Appendix 5b - Additional BART information for ESSROC-Speed

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BEST AVAILABLE RETROFIT TECHNOLOGY APPLICABILITY ANALYSIS
AIR QUALITY MODELING PROTOCOL
ESSROC CEMENT CORPORATION – SPEED PLANT

SPEED, INDIANA

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1. INTRODUCTION

ESSROC Cement Corporation (ESSROC) operates a portland cement manufacturing facility in Speed, Indiana. ESSROC is currently operating in accordance with Indiana Department of Environmental Management (IDEM) Title V operating permit T019-6016-00008, issued on June 15, 2004. The current Title V permit expires June 15, 2009.

The facility is considered eligible to be regulated under the Best Available Retrofit Technology (BART) provisions of the Regional Haze Rule. Air quality modeling will be used to determine whether the emissions from ESSROC's BART-eligible emission units cause or contribute to visibility impairment at any federally protected Class I area, and hence whether a BART Determination is necessary. This modeling protocol is presented to describe the procedures, analytical techniques, and data resources ESSROC proposes to use to make the applicability determination. ESSROC's evaluation of BART-eligibility and the proposed modeling methods to determine applicability of BART as described in this protocol are consistent with the following guidance documents:

- U.S. EPA, "Regional Haze Regulations and Guideline for Best Available Retrofit Technology (BART) Determinations," *Federal Register* Volume 70, Number 128, July 6, 2005.
- U.S. EPA, *Guidance for Tracking Progress under the Regional Haze Rule* (EPA-54/B-03-004), September 2003.
- U.S. EPA, *Guidance for Estimating Natural Visibility Conditions under the Regional Haze Rule* (EPA-454/B-03-005), October 2003.
- U.S. EPA, *Interagency Workgroup on Air Quality Modeling (IWAQM) Phase 2 Summary Report* (EPA-454/R-98-019), December 1998.
- U.S. EPA, *Guideline on Air Quality Models*, 40 CFR Part 51, Appendix W (Revised, November 9, 2005).
- VISTAS, *Protocol for the Application of the CALPUFF Model for Analyses of Best Available Retrofit Technology (BART)*, *Revision 3.2*, August 31, 2006.
- VISTAS and U.S. EPA, "Q&A for Source by Source BART Rule" (Draft), October 28, 2005.
- MRPO, *Regional Haze and Visibility in the Upper Midwest, Final Draft*, September 1, 2001.
- MRPO, *Midwest Regional Planning Organization Modeling Protocol*, October 21, 2005.
- MRPO, *Single Source Modeling to Support Regional Haze BART Modeling Protocol*, March 21, 2006.

The *VISTAS BART Modeling Protocol* as revised on August 31, 2006, and the *Single Source Modeling to Support Regional Haze BART Modeling Protocol*, from this point forward referred to as the MRPO BART Modeling Protocol, are incorporated by reference for ESSROC's source-specific modeling analyses, and are presented in Appendix A and Appendix B of this modeling protocol document. This BART applicability modeling protocol is submitted to IDEM to provide the opportunity for review and comment in conjunction with review by the U.S. EPA and Federal Land

Managers (FLM) responsible for oversight of the federally-protected Class I area potentially affected by ESSROC's Speed BART-eligible operations. In addition to IDEM's review and comment on this protocol, ESSROC anticipates additional communication with IDEM throughout the BART implementation process as details become available between the time this modeling protocol is submitted and ESSROC's BART Applicability Analysis is submitted to ensure that modeling analyses are conducted using mutually agreeable data resources and processing options.

1.1 OVERVIEW OF REGIONAL HAZE RULE AND BART REQUIREMENTS

The Regional Haze Rule requires that major sources of visibility-affecting pollutants belonging to one or more of 26 specific industrial source categories evaluate BART if the source was "in existence" (i.e., built or reconstructed) before August 7, 1977, and began operation after August 7, 1962. Such sources are termed "BART-eligible sources." Major sources of visibility-affecting pollutants have the potential to emit 250 tons per year (tpy) of one or more of oxides of nitrogen (NO_X), sulfur dioxide (SO_2), volatile organic compounds (VOC), ammonia, and particulate matter less than 10 micrometers in aerodynamic diameter (PM_{10}). Hereafter, the "BART-eligible source" is taken to mean the collection of sources at a facility in existence during the relevant time period within one or more BART source categories that has potential emissions of one or more visibility-affecting pollutants in excess of 250 tpy. The BART-eligible source may include multiple emission units, but need not include the entire facility.

1.1.1 DETERMINATION OF BART-ELIGIBILITY

The U.S. EPA BART guidelines define the following three steps for determining which sources at a facility are BART-eligible:

1. Identify the emission units in the BART source categories,
2. Identify the start-up dates of those units, and
3. Compare potential emissions to the 250 tpy cutoff.

Portland cement plants are one of the listed source categories, and include all process operations that are considered to be part of Standard Industrial Classification 32 – Stone, Clay, Glass, and Concrete Products. ESSROC's Speed Plant has determined that 28 emission units comprise the BART-eligible source because the units operate at a Portland cement manufacturing plant, were in existence on August 7, 1977, and began operation after August 7, 1962.[1] The collection of emission units at the Speed Plant has potential emissions greater than 250 tpy of each of NO_X, SO_2, and PM_{10} and accordingly was evaluated to determine whether the units are exempt from BART or whether the units are subject to BART and thus require a BART determination. Specific information about these emission units is provided in Section 2 of this BART modeling protocol.

[1] Sources with the potential to emit less than 5 tpy of each visibility affecting pollutant (i.e. PM_{10}, NO_X, SO_2 or VOC) as well as sources that are insignificant under the Title V operating permit program were not considered in this analysis.

1.1.2 ASSESSMENT OF CONTRIBUTION TO VISIBILITY IMPAIRMENT AND BART APPLICABILITY

In its role as the technical analysis coordinator for the State of Indiana, MRPO developed a BART Modeling Protocol that was issued on March 21, 2006 to provide regional planning organization-specific data and techniques for completing BART exemption modeling. Since the Speed facility is also located on the fringe of the southeastern states RPO boundaries and because the meteorological domains developed by VISTAS overlap the Speed facility and adjacent Class I areas, VISTAS information will be utilized herein. For example, VISTAS developed a common modeling protocol and data resources for use by state regulatory agencies and BART-eligible sources. The final *VISTAS BART Modeling Protocol* was issued on December 22, 2005, and was revised most recently on August 31, 2006. It prescribes modeling techniques and data resources to conduct screening and refined analyses to assess whether a BART-eligible source is subject to BART. Since the VISTAS protocol is the most extensive set of prescribed modeling guidelines for BART exemption modeling and it follows EPA guidance on Regional Haze, the Speed facility has opted to utilize the modeling procedures set forth in *VISTAS BART Modeling Protocol*, except for where otherwise specified in the MRPO BART Modeling Protocol.

A BART-eligible source is determined to be subject to BART if the source causes or contributes to visibility impairment at a federally protected Class I area. Causation is defined as a single-source impact of 1.0 delta deciviews (Δdv, where delta means a source-specific impact compared to a natural background) or more; contribution is defined as a single-source impact of 0.5 Δdv or more (each evaluated on a 24-hour average basis). The deciview is a metric used to represent normalized light extinction attributable to visibility-affecting pollutants. To determine whether a BART-eligible facility causes or contributes to visibility impairment, U.S. EPA guidance requires the use of an air quality model, specifically recommending the CALPUFF modeling system, to quantify the impacts attributable to a single BART-eligible source. Because contribution to visibility impairment is sufficient cause to require a BART determination, 0.5 dv is the critical threshold for assessment of BART applicability.

Regional haze is measured using the light extinction coefficient (b_{ext}), which is expressed in terms of the haze index expressed in dv. The haze index (*HI*) is calculated as shown in the following equation.

$$HI = 10 \ln\left(\frac{b_{ext}}{10}\right)$$

Since BART-applicability is based on source-specific visibility impacts compared to the visibility impairment associated with a natural background, both the source's visibility impacts as well as the natural background visibility must be determined. This requires the determination of a source-specific light extinction coefficient and the light extinction coefficient associated with a natural background.

The source-specific light extinction coefficient, $b_{ext,source}$, is affected by particulate species either directly emitted from a source or formed as a result of emissions directly emitted from a source (precursor emissions), including sulfates (SO_4), nitrates (NO_3), coarse particulate matter (PMC), fine particulate matter (PMF), secondary organic aerosols (SOA), and elemental carbon (EC). The source-specific light extinction coefficient is calculated as shown in the following equation:

$$b_{ext,source}\left(Mm^{-1}\right) = b_{SO_4} + b_{NO_3} + b_{PMC} + b_{PMF} + b_{SOA} + b_{EC}$$

where,

$b_{SO_4} = 3 * [(\mathrm{NH}_4)_2\mathrm{SO}_4] * f(RH)$

$b_{NO_3} = 3 * [\mathrm{NH}_4\mathrm{NO}_3] * f(RH)$

$b_{PMC} = 0.6 * [\text{Coarse Particulate Matter}]$

$b_{PMF} = 1 * [\text{Fine Particulate Matter}]$

$b_{SOA} = 4 * [\text{Organic Condensable Particulate Matter}]$

$b_{EC} = 10 * [\text{Elemental Carbon}]$

$[\ ] = \text{Concentration in } \mu\text{g/m}^3$

The background light extinction coefficient, $b_{\text{ext, background}}$, is affected by various particulate species that exist naturally in the atmosphere and the Rayleigh scattering phenomenon. The background light extinction coefficient is calculated as shown in the following equation.

$$b_{back}\,(Mm^{-1}) = b_{SO_4} + b_{NO_3} + b_{OC} + b_{Soil} + b_{Coarse} + b_{EC} + b_{Ray}$$

where,

$b_{SO_4} = 3 * [(\mathrm{NH}_4)_2\mathrm{SO}_4] * f(RH)$

$b_{NO_3} = 3 * [\mathrm{NH}_4\mathrm{NO}_3] * f(RH)$

$b_{OC} = 4 * [\mathrm{OC}]$

$b_{Soil} = 1 * [\text{Soil}]$

$b_{Coarse} = 0.6 * [\text{Coarse Mass}]$

$b_{EC} = 10 * [\text{Elemental Carbon}]$

$b_{Ray} = 10\ Mm^{-1}$

$[\ ] = \text{Concentration in } \mu\text{g/m}^3$

Values for the parameters listed above that are specific to the natural background conditions at the Class I areas considered in this analysis are provided on an annual average basis in the U.S. EPA's *Guidance for Estimating Natural Visibility Conditions Under the Regional Haze Rule*.[2] Detailed information about the natural background conditions considered in this modeling analysis for the operations at the Speed Plant is provided in Section 3.5 of this protocol.

