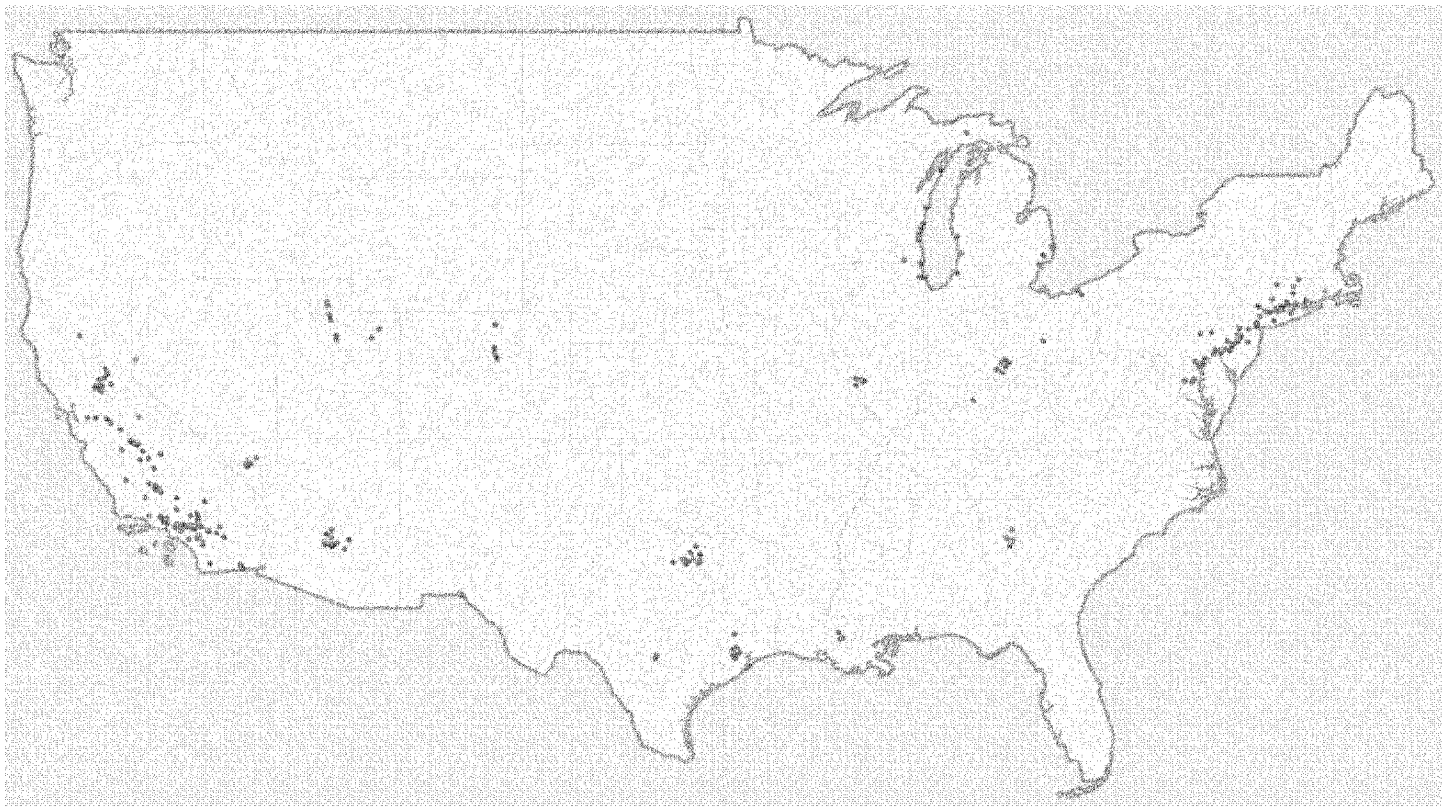
Monitored Data Method

Monitored Data 2016 Ozone Design Value (ppb)

