

### **Torpey – App M – Receptor Design**

The ADMT cannot comment on the development of specific receptor grids used for case-by-case modeling demonstrations, however, the guidance for developing receptor grids are consistent with previous guidance and are by no means requirements when determining the maximum ground-level concentration. No edits were made.

### **Torpey – App E – Minor and Federal NAAQS**

The comment notes that the text of the appendix does not point out the distinct differences between minor and PSD NAAQS demonstrations. The appendix does address the differences between minor and PSD NAAQS demonstrations as applicable. For example, paragraph two under the Preliminary Impact Determination section states that “For Minor NAAQS, one year of National Weather Service (NWS) meteorological data is sufficient. For Prevention of Significant Deterioration (PSD) NAAQS, five years of NWS meteorological data or at least one year of site-specific meteorological data are required.”

Item 1 of comment: The appendix includes separate discussions for the preliminary impact determination and full NAAQS modeling; therefore, there is no need to break the appendix into two separate appendices. No edits were made.

Item 2 of comment: This is general guidance. The ADMT’s goal was to keep the analyses as consistent as possible with the understanding that for each of these case-by-case reviews, there are going to be unique factors that may be considered when providing a demonstration. No edits were made.

Item 3 of comment: The terminology used throughout the document was consistent. The ADMT does not see any benefit in changing the title to reflect “federal” or “major”. No edits were made.

### **Red – A comment on the draft modeling guideline**

Thank you for the comment. No edits were made.

### **Song – Comments to the Draft Air Quality Modeling Guidelines**

Item 1 of comment: After the court decision to vacate the PM<sub>2.5</sub> SILs and SMCs, the ADMT wrote the guidance in Appendix A in anticipation that all SILs and SMCs would eventually need to be justified; however, the ADMT agrees that limiting the discussion to PM<sub>2.5</sub> would be less confusing. Edits to the appropriate sections have been made.

Item 2 of comment: The ADMT is aware that information in Step 2 of Appendix A is the same information that can be found in Appendix D. The information was included in Appendix A to be inclusive and to limit references to multiple sections throughout the guidance document. However, Step 2 will be edited based on item 1 above.

### **Guo – TCEQ Draft Modeling Guidance Comments**

Item 1 (Page 32: Downwash Applicability): This item poses a question that would be more appropriate to address during a case-by-case review as opposed to developing

general guidance. However, in response to the question, the documentation should be as detailed as necessary in order to support the demonstration. No edits were made.

Item 2 (Page 35: Appendix A – Justifying the Use of the Significant Impact Levels (SIL)): After the court decision to vacate the PM<sub>2.5</sub> SILs and SMCs, the ADMT wrote the guidance in Appendix A in anticipation that all SILs and SMCs would eventually need to be justified; however, the ADMT agrees that limiting the discussion to PM<sub>2.5</sub> would be less confusing. Edits to the appropriate sections have been made.

In regards to the 1-hr NO<sub>2</sub> and 1-hr SO<sub>2</sub> interim SILs, the applicant will still need to provide justification for the appropriateness of these values. This can be done by referencing the applicable EPA guidance documents.

Item 3 (Page 40: Appendix B – Federal and State Air Quality Standards): Edits to the tables in Appendix B have been made to reflect when SO<sub>2</sub> standards need to be addressed.

Item 4 (Page 42: Appendix C – Requesting the Information from APAD): It is the ADMT's understanding that information requests can be made online, by fax, or by email; however, the Information Resources Division should be contacted (512-239-DATA) to receive clarification on the appropriate methods since they manage the data. No edits were made.

Item 5 (Page 51: Appendix E – Minor and PSD NAAQS): The guidance document sufficiently addresses this comment. No edits were made.

Item 6 (Page 57: Appendix F – State Property Line Standard Analysis): This item poses a question that would be more appropriate to address during a case-by-case review as opposed to developing general guidance. However, in response to the question, the documentation should be as detailed as necessary in order to support the demonstration. No edits were made.

Item 7 (Page 69: Appendix J – Preferred Air Dispersion Models): The ADMT believes the guidance document sufficiently addresses this comment. No edits were made.

Item 8 (Page 79: Appendix M – Receptor Design): The guidance document sufficiently addresses this comment. This is general guidance. The ADMT's goal was to keep the analyses as consistent as possible with the understanding that for each of these case-by-case reviews, there are going to be unique factors that may be considered when providing a demonstration. Applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

Item 9: (Page 87: Appendix O – Meteorological Data): This item poses a question that would be more appropriate to address during a case-by-case review as opposed to developing general guidance. However, in response to the question, yes, they can be downloaded from the TCEQ website or they can be files that are generated by the applicant.