[2] U.S. EPA, *Guidance for Estimating Natural Visibility Conditions Under the Regional Haze Rule*, Table 2-1, Attachment A, September 2003, EPA-454/B-03-005.

ESSROC proposes to utilize screening modeling techniques and, if necessary, refined modeling techniques to determine whether BART-eligible operations at the Speed Plant contribute to visibility impairment at any Class I areas. The CALPUFF modeling system will be used to compute the 24-hour average visibility impairment attributable to ESSROC to assess whether the 0.5 dv contribution threshold is exceeded, and if so, the frequency, duration, and magnitude of any exceedance events. The VISTAS refined approach prescribes that the 98th percentile impact be evaluated in refined analyses as the eighth-highest, 24-hour average, visibility impact of each of three years modeled, or the 22nd-highest, 24-hour average, visibility impact over the three years modeled, whichever is more conservative. This impact is generally represented as the highest, 24-hour average, impact at any receptor in the Class I area on the day. To assess whether BART-eligible operations contribute to visibility impairment, ESSROC's applicability modeling analysis will quantify the top eight, 24-hour average, visibility impacts of each year modeled to illustrate the distribution (i.e., frequency, duration, and magnitude) of peak visibility impairment episodes attributable to the Speed Plant. This method is identical to that provided in the MRPO BART Modeling Protocol with the lone exception that if actual annual emissions were modeled, then the peak, or maximum, impact must be less than 0.5 dv for a source to be deemed exempt from a BART determination. Also, the use of the peak impact as mentioned in the MRPO BART Modeling Protocol was intended for 36-km grid resolution model runs. Since ESSROC proposes to perform refined modeling, 12-km and potentially 4-km grid resolution runs, the 98th percentile impact is the more appropriate visibility metric. Note that VISTAS adopted a similar approach for refined modeling, 4-km grid resolution, since 12-km grid resolution data was the coarsest grid utilized in BART exemption modeling.

CALPUFF is a refined air quality modeling system that is capable of simulating the dispersion, chemical transformation, and long-range transport of multiple visibility-affecting pollutant emissions from a single source and is therefore preferred for BART applicability and determination analyses. The CALPUFF modeling system is described in technical detail in the *VISTAS BART Modeling Protocol* and its use in screening and refined analyses for BART applicability assessment of ESSROC's Speed Plant is described in Sections 3, 4, and 5 of this modeling protocol.

The *VISTAS BART Modeling Protocol* specifies that all Class I areas within 300 km of a BART-eligible source must be initially evaluated to determine whether the source contributes to visibility impairment. For site-specific modeling not conducted by the state, IDEM has suggested a similar approach be taken for modeling BART-eligible sources in Indiana[3]. Table 1-1 summarizes the distances separating the Speed Plant from all Class I areas within the VISTAS region and adjacent states. Consistent with the *VISTAS BART Modeling Protocol*, only those Class I areas within 300 km are considered further in the BART applicability modeling analysis.

[3] Per conversation between Trinity Consultants and Mark Derf of IDEM on October 31, 2006, sources conducting screening (12 km grid scale) or refined (4 km grid scale) site-specific modeling should only consider Class I areas within 300 km of the BART-eligible source.

TABLE 1-1. DISTANCES (KILOMETERS) SEPARATING CLASS I AREAS AND ESSROC'S SPEED PLANT

Class I Area	Distance (km)
Breton	972
Cape Romain	816
Chassahowitzka	1109
Cohutta	392
Dolly Sods	551
Everglades	1456
Great Smokey Mountains	347
Hercules Glade	653
James River Face	553
Joyce Kilmer	361
Linville Gorge	434
Mammoth Cave	**130**
Mingo	416
Okefenokee	874
Otter Creek	525
Shenandoah	601
Shining Rock	417
Sipsey	471
St. Marks	929
Swanquarter	891
Wolf Island	879

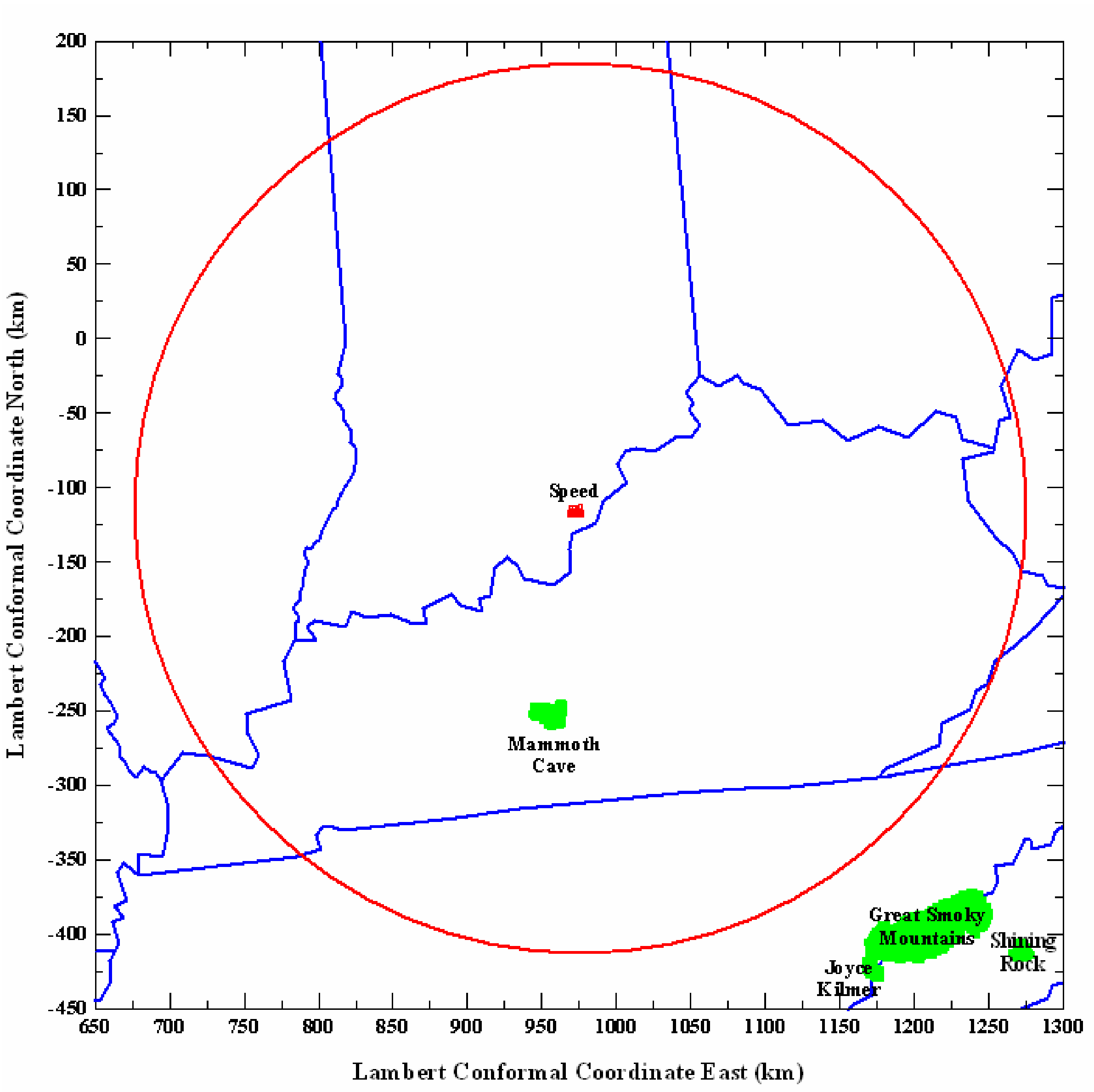
Figure 1-1 illustrates the location of ESSROC's Speed operations relative to the federally protected Class I area that is located within 300 km of the Speed Plant:

- Mammoth Cave National Park, approximately 130 km to the south of the facility in central Kentucky

The locations of Class I areas and receptor locations evaluated in the modeling analysis were determined by, and obtained from, the U.S. National Park Service and the U.S. Forest Service, which are the FLMs for the national parks and wilderness areas, respectively.[4]

[4] National Park Service compilation of Class I area receptors, http://www2.nature.nps.gov/air/maps/receptors/.

FIGURE 1-1. LOCATION OF ESSROC'S SPEED PLANT RELATIVE TO CLASS I AREAS WITHIN 300 KM



The initial screening analysis results will be used to demonstrate whether refined analysis is necessary for Mammoth Cave National Park. ESSROC will initially conduct screening modeling of visibility impacts at the lone Class I area within 300 km, but also anticipates possibly conducting refined modeling as described in this modeling protocol.

1.2 SCHEDULE FOR BART IMPLEMENTATION IN INDIANA

Each state will establish its own schedule for BART implementation, which includes separate deadlines for BART applicability assessment and determination protocols and final reports. Per previous conversations with IDEM, there is not a deadline for exemption modeling at this time; however, ESSROC will complete any BART exemption modeling in a timely manner after receiving comments on this modeling protocol.

1.3 ORGANIZATION OF MODELING PROTOCOL

The remainder of this modeling protocol is organized as follows.

- Section 2 describes the BART-eligible emission units at the Speed Plant and the emission rates to be modeled in the BART applicability analysis.
- Section 3 describes the procedural and technical guidance for conducting Class I area analyses.
- Section 4 describes the proposed approach for CALPUFF modeling, including the data resources and technical modeling options to be used in the CALMET, CALPUFF, and CALPOST analyses.
- The presentation of results from, and quality assurance techniques for, BART applicability modeling analyses are described in Section 5.

The air quality modeling analysis methodology will generally conform to the *VISTAS BART Modeling Protocol* and the MRPO BART Modeling Protocol, which are provided in Appendix A and Appendix B of this report for reference.

2. BART-ELIGIBLE SOURCE DESCRIPTION

This section of the modeling protocol describes the emission units that comprise the BART-eligible source at ESSROC's Speed Plant. Emissions and exhaust characteristics of each emission unit are quantified to demonstrate how each unit will be represented in the modeling analysis.

2.1 BART-ELIGIBLE EMISSION UNITS

ESSROC reviewed the criteria for BART-eligibility and determined that the emission units at the Speed Plant summarized in Table 2-1 are BART-eligible.[5] Potential emissions of PM_{10} are based on the 2005 EI for ESSROC's Speed Plant.

