



Alaska Oil and Gas Association



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Joshua M. Kindred, Environmental Counsel

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Environmental Protection Agency,
Attention Docket No. EPA-HQ-OAR-2015-0310
Mail code 28221T 1200
Pennsylvania Ave. NW.
Washington, DC 20460
Docket ID No. EPA-HQ-OAR-2015-0310-0001

Re: Comments on EPA Revision to the Guideline on Air Quality Models: Enhancements to the AERMOD Dispersion Modeling System and Incorporation of Approaches to Address Ozone and Fine Particulate Matter

Dear Sir/Madam:

The Alaska Oil and Gas Association (AOGA) appreciates the opportunity to submit comments in response to the July 29, 2015 Federal Register that proposes to revise the Guideline on Air Quality Models, enhance the AERMOD Dispersion Modeling System, and incorporate approaches addressing ozone and fine particulate matter. AOGA is a professional trade association whose members account for the majority of oil and gas exploration, development, production, transportation, and refining activities onshore and offshore in Alaska. AOGA and its members are longstanding supporters of responsible oil and gas leasing; exploration and development; and wildlife conservation, management and research. In accordance with those principles, AOGA submits this letter as an offer of support to the American Petroleum Institute's (API) substantive comments on the topics in question.

As an initial matter, AOGA does generally support the EPA's efforts to update the AERMOD modeling system, although it strongly encourages the EPA to consider modifications to the proposal as outlined in the API's comments and referenced below. AOGA also supports the EPA's proposal to make the AERMET and AERMOD low wind speed improvements as well as making NO₂ Tier 2 (ARM2) and Tier 3 (OLM, PVMRM) screening models regulatory default options. Finally, AOGA appreciates the EPA's efforts

regarding updates to the procedures for determining background concentrations, and hopes that the EPA will consider additional refinements as appropriate.

API's comments provide thorough and persuasive support for its contentions and recommendations. In an effort to refrain from offering duplicative and redundant arguments, AOGA would simply like to echo some of the broader concerns and issues associated with API's positions and recommended modifications to the EPA's proposals:

AOGA believes that the default minimum in-stack NO₂/NO_x ratio (ISR) of 0.5 is overly conservative as applied to the majority of sources. Accordingly, AOGA would ask the EPA to analyze available ISR data and appropriately define default minimum ISR's by source type.¹ The EPA should unequivocally allow for more representative NO₂/NO_x in-stack ratios to be used absent Model Clearinghouse approval.

AOGA is understandably apprehensive with the EPA's proposal to expand the official role of its Modeling Clearinghouse by mandating that all non-guideline modeling requests be approved through the Modeling Clearinghouse. If the EPA finalizes Appendix W as proposed, it will invariably result in substantial increases in non-guideline modeling approaches for both long-range transport modeling, single-source modeling of ozone, and secondary PM_{2.5} concentrations. As a result, AOGA is concerned that the Model Clearinghouse will, through no fault of its own, experience legitimate staffing issues as it attempts to digest the increase in review requests. AOGA believes that a significant and meaningful expansion in Model Clearinghouse resources or delegation of authority to the EPA Regions will be necessary in order to prevent permitting delays.²

Although the EPA proposal contemplates updates in determining background concentrations that constitute improvements to the process, AOGA believes that additional modifications would be beneficial. Specifically, AOGA would suggest the EPA consider allowing for the use of actual emissions for modeling background sources and, when appropriate, the use of monitoring to capture and characterize impacts of nearby sources.³

AOGA also advocates for the EPA to include a framework for implementing model changes on a timely basis in Appendix W. Although AERMOD has undergone numerous revisions, with some versions correcting fixes and others providing improved parameterizations over the past decade, the EPA's current approach dictates that new model capabilities be treated as "beta options" only permissible for use on a case-by-case basis until a formal modification to Appendix W is finalized. Quite simply, this approach lacks the malleability to properly capitalize on innovative improvements and the natural evolution in this arena. In order to improve the efficiency of modeling advances entering the regulatory system, AOGA encourages the EPA to develop a tiered structure for

¹ For more detailed analysis, please review section 2.2.1.1 of API's substantive comments.

² For more detailed analysis, please review section 5.1 of API's substantive comments.

³ For more detailed analysis, please review section 1.7 of API's substantive comments.

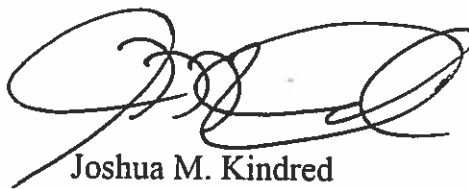
implementing model changes, which would streamline the process for incorporation of technical model advances while still allowing for meaningful public review.⁴

AOGA suggests that the EPA allow for consideration of emissions variability for New Source Review modeling, similar to the consideration provided for SO₂ nonattainment modeling. By way of example, the Emissions Variability Processor (EMVAP7) and the Transportable Variable Emissions Processor (TRANSVAP8) are available tools.⁵

Finally, in the original iteration of Appendix W, the EPA allowed permit applicants the ability to continue to use the previously preferred short-range model, ISC3, for a full year after promulgation. In doing so, the EPA acknowledged that any transition period provides an adjustment period for any new modeling process while sanctioning a continuation, without interruption, of a permitted activity already in progress. Understanding the value of that grace period, AOGA asks the EPA to assign the same one-year transition period to certain modeling approaches in the finalized Appendix W. In that vein, AOGA believes that the EPA should “grandfather” those modeling protocols associated with PSD permit applications already deemed complete. The EPA should provide that if modeling protocols using the procedures allowed before promulgation of a revised Appendix W, and up to one year following its effective date, are proposed and accepted, then those procedures will be permissible through the entirety of that permit application.⁶

Thank you again for the opportunity to submit this letter supporting API’s substantive comments. Should you have any questions please contact Joshua Kindred at 907-222-9604 or kindred@aoga.org.

Sincerely,



Joshua M. Kindred
Environmental Counsel
Alaska Oil & Gas Association

⁴ For a more detailed discussion of such a tiered approach, please review section 8.1 of API’s substantive comments.

⁵ For more detailed analysis, please review section 9.1 of API’s substantive comments.

⁶ For more detailed analysis, please review section 10 of API’s substantive comments.

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