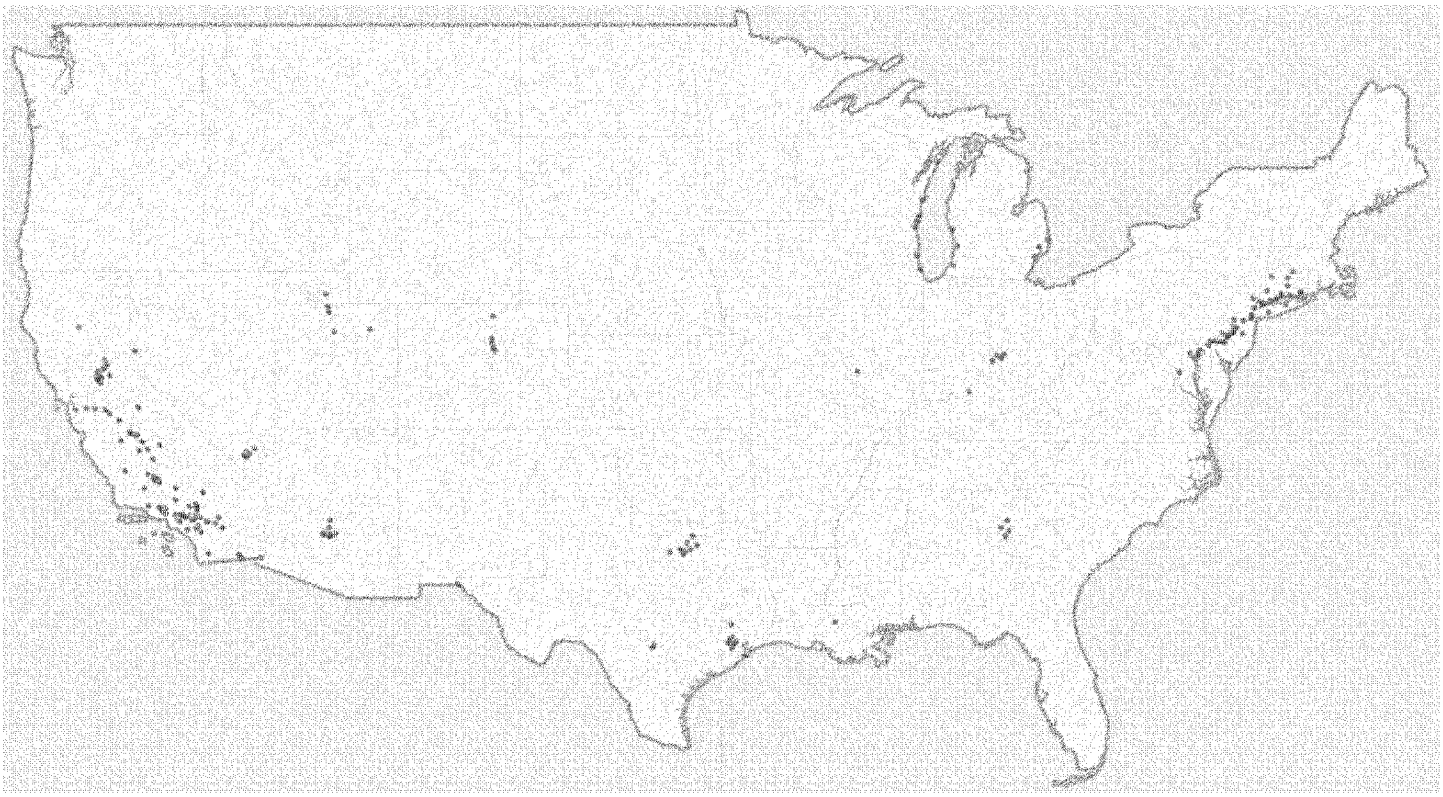


DVs still considered draft until final State approval

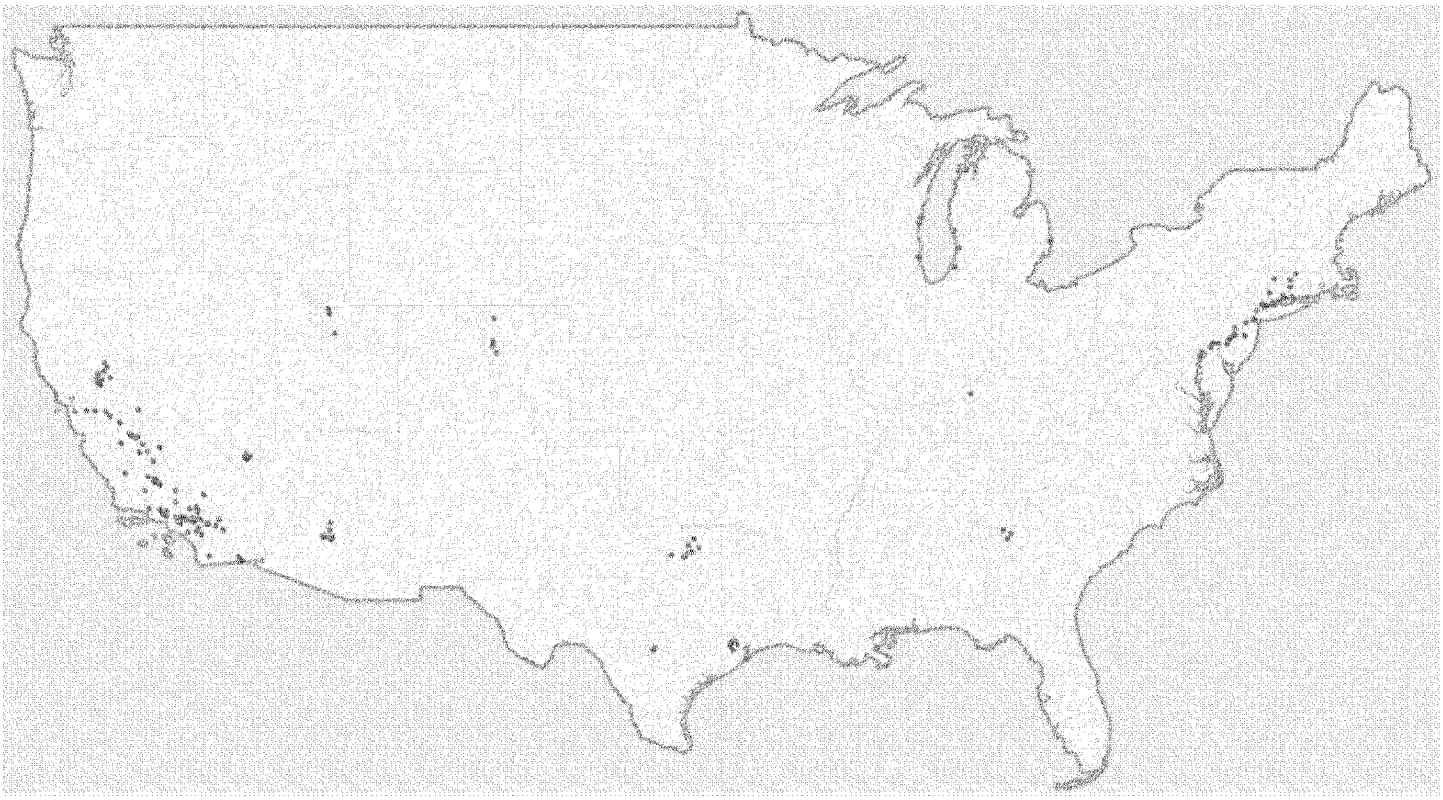
Monitored Data Method Indicating Ozone Nonattainment at 70 ppb