TABLE 2-1. POTENTIAL EMISSIONS FROM BART-ELIGIBLE EMISSION UNITS AT ESSROC'S SPEED PLANT[6]

Emission Unit ID	EU Description	Year Constructed	Potential Emissions (tpy)			
			NO_x	SO_x	PM_{10}	VOC
EU08	clay crusher	1977	--	--	8.45	--
EU09	C-15 covered conveyor (clay)	1977	--	--	17.46	--
EU109	hopper (raw mill)	1976	--	--	TBD	--
EU124	south reclaim clinker covered conveyor	1971	--	--	5.07	--
EU125	truck loading station	1971	--	--	TBD	--
EU126	truck unloading station	1971	--	--	TBD	--
EU132	finish mill feed belt	1977	--	--	TBD	--
EU135	Gypsum elevator (2D finish mill)	1964	--	--	5.86	--
EU14	Loesche raw mill	1977	--	--	270.31	--
EU146	CKD/Lime tank	1964	--	--	6.76	--
EU16	blend silo #1	1971	--	--	10.59	--
EU17	blend silo #2	1977	--	--	15.20	--
EU19	feed system for kiln #1	1971	--	--	6.42	--
EU20	kiln #1	1971	1576.80	4835.52	133.39	6.75
EU22	cooler #1	1971	--	--	20.65	--

[5] Emission units having a potential to emit of less than 5 tpy of each visibility affecting pollutant will not be considered in BART exemption modeling analyses should IDEM or MRPO require the modeling of speciated particulate matter.

[6] Note the Speed Plant is seeking plantwide applicability limitations (PALs) for emissions of nitrogen oxides (NO_x) and sulfur dioxide (SO_2). These limits are 2,681 tpy of NO_x and 4,129 tpy of SO_2.

Emission Unit ID	EU Description	Year Constructed	Potential Emissions (tpy)			
			NO_x	SO_x	PM_{10}	VOC
EU23	#1 clinker drag conveyor (clinker)	1971	--	--	5.63	--
EU27[7]	kiln #2	1977	2023.56	7936.56	185.49	75.79
EU29	cooler #2	1977	--	--	36.37	--
EU30	#2 clinker drag conveyor (clinker)	1977	--	--	5.52	--
EU33	covered incline belt (clinker)	1972	--	--	5.63	--
EU35	gypsum/stone transfer circuit	1964	--	--	14.87	--
EU36	clinker transfer circuit ABC mills	1964	--	--	5.29	--
EU37	elevators (2ABC finish mill)	1969	--	--	5.01	--
EU47	finish mill circuit 2D	1964	--	--	52.98	--
EU50	502 silos	1966	--	--	5.26	--
EU54	501 silos	1965	--	--	21.93	--
EU66	coal crusher mill #1	1971	--	--	11.96	--
EU67	coal crusher mill #2	1977	--	--	26.47	--
EU96	Truck Dump Hopper	1977	--	--	TBD	--
EU97	Limestone Conveyor	1977	--	--	TBD	--

Based on conversations with IDEM staff, ESSROC understands that VOC, ammonia, and PM_{10} emissions will not be required in the applicability modeling. As such, subsequent analyses using CALPUFF will not include VOC, ammonia, or PM_{10} emissions; however, ESSROC has provided estimates for the potentials emission of VOC and PM_{10} from each BART-eligible emission unit and reserves the right to refine the emission rates presented in Table 2-1.[8]

2.2 BART-ELIGIBLE SOURCE MODEL EMISSIONS INVENTORY

Whereas the BART eligibility determination relies on potential emissions of visibility-affecting pollutants, the BART applicability modeling analysis utilizes maximum actual 24-hour average emission rates of visibility affecting pollutants (i.e. NO_X, SO_2). Although not specified in the MPRO Protocol, the *VISTAS BART Modeling Protocol* specifies the following hierarchy of information resources to establish the maximum actual 24-hour average emission rate for BART applicability modeling over the prior three-to-five year period:

[7] Kiln #2 system also includes a bypass stack. This bypass stack operates intermittently and for practical purposes of this analysis it is reasonable to assume that the maximum average daily emissions from Kiln #2 for the purposes of this modeling analysis are representative of when the bypass stack is in operation

[8] Per conversation between Trinity Consultants and Mark Derf of IDEM on December 1, 2006, sources conducting CALPUFF site-specific modeling should only model emissions of NO_x and SO_x. All other pollutants (VOC, PM_{10}, etc.) will initially be analyzed by the RPO using CAMx.

- 24-hour maximum emissions observed using a Continuous Emission Monitor (CEM) for the period 2001 through 2003
- 24-hour maximum emissions observed using a CEM for any representative period
- facility stack test emissions
- Potential to emit
- Permit allowable emissions
- Emissions factors from U.S. EPA *AP-42* source profiles

The MRPO confirms this hierarchy in the MRPO BART Modeling Protocol by stating:

> *"States will use the 24-hr maximum emissions rate between 2002 and 2004. If this data is not available, then a short term "allowable" or "potential" emission rate of emissions between 2002-2004 will be used. If neither of these types of emission rates is available, then the highest actual annual emissions divided by hours of operation of NO_x, SO_x, and primary PM between 2002 and 2004 will be applied in CALPUFF."*

As previously stated, MRPO is performing modeling to determine whether VOC, ammonia, and PM emissions need to be considered for BART analyses. Per guidance from IDEM, ESSROC will only model emissions of NO_x and SO_x from the two cement kilns. The modeled NO_x and SO_x emissions will be derived from site-specific CEM data for the two kilns. ESSROC will ensure that the pollutant emission rates used are as representative as possible of a maximum actual 24-hour average emission rate.

Modeling of visibility impairment requires that the components of the exhaust stream be speciated because different types of particulate matter affect visibility to varying extents. As such, if particulate matter were to be modeled, then additional data beyond the CEMS data will be needed for visibility modeling. The amount by which a mass of a certain species scatters or absorbs light is termed the *extinction efficiency* or *extinction coefficient*, and ranges from values of 0.6 m^2/g for coarse particulate matter to 10 m^2/g for elemental carbon. Fine particulate matter (1 m^2/g) and organic aerosols (4 m^2/g) scatter light with intermediate efficiencies, and ammonium sulfate and ammonium nitrate (that forms from precursor SO_2 and NO_X emissions in the presence of ambient ammonia) are hygroscopic species that are particularly efficient light scatters in the presence of ambient water vapor (3f(RH) m^2/g, where f(RH) is a function of the relative humidity). The size distribution of particle species is also important, since smaller particles may be transported longer distances than larger particles and dispersed differently under prevailing ambient conditions. Figure 2-1 depicts the speciation of visibility-affecting pollutant emissions as represented in the *VISTAS BART Modeling Protocol*.

FIGURE 2-1. PARTICULATE MATTER SPECIATION (AFTER FIGURE 4-3 OF THE *VISTAS BART MODELING PROTOCOL*)

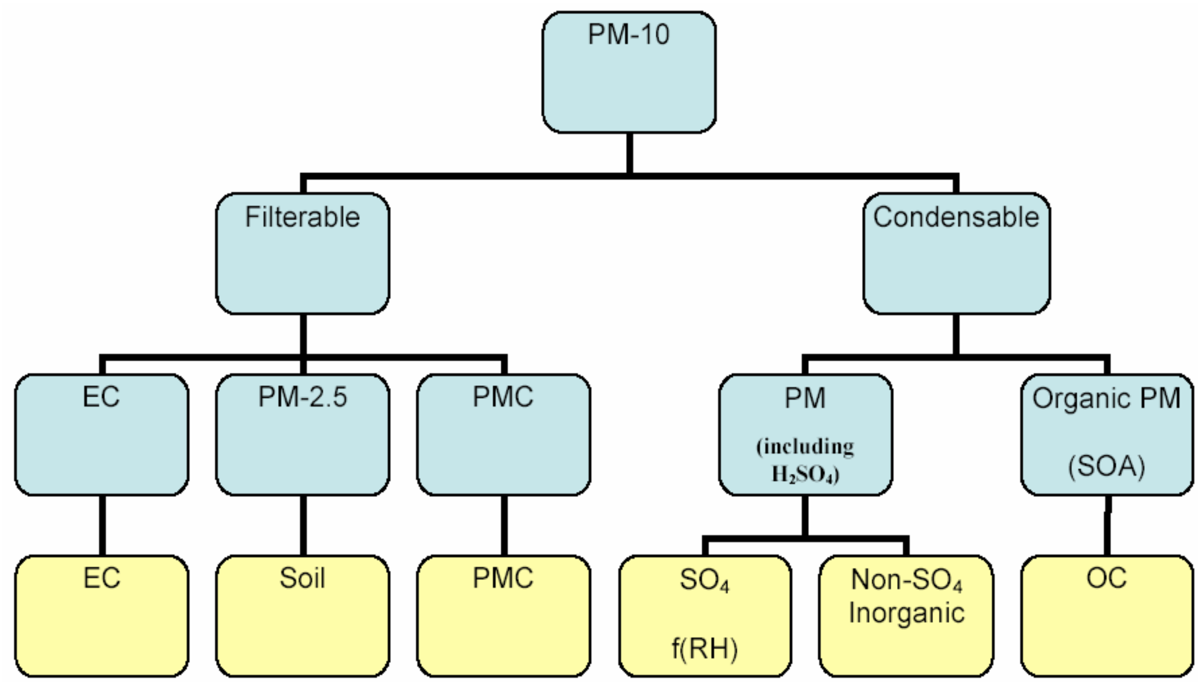


Table 2-3 gives definitions for the nomenclature used to describe speciated emissions.

TABLE 2-3. NOMENCLATURE FOR EMISSIONS SPECIATION ANALYSIS

Nomenclature	Description
TSP	Total suspended particulate, filterable PM with an aerodynamic diameter < 30 μm
PM_{10}	Filterable particulate matter with an aerodynamic diameter < 10 μm
PM_{6-10}	Filterable particulate matter with an aerodynamic diameter > 6 and < 10 μm
$PM_{2.5-6}$	Filterable particulate matter with an aerodynamic diameter > 2.5 and < 6 μm
$PM_{2.5}$	Filterable particulate matter with an aerodynamic diameter < 2.5 μm
$PM_{1.25-2.5}$	Filterable particulate matter with an aerodynamic diameter > 1.25 and < 2.5 μm
$PM_{1-1.25}$	Filterable particulate matter with an aerodynamic diameter > 1.0 and < 1.25 μm
$PM_{0.625-1}$	Filterable particulate matter with an aerodynamic diameter > 0.625 and < 1.0 μm
$PM_{0.5-0.625}$	Filterable particulate matter with an aerodynamic diameter > 0.5 and < 0.625 μm
PMC	Filterable Coarse particulate matter
PMF	Filterable Fine particulate matter
EC	Elemental carbon
CPM	Condensable particulate matter (organic and inorganic)
NO3	Inorganic Nitrate CPM
SO4	Inorganic Sulfate CPM
POC	Primary organic condensable emissions
PIC	Primary non-hygroscopic inorganic condensable emissions (non sulfate)
TPM_{10}	Filterable PM_{10} + CPM
$TPM_{2.5}$	Filterable $PM_{2.5}$ + CPM

Should the modeling of particulate matter be necessary, Table 2-4 summarizes the grouping of PM species and extinction coefficient of each component described in the *VISTAS BART Modeling Protocol*.

