

January 13, 2017

Mr. George Bridgers
Air Quality Modeling Group
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency (EPA)
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

Subject: Guidance on the Development of Modeled Emission Rates for Precursors (MERPs) as a Tier 1 Demonstration Tool for Ozone and PM_{2.5} under the PSD Permitting Program; Comment Period Extension Request

Dear Mr. Bridgers:

The Association of Air Pollution Control Agencies (AAPCA)¹ requests an extension of the public comment period for U.S. EPA's Guidance on the Development of Modeled Emission Rates for Precursors (MERPs) as a Tier 1 Demonstration Tool for Ozone and PM_{2.5} under the PSD Permitting Program (herein "MERPs Guidance").² Extending the comment period for this guidance for a minimum of two weeks, until at least February 17, 2017, would provide an opportunity for state and local air agencies to accommodate the current workload for their modeling personnel, helping to ensure substantive and meaningful feedback on this draft guidance.

EPA's draft MERPs Guidance was released December 2, 2016, and currently has a comment deadline of February 3, 2017.³ This period for review and comment overlaps with a number of EPA rulemakings and deadlines related to modeling, as well as three Federal holidays⁴ and the 2017 presidential inauguration and transition.

Many air agencies have been working to complete the modeling analysis due January 13, 2017 for the Data Requirements Rule for the 2010 1-Hour Sulfur Dioxide Primary National Ambient Air Quality Standards.⁵ Among other EPA actions,⁶ these agencies will need to simultaneously review the MERPs Guidance, EPA's Draft PM_{2.5} Precursor Demonstration Guidance (comment deadline of January 31, 2017),⁷ and EPA's final rule Revisions to the Guideline on Air Quality Models: Enhancements to the

¹ AAPCA is a national, non-profit, consensus-driven organization focused on assisting state and local air quality agencies and personnel with implementation and technical issues associated with the federal Clean Air Act. Twenty state environmental agencies currently sit on AAPCA's Board of Directors. AAPCA is housed in Lexington, Kentucky as an affiliate of The Council of State Governments. You can find more information about AAPCA at: <http://www.cleanairact.org>.

² https://www3.epa.gov/ttn/scram/guidance/guide/EPA454_R_16_006.pdf

³ MERPs Guidance, pg. 2.

⁴ A listing of Federal holidays can be found at: <https://www.opm.gov/policy-data-oversight/snow-dismissal-procedures/federal-holidays/#url=2017>.

⁵ <https://www.gpo.gov/fdsys/pkg/FR-2015-08-21/pdf/2015-20367.pdf>.

⁶ More information can be found in the [Fall 2016 Unified Agenda](#), the [White House Office of Information & Regulatory Affairs](#) (OIRA), and U.S. EPA's [Regulatory Development and Retrospective Review Tracker](#) and [Action Initiation Lists](#).

⁷ https://www.epa.gov/sites/production/files/2016-11/documents/transmittal_memo_and_draft_pm25_precursor_demo_guidance_11_17_16.pdf.

AERMOD Dispersion Modeling System and Incorporation of Approaches to Address Ozone and Fine Particulate Matter (“Appendix W”).⁸

The final Appendix W rule, which contains revisions to important modeling resources, was extensively delayed. U.S. EPA had projected release of the final rule as early as July 2016.⁹ EPA sent the final Appendix W rule to the White House Office of Information and Regulatory Affairs for Executive Order 12866 review on September 2, 2016, with the rule completing interagency review on November 30, 2016.¹⁰ U.S. EPA eventually released a pre-publication version to the public on December 21, 2016. Publication in the *Federal Register* is currently projected for January 17, 2017, with the rule becoming effective 30 days thereafter.¹¹

EPA’s revisions to Appendix W include a “tiered demonstration approach to address the secondary chemical formation of ozone and fine particulate matter (PM_{2.5}) associated with precursor emissions from single sources,”¹² with the MERPs Guidance “intended to provide a detailed framework that applicants may choose to apply, in consultation with the appropriate permitting authority, to estimate single-source impacts on secondary pollutants under the first tier approach.”¹³ The relationship between these two documents will require agencies to review them in conjunction in order to be fully informed prior to commenting. Several weeks elapsed between the release of the draft MERPs Guidance and EPA providing final Appendix W revisions to air agencies.

Lastly, EPA is holding a webinar on the MERPs Guidance on January 19,¹⁴ and has also indicated that the Agency intends to hold a webinar on Appendix W in early 2017. Adjusting the comment period would allow this valuable exchange of insight to inform substantive feedback to EPA.

Thank you for considering this request to extend the comment deadline for the MERPs Guidance to provide at least an additional two weeks for state and local agencies to review. If you have any questions regarding our request, please contact Clint Woods at cwoods@csg.org or (859) 244-8040.

Sincerely,

A handwritten signature in black ink that reads "Clinton J. Woods". The signature is written in a cursive, slightly slanted style.

Clinton J. Woods, Executive Director
AAPCA

⁸ https://www3.epa.gov/ttn/scram/appendix_w/2016/AppendixW_2016.pdf.

⁹ <https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=201604&RIN=2060-AS54>.

¹⁰ RIN: 2060-AS54.

¹¹ <https://www.federalregister.gov/documents/2017/01/17/2016-31747/guideline-on-air-quality-models-enhancements-to-aermod-dispersion-modeling-system-and-incorporation>.

¹² Appendix W, pre-publication version, pg. 1.

¹³ MERPs Guidance, pg. 4.

¹⁴ <https://www.epa.gov/scram>.