

Region 7 comments (from Mark A. Smith)

We have reviewed the FAR version of the rule and we have concerns due to the inclusion of the second definition of *actual emissions* in the rule. The new definition of *actual emissions* applies specifically to increment modeling procedures which will codify procedures which allow for the use of long-term emission rates when modeling to verify compliance with increments with short-term averaging periods. In the case of short-term increments, the rule codifies procedures which provide permitting authorities discretion to calculate emission rates for short-term modeling by dividing the annual emission rate expressed in tons per year by the total annual hours of operation. Region 7 analysis of this procedure has shown the short-term increments can be significantly underestimated as a result and could change the outcome of increment modeling results which affect air pollution control decisions in PSD permits. The long term impact of this change to the PSD rules could result in permitted emissions causing or contributing to violations of the short-term PSD increments and national ambient air quality standards (NAAQS).

Since the inception of this rule, Region 7 has expressed its concern that codification of any procedures which allow for the use of long-term emission rates when modeling against short-term increments would not be reflective of the goal of the PSD program – to minimize the degradation of air quality and preserve the existing air quality in areas of the country that currently enjoy clean air.