TABLE 2-4. ASSIGNMENT OF EMITTED PM SPECIES TO MODELED PM CATEGORIES

Modeled PM Category[1]	Components	Output Category[2]	Extinction Coefficient (m^2/g)
PMC	Filterable coarse particles (PM_{6-10}, $PM_{2.5-6}$)	PMC	0.6
PMF	Filterable fine particles ($PM_{1.25-2.5}$, $PM_{1-1.25}$, $PM_{0.625-1}$, $PM_{0.5-0.625}$)	SOIL	1
PIC	Non-hygroscopic, non-sulfate primary inorganic condensable (PIC) emissions	SOIL	1
SO4	Primary inorganic condensable emissions of sulfates	SO4	3*f*(RH)
POC	Primary organic condensable emissions	SOA	4
EC	Uncombusted carbonaceous fuel	EC	10

1 Modeled PM Category denotes the input of emissions data into CALPUFF.
2 Output Category denotes the assignment of modeled emissions in POSTUTIL for the visibility calculations in CALPOST.

2.3 MODELED STACK PARAMETERS AND EMISSIONS

Actual stack parameters will be input to the CALPUFF model to represent the point of visibility-affecting pollutant emissions. As described earlier in this section, ESSROC will work to determine the most appropriate emission rates for this BART modeling analysis. The location of each point source will be represented consistently in the Lambert Conformal Coordinate system used for the screening and refined meteorological data analyses prepared by VISTAS. Each exhaust discharges vertically without obstruction. Since the nearest Class I area is located more than 100 km from the facility, effects of building downwash will not be considered in this modeling analysis per the MRPO BART Modeling Protocol. Table 2-5 summarizes the stack parameters for BART-eligible emission units at ESSROC's Speed Plant. As will be discussed later, the stack associated with EU27 is actually 65.5 meters in height; however, it will be modeled with a stack height of 213 ft (65 m) to comply with the definition of GEP stack height.

TABLE 2-5. STACK PARAMETERS FOR BART-ELIGIBLE EMISSION UNITS

Emission Unit ID	LCC East (km)	LCC North (km)	Base Elevation (ft)	Stack Height (ft)	Exhaust Temperature (°F)	Exhaust Velocity (ft/s)	Stack Diameter (ft)
EU20	972.072	-115.597	450	120	465	72.7	8
EU27	972.072	-115.597	453	213	300	53.5	9.75

3. GEOPHYSICAL AND METEOROLOGICAL DATA

Section 3 of this BART applicability modeling protocol for ESSROC's Speed facility describes the geophysical and meteorological data that will be used in the screening and any necessary refined analyses. The information in Section 3 is largely adapted from the *VISTAS BART Modeling Protocol*, which is presented in Appendix A of this source-specific protocol for reference, the MRPO BART Modeling Protocol, which is included as Appendix B, and sample model files made available on the VISTAS technical contractor website.[9]

CALMET requires geophysical data about the domain to characterize the terrain and land use parameters that potentially affect dispersion. Terrain features affect flows and create turbulence in the atmosphere and are potentially subjected to higher concentrations of elevated puffs, and different land uses exhibit variable characteristics such as surface roughness, albedo, Bowen ratio, and leaf-area index that also affect turbulence and dispersion.

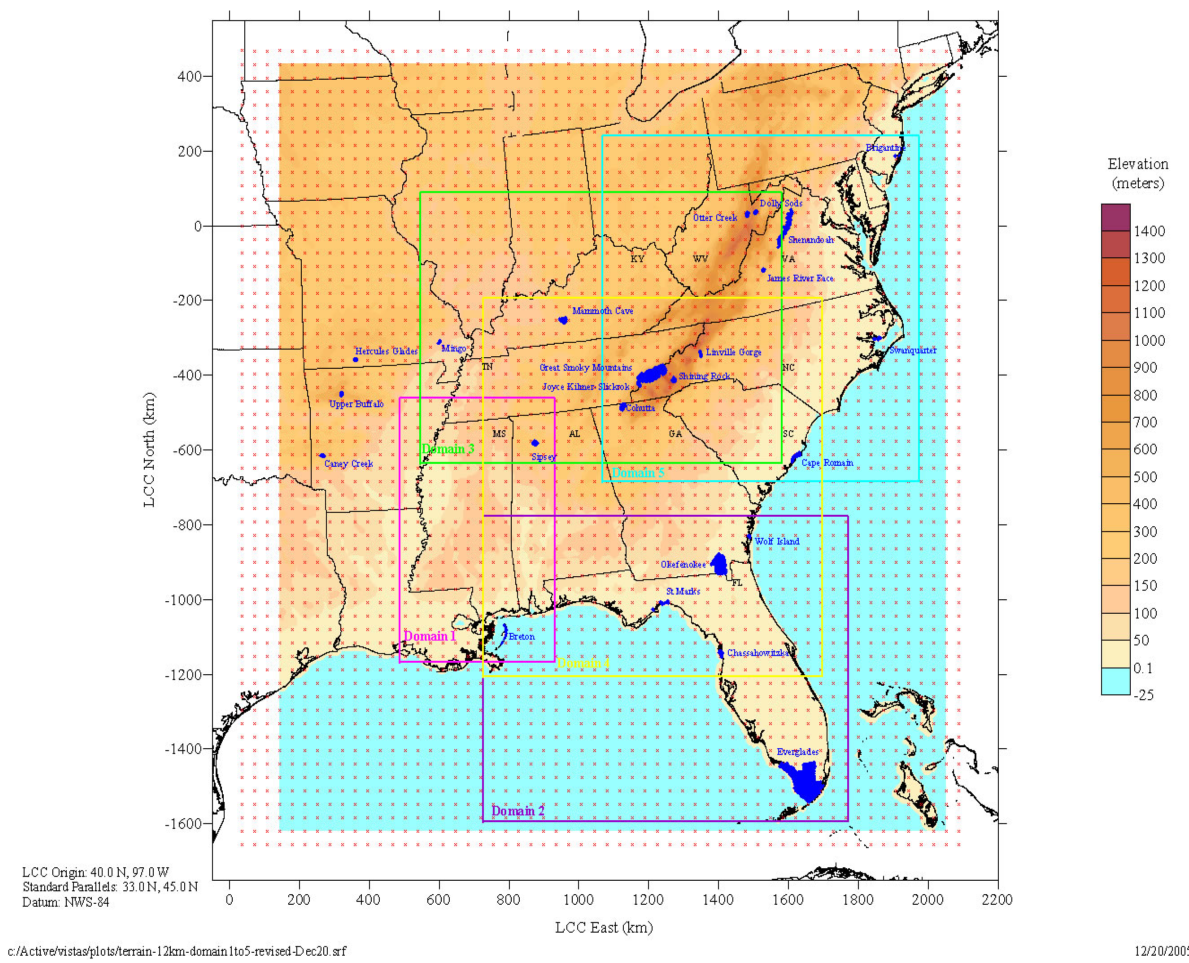
3.1 TERRAIN ELEVATIONS WITHIN THE MODELING DOMAIN

According to the *VISTAS BART Modeling Protocol*, terrain elevations within the modeling domain were processed from SRTM-GTOPO30 digital terrain data format with 30-arcsec resolution. SRTM30 is a digital elevation data set that spans the globe from 60° north latitude to 56° south latitude, approximately from the southern tip of Greenland to below the southern tip of South America. It has a horizontal grid spacing of 30 arc-seconds (approximately 1 kilometer). GTOPO30 is a global digital elevation model with a horizontal grid spacing of 30 arc-seconds (approximately 1 kilometer) that was derived from several raster and vector sources of topographic information that include U.S. Geological Survey (USGS) digital elevation models. The VISTAS Technical Contractor used data preprocessors to format and assimilate these data into a single geophysical data file for processing by CALMET to generate the 12-km screening data set. According to the *VISTAS BART Modeling Protocol*, higher resolution 3 arc-second DEM data were used to simulate terrain elevations in the 4-km refined data set.

Refined analyses may be a necessary part of the ESSROC BART applicability analysis, in which case CALMET grid sizes of 4 km will be used to represent the modeling domain. As described in the *VISTAS BART Modeling Protocol*, VISTAS has provided 2001 through 2003 CALMET files for five 4-km sub-regional domains, one of which, sub-domain 3, includes both ESSROC's Speed Plant and the Class I area within 300 km. Figure 3-1 shows the different sub-domains within the VISTAS region.

[9] http://src.com/verio/download/download.htm#VISTAS_VERSION.

FIGURE 3-1. 12-KM AND 4-KM SUBREGIONAL CALMET DOMAINS (AFTER FIGURE 4-4 OF THE *VISTAS BART MODELING PROTOCOL)*



3.2 LAND USE AND COVER WITHIN THE MODELING DOMAIN

Land use and land cover (LULC) within the modeling domain was assimilated by the VISTAS technical contractor into a single geophysical data file for processing by CALMET using Composite Theme Grid (CTG) data archived by the U.S. Geological Survey at a resolution of 200 meters. CALMET was used to calculate the fractional land use types within each cell of the 12-km size regional grid and 4-km size sub-regional grid. LULC in each grid cell was used by CALMET to compute the micrometeorological parameters (i.e., surface roughness, Bowen ratio, albedo, soil heat flux) that affect turbulent dispersion in the boundary layer.

3.3 METEOROLOGICAL DATABASE

CALMET is the meteorological preprocessor that compiles three-dimensional meteorological fields from mesoscale model (MM) output, raw observations of surface and upper air conditions, precipitation measurements, and geophysical parameters into a single, hourly, gridded, data set for input to CALPUFF. The federal *Guideline* for CALPUFF processing provides the following recommendations for the meteorological data period at Section 9.3.1.2:

> *Less than five, but at least three, years of meteorological data (need not be consecutive) may be used if mesoscale meteorological fields are available, as discussed in paragraph 9.3(c). These mesoscale meteorological fields should be used in conjunction with available standard [National Weather Service] NWS or comparable meteorological observations within and near the modeling domain.*

The *VISTAS BART Modeling Protocol* describes a regional domain and a set of pre-computed regional CALMET meteorological files with 12 km grid size for the years 2001, 2002, and 2003, prepared by the VISTAS technical contractor to allow any Class I areas within the VISTAS area to be evaluated with a consistent meteorological database and consistent CALPUFF modeling options. In addition, the VISTAS technical contractor also prepared sub-domains of the regional grid in a similar fashion to the regional screening domain with 4 km grid size for the years 2001, 2002, and 2003. The CALMET modeling output files in the form of CALPUFF-ready, three-dimensional meteorological files were made available on external hard drives to the States and other parties. ESSROC will utilize the 12 km grid for screening analysis and sub-domain 3 for any refined analyses that may be required.