Item 10: (Page 97: Appendix R – Secondary Formation of PM<sub>2.5</sub>): Case I applies to minor NSR demonstrations.

Agree with the greater than/equal to recommendation. Edits to the appropriate sections have been made.

It is not clear from the comment what the “additional modeling burden” that will be imposed but based on the example provided by the commenter, Case 4 needs to have some sort of demonstration provided to address secondary formation of PM<sub>2.5</sub>.

Item 11: (Page 101: Appendix S – Additional Guidance for 1-hr NO<sub>2</sub> and 1-hr SO<sub>2</sub>): The guidance document sufficiently addresses this comment. However, in response to the question, the documentation should be as detailed as necessary in order to support the demonstration. No edits were made.

Item 12: (Additional Comments): The ADMT is unaware of any revisions to the Oil and Gas Standard Permit and Permit-By-Rule Refined Screening Modeling Guidelines as result of the ADMT’s modeling guidelines updates.

### **Texas Chemical Council – Comments on Draft AQM Guidelines**

Item 1: (Significant Impact Level (SIL) Justification): After the court decision to vacate the PM<sub>2.5</sub> SILs and SMCs, the ADMT wrote the guidance in Appendix A in anticipation that all SILs and SMCs would eventually need to be justified; however, the ADMT agrees that limiting the discussion to PM<sub>2.5</sub> would be less confusing. Edits to the appropriate sections have been made.

Item 2: (Minor NAAQS Analysis): The ADMT did not include the screening approach, commonly called the “90% rule,” for several reasons. First, there are not screening background concentrations for all pollutants and averaging times. The screening background concentrations that are available were developed in 1998 and have not been revised. Applicants in the past have misused this step by using actual monitoring data instead of the screening background concentrations. The screening approach was developed at a time when the models were not as sophisticated and processing took longer. With the advancements in technology and improvements in the models that are used that the screening approach is not necessary to include in the guidance. However, applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

Item 3: (Air Permit Allowable Database): The different averaging periods on the Modeling Request Form are there because an applicant could rely on an emission rate based on a specific averaging time. No edits were made.

Thank you for the suggestion on revisions and updates to APAD, but this comment is beyond the scope in regards to the modeling guidelines.

Item 4: (Class I Area Visibility and AQRV Analysis): Thank you for the suggestion, however, the applicant should coordinate with the appropriate FLM for a Class I area when addressing visibility requirements. No edits were made.

Item 5: (Secondary PM Emissions – Precursor Emissions below SERs): EPA has N/A for Case I and Case II because the emissions for the precursors are less than the SER. However, the TCEQ has a minor NSR program as a part of our SIP-approved program and have provided this guidance as a way to address secondary formation. No edits were made.

### **Zephyr – Comments to Draft Modeling Guideline 082914**

Item 1: (RE: Preliminary Impact Determination, Minor NAAQS Response (pages 20 and 21)): The characterization of the current guidance is not accurate. The screening step, commonly referred to as the “90% rule,” is based on screening background concentrations and not existing ambient air concentrations. In addition, the combination of the project plus screening background concentration is compared to 90% of the NAAQS and not the full NAAQS.

The ADMT did not include the screening approach for several reasons. First, there are not screening background concentrations for all pollutants and averaging times. The screening background concentrations that are available were developed in 1998 and have not been revised. Applicants in the past have misused this step, as noted above, by using actual monitoring data instead of the screening background concentrations. The screening approach was developed at a time when the models were not as sophisticated and processing took longer. The ADMT believes that with the advancements in technology and improvements in the models that are used that the screening approach is not necessary to include in the guidance. However, applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

Item 2: (RE: Analysis of the Ambient Air Quality; Step 2 (beginning page 36)): This is general guidance. The ADMT’s goal was to keep the analyses as consistent as possible with the understanding that for each of these case-by-case reviews, there are going to be unique factors that may be considered when providing a demonstration. No edits were made.

Item 3: (RE: Appendix C, Requesting Information from the Air Permits Allowable Database (page 41)): The ADMT is unaware of this issue. The Information Resource Division is responsible for maintaining the APAD database and should be contacted to address any complications with the retrieval process. No edits were made.

Item 4: (RE: Appendix C, Requesting Information from the Air Permits Allowable Database, Notes about APAD Data, What to do about data gaps in APAD (page 44)): Thank you for the suggestion, but this comment is beyond the scope in regards to the modeling guidelines. As noted in the comment, this information may be available within the GroupWise Remote Document Server as well as other agency databases. No edits were made.

