

**Responses to Significant Comments on the
Proposed Finding of Significant Contribution and Rulemaking for
Certain States in the Ozone Transport Assessment Group (OTAG)
Region for Purposes of Reducing Regional Transport of Ozone
(62 FR 60318, November 7, 1997 and 63 FR 25902, May 11, 1998)**

Docket Number A-96-56

U.S. Environmental Protection Agency
September 1998

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**Appendix A
EGU Addition Requests to Inventory**

ILLINOIS			
Commenter	Unit(s) Affected	Action Requested	Action Taken/Rationale
IL EPA, D-244	Projected future ComEd units Wood River (1,2,3) Havana (1,2,3,4,5,6,7,8)	Add these units to the IL inventory	Projected future ComEd units were not added since 95/96 HI data is used. Wood River and Havana units were added to the IL inventory but no data for these units were submitted to EPA or included in the inventory.
IL EPA, H-33	IL EPA submitted a corrected and complete inventory for all affected units in the state of IL (A number of units were not included in the EPA inventory and should be added)	EPA should replace the IL inventory in the SNPR with the complete inventory for EGUs and non-EGUs prepared and submitted by IL EPA.	EPA notes that all recommended revisions to the emission inventories were required to be submitted by the close of the comment period on the NPR (3/9/98), to allow sufficient time to conduct additional modeling. Since this comment was received after the deadline, the units of concern that can be considered additional units may not have been incorporated into the inventory unless their inclusion was requested by another comment submitted prior to this deadline and approved by EPA.
Lake Michigan Air Directors Consortium, (LADCO), D-104	Numerous units (not listed in comments)	EPA should re-evaluate the inventory for IL based on the information submitted.	EPA did not completely incorporate the data submitted by LADCO. There was a mismatch between the LADCO and OTAG unit ID fields. Therefore, in order to avoid duplication, only data for plants not already in the inventory were added.

Appendix C
EGU Heat Input Correction Requests to Inventory (Con't)

ILLINOIS			
Committer	Unit(s) Affected	Action Requested	Action Taken
IL EPA, H-33	Joliet 72; Meredosia 5	EPA should correct the 2007 HI data for these units and adjust the IL inventory accordingly.	EPA notes that all recommended revisions to the emission inventories were required to be submitted by the close of the comment period on the NPR (3/9/98), to allow sufficient time to conduct additional modeling. Since this comment was received after the deadline, the 2007 heat input data for the units of concern have not been revised in the inventory.
ComEd, D-6, D-300, H-90	Powerton 51, 52, 61, 62	EPA should correct the 96 HI data for these units and adjust the inventory for the State of IL accordingly.	EPA corrected the data as requested since the Part 75 DAHS did not correctly apportion HI data from common stacks to individual units.
Illinois Power, D-170	Vermillion	EPA should use 90 rather than 96 HI data for this plant since 96 was an anomalous year.	EPA did not use the 90 HI data for this plant. If the plant operated less than nominally in 96, then demand was presumably met by another plant. Increasing the budget for this plant would unnecessarily inflate the budget.
Lake Michigan Air Directors Consortium, (LADCO), D-104	Numerous units (not listed in comments)	EPA should re-evaluate the inventory for IL based on the information submitted.	EPA did not completely incorporate the data submitted by LADCO. There was a mismatch between the LADCO and OTAG unit ID fields. Therefore, in order to avoid duplication, only data for plants not already in the inventory were added. Thus, this comment was not used to justify proposed HI corrections for units already identified in the inventory released in conjunction with the NPR.