3.3.1 MM5 SIMULATIONS AND NWS OBSERVATIONS

MM data are used as “observed” or “first-guess” fields in CALMET due to its high-resolution representation of meteorological conditions on a uniform three-dimensional grid. The following three years of MM5 meteorological data have been assembled by VISTAS for use in the regional CALPUFF modeling effort:

- 2001 MM5 dataset at 12 km and 36 km grid (developed for EPA)
- 2002 MM5 dataset at 12 km and 36 km grid (developed by VISTAS)
- 2003 MM5 dataset at 36 km grid (developed by the Midwest Regional Planning Organization).

These data sets were provided to the VISTAS technical contractor, which produced annual CALMET meteorological files for the 12-km grid resolution in the regional domain and 4-km grid resolution sub-domains. The development of the 12-km CALMET meteorological fields from MM5 data were conducted in No-Observations (“No-Obs”) mode since the MM5 data already reflect assimilation of observational data and are likely to adequately characterize regional wind patterns that are consistent with the 12-km scale.

When the 12-km MM5 (2001 and 2002) data are used, the diagnostic CALMET terrain adjustments were turned off since the grid resolution of the MM5 data is the same as the CALMET grid and the terrain adjustments on the 12-km grid scale will already be reflected in the MM5 dataset. In this case, the MM5 winds will be interpolated by

CALMET to the CALMET layers and CALMET's boundary layer modules will compute mixing heights, turbulence parameters and other meteorological parameters that are required by CALPUFF. For 2003, the 36-km MM5 data were used as CALMET's initial guess field and then the CALMET diagnostic terrain adjustments (see Section 3.1.1 of the *VISTAS BART Modeling Protocol*) were applied to reflect terrain on the scale of the CALMET grid (i.e., 12 km).

The finer grid (4 km or higher resolution) CALMET simulations, which ESSROC may need to utilize as part of a refined analysis, were run by VISTAS technical contractor in hybrid mode, using both MM5 data to define the initial guess fields and NWS meteorological observational data in the Step 2 calculations. In this manner, actual observations of three-dimensional meteorological conditions can be used in the model to smooth the coarse MM5 resolution to better represent areas in which terrain features and coastlines may have an important effect on meteorological conditions, but not be well resolved in the mesoscale model. Surface, upper air, precipitation, and offshore buoy observation points are readily available for use in CALMET. The following generally describes the use of NWS observations in Step 2 of the CALMET analyses.

Parameters affecting turbulent dispersion that are observed hourly at surface stations include wind speed and direction, temperature, cloud cover and ceiling, relative humidity, and precipitation type. Surface data would be selected from the available data inventory to optimize spatial coverage and representation of the domain. Raw observations were obtained from the National Climatic Data Center (NCDC), quality assured, and merged using the SMERGE pre-processor to create a single assimilated data file of surface observations for each year analyzed.

Observations of meteorological conditions in the upper atmosphere provide a profile of turbulence from the surface through the depth of the boundary layer in which dispersion occurs. Upper air data are collected by balloons launched simultaneously across the observation network at 0000 Greenwich Mean Time (GMT) (7 o'clock PM in Speed, Indiana) and 1200 GMT (7 o'clock AM in Speed, Indiana). Sensors observe pressure, wind speed and direction, and temperature (among other parameters) as the balloon rises through the atmosphere. The upper air observation network is less dense than surface observation points since upper air conditions vary less and are generally not as affected by local effects (e.g., terrain or coastlines). Upper air data were extracted from the NCDC's available data inventory to optimize spatial coverage and representation of the domain, and utilization from year to year may vary due to availability and data quality.

The effects of wet deposition processes on ambient pollutant concentrations are an important part of the BART applicability analysis. Therefore, it is necessary to include observations of precipitation in the CALMET analysis. Precipitation data were collected from selected surface meteorological data stations included in the analysis, plus Cooperative Observation Network (COOP) stations nearer to or within the domain. Precipitation data were extracted from among the NCDC's available data inventory to optimize spatial coverage and representation of the domain. Raw observations from these stations were quality assured and merged using the PMERGE pre-processor to create a single assimilated data file of precipitation observations.

3.4 AIR QUALITY DATABASE

The CALPUFF model is capable of simulating linear chemical transformation effects by using pseudo-first-order chemical reaction mechanisms for the conversions of SO_2 to SO_4, and NO_X, which consists of nitrogen oxide (NO) and nitrogen dioxide (NO_2), to nitrate (NO_3) and nitric acid (HNO_3). In this study, chemical transformations involving two species (SO_2, NO_X) will be modeled using the MESOPUFF II chemical transformation scheme. Ambient concentrations of ammonia and ozone concentrations as represented in the model affect the MESOPUFF II chemical transformation simulation.

3.4.1 OZONE BACKGROUND CONCENTRATIONS

Both screening and refined analyses will initially utilize monthly average ozone background values included in Table 2 of the MRPO BART Modeling Protocol. These values are listed in Table 3-1. ESSROC reserves the right to use observed ozone data for 2001 through 2003 from non-urban CASTNet and AIRS stations compiled by the VISTAS technical contractor. If observed ozone data is used, then monthly average ozone background values will be computed based on daytime average ozone concentrations from the OZONE.DAT file (6am-6pm average ozone concentrations computed by month) for substitution should all observations be missing for a particular hour of the dataset.

TABLE 3-1. DOMAIN SEASONAL AVERAGE OZONE CONCENTRATIONS.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
O3 (ppb)	31	31	31	37	37	37	33	33	33	27	27	27

3.4.2 AMMONIA BACKGROUND CONCENTRATIONS

In both screening and refined analyses, a background value of 0.3 ppb for ammonia will be utilized for the months of January, February and March, while a value of 0.5 ppb will be used for the remainder of the year. The use of these default values is consistent with the MRPO BART Modeling Protocol. For refined analyses, the revised *VISTAS BART Modeling Protocol* prescribes that postprocessing to repartition HNO_3 and NO_3 using the ammonia limiting method (ALM) in POSTUTIL be used only with these ppb background levels.

3.4.3 OTHER POLLUTANT BACKGROUND AND BOUNDARY CONDITIONS

The initial *VISTAS BART Modeling Protocol* envisioned the use of modeled boundary conditions of ammonia and sulfates in the refined analysis of chemical transformations involving these species and nitrates. However, VISTAS' Technical Analysis Workgroup has since concluded that modeled background and boundary conditions should not be utilized for BART modeling purposes because “EPA and FLM recommend that ALM approach using CMAQ concentration data (SO_X, NO_X, total NH_3) be reviewed by EPA Modeling Clearinghouse before being used in a regulatory application.” Accordingly, such background data will not be utilized in ESSROC’s BART applicability modeling analyses.

3.5 NATURAL CONDITIONS AT CLASS I AREAS

The visibility goal of the Clean Air Act is both the remedying of existing visibility impairment, and prevention of future visibility impairment. In its *BART Implementation Guidance*, U.S. EPA affirms that it interprets the goal to mean return atmospheric conditions to “natural visibility conditions.” For the purposes of BART analyses, the U.S. EPA has determined that it “did not intend to limit States to the use of the 20% best visibility days…States may use 20% best visibility days or annual average.”[10] The July 18, 2006 revision to the *VISTAS BART Modeling Protocol* indicates that the annual average visibility may be considered as the reference natural background condition. However, the MRPO BART Modeling Protocol states that the 20% best days should be used. Three options are available, at the discretion of the State, including Option (1), a single value representing the average haze index on the 20% estimated best visibility days at each Class I area; Option (2), a monthly average natural background conditions computed from estimated components of visibility-affecting pollutants and monthly average relative humidity values specific to each Class I area; or Option (3) based on the revised IMPROVE algorithm in determining the natural background visibility characteristics at Mammoth Cave. Option 1 - 20% best days background condition appears to be the preferred approach by the MRPO. If necessary, ESSROC reserves the right to use Option 1, Option 2, or Option 3 in determining the natural background visibility characteristics at Mammoth Cave, while conducting refined analyses. The calculations of natural background visibility for each of these options are described below.

3.5.1 20% BEST DAYS NATURAL BACKGROUND (OPTION 1)

For the Class I area within 300 km of the Speed facility and potentially affected by its BART-eligible operations, Table 3-2 summarizes the default natural background conditions as tabulated in Appendix B of U.S. EPA’s *Guidance for Estimating Natural Visibility Conditions under the Regional Haze Rule*.

TABLE 3-2. NATURAL BACKGROUND CONCENTRATIONS FOR CLASS I AREAS POTENTIALLY AFFECTED BY THE SPEED FACILITY

Class I Area	b_{ext} (Mm^{-1})	Annual Average Haze Index (dv)	Best Days Haze Index (dv)	Worst Days Haze Index (dv)
Mammoth Cave	21.58	7.69	3.85	11.53

[10] U.S. EPA Memorandum from Mr. Joseph Paisie to Ms. Kay Prince, as Attachment A to a proposed settlement agreement between the Utility Air Regulatory Group and U.S. EPA, published at 71 Federal Register No. 84, pp. 25,838-25,840, May 2, 2006.

* As tabulated in Appendix B of U.S. EPA's *Guidance for Estimating Natural Visibility Conditions under the Regional Haze Rule* (2003).

To represent natural conditions in the absence of anthropogenic sources of sulfates and nitrates, the background extinction coefficient is expressed in terms of Rayleigh scattering and scattering due to soils (i.e., fine particles) based on the 20 percent best days, and is calculated from the tabulated "Best Days Haze Index" value using the following equations.

$$b_{back} = 10\exp\left(\frac{HI}{10}\right),$$

Where *HI* is Haze Index expressed in units of deciviews (dv). Therefore, total b_{back} for the best days at Mammoth Cave, including the Rayleigh scattering coefficient, is calculated as shown in the following equations.

$$b_{back} = 10\exp\left(\frac{3.85}{10}\right) = 14.69\ \text{Mm}^{-1} = b_{ray} + b_{soil}$$

$$\therefore b_{soil} = b_{back} - b_{ray} = 14.69\ \text{Mm}^{-1} - 10\ \text{Mm}^{-1} = 4.70\ Mm^{-1}\ \textit{for Mammoth Cave}$$

3.5.2 U.S. EPA ANNUAL AVERAGE NATURAL BACKGROUND (OPTION 2)

Alternatively, Table 3-3 summarizes the default natural background conditions using average natural concentrations of sulfate, nitrate, and particulate species for areas in the Eastern U.S. as tabulated in Table 2-1 of U.S. EPA's *Guidance for Estimating Natural Visibility Conditions under the Regional Haze Rule*.