Item 5: (RE: Appendix D, Representative Background Monitoring Concentrations, No Existing Ambient Monitoring Data for the County (pages 47 and 48)): Page 49 of the draft guidance document sufficiently addresses this comment. No edits were made.

Item 6: (RE: Appendix S, Additional Guidance for evaluation 1-hour Nitrogen Dioxide and 1-hour Sulfur Dioxide, Treatment of Intermittent Emissions for 1-hour NO<sub>2</sub> and 1-hour SO<sub>2</sub> NAAQS (pages 101 and 102)): This is general guidance. The ADMT's goal was to keep the analyses as consistent as possible with the understanding that for each of these case-by-case reviews, there are going to be unique factors that may be considered when providing a demonstration. Applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

### **American Electric Power Service Corporation – Comments of American Electric Power Service Corporation on Draft Revisions to Texas Air Quality Modeling Guidelines – APDG 6362**

Item 1: (Page 17 – Screening Modeling): This is general guidance. The ADMT's goal was to keep the analyses as consistent as possible with the understanding that for each of these case-by-case reviews, there are going to be unique factors that may be considered when providing a demonstration. Applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

Item 2: (Page 19 – Preliminary Impact Determination – Step 4): The statement referenced in the comment is supported by the example provided in the comment. However, edits were made to the appropriate sections to consider when a source operates at the maximum rate continuously.

Item 3: (Page 22 – State Property Line Step 1): It is unclear what the comment is meant to address. The State Property Line analysis is separate from a NAAQS demonstration. The significance thresholds for the 1-hr SO<sub>2</sub> and 1-hr NO<sub>2</sub> already follow EPA guidance for the SIL recommendations, which are based on a 4% value. No edits were made.

For the second part of the comment, the guidance document sufficiently addresses this comment. No edits were made.

Item 4: (Pages 39-40 Appendix B – Federal and State Air Quality Standards): In Table B-1, the ADMT agrees with the recommendation. Edits to the appropriate sections have been made.

In Table B-2, the “a” is meant to represent a footnote and edits to the appropriate sections have been made.

In Table B-3, the guidance document sufficiently addresses this comment in Appendix F. However, for additional clarification, a footnote has been added to the bottom of Table B-3.

Item 5: (Page 45 – Appendix D): The ADMT appreciates the support.

Item 6: (Page 52 – Preliminary Impact Determination – Particulate Matter (PM<sub>2.5</sub>): The guidance document sufficiently addresses this comment, particularly Appendix R. No edits were made.

Item 7: Page 54 – Full NAAQS Analysis – Particulate Matter (PM<sub>2.5</sub>): The guidance document sufficiently addresses this comment, particularly Appendix R. No edits were made.

Item 8: (Page 79 – Special Cases to consider when developing a receptor grid): This is general guidance. The ADMT's goal was to keep the analyses as consistent as possible with the understanding that for each of these case-by-case reviews, there are going to be unique factors that may be considered when providing a demonstration. No edits were made.

Item 9: (Page 85 – Terrain): For the first part of the comment, the guidance document sufficiently addresses this comment. No edits were made.

For the second part of the comment, ADMT appreciates the support.

Item 10: (Page 97 – Appendix R – Secondary Formation of Particulate Matter (PM<sub>2.5</sub>)): For the first part of the comment, the guidance document sufficiently addresses this comment. No edits were made.

For the second part of the comment, edits to the appropriate sections have been made based on current EPA guidance for PM<sub>2.5</sub> permit modeling.

### **Kennedy – Comment on Draft Air Quality Modeling Guidelines**

Item 1: This is general guidance. The ADMT's goal was to keep the analyses as consistent as possible with the understanding that for each of these case-by-case reviews, there are going to be unique factors that may be considered when providing a demonstration. Applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. However, edits were made to the appropriate section(s) in order to clarify that applicants have flexibility when addressing off-property sources.

### **Texas Industry Project – TIP Comments on Draft TCEQ Air Quality Modeling Guidelines 8-29-14**

Item 1: (Non-PM<sub>2.5</sub> Significant Impact Levels): After the court decision to vacate the PM<sub>2.5</sub> SILs and SMCs, the ADMT wrote the guidance in Appendix A in anticipation that all SILs and SMCs would eventually need to be justified; however, the ADMT agrees that limiting the discussion to PM<sub>2.5</sub> would be less confusing. Edits to the appropriate sections have been made.