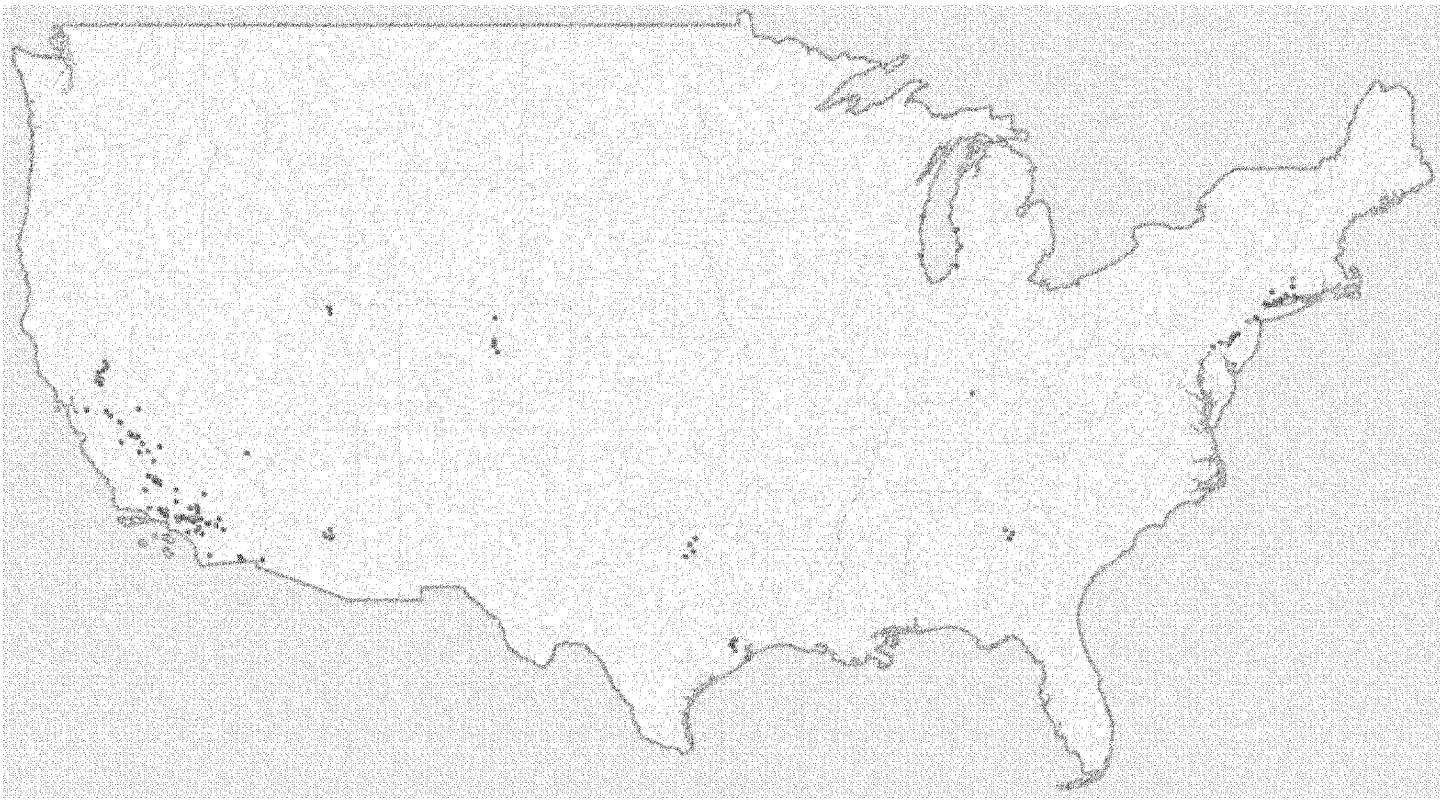
Monitored Data Method Indicating Ozone Nonattainment at 71 ppb



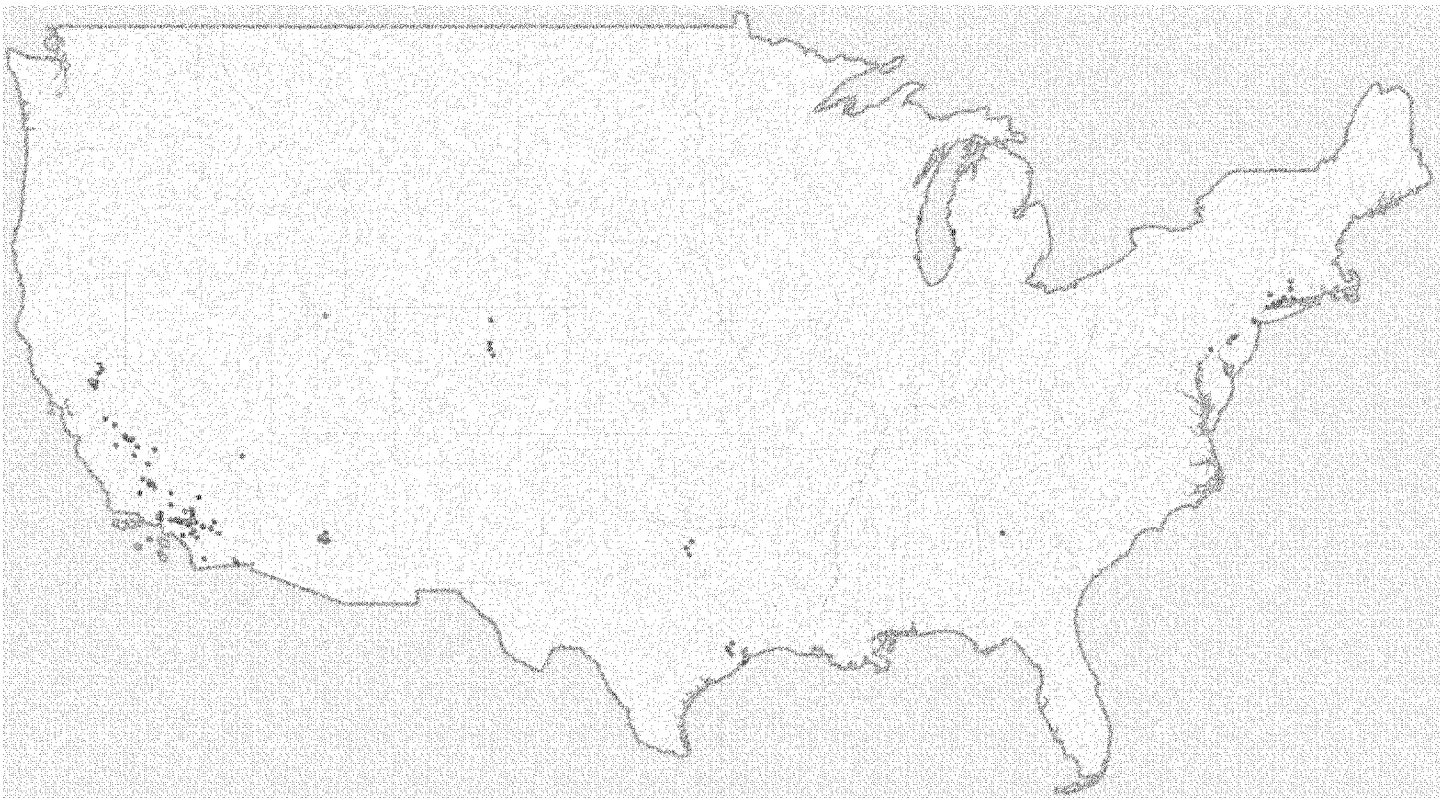
Monitored Data Method Indicating Ozone Nonattainment at 72 ppb