**APPENDIX D
NON-EGU SOURCE CORRECTION REQUESTS TO INVENTORY**

**Appendix D
Non-EGU Source Correction Requests to Inventory**

STATIONARY AREA AND NONROAD			
Commenter	Category	Action Requested	Action Taken
IV-D-89, Virginia DEQ	Stationary Area & Nonroad	<p>Requests area source emission revisions for six counties. Provides county-level total emissions for unidentified year.</p> <p>Requests 2007 emission revisions for locomotives and military aircraft categories. Provides State-level adjustment.</p>	<p>County level emissions not modified due to lack of year of data.</p> <p>1995-2007 growth factors adjusted for locomotives and military aircraft categories to reflect requested adjustment.</p>
IV-D-104, LADCo	Stationary Area & Nonroad	Requests area and nonroad emission, growth, and control changes on behalf of Illinois.	Comments accepted and incorporated.
IV-D-244, Illinois EPA	Stationary Area & Nonroad	Comments submitted via IV-D-104.	See IV-D-104 for action taken.
IV-D-247, Alabama DEM	Stationary Area	Questions EPA's default stationary area source inventory. Believes inventory overestimates emissions and double counts sources already in the point source inventories.	No supporting data provided. No action taken.
IV-D-114 (IV-D-309), New York DEC	Nonroad	<p>Requests that EPA not use "actual" 1995 nonroad activity levels to project 2007 activity levels.</p> <p>Requests use of 1990 inventory as this is basis of NY's ROP SIP and already gone through public review.</p> <p>Disagrees with use of seasonal weekday and weekend adjustments.</p>	No action taken. EPA used 1990 nonroad inventory as basis for projections. EPA used weekday and weekend adjustments for episodic adjustment.

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STATIONARY AREA AND NONROAD			
Commenter	Category	Action Requested	Action Taken
IV-D-136, North Carolina DENR	Stationary Area & Nonroad	Requests that EPA use NC provided county-level population forecasts to project nonroad activity and emissions.	Comments accepted and commenter provided files used for nonroad growth estimates.

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HIGHWAY MOBILE			
Commenter	Category	Action Requested	Action Taken
IV-D-89, Virginia DEQ	Highway Mobile VMT and Control Assumptions	Requests removal of basic I/M programs from Richmond area (seven counties).	Basic I/M control removed from mobile highway emission estimates in all counties cited.
IV-D-104, LADCo	Highway Mobile VMT, Growth, and Control Assumptions	Requests mobile source VMT, vehicle mix, Mobile model inputs, speed, and temporal adjustments made on behalf of Illinois, Indiana, Wisconsin, and Michigan.	All comments, except VMT and vehicle mix for Michigan and Wisconsin accepted and incorporated. Vehicle mix found to have significant errors in relation to ratios of vehicle types in all other OTAG States for these two States.
IV-D-136, North Carolina DENR	Highway Mobile VMT	Requests modification of NC VMT with submission of new county-level VMT data.	Comment accepted and incorporated into inventory with allocation of VMT by SNPR existing vehicle type ratios.
IV-D-191, SEMCOG	Highway Mobile	Requests revision to VMT and Mobile inputs. Submits data by reference to IV-D-104.	See IV-D-104 for action taken.
IV-D-239, Michigan DEQ	Highway Mobile	Requests revision to VMT and Mobile inputs. Submits data by reference to IV-D-104.	See IV-D-104 for action taken.
IV-D-244, Illinois EPA	Highway Mobile	Requests revision to VMT and Mobile inputs. Submits data by reference to IV-D-104.	See IV-D-104 for action taken.
IV-D-247, Alabama DEM	Highway Mobile VMT	Comments that VMT listed is too high for AL. Provides county-level, functional-class specific VMT.	Comment accepted and incorporated.
IV-D-264, Wisconsin DNR	Highway Mobile	Requests revision to VMT and Mobile inputs. Submits data by reference to IV-D-104.	See IV-D-104 for action taken.

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Commenter	Category	Action Requested	Action Taken
IV-D-114 (IV-D-309), New York DEC	Highway Mobile	Requests modification to VMT growth for NY. Comments that NY has adopted LEV and will not opt-in to NLEV. Current modeling with NLEV increases NOx emissions by about 2.5% for this category in NY.	VMT growth not modified as county or vehicle-type specific data not provided with comment. Mobile model input files modified to reflect LEV in NY.

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NON-EGU POINT			
Commenter	Category	Action Requested	Action Taken
IV-D-66, Akzo Nobel	Non-EGU Point	Requests modification of source size and SCC for multiple units.	Comment forwarded to WV for State verification. Boiler size modifications not incorporated as matching units could not be found inventory. SCC modifications made.
IV-D-87, International Paper	Non-EGU Point	Requests emission modification for multiple units.	Comment forwarded to AL, CT, GA, NC, NY, PA, SC, and WI for State verification. CT response indicates International Paper (IP) may have estimated emissions incorrectly. EPA follow-up with IP discovered emission estimates based on permitted values, not actual values. Comment not accepted for any unit.