Item 2: (Secondary PM<sub>2.5</sub> Issues, Part A – Precursor Emissions Below the SER): EPA has N/A for Case I and Case II because the emissions for the precursors are less than the SER. However, the TCEQ has a minor NSR program as a part of our SIP-approved

program and have provided this guidance as a way to address secondary formation. No edits were made.

Item 2: (Secondary PM<sub>2.5</sub> Issues, Part B – Qualitative Assessments): The guidance document sufficiently addresses this comment. No edits were made.

Item 3: (Effects Screening Levels): The guidance document sufficiently addresses this comment. The definition for ESL on page 9 of the draft guidelines contains the exact language requested in the comment. No edits were made.

Item 4: (Modeling Steps – Part A – Preliminary Impact Determination): For the first paragraph, this is general guidance. The ADMT's goal was to keep the analyses as consistent as possible with the understanding that for each of these case-by-case reviews, there are going to be unique factors that may be considered when providing a demonstration. No edits were made.

For the second paragraph, the guidance document sufficiently addresses this comment in Appendix E and Appendix I. The NAAQS and Increment sections of the main document also references the exceedance- and statistically-based standards. No edits were made.

For the third paragraph, it is incumbent on the applicant to determine the scope of the project with the permit reviewer. No edits were made.

For the fourth paragraph, the ADMT agrees and edits to the appropriate sections have been made.

Item 4: (Modeling Steps – Part B – State-Only Requirements): For the first paragraph, guidance document sufficiently addresses this comment. No edits were made.

For the second paragraph, the ADMT did not include the screening approach for several reasons. First, there are not screening background concentrations for all pollutants and averaging times. The screening background concentrations that are available were developed in 1998 and have not been revised. Applicants in the past have misused this step by using actual monitoring data instead of the screening background concentrations. The screening approach was developed at a time when the models were not as sophisticated and processing took longer. The ADMT believes that with the advancements in technology and improvements in the models that are used that the screening approach is not necessary to include in the guidance. However, applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

Item 4: (Modeling Steps – Part C – Air Permits Allowable Database): For the first paragraph, the different averaging periods on the Modeling Request Form are there because an applicant could rely on an emission rate based on a specific averaging time. No edits were made.

For the second paragraph, thank you for the suggestion on revisions and updates to APAD, but this comment is beyond the scope in regards to the modeling guidelines.

Item 4: (Modeling Steps – Part D – Advanced Modeling Techniques): This is general guidance. The ADMT's goal was to keep the analyses as consistent as possible with the understanding that for each of these case-by-case reviews, there are going to be unique factors that may be considered when providing a demonstration. Applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

Item 5: (Monitoring Data): The guidance document sufficiently addresses this comment. No edits were made.

Item 6: (PSD Additional Impacts Analysis): This is general guidance. The ADMT's goal was to keep the analyses as consistent as possible with the understanding that for each of these case-by-case reviews, there are going to be unique factors that may be considered when providing a demonstration. No edits were made.

Item 7: (PM<sub>2.5</sub> Secondary Formation Conversion Ratios): The guidance document sufficiently addresses this comment. Applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

Item 8: (Drafting Comments): No. 1 – This type of information is considered during a health effects review. No edits were made.

No. 2 – Thank you for the comment. No edits were made.

No. 3 – Thank you for the comment. No edits were made.

No. 4 – Thank you for the comment. No edits were made.

No. 5 – Thank you for the comment. No edits were made.

No. 6 – Agree. Edits to the appropriate sections have been made.

No. 7 – Agree. Appendix O was updated to reflect current guidance.

No. 8 – Agree. Edits to the appropriate sections have been made.

No. 9 – The ADMT is aware that information in Step 2 of Appendix A is the same information that can be found in Appendix D. The information was included in Appendix A to be inclusive and to limit references to multiple sections throughout the guidance document. No edits were made.

No. 10 – The ADMT believes the guidance document sufficiently addresses this comment. No edits were made.

No. 11 – Thank you for the comment. No edits were made.

No. 12 – Thank you for the comment. No edits were made.

No. 13 – This is general guidance. The ADMT's goal was to keep the analyses as consistent as possible with the understanding that for each of these case-by-case reviews, there are going to be unique factors that may be considered when providing a demonstration. Applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

## **Luminant – Comments on Draft TCEQ Modeling Guidance**

Item 1: (Minor NSR Modeling Methodology (p20-21)): The characterization of the current guidance is not accurate. This is general guidance. The ADMT's goal was to keep the analyses as consistent as possible with the understanding that for each of these case-by-case reviews, there are going to be unique factors that may be considered when providing a demonstration. Applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

Item 2: (PSD NAAQS Analysis Step 2 (p24)): Thank you for the comment. No edits were made.