The values presented in Table 3-3 are more appropriate for the determination of natural background conditions, since this approach includes all visibility-affecting species and does not rely only on soil dust concentrations to define the natural background conditions. Ammonium sulfates and nitrates as well as organic and elemental carbon are appropriate for representation as part of the natural background because of emissions from naturally occurring biogenic sources (e.g., vegetation and wildfire biomass burning). Accordingly, ESSROC will compute the light extinction change relative to background listed in Table 3-3.[11]

[11] ESSROC is currently awaiting feedback from IDEM regarding the computation of the natural background and the values listed in Table 4 of the MRPO BART Modeling Protocol.

TABLE 3-3. NATURAL BACKGROUND CONCENTRATIONS OF VISIBILITY-AFFECTING POLLUTANTS

Component	West ($\mu g/m^3$)	East ($\mu g/m^3$)	Error Factor	Dry Extinction Efficiency (m^2/g)
Ammonium sulfate	0.12	0.23	2	3
Ammonium nitrate	0.1	0.1	2	3
Organic carbon mass	0.47	1.4	2	4
Elemental carbon	0.02	0.02	2-3	10
Soil	0.5	0.5	1½ - 2	1
Coarse Mass	3	3	1½ - 2	0.6

As is described in Section 4 of this protocol, the effects of relative humidity to amplify the visibility impairment of hygroscopic sulfates and nitrates will be characterized using "Method 6," which computes Δb_{ext} using a *monthly average* relative humidity adjustment particular to each Class I area applied to background and modeled sulfate and nitrate emissions. Table 3-4 summarizes the monthly average humidity values that will be applied for the Class I area considered in this analysis, as tabulated in Table A-3 of U.S. EPA's *Guidance for Estimating Natural Visibility Conditions under the Regional Haze Rule*.

TABLE 3-4. MONTHLY AVERAGE *f*(RH) FOR SELECTED CLASS I AREAS*

Class I Area	January	February	March	April	May	June	July	August	September	October	November	December
Mammoth Cave	3.4	3.1	2.9	2.6	3.2	3.5	3.7	3.9	3.9	3.4	3.2	3.5

* As tabulated in Table A-3 of U.S. EPA's *Guidance for Estimating Natural Visibility Conditions under the Regional Haze Rule* (2003).

Using the default IMPROVE light extinction formula, the natural background conditions for each species listed in Table 3-3 and the average relative humidity factor for January shown in Table 3-4, the EPA annual average natural background extinction at Mammoth Cave in the month of January can be calculated as follows.

$$b_{back}(Mm^{-1}) = b_{SO_4} + b_{NO_3} + b_{OC} + b_{Soil} + b_{Coarse} + b_{EC} + b_{Ray}$$

where,

$b_{SO_4} = 3 * [(\mathrm{NH}_4)_2\mathrm{SO}_4] * f(RH)$

$b_{NO_3} = 3 * [\mathrm{NH}_4\mathrm{NO}_3] * f(RH)$

$b_{OC} = 4 * [\mathrm{OC}]$

$b_{Soil} = 1 * [\mathrm{Soil}]$

$b_{Coarse} = 0.6 * [\text{Coarse Mass}]$

$b_{EC} = 10 * [\text{Elemental Carbon}]$

$b_{Ray} = 10\ Mm^{-1}$

$[\ \ ] = \text{Concentration in } \mu\text{g/m}^3$

$$b_{back} = 3 * [(\mathrm{NH}_4)_2\mathrm{SO}_4] * f(RH) + 3 * [\mathrm{NH}_4\mathrm{NO}_3] * f(RH) + 4 * [\mathrm{OC}] + 1 * [\mathrm{Soil}] + 0.6 * [\text{Coarse Mass}] + 10 * [\text{Elemental Carbon}] + b_{ray}$$

$$b_{back} = 3 * (0.23 \mu g / m^3) * (3.4) + 3 * (0.1 \mu g / m^3) * (3.4) + 4 * (1.4 \mu g / m^3) + 1 * (0.5 \mu g / m^3) + 0.6 * (3 \mu g / m^3) + 10 * (0.02 \mu g / m^3) + 10$$

$$b_{back} = 21.46\ \mathrm{Mm}^{-1} \text{ for Mammoth Cave in January}$$

3.5.3 REVISED IMPROVE ALGORITHM NATURAL BACKGROUND (MODIFIED OPTION 3)

As noted in the revised *VISTAS BART Modeling Protocol*, the U.S. EPA and the Regional Planning Organizations (including VISTAS) evaluated whether refinements are warranted to the methods recommended in U.S. EPA's guidance to calculate default estimates of natural background visibility. In addition, the Interagency Monitoring of Protected Visual Environments (IMPROVE) work group has recently approved an alternative to the default formula used to estimate extinction from particle concentration measurements.[12] Refinements in the revised IMPROVE formula may include the following:

- Adding a sea salt term, including a growth factor due to relative humidity
- Adding a site-specific Rayleigh scattering term to the formula. Values have been calculated by IMPROVE for most Class I areas.

In refined BART applicability analyses, ESSROC will evaluate the results of the analysis using both the standard light extinction calculation (which excludes sea salt concentrations and uses the default 10 Mm^{-1} value of Rayleigh scattering), as well as applying a correction to the Rayleigh scattering value. Note that ESSROC is not proposing to use the revised IMPROVE light extinction equation, rather only to utilize corrections to Rayleigh scattering that can be utilized in the existing CALPOST algorithms for refined BART Applicability Modeling Analyses.

The default Rayleigh scattering coefficient of 10 Mm^{-1} represents light scattering due to air molecules at a reference elevation condition of approximately 5,000 feet. The 2005

[12] Pitchford, M., W. Malm, B. Schichtel, N. Kumar, D. Lowenthal, and J. Hand, 2005. *Revised IMPROVE Algorithm for Estimating Light Extinction from Particle Speciation Data*. Report to IMPROVE Steering Committee, November 2005.

IMPROVE work group report describes that Rayleigh scattering depends on the density of the air and thus varies with temperature and pressure, and accordingly tabulates Class I-area specific values of Rayleigh scattering corrected for these effects. Values of 11.4 Mm^{-1} is recommended for Mammoth Cave. Therefore, calculations of the revised IMPROVE natural background light extinction will be identical to the EPA annual average natural background calculations above, except the Rayleigh scattering coefficient of 10 Mm^{-1} will be substituted with the site specific values of 11.4 Mm^{-1} for Mammoth Cave.

4. AIR QUALITY MODELING METHODOLOGY

Section 4 of this BART applicability modeling protocol for ESSROC's Speed Plant describes the air quality modeling methodology that will be used in the screening and refined analyses. The information in this Section 4 is largely adapted from the *VISTAS BART Modeling Protocol*, which is presented in Appendix A of this source-specific protocol for reference, the MRPO BART Modeling Protocol, and sample model files made available on the VISTAS technical contractor website.[13]

Section 2.2 of the *VISTAS BART Modeling Protocol* summarizes recommendations for the air quality modeling analyses required to assess applicability of BART by determining whether ESSROC's Speed Plant contributes to visibility impairment at the Class I area within 300 km, Mammoth Cave. The CALPUFF V5.754 modeling system is recommended as the preferred modeling approach for use in the BART analyses.

4.1 PLUME MODEL SELECTION

CALPUFF and its meteorological model, CALMET, are designed to handle the complexities posed by the complex terrain, the large source-receptor distances, chemical transformation and deposition, and other issues related to Class I visibility impacts. The CALPUFF modeling system has been adopted by the U.S. EPA as a *Guideline* model for source-receptor distances greater than 50 km, and for use on a case-by-case basis in complex flow situations for shorter distances. CALPUFF is recommended for Class I impact assessments by FLAG and IWAQM. The final BART guidance recommends CALPUFF as "the best modeling application available for predicting a single source's contribution to visibility impairment." As a result of these recommendations, the *VISTAS BART Modeling Protocol* is based on the use of CALPUFF for its BART determinations. Specifically, VISTAS CALMET Version 5.774 and CALPUFF Version 5.756 will be used in the CALPUFF analyses for BART applicability assessment, or other appropriate versions as specified by MRPO.[14]

This source-specific modeling protocol for ESSROC's Speed Plant incorporates by reference the *VISTAS BART Modeling Protocol* and the MRPO BART Modeling Protocol. The following sections present a brief summary of major features of the CALMET and CALPUFF models, and further detailed information should be obtained from the *VISTAS BART Modeling Protocol* and documentation referenced therein.

4.1.1 MAJOR RELEVANT FEATURES OF CALMET

The CALMET meteorological model consists of a diagnostic wind field module and boundary layer micrometeorological modules for overwater and overland boundary layers.

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[13] http://src.com/verio/download/download.htm#VISTAS_VERSION.

[14] Per the MRPO BART Modeling Protocol, CALPUFF version 5.771a, CALMET version 5.53a, CALPOST version 5.51 and POSTUTIL version 1.4 are to be used for conducting BART exemption modeling. However, there have been updates to the CALPUFF modeling since this protocol was published. As such, ESSROC proposes to use the CALPUFF modeling system detailed in the revisions to the *VISTAS BART Modeling Protocol.*

Over land surfaces, the energy balance method of Holtslag and van Ulden (1983) is used to compute hourly gridded fields of the sensible heat flux, surface friction velocity, Monin-Obukhov length, and convective velocity scale. Mixing heights are determined from the computed hourly surface heat fluxes and observed temperature soundings using a modified Carson (1973) method based on Maul (1980). The model also determines gridded fields of Pasquill-Gifford-Turner (PGT) stability class and hourly precipitation rates.

The diagnostic wind field module uses a two-step approach to the computation of the wind fields (Douglas and Kessler, 1988). In the first step, an initial-guess wind field is adjusted for kinematic effects of terrain, slope flows, and terrain blocking effects to produce a Step 1 wind field. Gridded MM5 can be used to define the initial guess field. The second step consists of an objective analysis procedure to introduce observational data into the Step 1 wind field to produce a final wind field.

Development of the Step 1 wind field begins with the initial guess field defined by the MM5 prognostic meteorological model. Normally, the CALMET computational domain is specified to be at finer grid resolution than the MM5 dataset used to initialize the initial guess field. For example, 36-km MM5 data available for VISTAS modeling may be used to develop the initial guess field on a 4-km or even a 1-or-2-km CALMET grid. The Step 1 algorithms in CALMET described below apply terrain adjustments to the initial guess field on the fine-scale CALMET grid. Thus, the CALMET winds are adjusted to respond to fine-scale terrain features not necessarily seen by the coarser scale MM5 model.

The approach of Liu and Yocke (1980) is used to evaluate the effects of the kinematic terrain on the wind field. The initial guess field winds are used to compute a terrain-forced vertical velocity, subject to an exponential, stability-dependent decay function. The effects of terrain on the horizontal wind components are evaluated by applying a divergence-minimization scheme to the initial guess wind field. The divergence minimization scheme is applied iteratively until the three-dimensional divergence is less than a threshold value.

