From: Portanova, Mary <portanova.mary@epa.gov>
Sent: Wednesday, September 02, 2015 11:49 AM
To: Van Vlerah, Jennifer
Cc: Aburano, Douglas; Summerhays, John; Robinson, Randall; Blakley, Pamela
Subject: Comments on 4/3/15 SO2 NA SIP submittal

The following are comments we have on the April 3, 2015 SO2 nonattainment SIP submittal.

Muskingum River: Ohio did not address the contribution from Globe Metallurgical, Inc. (Globe) in its April 3, 2015 submittal, since the Muskingum River Power Plant had contributed 99% of the SO2 emissions in the nonattainment area. The submittal does not provide a modeling analysis for the Muskingum River nonattainment area but instead analyzes the power plant's emissions and the monitored values and concludes that the closure of the Muskingum River Power Plant this June will bring the area into attainment. We agree that the power plant was likely to have been the main contributor to the monitored NAAQS violations in the area, but the submittal must also address other sources within the nonattainment area which could contribute to exceedances of the SO2 NAAQS. Given the level of Globe's emissions (1200 tons per year) and the source's emission configuration, we believe that Globe could potentially cause or contribute to SO2 NAAQS exceedances even without the power plant in operation. Ohio should address the Globe facility in its SIP, considering emission reductions and/or improvements to its emission venting.

Steubenville: Ohio used a weight of evidence approach to supplement modeling for the Cardinal plant in the Steubenville area, citing EPA's ozone/PM/haze guidance. This guidance does not strictly apply for SO2. While we will consider all the arguments that Ohio presents to demonstrate that the area's emission limits will lead to attainment of the standards, the quality of the modeling analysis is the primary component. Citing vague "inconsistencies and inaccuracies," for example, is not an adequate justification for choosing not to rely on modeling for the southern portion of the nonattainment area. We recognize that the Cardinal plant's unusual emissions routing is difficult to characterize and anticipate discussing this analysis further.

Ohio used the Buoyant Line and Point Source model (BLP) to help characterize emissions from Mountain State Carbon in the Steubenville area. The method seems reasonable but appears to differ from the way EPA has included BLP in AERMOD. A formal alternative model justification may be necessary for this application.