Item 3: (PSD NAAQS Analysis Step 3 (p24)): Agree. Edits to the appropriate sections have been made.

Item 4: (Appendix C – Air Permits Allowable Database (APAD)(p41-44)): Part 1 (p41) – Thank you for the comment. No edits were made.

Part 2 (p43) – No, this is a continuing effort as projects are submitted. No edits were made.

Part 3 (p43) – This comment is beyond the scope in regards to the modeling guidelines. However, the pseudo-point parameters are used because they are conservative and allow the model-ready file to run. No edits were made.

Part 4 (p44) – Thank you for the suggestion on revisions and updates to APAD, but this comment is beyond the scope in regards to the modeling guidelines. No edits were made.

Item 5: (Appendix Q – Conducting an Ambient Ozone Impacts Analysis (p94-96)):  
Part 1 – Edits to the appropriate sections have been made.

Part 2 –The de minimis levels are relied upon to establish whether a source contributes to a violation. The EPA has not established a de minimis level for ozone. EPA has provided guidance on rounding conventions in their March 1, 2011 memo, “Additional Clarification Regarding Application of Appendix W Modeling Guidance for the 1-hour NO<sub>2</sub> National Ambient Air Quality Standard”. No edits were made.

Item 6: (Appendix R – Secondary Formation of Particulate Matter (PM<sub>2.5</sub>)): Agree. Edits to the appropriate sections have been made.

## **Z-Environmental – Comments on the TCEQ’s Draft Air Quality Modeling Guidance**

Item 1: (Page 15 Section III – Air Quality Analysis): The state property line analysis falls under the “protective of public health, general welfare, and physical property”. No edits were made.

Item 2: (Page 72 Source Types – Volume Sources): Agree. Edits to the appropriate sections have been made.

Item 3: (Page 73 Source Types – Open Pits): Agree. Edits to the appropriate sections have been made.

Item 4: (Page 90 Modeling Emissions Inventory): This is general guidance. Applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

Item 5: (II. Air Quality Analysis Report): Thank you for the comment. No edits were made.

Item 6: (III. Air Quality Analysis Protocol, Page 16 Air Quality Analysis Process): As stated in the guidance document, ideally the protocol will look just like the final AQA minus the modeling results. For additional examples, you may refer to the expanded outline from the 2014 Environmental Trade Fair at the following url:  
[www.tceq.texas.gov/permitting/air/guidance/newsourcereview/nsr\\_mod\\_guidance.html](http://www.tceq.texas.gov/permitting/air/guidance/newsourcereview/nsr_mod_guidance.html).  
No edits were made.

Item 7: (IV. Receptor Grid Development, Page 32 Receptor Design): Agree. Edits to the appropriate sections have been made.

Item 8: (IV. Receptor Grid Development, Page 33 Receptor Design): This is general guidance. Applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

Item 9: (V. Background Sources, Page 41 Appendix C – Requesting Information from the Air Permits Allowable Database (APAD)): Agree. Edits to the appropriate sections have been made.

Item 10: (V. Background Sources, Page 42 Notes about APAD data): Agree. Edits to the appropriate sections have been made.

Item 11: (V. Background Sources, Page 44 Notes about APAD data): Agree. Edits to the appropriate sections have been made.

Item 12: (Pages 5, 56, 101, and 102 Intermittent Sources): The guidance document sufficiently addresses this comment. No edits were made.

Item 13: (VI. Web Links, Page 41 Appendix C – Requesting Information from the Air Permits Allowable Database (APAD)): Agree. Edits to the appropriate sections have been made.

Item 14: (VI. Web Links, Page 44 Notes about APAD data): Agree. Edits to the appropriate sections have been made.

Item 15: (VI. Web Links, Page 76 Appendix L – Downwash Applicability): Agree. Edits to the appropriate sections have been made.

Item 16: (VI. Web Links, Page 84 LULC Analysis for AERMOD and AERSCREEN): Agree. Edits to the appropriate sections have been made.

Item 17: (VI. Web Links, Page 86 Terrain): Agree. Edits to the appropriate sections have been made.

Item 18: (VII. ESL Analyses, Page 22 Health Effects Analysis): Agree. Edits to the appropriate sections have been made.