The original slope flow algorithm in CALMET has been upgraded (Scire and Robe, 1997) based on the shooting flow algorithm of Mahrt (1982). This scheme includes both advective-gravity and equilibrium flow regimes. At night, the slope flow model parameterizes the flow down the sides of the valley walls into the floor of the valley, and during the day, upslope flows are parameterized. The magnitude of the slope flow depends on the local surface sensible heat flux and local terrain gradients. The slope flow wind components are added to the wind field adjusted for kinematic effects.

The thermodynamic blocking effects of terrain on the wind flow are parameterized in terms of the local Froude number (Allwine and Whiteman, 1985). If the Froude number at a particular grid point is less than a critical value and the wind has an uphill component, the wind direction is adjusted to be tangent to the terrain.

The wind field resulting from the preceding adjustments of the initial-guess wind is the Step 1 wind field. The second step of the procedure may involve introduction of observational data into the Step 1 wind field through an objective analysis procedure. An inverse-distance squared interpolation scheme is used which weights observational data heavily in the vicinity of the observational station, while the Step 1 wind field dominates the interpolated wind field in regions with no observational data. The resulting wind field is subject to smoothing, an optional adjustment of vertical velocities based on the O'Brien (1970) method, and divergence minimization to produce a final Step 2 wind field.

The introduction of observational data in the Step 2 calculation is an option. It is also possible to run the model in "no observations" (No-Obs) mode, which involves the use only of MM5 gridded data for the initial guess field followed by fine-scale terrain adjustments by CALMET. In No-Obs mode, observational data are not used in the Step 2 calculations. The No-Obs mode is appropriate when the MM5 simulations adequately characterize the regional wind patterns and when local observations, especially surface observations, reflect local conditions on a scale smaller than that of the CALMET domain and hence their spatial representativeness may be limited. Such situations are most likely to occur when the CALMET grid scale is relatively large (i.e., coarser than the scale of variation of the true wind field), which is particularly likely to occur in complex terrain or along the seashore.

As was described in Section 3.3.1 of this protocol, when the 12-km MM5 (2001 and 2002) data are used, the diagnostic CALMET terrain adjustments were turned off since the grid resolution of the MM5 data is the same as the CALMET grid and the terrain adjustments on the 12-km grid scale will already be reflected in the MM5 dataset. In this case, the MM5 winds will be interpolated by CALMET to the CALMET layers and CALMET's boundary layer modules will compute mixing heights, turbulence parameters and other meteorological parameters that are required by CALPUFF. For 2003, the 36-km MM5 data were used as CALMET's initial guess field and then the CALMET diagnostic terrain adjustments (see Section 3.1.1 of the *VISTAS BART Modeling Protocol*) will be applied to reflect terrain on the scale of the CALMET grid (i.e., 12 km). Refined analyses, if required, will utilize the MM5 data as the first-guess wind field, apply the diagnostic algorithms to create the Step 1 winds, and use NWS data for smoothing in Step 2.

4.1.2 MAJOR RELEVANT FEATURES OF CALPUFF

By its puff-based formulation and through the use of three-dimensional meteorological data developed by the CALMET meteorological model, CALPUFF can simulate the effects of time- and space-varying meteorological conditions on pollutant transport from sources in complex terrain. The major features and options of the CALPUFF model are summarized in Table 3-2 of the *VISTAS BART Modeling Protocol*. Some of the technical algorithms are briefly described as follows.

- Complex Terrain: The effects of complex terrain on puff transport are derived from the CALMET winds. In addition, puff-terrain interactions at gridded and discrete receptor locations are simulated using one of two algorithms that modify the puff-height (either that of ISCST3 or a general "plume path coefficient" adjustment), or an algorithm that simulates enhanced vertical dispersion derived from the weakly-stratified flow and dispersion module of the Complex Terrain Dispersion Model (CTDMPLUS) (Perry et al., 1989). The puff-height adjustment algorithms rely on the receptor elevation (relative to the elevation at the source) and the height of the puff above the surface. The enhanced dispersion adjustment relies on the slope of the gridded terrain in the direction of transport during the time step.

- Subgrid Scale Complex Terrain (CTSG): An optional module in CALPUFF, CTSG treats terrain features that are not resolved by the gridded terrain field, and is based on the CTDMPLUS (Perry et al., 1989). Plume impingement on subgrid-scale hills is evaluated at the CTSG subgroup of receptors using a dividing streamline height (H_d) to determine which pollutant material is deflected around the sides of a hill (below H_d) and which material is advected over the hill (above H_d). The local flow (near the feature) used to define H_d is taken from the gridded CALMET fields. As in CTDMPLUS, each feature is modeled in isolation with its own set of receptors.
- Puff Sampling Functions: A set of accurate and computationally efficient puff sampling routines is included in CALPUFF, which solve many of the computational difficulties encountered when applying a puff model to near-field releases. For near-field applications during rapidly-varying meteorological conditions, an elongated puff (slug) sampling function may be used. An integrated puff approach may be used during less demanding conditions. Both techniques reproduce continuous plume results under the appropriate steady state conditions.
- Building Downwash: The Huber-Snyder and Schulman-Scire downwash models are both incorporated into CALPUFF. An option is provided to use either model for all stacks, or make the choice on a stack-by-stack and wind sector-by-wind sector basis. Both algorithms have been implemented in such a way as to allow the use of wind direction specific building dimensions. The PRIME building downwash model (Schulman et al., 2000) is also included in CALPUFF as an option.
- Dispersion Coefficients: For the purposes of these modeling analyses, ESSROC will use the Pasquill-Gifford dispersion option as referenced in the *VISTAS BART Modeling Protocol* and consistent with current U.S. EPA guidance for regulatory modeling applications.
- Overwater and Coastal Interaction Effects: Because the CALMET meteorological model contains both overwater and overland boundary layer algorithms, the effects of water bodies on plume transport, dispersion, and deposition can be simulated with CALPUFF. The puff formulation of CALPUFF is designed to handle spatial changes in meteorological and dispersion conditions, including the abrupt changes that occur at the coastline of a major body of water.
- Dry Deposition: A resistance model is provided in CALPUFF for the computation of dry deposition rates of gases and particulate matter as a function of geophysical parameters, meteorological conditions, and pollutant species. For particles, source-specific mass distributions may be provided for use in the resistance model. Of particular interest for BART analyses is the ability to separately model the deposition of fine particulate matter (< 2.5 μm diameter) from coarse particulate matter (2.5-10 μm diameter).
- Wind Shear Effects: CALPUFF contains an optional puff splitting algorithm that allows vertical wind shear effects across individual puffs to be simulated. Differential rates of dispersion and transport among the "new" puffs generated from the original,

well-mixed puff can substantially increase the effective rate of horizontal spread of the material. Puffs may also be split in the horizontal when the puff size becomes large relative to the grid size, to account for wind shear across the puffs.

- Wet Deposition: An empirical scavenging coefficient approach is used in CALPUFF to compute the depletion and wet deposition fluxes due to precipitation scavenging. The scavenging coefficients are specified as a function of the pollutant and precipitation type (i.e., frozen vs. liquid precipitation).
- Chemical Transformation: CALPUFF includes options for parameterizing chemical transformation effects using the five species scheme (SO_2, $SO_4^{=}$, NO_X, HNO_3, and NO_3^-) employed in the MESOPUFF II model or a set of user-specified, diurnally-varying transformation rates. The MESOPUFF II scheme is recommended by IWAQM. It produces secondary fine particulate matter (sulfate and nitrate) from emissions of SO_2 and NO_X and thus allows analyses of visibility impacts. Ambient ozone concentrations are used in the parameterized chemical transformation module as a surrogate for OH radicals during daylight hours. Ambient ammonia concentrations are used together with a temperature and relative humidity-dependent equilibrium relationship to partition nitric acid and nitrate on an hour-by-hour and receptor-by-receptor basis.

4.2 MODELING DOMAIN CONFIGURATION

The VISTAS regional modeling domains illustrated in Figure 3-1 in the preceding section of this protocol was designed to allow any Class I areas within the VISTAS area to be evaluated with a single meteorological database and consistent CALPUFF modeling options. The horizontal domain is comprised of grid cells, each containing a central grid point at which meteorological and computational parameters are calculated at each time step. For the initial regional analysis, a grid spacing interval of 12 km will be selected. Given this interval, the domain consists of 160 by 172 grid cells. A Lambert Conformal Coordinate projection system is used to describe the horizontal grid, with origin at 40 degrees North latitude and 97 degrees West longitude. Standard parallels for the projection were set at 33 degrees North and 45 degrees North.

Table 4-1 summarizes the vertical grid structure selected for this analysis, which comprises ten vertical layers. The cell face height of each layer indicates its vertical extent. The vertical domain is composed of terrain-following grid cells, the number and size of which are chosen so as to constrain the boundary layer in which dispersion and chemical transformations take place. The highest cell face was selected to be 4,000 meters to constrain the default maximum mixing height of 3,000 meters.

TABLE 4-1. VERTICAL GRID STRUCTURE

Vertical Grid Cell	Cell Face Height (meters)
1	20
2	40
3	80
4	160
5	320
6	640
7	1,200
8	2,000
9	3,000
10	4,000

Refined analyses, if necessary, will be conducted using one or more of the subregional 4-km grids that the VISTAS technical contractor will provide. ESSROC anticipates that refined analyses may be necessary for Mammoth Cave National Park, in which case the appropriate subregional grid (Domain 3) will be utilized.

4.3 CALMET METEOROLOGICAL MODELING

CALMET meteorological modeling for the refined analysis will be conducted over the entire VISTAS regional domain described in section 4.2. The major features of CALMET were described in Section 4.1.1 of this protocol, and the geophysical and meteorological databases were described in Section 3. CALMET processing will be conducted generally in accordance with the recommendations of IWAQM *Phase 2 Summary Report and Recommendations for Modeling Long Range Transport Impacts*, with the following exceptions and/or specifications of non-default values.

- Modeling period: 2001 through 2003
- Meteorological inputs: MM5 data provide initial guess fields in CALMET
- CALMET mode: No-Observations mode including option to read overwater data directly from MM5
- Diagnostic options: IWAQM default values, except as follows: diagnostic terrain blocking and slope flow algorithms used for 2003 simulations (using 36-km MM5 data), but no diagnostic terrain adjustments in 2001 and 2002 simulation (using 12-km MM5 data)
- CALMET options dealing with radius of influence parameters (R1, R2, RMAX1, RMAX2, RMAX3), BIAS, ICALM parameters are not used in No-Observations mode.
- TERRAD (terrain scale) is required for runs with diagnostic terrain adjustments (i.e., the 2003 simulations). Values of ~10-20 km will be tested, and a value of 15 km was selected by the VISTAS technical contractor.

