



Alabama Department of Environmental Management  
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April 6, 2017

EPA Docket Center, WJC West Building  
Attention Docket ID No. EPA-HQ-OAR-2016-0751-0001  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

RE: Notice of Data Availability of the Environmental Protection Agency's Preliminary Interstate Ozone Transport Modeling Data for the 2015 Ozone National Ambient Air Quality Standard. Docket ID No. EPA-HQ-OAR-2016-0751-0001.

The Alabama Department of Environmental Management (ADEM) respectfully submits the following comments regarding the "Notice of Data Availability of the Environmental Protection Agency's Preliminary Interstate Ozone Transport Modeling Data for the 2015 Ozone National Ambient Air Quality Standards (NAAQS)" published in the Federal Register on January 6, 2017.


ADEM supports the use of an alternative threshold above the current 1 percent (0.7 ppb) threshold to evaluate the significance of a state's contribution to a downwind ozone issue. Under EPA's recent analysis of its 2016 draft Guidance on Significant Impact Levels (SIL) of Ozone and Fine Particles in the Prevention of Significant Deterioration Permitting Program, EPA has the flexibility to develop a threshold that matches modeling accuracy. The guidance itself states, "This technical analysis provides a basis for a permitting authority to conclude that concentration increases below this SIL do not cause or contribute to violations of the relevant NAAQS or PSD increments." ADEM requests that EPA consider whether an alternative threshold above 0.7 ppb is appropriate, given the complexity and uncertainty in modeling six-year projections for linkages across long distances for contributions virtually undetectable by monitors.

When calculating projected relative response factors (RRFs), EPA's modeling used the grid cell with the maximum 2011 value in the 3X3 array of cells surrounding the monitor instead of the grid cell that actually contains the monitor. It is ADEM's contention that the monitor grid cell value should be used for RRF calculations, based on the argument that this grid cell is the only one that can be validated by observed data. Further, using the maximum value in the 3X3 grid could not only change the monitor's status (nonattainment/maintenance) but could also change the contributing sources; all based on a concentration in a cell that cannot be validated.



Thank you for the opportunity to provide comments on this modeling.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ronald W. Gore".

Ronald W. Gore

Director, Air Division