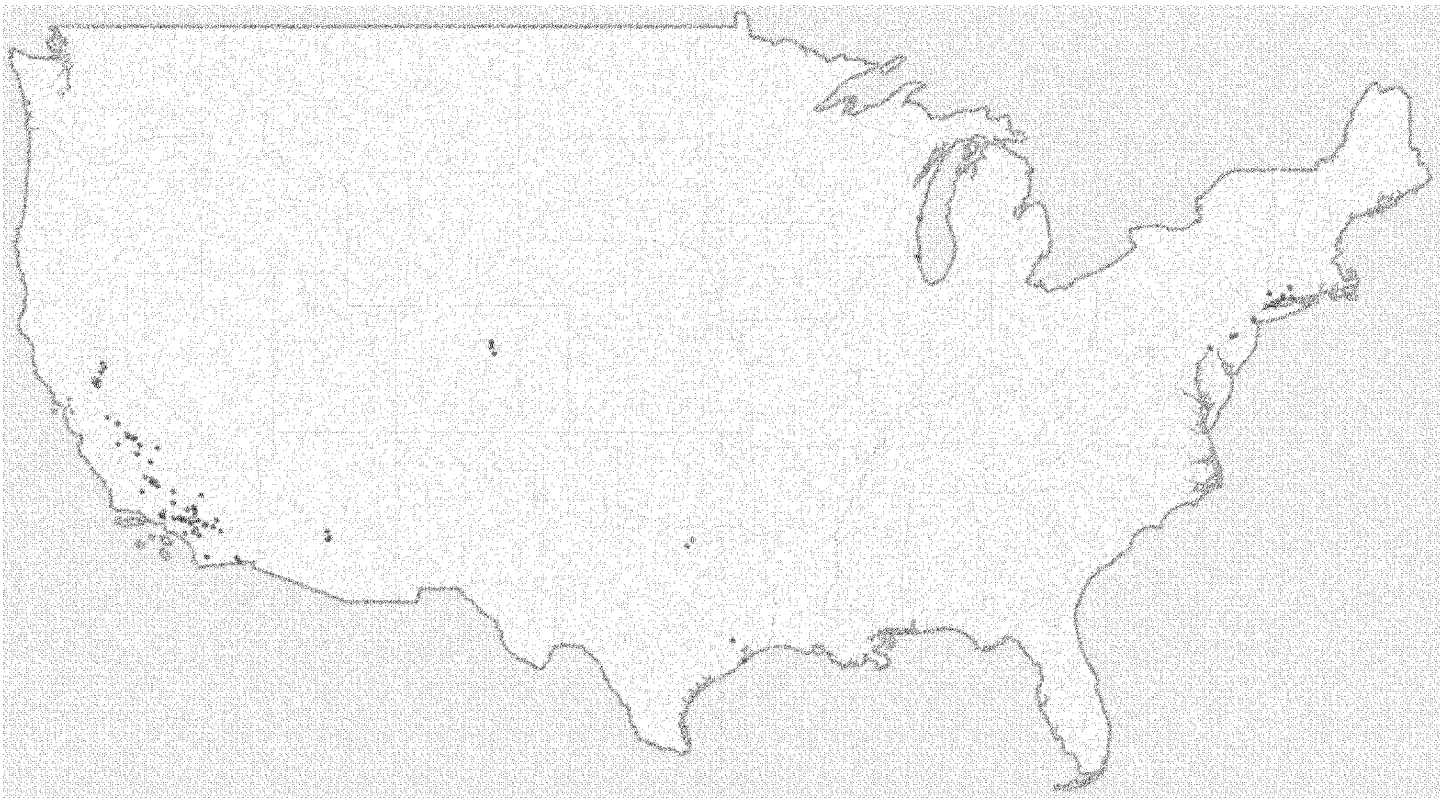
Monitored Data Method Indicating Ozone Nonattainment at 73 ppb