Item 19: (VII. ESL Analyses, Page 23 Health Effects Analysis): Disagree, however, we believe the web link that was provided in the previous response is sufficient for obtaining the information that is requested in this comment. No edits were made other than the one noted above in Item 12.

Item 20: (VII. ESL Analyses, Page 59 Appendix G – Health Effects Analysis): Thank you for the suggestion, but this comment is beyond the scope in regards to the modeling guidelines. The applicant would need to coordinate with the Toxicology Division.

Item 21: (VIII. SILs, Page 35 Appendix A – Justifying the Use of the Significant Impact Levels): After the court decision to vacate the PM<sub>2.5</sub> SILs and SMCs, the ADMT wrote the guidance in Appendix A in anticipation that all SILs and SMCs would eventually need to be justified; however, the ADMT agrees that limiting the discussion to PM<sub>2.5</sub> would be less confusing. Edits to the appropriate sections have been made.

Item 22: (VIII. SILs, Page 35 Appendix A – Justifying the Use of the Significant Impact Levels): Thank you for the comment. No edits were made.

Item 23: (IX. State Property Line Analyses, Page 21 State Property Line Standard Analysis, Page 56 Appendix F – State Property Line Standard Analysis): Agree. Edits to the appropriate sections have been made.

Item 24: (IX. State Property Line Analyses, Page 22 Minor NAAQS Analysis – State Property Line Step 1): Agree. Edits to the appropriate sections have been made.

Item 25: (X. Downwash Analyses, Page 32 Downwash Applicability): Agree. Edits to the appropriate sections have been made.

Item 26: (X. Downwash Analyses, Page 76 Appendix L – Downwash Applicability): Agree. Edits to the appropriate sections have been made.

Item 27: (XI. PSD Analyses, Page 30 Class I Area Analysis): Added a link to a map of Class I areas in the appropriate section.

Item 28: (XI. PSD Analyses, Page 31 Class I Area Analysis – Visibility and AQRV Analysis): Thank you for the comment. No edits were made.

### **Sage Environmental Consulting – AQMG Comment Letter**

Item 1: (Modeling of Off-Property Sources): The ADMT did not include the screening approach for several reasons. First, there are not screening background concentrations for all pollutants and averaging times. The screening background concentrations that are available were developed in 1998 and have not been revised. Applicants in the past have misused this step by using actual monitoring data instead of the screening background concentrations. The screening approach was developed at a time when the models were not as sophisticated and processing took longer. The ADMT believes that with the advancements in technology and improvements in the models that are used that the screening approach is not necessary to include in the guidance. However, applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

Item 2: (Refining Background Concentrations): This is general guidance. The ADMT's goal was to keep the analyses as consistent as possible with the understanding that for each of these case-by-case reviews, there are going to be unique factors that may be considered when providing a demonstration. Applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

Item 3: (Ratio Techniques and Collocation): This is general guidance. The ADMT's goal was to keep the analyses as consistent as possible with the understanding that for each of these case-by-case reviews, there are going to be unique factors that may be considered when providing a demonstration. Applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

### **Spirit Environmental – Air Quality Modeling Guidelines – APDG 6232 (Public Comment Draft)**

Item 1: (Comments on General Content, Part a: Section III – Air Quality Analysis (Page 16)): The ADMT tries to be consistent in the review of modeling protocols and subsequent air quality analyses (AQA). However, the level of detail between protocols can vary. As additional details come in the AQA, it could impact what was proposed in the protocol. No edits were made.

Item 2: (Comments on General Content, Part b: Section IV – Screening Modeling (Page 17)): Agree. Edits to the appropriate sections have been made.

Item 3: (Comments on General Content, Part c: Section IV – Refined Modeling (Page 17)): Agreed. Edits to the appropriate sections have been made.

Item 4: (Comments on General Content, Part d: Minor NAAQS Step 3 (Page 21)): Thank you for the comment. No edits were made.

Item 5: (Comments on General Content, Part e: Minor NAAQS Step 4 (Page 21)): This is general guidance. Applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

Item 6: (Comments on General Content, Part f: Minor NAAQS Step 4 and Minor NAAQS Step 5 (Page 21)): This is general guidance. Applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

Item 7: (Comments on General Content, Part g: PSD NAAQS Step 1 (Pages 23 and 24)): Edits to the appropriate sections have been made.

Item 8: (Comments on General Content, Part h: PSD NAAQS Step 3 (Page 24)): This is general guidance. Applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

Item 9: (Comments on General Content, Part i: PSD NAAQS (Pages 24 and 25) and PSD Increment Step 5 (Pages 28 and 29)): Thank you for the comment. No edits were made.