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Commenter	Category	Action Requested	Action Taken
IV-D-89, Virginia DEQ	Non-EGU Point	Requests emissions modification for multiple units. Requests that VA non-EGU growth should be doubled.	<p>No supporting growth data provided. Growth comment not accepted.</p> <p>NOx RACT Exemptions: Modified inventory to reflect exemption for all sources listed.</p> <p>Allied Signal: Use VA provided base emissions to revise inventory. Matched to AIRS to get stack and other pollutant information.</p> <p>Virginia Vibre: Per VA direction, use comments provided under IV-D-115 to address issue.</p> <p>DuPont Spruance: Not enough information to include requested additional units in inventory.</p> <p>Philip Morris: Revised heat input and emissions as provided by VA.</p> <p>Bear Island Paper: Correct emissions for existing units as provided by VA. Not enough information to include requested additional units in inventory.</p> <p>Hoechst Celanese: Revised emissions as provided by VA.</p> <p>Westvaco: After discussion with VA, use March 31, 1998 response direction from VA to revise units.</p>
IV-D-90, Celanese	Non-EGU Point	Requests emissions modification.	<p>Comment forwarded to VA for State verification.</p> <p>Addressed under IV-D-89.</p>

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Commenter	Category	Action Requested	Action Taken
IV-D-93, RC Cement	Non-EGU Point	Requests emissions modification.	Comment forwarded to TN, PA, and MO for State verification. PA and MO response indicate source already submitted by State and EPA should use State submission. State data used per State request. TN response directed EPA to use RC Cement submitted data. RC Cement data used for facility in TN.
IV-D-104, LADCo	Non-EGU Point	Request emissions, growth, control modifications on behalf of Illinois, Indiana, Wisconsin, and Michigan.	EPA accepted and incorporated all LADCo submitted 1995 base year and growth and control parameter files. EPA did not accept any 2007 provided files where growth and control information were not provided to validate their calculation (i.e., 2007 foundation files when 1995 foundation and 1995 to 2007 growth and control parameters not included).

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Commenter	Category	Action Requested	Action Taken
IV-D-115, Virginia Manufacturers Association (VMA)	Non-EGU Point	Requests emission revisions for multiple facilities.	<p>Comment forwarded to VA for State verification.</p> <p>Amoco Oil Company: EPA could not identify corresponding sources in inventory for modification per Amoco's comment. No changes made to inventory to address this comment.</p> <p>Bear Island Paper: Addressed under IV-D-89.</p> <p>Celanese: Addressed under IV-D-89.</p> <p>Dan River Company: Comment accepted and incorporated into inventory.</p> <p>DuPont: Addressed under IV-D-89.</p> <p>Greif Bros. Corporation: Comment accepted and incorporated into inventory.</p> <p>Philip Morris: Addressed under IV-D-89.</p> <p>Union Camp: Request for modification to source growth factor. No supporting information for this request, therefore, no changes made to inventory to address this comment.</p> <p>Westvaco: Addressed under IV-D-89.</p>

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Commenter	Category	Action Requested	Action Taken
IV-D-118, Howard and Howard (for Champion International).	Non-EGU Point	Requests emission revisions and source addition for multiple facilities.	<p>Comment forwarded to NY, OH, MI, AL, and NC for State verification.</p> <p>EPA follow-up with Champion International for additional stack parameter information.</p> <p>EPA accepted all comments, with exception of three units at MI facility, where positive identification of sources could not be made. 1996 data used as representative of 1995 emissions for NY, OH, MI, and AL facilities.</p>
IV-D-120, Allied Signal	Non-EGU Point	Requests emission revisions for multiple facilities.	<p>Response from NC provided additional data to include with NC facility data provided by Champion.</p> <p>Comment forwarded to VA and MI for State verification.</p> <p>VA facility addressed under IV-D-89.</p>
IV-D-126, PSM International, Inc.	Non-EGU Point	Identified six cement kilns missing from inventory.	<p>MI facility data not included as MI response stated that facility does not meet the large source threshold it used to supply data to EPA. Concern that facility is accounted for in area source inventory.</p> <p>Comment not accepted as insufficient data available to determine if sources missing from inventory.</p>
IV-D-130, Philip Morris	Non-EGU Point	Requests facility modification in inventory.	<p>Comment forwarded to VA for State verification.</p> <p>Addressed under IV-D-89.</p>