Monitored Data Method Indicating Ozone Nonattainment at 74 ppb

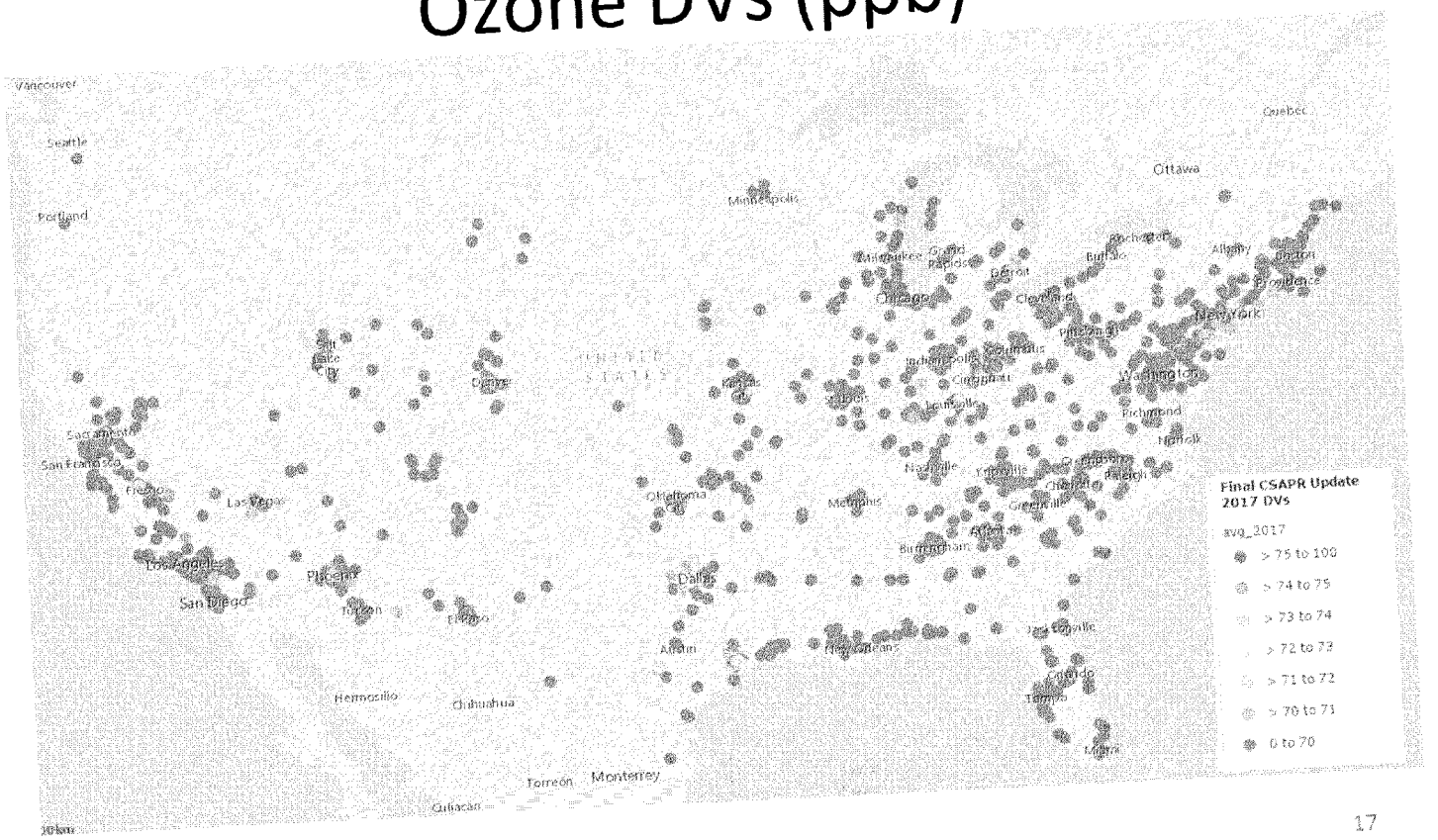


Monitored Data Method Indicating Ozone Nonattainment at 75 ppb

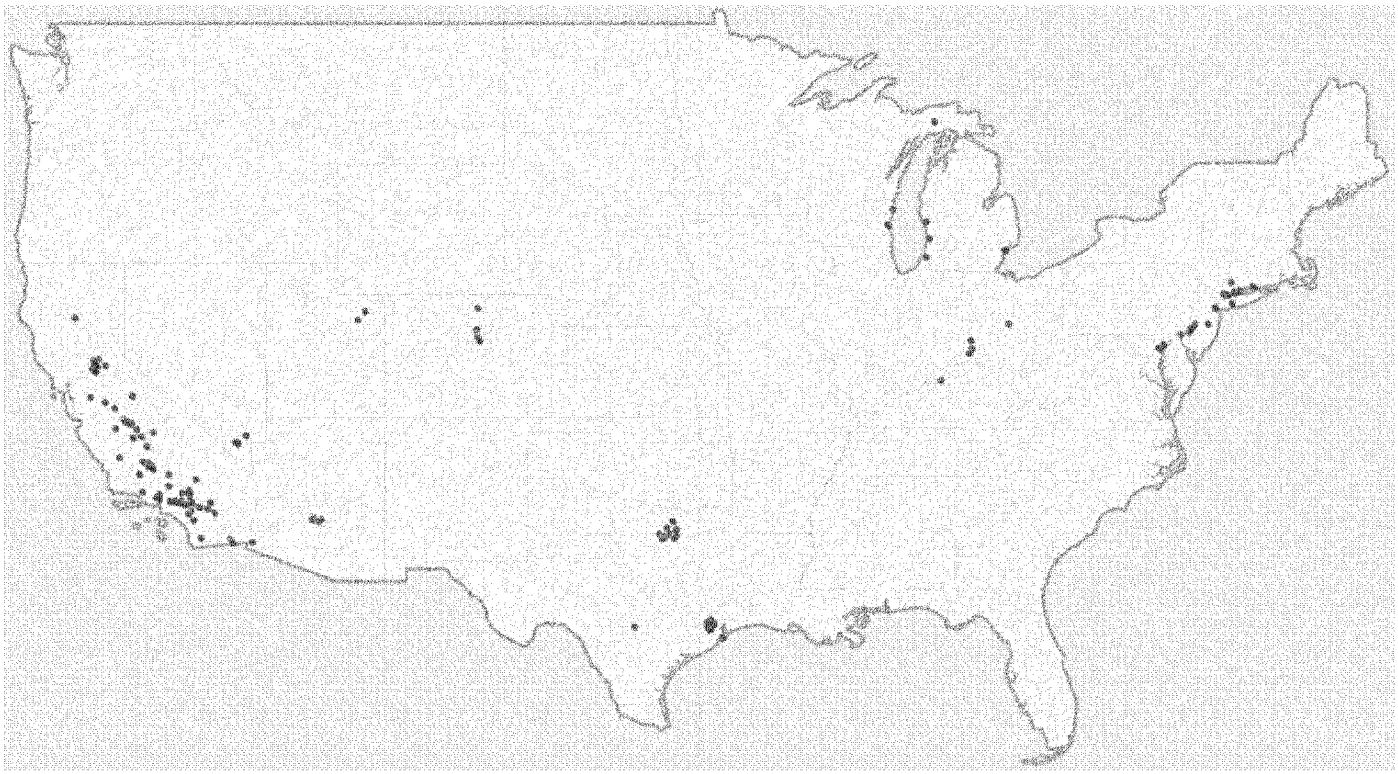


