

COMMENTS OF MIDWEST OZONE GROUP

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Saratoga, NY

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Emissions Reduction Quantification

Midwest Ozone Group (MOG) members operate some 80,000 MW of fossil-fuel fired electric generating capacity in the Midwest and Pennsylvania. For a number of years, MOG has sponsored atmospheric chemistry analyses of ozone transport, much of which having been reported to the Commission at past meetings. We all understand that ozone nonattainment in the OTR is the result of complex dynamics, including components of both NO_x transported over distances and emissions from international sources. Significantly, however, recent source apportionment modeling has increasingly shown that the vast majority of sources contributing to the remaining nonattaining monitors in the OTR, primarily in Connecticut along the I-95 corridor, are, in reality, local sources.

Both MOG and EPA modeling have shown that ozone air quality in the OTC is improving and could achieve attainment of the current ozone NAAQS in the near future with on-the-books and on-the-way controls. However, modeling has also become increasingly complex and dependent on the quality of the emission inventory used to begin the modeling process. A constant criticism of recent EPA modeling has been the use of outdated emissions inventories from which to begin the modeling process. Because of the dramatic reduction of NO_x emissions since 2009, particularly from the EGU and ICI boiler sectors, EPA has begun rulemaking analyses of recent transport rules using woefully outdated emission inventories. MOG believes that EPA has also failed to account for reductions in the NO_x inventory resulting from implementation of a number of OTC programs that are on-the-way, including HEDD, RACT, Tier 3, aftermarket catalysts, lightering, and SmartWay, among others. Programs like RACT are, of course, legally mandated requirements of the Clean Air Act.

If both the OTC states and the upwind states are to have the proper data upon which to base decisions about what additional control strategies are needed to implement ozone NAAQS requirements, we must work together to develop the most accurate modeling work product possible. Accordingly, MOG urges the OTC and its member states to make available to EPA and the public data that will quantify the emission reductions attributable to on-the-books and legally mandated programs that will be effective on the applicable attainment dates. To be useful to modelers, this data should identify the facilities, locations, and quantifiable emission reductions involved. Having data on the known and required emission reduction programs for all source categories and pollutants for all future years is crucial for EPA and others to consider in transport rule planning. Only when these and other nationally adopted programs are included in EPA's modeling platform can upwind and downwind states be confident that regulated entities, source categories, and states are fairly being identified as contributors to downwind air quality at problem monitors and truly understand ozone control strategies.