Item 10: (Comments on General Content, Part j: PSD Increment Analysis (Page 26)): Please refer to the definitions in 40 CFR § 52.21. No edits were made.

Item 11: (Comments on General Content, Part k: Additional Impacts Analysis (Pages 29 and 30)): Thank you for the comment. No edits were made.

Item 12: (Comments on General Content, Part l: Receptor Design (Page 32)): This is general guidance. The ADMT's goal was to keep the analyses as consistent as possible with the understanding that for each of these case-by-case reviews, there are going to be unique factors that may be considered when providing a demonstration. Applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

Item 13: (Comments on General Content, Part m: Appendix A – Justifying the Use of Significant Impact Levels (Page 35)): Agree. Edits to the appropriate sections have been made.

Item 14: (Comments on General Content, Part n: Appendix A – Analysis of Ambient Air Quality (Pages 35 and 36)): The guidance document sufficiently addresses this comment. However, applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

Item 15: (Comments on General Content, Part o: Appendix C – Requesting Information from the Air Permits Allowable Database (Page 42)): Thank you for the suggestion, but this comment is beyond the scope in regards to the modeling guidelines.

Item 16: (Comments on Definitions, Part a: Class I area): Thank you for the comment. No edits were made.

Item 17: (Comments on Definitions, Part b: Class II area): Thank you for the comment. No edits were made.

Item 18: (Comments on Definitions, Part c: De minimis impact): Edits were made to the appropriate sections.

Item 19: (Comments on Definitions, Part d: Ground-Level Concentration (GLC)): Agree. Edits to the appropriate sections have been made.

Item 20: (Comments on Definitions, Part e: Minor): Please refer to the definitions in 30 TAC 116.400 (a)(1)(A). Edits to the appropriate sections have been made.

Item 21: (Comments on Definitions, Part f: Screening technique): Thank you for the comment. No edits were made.

Item 22: (Comments on Definitions, Part g: Single Property Line Designation): Thank you for the comment. No edits were made.

Item 23: (Comments on Grammar and Style, Part a): Thank you for the comment. No edits were made.

Item 24: (Comments on Grammar and Style, Part b): Thank you for the comment. No edits were made.

Item 25: (Comments on Grammar and Style, Part c): Agree. Edits to the appropriate sections have been made.

Item 26: (Comments on Grammar and Style, Part d): Agree. Edits to the appropriate sections have been made.

Item 27: (Comments on Grammar and Style, Part e): Agree. Edits to the appropriate sections have been made.

**Texas Oil & Gas Association Comments Draft Air Quality Modeling Guidance TCEQ – APDG 6232v2 (Draft 06/2014)**

Item 1: (General Comment): Thank you for the comment. No edits were made.

Item 2: (Page 9 Definition of Class II area): Agree. Edits to the appropriate sections have been made.

Item 3: (Page 12 Definition of Significant Monitoring Concentration (SMC)): Thank you for the comment. No edits were made.

Item 4: (Page 14 Authority for Requesting Air Quality Impacts Analysis): The guidance document sufficiently addresses this comment. No edits were made.

Item 5: (Page 15 Section III - Air Quality Analysis): The state property line analysis falls under the “protective of public health, general welfare, and physical property.” No edits were made.

Item 6: (Page 15 Section III – Air Dispersion Modeling): Modeling is just a tool that provides information to help with regulatory decisions. The wording that is used is consistent with EPA’s description of modeling. Therefore, the word “predicted” is appropriate and if the tool is used correctly, it should provide reasonable assurance that the analysis is protective provided the site operates within its permitted limits. Thank you for the comment. No edits were made.

Item 7: (Page 16 Air Quality Analysis Process): As stated in the guidance document, ideally the protocol will look just like the final AQA minus the modeling results. For additional examples, you may refer to the expanded outline from the 2014 Environmental Trade Fair at the following url:  
[www.tceq.texas.gov/permitting/air/guidance/newsourcereview/nsr\\_mod\\_guidance.html](http://www.tceq.texas.gov/permitting/air/guidance/newsourcereview/nsr_mod_guidance.html)  
No edits were made.

Item 8: (Page 16 Section III, Ambient Air Monitoring): Agree. Edits to the appropriate sections have been made.

Item 9: (Page 21, Minor NSR): This is general guidance. Applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

Item 10: (Page 21 State Property Line Standard Analysis – Page 56 Appendix F – State Property Line Standard Analysis): Agree. Edits to the appropriate sections have been made.