Final CSAPR Method

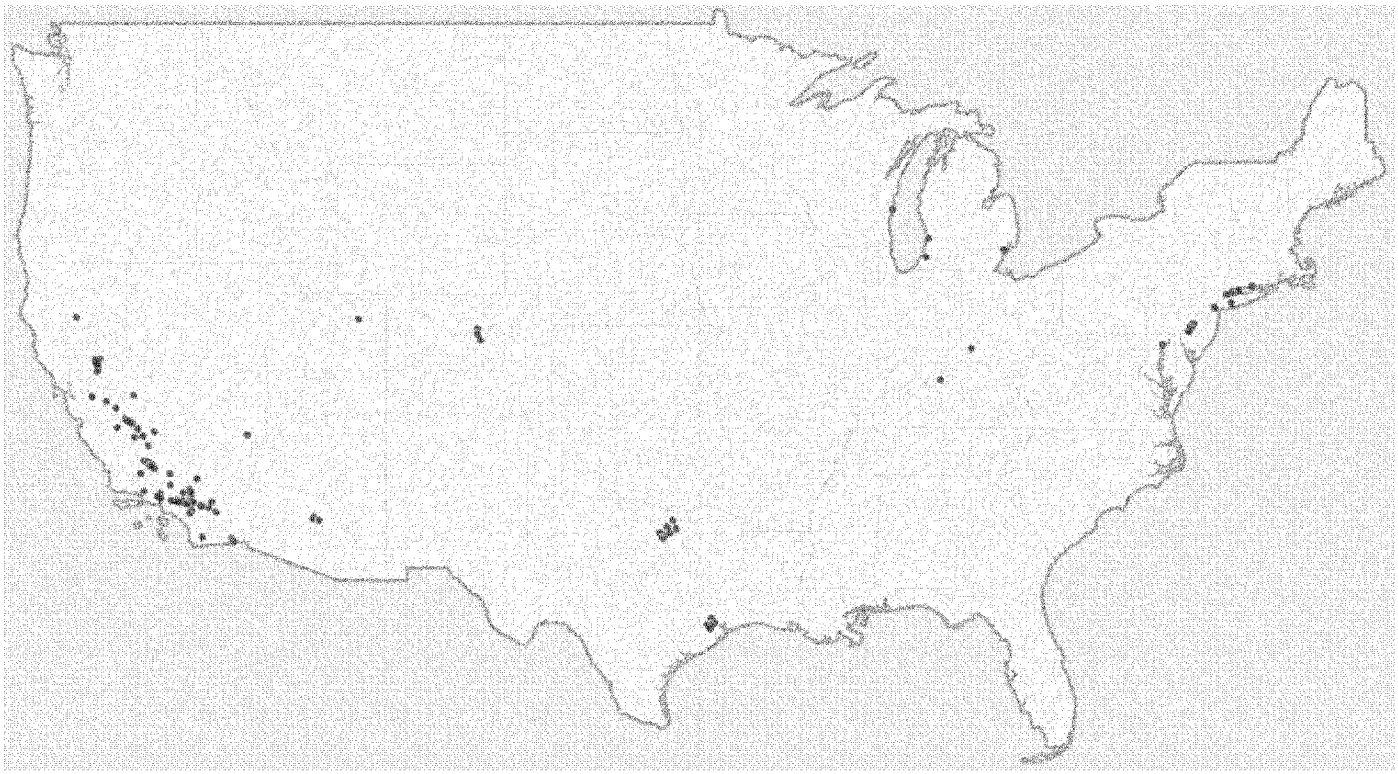
Final CSAPR 2017 Average Ozone DVs (ppb)



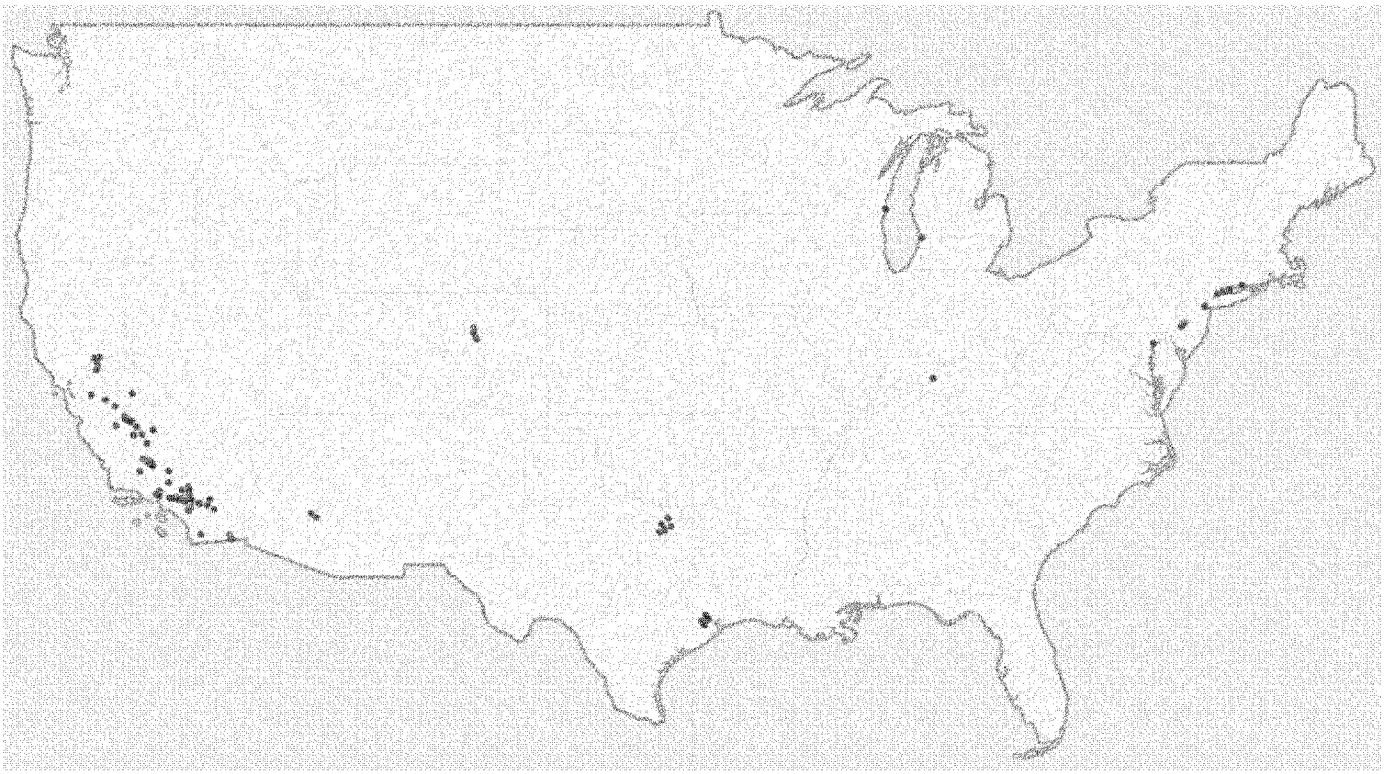
Final CSAPR Method Indicating Ozone Nonattainment at 70 ppb



