MEMORANDUM

SUBJECT: Status of Guidance for Ozone and PM2.5 Permit Modeling

FROM: Tyler Fox, Group Leader
Air Quality Modeling Group (C439-01)

TO: Final Regulatory Docket No. EPA-HQ-OAR-2015-0310

In its final revisions to the *Guideline on Air Quality Models* (*Guideline*), the Environmental Protection Agency (EPA) has promulgated the two-tiered demonstration approach for addressing single-source impacts on ozone and secondary PM2.5, as described in section 5 of the revised *Guideline*. The EPA has also released new technical guidance and updated previous technical guidance to assist stakeholders in conducting the appropriate Prevention of Significant Deterioration (PSD) compliance demonstrations. A draft of the *Guidance on the Development of Modeled Emission Rates for Precursors (MERPs) as a Tier 1 Demonstration Tool for Ozone and PM2.5 under the PSD Permitting Program* (EPA 454/R-16-006) is currently under review and comment, while an updated version of the *Guidance on the Use of Models for Assessing the Impacts of Emissions from Single Sources on the Secondarily Formed Pollutants Ozone and PM2.5* (EPA 454/R-16-005) was provided with this final rule. These revisions to the *Guideline* and supporting technical guidance are based on sound science and practical application of available models and tools to address single-source impacts on ozone and secondary PM2.5.

As part of this final rulemaking, the EPA committed to update its 2014 *Guidance for PM2.5 Modeling* (EPA-454/B-14-001) to reflect revisions to the *Guideline* and also incorporate appropriate sections for ozone through the release of a *Guidance for Ozone and PM2.5 Permit Modeling*. The EPA has completed updates to this technical guidance; however, an important aspect of this technical guidance is to provide a framework for permitting authorities to develop appropriate PSD compliance demonstrations consistent with the *Guidance on Significant Impact Levels for Ozone and Fine Particles in the Prevention of Significant Deterioration Permitting Program*. Given that the draft SILs guidance is currently being revised in consideration of public comments, the need for consistency has necessitated a delay. Instead, the EPA will be issuing a draft version of the *Guidance for Ozone and PM2.5 Permit Modeling* for public review and
comment within the next 30 days that will allow for input from the stakeholder community and for consistency with the final SILs guidance that is expected to be issued later this year.

Further questions about the draft guidance, please contact me directly, (919) 541-5562 or Fox.Tyler@epa.gov, or contact George Bridgers, (919) 541-5563 or Bridgers.George@epa.gov.