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Commenter	Category	Action Requested	Action Taken
IV-D-138, Pennsylvania DEQ	Non-EGU Point	<p>Requests emission revisions and unit additions for multiple facilities.</p> <p>Requests revisions to growth factors used in projected base and budget year calculations.</p>	<p>Incorporated emissions and boiler sizes from Tables 5, 6, and 7 of comment. Four units in Table 7 could not be identified in EPA inventory for corrections.</p> <p>Incorporated stack parameter information obtained by EPA via AIRS. Boiler capacities revised to 251 where comment indicated ">250" and to 249 where indicated as "<250."</p> <p>Incorporated comment supplied growth factors in base and budget calculation.</p>
IV-D-141, West Virginia Manufacturers Association (WVMA)	Non-EGU Point	Requests emission revisions to multiple units.	<p>Comment forwarded to WV for State verification.</p> <p>All 1990 emission modification requests from Exhibit B of comment incorporated in inventory. 2007 supplied data not supported with growth or control data. 2007 data requests not accepted.</p>
IV-D-152, Kodak	Non-EGU Point	Requests emission revisions to multiple units.	<p>Comment forwarded to NY for State verification.</p> <p>EPA incorporated comment supplied "post-OTC" corrected data by allocating unit level emissions to segments using existing SNPR point-level emission ratios.</p>
IV-D-177, Chatanooga-Hamilton County Air Pollution Control Bureau (TN)	Non-EGU Point	Requests emission revisions to multiple facilities.	<p>EPA incorporated DuPont facility emission modifications using existing SNPR point-level emission ratios.</p> <p>TN deferred to IV-D-93 for RC Cement facility. Addressed under IV-D-93.</p>

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Commenter	Category	Action Requested	Action Taken
IV-D-191, SEMCOG	Non-EGU Point	Requests emission revisions to multiple facilities. Submits data by reference to IV-D-104.	Addressed under IV-D-104.
IV-D-207, Integrated Waste Services Association (IWSA)	Non-EGU Point	Requests emission revisions to multiple facilities.	<p>Comment forwarded to MA, CT, NY, NJ, MI, VA, PA, MD, TN, AL, SC, GA, IN, IL, and OH for State verification.</p> <p>Response from AL, CT, IL, and VA indicates sources have been correctly submitted via State submission. Request of these States not to include IWSA submitted data. Comments for AL, CT, IL, and VA facilities not accepted.</p> <p>Response from MA provided AQCR and facility identification for EPA to retrieve facility information from AIRS. EPA could not positively identify these facilities in AIRS. Comment for MA facilities not accepted.</p> <p>Supporting information provided by IWSA not sufficient for modification to EPA inventory. No part of comment related to emission inventory modification accepted.</p>
IV-D-210, Lehigh Portland Cement	Non-EGU Point	Comments that growth for portland cement industry is positive, not negative, as indicated in the SNPR.	No supporting information provided to address this comment.

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Commenter	Category	Action Requested	Action Taken
IV-D-211, Westvaco	Non-EGU Point	Requests emission revisions to multiple facilities.	Comment forwarded to MD, PA, DC, KY, VA and WV for State verification.
			Comments accepted and emission points identified and modified per comment for MA, PA, DC, and WV.
			Response from KY indicated agreement with commenter issues. KY facility modifications accepted and included.
			Response from VA indicated use of State supplied comment. VA facility addressed under IV-D-89.
IV-D-227, Bethlehem Steel	Non-EGU Point	Comment states that iron and steel industry in positive growth cycle inconsistent with SNPR.	No supporting information provided to address this comment.
IV-D-239, Michigan DEQ	Non-EGU Point	Requests emission revisions to multiple facilities. Submits data by reference to IV-D-104.	Addressed under IV-D-104.
			EPA calculated stack parameters for sources using LADCo (IV-D-104) defaults.
IV-D-240, New Jersey	Non-EGU Point	Requests review of EGU and non-EGU sources for mis-classification.	EPA identified industrial and miscellaneous boiler facilities in Table 6 of comment. EPA compared EGU inventory to non-EGU inventory and found no duplicates in inventories. No inventory modification action taken in response to this comment.
IV-D-244, Illinois EPA	Non-EGU Point	Requests emission revisions to multiple facilities. Submits data by reference to IV-D-104.	Addressed under IV-D-104.