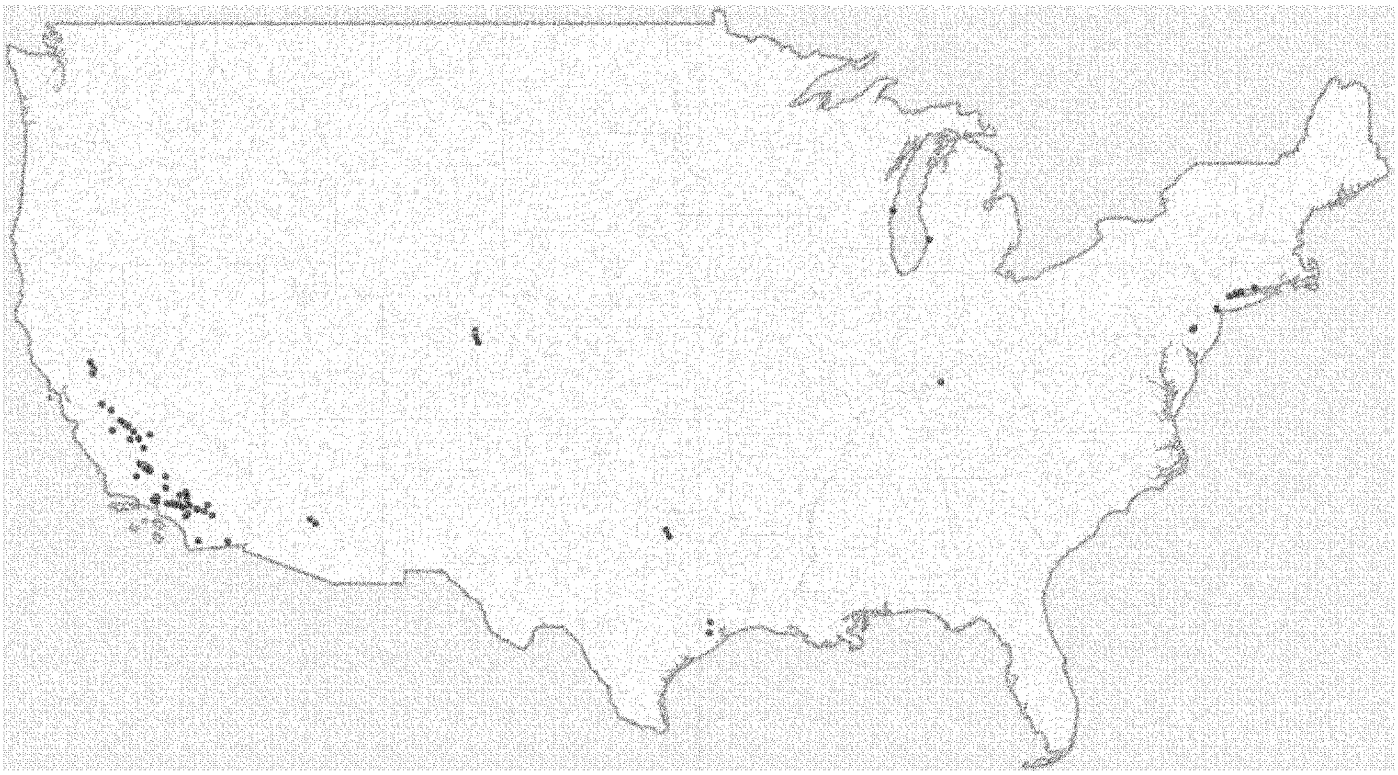
Final CSAPR Method Indicating Ozone Nonattainment at 71 ppb