Item 11: (Page 22 Minor NAAQS Analysis – State Property Line Step 1): Agree. Edits to the appropriate sections have been made.

Item 12: (Page 22 Health Effect Analysis): Agree. Edits to the appropriate sections have been made.

Item 13: (Page 23 Health Effects Analysis): Disagree, however, we believe the web link that was provided in the previous response is sufficient for obtaining the information that is requested in this comment. No edits were made other than the one noted above in Item 12.

Item 14: (Page 24 PSD Air Quality Analysis): This is general guidance. Applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

Item 15: (Page 25 PSD Pre-application Analysis): Thank you for the comment. No edits were made.

Item 16: (Page 29 Additional Impact Analysis): Thank you for the comment. No edits were made; however, the growth analysis is required as part of the PSD review (40 CFR § 52.21(o)).

Item 17: (Page 30 Class I Area Analysis): Agree. Added a link to a map of Class I areas in the appropriate section.

Item 18: (Page 31 Class I Area Analysis – Visibility and AQRV Analysis): Thank you for the comment. No edits were made.

Item 19: (Page 32 Downwash Applicability): Agree. Edits to the appropriate sections have been made.

Item 20: (Page 32 Receptor Design): Agree. Edits to the appropriate sections have been made.

Item 21: (Page 33 Receptor Design): This is general guidance. Applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

Item 22: (Page 35 Appendix A – Justifying the Use of the Significant Impact Levels): After the court decision to vacate the PM<sub>2.5</sub> SILs and SMCs, the ADMT wrote the guidance in Appendix A in anticipation that all SILs and SMCs would eventually need to be justified; however, the ADMT agrees that limiting the discussion to PM<sub>2.5</sub> would be less confusing. Edits to the appropriate sections have been made.

Item 23: (Page 35 Appendix A – Justifying the Use of the Significant Impact Levels): Thank you for the comment. No edits were made.

Item 24: (Page 39 Appendix B – Federal and State Air Quality Standards): Thank you for the comment. No edits were made. The EPA revoked both the existing 24-hour and annual standards, however, they will remain in effect until one year after the effective date of the 1-hour SO<sub>2</sub> designations (40 CFR § 50.4 (e)).

Item 25: (Page 41 Appendix C – Requesting Information from the Air Permits Allowable Database (APAD)): Agree. Edits to the appropriate sections have been made.

Item 26: (Page 42 Notes about APAD data): Agree. Edits to the appropriate sections have been made.

Item 27: (Page 45 Representative Background Monitoring Concentrations): Thank you for the comment. No edits were made.

Item 28: (Page 44 Notes about APAD data): Agree. Edits to the appropriate sections have been made.

Item 29: (Page 49 Appendix D – Monitoring Background Refinement): Agree. Edits were made in the appropriate section to make it more broadly applicable.

Item 30: (Page 53 Appendix E Full NAAQS Analysis): This is general guidance. Applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

Item 31: (Pages 5, 56, 101, and 102 Intermittent Sources): The guidance document sufficiently addresses this comment. No edits were made.

Item 32: (Page 59 Appendix G – Health Effects Analysis): Thank you for the suggestion, but this comment is beyond the scope in regards to the modeling guidelines. The applicant would need to coordinate with the Toxicology Division.

Item 33: (Page 69 Appendix J – Preferred Air Dispersion Models): Thank you for the comment. No edits were made.

Item 34: (Page 72 Source Types – Volume Sources): Agree. Edits to the appropriate sections have been made.

Item 35: (Page 73 Source Types – Open Pits): Agree. Edits to the appropriate sections have been made.

Item 36: (Page 76 Appendix L – Downwash Applicability): Agree. Edits to the appropriate sections have been made.

Item 37: (Page 84 LULC Analysis for AERMOD and AERSCREEN): Agree. Edits to the appropriate sections have been made.

Item 38: (Page 86 Terrain): Agree. Edits to the appropriate sections have been made.

Item 39: (Page 88 Appendix P Reporting Requirements): Thank you for the comment. No edits were made.

Item 40: (Page 90 Modeling Emissions Inventory): This is general guidance. Applicants are free to propose alternative methods for demonstrating compliance that the TCEQ will consider. No edits were made.

Item 41: (Page 100 Appendix S Additional Guidance for Evaluating 1-hour Nitrogen Dioxide and 1-hour Sulfur Dioxide): Thank you for the comment. No edits were made. The TCEQ is still reviewing the recent guidance and plans to update the 1-hr NO<sub>2</sub> guidance accordingly.