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Commenter	Category	Action Requested	Action Taken
IV-D-245, Essroc	Non-EGU Point	Requests emission revisions to multiple facilities. Comment indicates that industry not in negative growth cycle as SNPR indicates.	<p>Comment forwarded to IN, MD, and PA for State verification.</p> <p>Emission comment accepted after additional contact by EPA with Essroc representatives. Plant level emission estimates allocated to unit level emissions using existing SNPR point-level emission ratios.</p> <p>No supporting information provided to address growth comment.</p>
IV-D-247, Alabama DEM	Non-EGU Point	Submitted new point source inventory.	<p>Comment accepted and non-EGU point source inventory replaced by submitted comment inventory.</p> <p>County centroids used for missing lat / lon fields.</p>
IV-D-250, Merck	Non-EGU Point	Requests emission revisions to multiple facilities and additional of new sources.	<p>Comment forwarded to PA for State verification.</p> <p>Comment accepted and incorporated for West Point facility. Sufficient information not available to incorporate Cherokee facility.</p>

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Commenter	Category	NON-EGU POINT	Action Requested	Action Taken
IV-D-254 (IV-D-328), Interstate Natural Gas Association of America (INGAA)	Non-EGU Point		Requests emission and growth revisions to multiple facilities and deletion of sources from inventory.	Comment forwarded to AL, GA, IL, IN, KY, MD, MI, MO, NC, OH, PA, SC, TN, VA, and WV for State verification. Response from IL and VA indicated use of State supplied comment in lieu of INGAA data. INGAA comments for these States not accepted.
IV-D-264, Wisconsin DNR	Non-EGU Point		Requests emission revisions to multiple facilities. Submits data by reference to IV-D-104.	No source were deleted from inventory as non-budget reduced sources kept in inventory as baseline sources. Supporting information not available for specific source addition. No inventory modification made in response to this comment. Addressed under IV-D-104.
IV-D-268, Connecticut DEP	Non-EGU Point		Requests revision of source sizes for multiple facilities and clarification of MWC as EGU or non-EGU sources.	Boiler capacities modified per comment supplied data. MWC combustors designated as non-EGU sources. Only fossil-fuel fired units to be classified as EGUs. Additional sources could not be included in inventory due to lack of sufficient data.
IV-D-281, Cabot Corporation	Non-EGU Point		Requests revision of emission estimates for three flares used as pollution control devices.	Comment forwarded to WV for State verification. EPA converted annual to daily emissions and incorporated data per comment request.

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Commenter	Category	Action Requested	Action Taken
IV-D-284, Natural Gas Pipeline Company	Non-EGU Point	Requests emission and growth revisions to multiple facilities and deletion of sources from inventory. Submits data by reference to IV-D-254.	Addressed under IV-D-254.
IV-D-335, Jefferson Smurfit Corporation	Non-EGU Point	Requests emission and size revisions to multiple facilities. Requests addition of missing sources.	Comment forwarded to AL, OH, PA, IL, and IN for State verification. Response from IL and AL indicated use of State supplied comment in lieu of Jefferson Smurfit data. Jefferson Smurfit comments for these States not accepted. Supporting information not available to identify and modify additional source specific requests. No inventory modification made in response to this comment.
IV-D-340, Steelcase	Non-EGU Point	Requests emission and stack parameter revisions to multiple facilities.	Comment forwarded to IL in for State verification. Emission and stack parameter comments accepted and incorporated in inventory. Additional stack parameter information calculated using defaults.