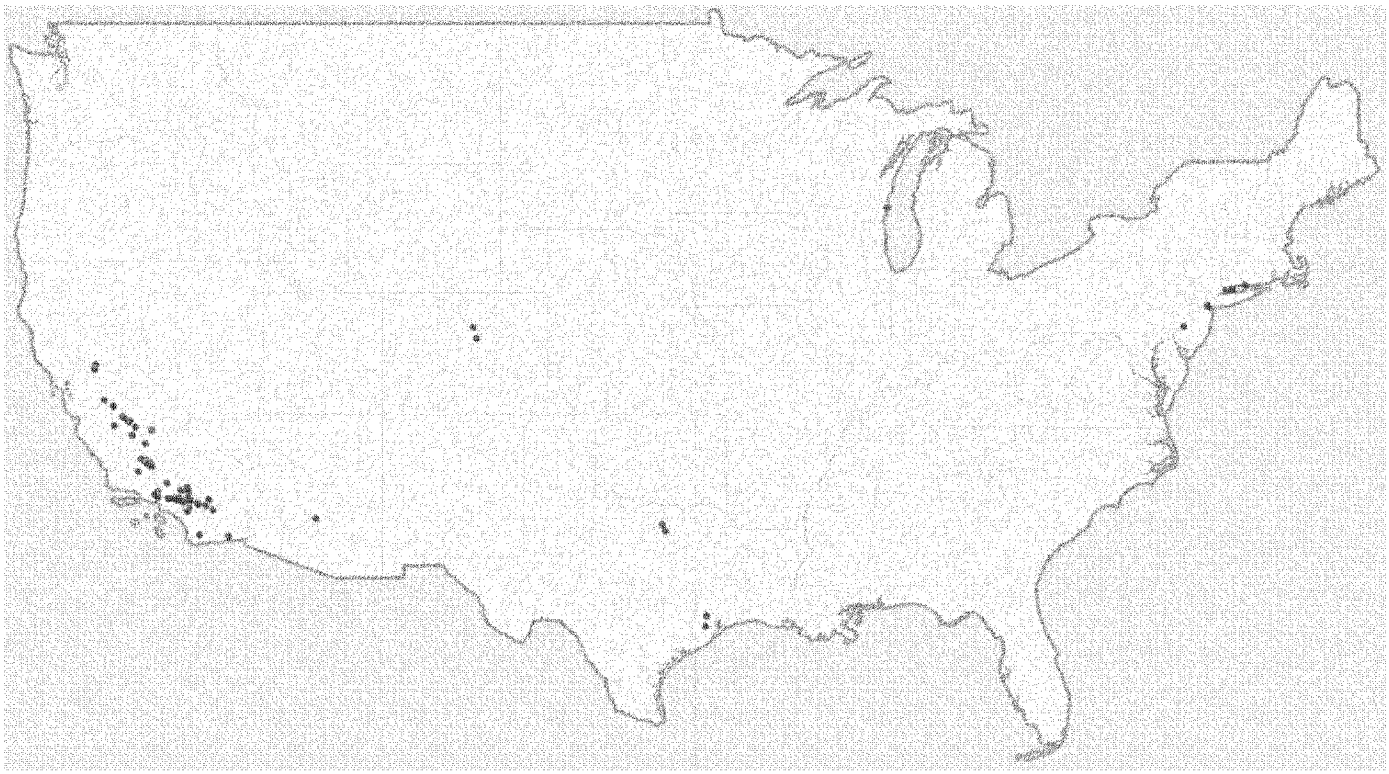
Final CSAPR Method Indicating Ozone Nonattainment at 72 ppb



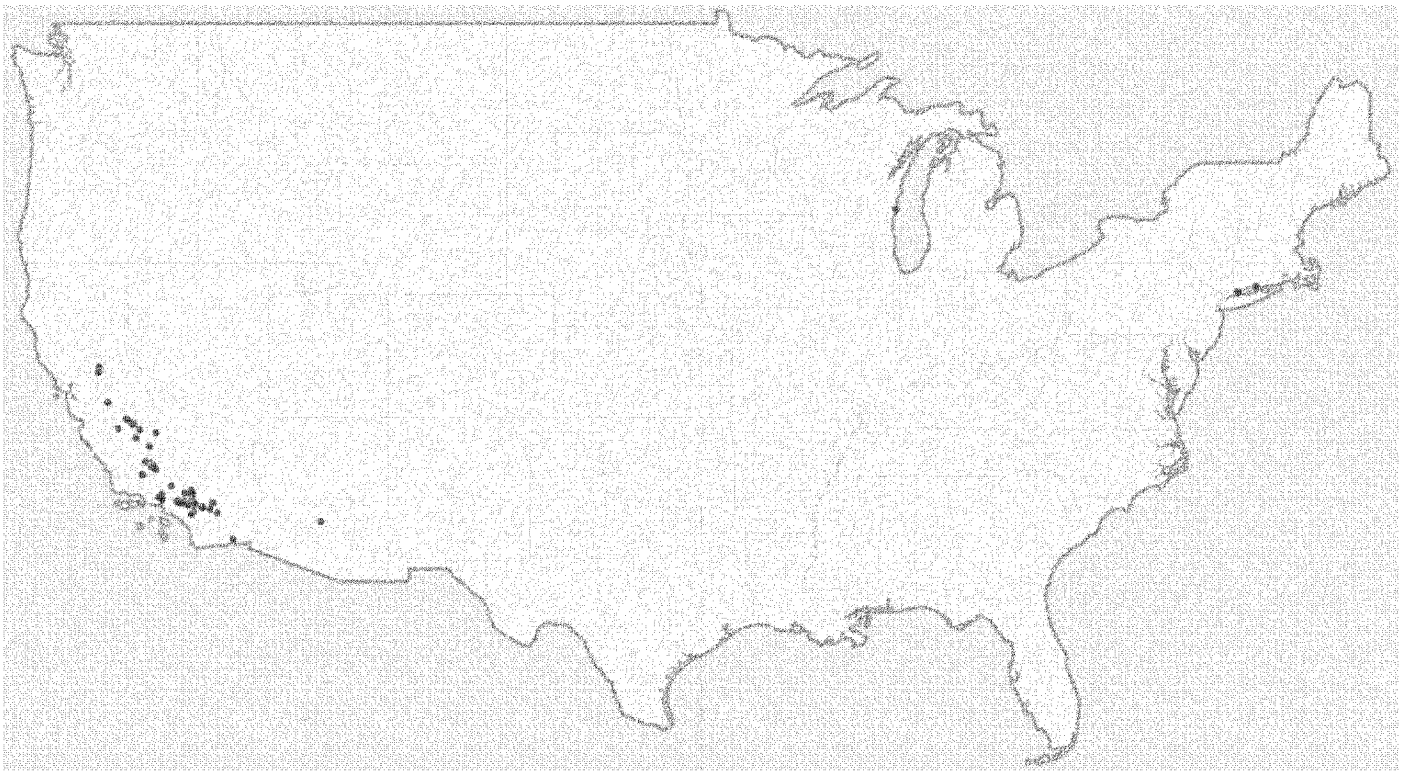
Final CSAPR Method Indicating Ozone Nonattainment at 73 ppb



Final CSAPR Method Indicating Ozone Nonattainment at 74 ppb



Final CSAPR Method Indicating Ozone Nonattainment at 75 ppb



For further information

See the web site for the Midwest Ozone Group at
http://midwestozonegroup.com/index.html;

or contact

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