



April 4, 2017

United States Environmental Protection Agency
Docket ID No. EPA-HQ-OAR-2016-0751

Subject: Preliminary Interstate Ozone Transport Modeling Data for the 2015 Ozone National Ambient Air Quality Standard – Notice of Data Availability

To Whom It May Concern:

Thank you for this opportunity to provide comments on the Preliminary Interstate Ozone Transport Modeling Data for the 2015 Ozone National Ambient Air Quality Standard (NAAQS) – Notice of Data Availability. The South Carolina Department of Health and Environmental Control (Department) is pleased to provide input to assist in the EPA's approach to interstate transport for the 2015 ozone NAAQS.

The Department has concerns about the EPA's continued use of the Integrated Planning Model (IPM) projections. The IPM projections have historically proven to include erroneous assumptions about the future use of electric generating units (EGU), including several errors in the most recent 2023 modeling results. The Department's review of the IPM 2023 assumptions revealed errors, including the exclusion of four (4) Winyah (ORIS ID 6249) coal burning units and the WS Lee boiler gas unit 3 (ORIS ID 3264), with no justification provided. These five units are currently in operation and there is no indication from the owners, either by notification to the Department or in the most recent Integrated Resource Plan, that these units are expected to go offline by the 2023 date. In addition, a new WS Lee combined cycle unit, scheduled to go online in 2017, is not included in the IPM 2023. Overall, the Department's comparison of overall 2023 NO_x emissions from the IPM indicates ten (10) percent lower emissions than predicted for South Carolina in the Eastern Regional Technical Advisory Committee (ERTAC) EGU model.

The Department acknowledges that South Carolina is responsible for providing its Good Neighbor State Implementation Plan (SIP) by October 26, 2018. Thus, accurate state modeling and a better understanding of the EPA's planning for interstate transport rule making are of utmost interest to the Department, as well as neighboring states. The Department agrees with other states in EPA Region 4

SCDHEC Comments

Docket ID No. EPA-HQ-OAR-2016-0751

April 4, 2017

that assumptions made by the EPA in its National Electric Energy Data System (NEEDS) used to produce its IPM results should be updated. The Department suggests the NEEDS database be updated to better reflect state utilities' plans for coal-to-gas conversion dates, and possible new plans for emissions controls, to enable the EPA and the states to meet these goals.

It is also reasonable to request the EPA to re-run its IPM modeling with more accurate data, such as a better reflection of planned EGU retirements, and the expansion of renewable energy projects. The use of more up-to-date data is likely to impact the projected design values for 2023. If each state is left to run its own modeling, the Department is concerned that timing and costs could hinder effective results and report sharing. This would likely affect the overall development of Good Neighbor SIP submittals in the region.

The Department is concerned with the EPA's significance level of a 1 percent (~ 0.7 ppb) threshold for the NAAQS to evaluate a state's contribution to downwind ozone problems. Instead, the Department suggests the EPA consider its 2016 draft Guidance on Significant Impact Levels (SIL) for Ozone and Fine Particles in the Prevention of Significant Deterioration Permitting Program. This document enables a permitting authority the basis to show concentrations below 1.0 ppb do not contribute to NAAQS or PSD violations.

In closing, the Department recommends the following to the EPA: 1) correct unit level data used in the IPM 2023 for all states, along with South Carolina, to include the four Winyah units and WS Lee Unit 3, 2) if possible, add a new 683 MW natural gas combined cycle unit for WS Lee, which should be operational in 2017 and so be reflected in the 2023 projections, 3) update its IPM modeling with more up-to-date and accurate data, 4) consider in the near future, the use of alternative, non-proprietary projection methodologies (e.g., ERTAC) for local and state air programs to utilize, 5) utilize a significance level of 1.0 ppb threshold for the NAAQS to assess a state's downwind ozone contribution, and 6) acknowledge that the EPA's data analysis will be defensible should the Department utilize it in the development of South Carolina's Good Neighbor SIP.

SCDHEC Comments
Docket ID No. EPA-HQ-OAR-2016-0751
April 4, 2017

Thank you again for the opportunity to comment on the Preliminary Interstate Ozone Transport Modeling Data for the 2015 Ozone National Ambient Air Quality Standard. If you have questions or need further information, please contact Robert J. Brown of my staff by telephone at (803) 898-4105 or e-mail at brownrj@dhec.sc.gov.

Respectfully,



Rhonda B. Thompson, P.E.,
Chief, Bureau of Air Quality

cc: Ms. Beverly Banister, Director,
Air, Pesticides and Toxics Management Division, EPA Region 4