- Land use defining water: JWAT1 = 55, JWAT2 = 55 (large bodies of water). This feature allows the temperature field over large bodies of water such as the Atlantic Ocean and the Great lakes to be properly characterized by buoy observations.
- Mixing height averaging parameter (MNMDAV) was determined by the VISTAS technical contractor to be 1 grid cell for regional simulations based on sensitivity tests. The purpose of the testing was to optimize the variable to allow spatial variability in the mixing height field, but without excessive noise.

Refined analyses, if necessary, will be prepared using appropriate CALMET model settings as described by the VISTAS technical contractor for the 4 km sub-regional grid utilized (Domain 3).

4.4 CALPUFF COMPUTATIONAL DOMAIN AND RECEPTORS

CALPUFF analyses to assess the visibility impacts attributable to ESSROC's Speed Plant will be performed on a computational domain that is a subset of the VISTAS regional domain. The size of the domain will be selected to encompass the Speed Plant and all Class I areas within 300 km, and to extend at least 50 km beyond in all directions. The size of the domain allows for the possible recirculation of puffs beyond the facility and areas being evaluated. Ambient impacts will be predicted at receptors specified by the FLM to represent the Class I area depicted in Figure 1-2.[15]

4.5 CALPUFF MODELING OPTION SELECTIONS

The CALPUFF analysis will be conducted generally in accordance with the recommendations of IWAQM *Phase 2 Summary Report and Recommendations for Modeling Long Range Transport Impacts*, with the following exceptions and/or specifications of non-default values.

- Chemical mechanism: MESOPUFF II module
- Species modeled: SO_2, NO_X
- Emission rates for modeling based on U.S. EPA BART guidance, i.e., maximum 24-hour actual emission rate with normal operations from the highest emitting day of the meteorological period modeled (excluding days where start-up, shutdown or malfunctions occurred sometime during the day). Note that potential emissions are used to determine if a source is BART-eligible, but maximum actual 24-hour average maximum emissions are used for modeling purposes (70 FR 39162).
- CALPUFF model options: Use IWAQM guidance, including Pasquill-Gifford (ISC-like) dispersion coefficients.
- Ozone dataset: Use monthly average ozone concentrations listed in Table 4 of the MRPO BART Modeling Protocol (Table 3-1 of this protocol) or observed data from 2001 to 2003 using daytime average ozone concentrations.
- Background ammonia concentration: In CALPUFF, use values of 0.3 ppb for January through March and 0.5 ppb for the remainder of the year.
- Puff representation: integrated puff sampling methodology.

[15] http://www2.nature.nps.gov/air/maps/Receptors/index.htm

- Building downwash: Since the nearest Class I area is located more than 100 km from the facility, effects of downwash will not be evaluated in the initial regional modeling unless specifically requested by IDEM.
- GEP stack height: Since the heights of all stacks other than the #2 kiln stack are less than 65 meters, the stacks comply with the definition of GEP as set forth by the state of Indiana[16] and thus conform to modeling requirements. Since the #2 kiln stack is approximately 65.5 meters tall, ESSROC will conservatively model the stack as being 65 meters tall.
- Deposition Flux Output: Per the MRPO BART Modeling Protocol, the values of IDRY and IWET will be set to 0 since dry and wet deposition flux output is not applicable for BART exemption modeling analyses, which will only evaluate emissions of SO_2 and NO_X.

4.6 CALPOST PROCESSING OPTION SELECTIONS FOR LIGHT EXTINCTION AND HAZE IMPACT CALCULATIONS

The following postprocessing techniques will be used to compute the 24-hour average visibility impacts at the Class I area of concern located within 300 km of the Speed Plant.

- Visibility Method 6 will be used with Class I area-specific, monthly average, relative humidity values as described in Section 3.5 of this modeling protocol using the 20% best days natural concentrations of visibility-affecting pollutants.
- Natural background light extinction will be represented at the Class I Areas as described in Section 3.5 of this modeling protocol.
- Ammonia Limiting Method: For refined analyses, if necessary, the ammonia limiting method will be utilized only to re-partition the NO_3/HNO_3 equilibrium for each hour as a function of temperature, relative humidity, and the MRPO BART Modeling Protocol prescribed ammonia background levels.

To assess whether BART-eligible operations contribute to visibility impairment, ESSROC's applicability modeling analysis will demonstrate the top eight 24-hour average visibility impacts of each year modeled to illustrate the distribution (i.e., frequency, duration, and magnitude) of peak visibility impairment episodes attributable to the Speed Plant. Per the MRPO BART Modeling Protocol, only the 98th percentile 24-hour average visibility impact (highest, eighth-high impact of each year or 22nd highest impact over three years) will be evaluated in the analysis when potential or peak emissions rates are modeled. However, should a calculated actual 24-hour average emission rate be modeled (i.e. actual annual emissions divided by hours of operation, or 8760 hours), then the peak, or maximum, dv value will be compared to the 0.5 dv threshold.

4.7 MODELING PRODUCTS

ESSROC will prepare and submit a BART applicability analysis result describing the modeling procedures, data resources, and results of any screening and refined modeling used to assess whether the Speed Plant is subject to BART. The Results section of the CALPUFF modeling report should contain the following information:

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[16] GEP stack height is defined in 326 IAC 1-7-4.

1. Map of source location and Class I areas within 300 km of the source
2. Table listing all Class I area impacts at those Class I areas within 300 km of the source
3. A discussion of the number of Class I areas with visibility impairment from the source on 98th percentile days in each year greater than 0.5 dv (total visibility impairment minus impairment for natural background visibility equals delta-dv, the visibility impact attributed to the source).
4. Discussion of the number of days below the 98th percentile that the impact of the source exceeds 0.5 dv, the number of receptors in the Class I area where the impact exceeds 0.5 dv, and the maximum impact.

5. QUALITY ASSURANCE METHODS

ESSROC will conduct quality assurance of CALMET, CALPUFF, and CALPOST analyses in a manner that generally conforms to the *VISTAS BART Modeling Protocol*. A description of the quality assurance methods and products (e.g., test case simulations, graphic representations of model fields and performance) will be provided in ESSROC's BART Applicability Modeling Report.
The following sections describe techniques that can be used to visualize and quality assure performance of each model component as described in the VISTAS *BART Modeling Protocol*.

5.1 CALMET FIELDS

Section 4 of the *VISTAS BART Modeling Protocol* describes the methods and procedures for use in conducting regional scale modeling to determine the whether a particular source or group of sources is subject to BART controls. The MRPO BART Modeling Protocol provides additional guidance for conducting BART exemption modeling. In the initial application, the regional CALPUFF-ready meteorological data files will be provided by VISTAS. The amount of effort for end-users performing QA of these pre-defined meteorological fields will be reduced from what is required in developing source-specific meteorological fields, as described below. Also, VISTAS has provided five subregional CALMET meteorological datasets in a CALPUFF-ready format. The development of these CALMET datasets were subject to a QA program as part of their development, so the necessary quality assurance activity of end-users is again reduced from what would be required in the development of the dataset. It is not expected that the quality assurance steps in the development will be repeated in each application. The VISTAS-provided regional and subregional meteorological fields will include a test case simulation for demonstrating that expected modeling results are obtained on the user's computer platform. ESSROC will execute this test case simulation to demonstrate that the expected results can be reproduced.

The critical CALMET input parameters depend on the mode in which the model is run (i.e., observations mode, hybrid mode, or no-observations mode), and the location and spatial representativeness of any observational data. In a site-specific protocol involving the development of a meteorological dataset, the elements of the QA process include preparation of wind roses (using observed, MM5 and CALMET-derived data), including examination of the data as a function of season and time of day (e.g., 4am, 10am, 4pm wind roses), time series analyses, and presentation of 2-D vector plots illustrating terrain effects or other features of the flow expected to occur within the domain. For example, 2-D vector plots produced during light wind speed stable conditions (e.g., early morning such as 4 am) are good for assessing the performance of the CALMET model configuration and switches in reproducing terrain effects because these conditions are likely to maximize the terrain impacts in the model. Customization of the QA process for the individual site-specific domain based on the availability of data and the physical processes expected to be important at that location will be conducted as part of the site-specific QA plan development.

5.2 CALPUFF, CALPOST, AND POSTUTIL RESULTS

Most of the CALPUFF input variables contain default values. Appendix B of the IWAQM report contains a list of recommended CALPUFF switch settings. Except as modified in Chapter 4 of the *VISTAS BART Modeling Protocol*, the MRPO BART Modeling Protocol or in a source-specific protocol, the IWAQM guidance should be used in setting up the CALPUFF simulations. The CALPUFF model obtains the switch settings from an ASCII "control file" with a default name called the CALPUFF.INP file. As is the case with the comparable CALMET file, it is essential that the control file be reviewed manually as part of the CALPUFF QA analysis. To facilitate this process, as was the case with the CALMET GUI, the CALPUFF GUI retains all of the input descriptive information that is part of the standard CALPUFF.INP file structure.

CALPOST is run separately for each Class I area in order to obtain the necessary visibility statistics for evaluating compliance with the BART finer grid modeling thresholds. The inputs to CALPOST involve selection of the visibility method (Method 6 in the standard EPA BART guidance), entry of Class I area-specific data for computing background extinction and monthly relative humidity factors for hygroscopic aerosols. CALPOST contains a receptor screening that allow subsets of a receptor network modeling in CALPUFF to be selected for processing in a given CALPOST run. This is how receptors within a single Class I area are selected for processing from a CALPUFF output file that may contain receptors from several Class I areas. CALPOST contains options for creating plot files that will help in the confirmation that the proper receptor subset is extracted.

The CALPOST output file contains a listing of the highest visibility impact each day of the model simulation over all receptors included in CALPOST analysis. Receptors will normally be selected in each CALPOST run so that each CALPOST run represents the impacts at a single Class I area. For a finer grid simulation, the 98th percentile value (8th highest day) is used for comparison against the BART threshold of 0.5 deciviews. It is necessary to import the results of the CALPOST table into a sorting program such as a spreadsheet to rank the daily change in extinction values such as is presented in Table 4-2.

The CALPOST inputs that will be carefully checked as part of the CALPOST quality assurance include the following:

- Visibility technique (Method 6)
- Monthly Class I-specific relative humidity factors for Method 6
- Background light extinction values
- Inclusion of all appropriate species from modeled sources
- Extinction efficiencies for each species
- Screen to select appropriate Class I receptors for each CALPOST simulation.

POSTUTIL allows the user to sum the contributions of sources from different CALPUFF simulations into a total concentration file. In addition, it contains options to scale the concentrations from different modeled species (e.g., different particle sizes) into species-dependent size distributions for the particulate matter. For example, PM is often simulated with unit emission rates for each particle size category and, in the POSTUTIL stage, the contributions of each size category based on the species being considered (e.g., elemental carbon, coarse particulate matter, etc.) are combined to form the species concentrations for input into CALPOST. This process, although simple, requires a careful review of the weighting factors for each source. POSTUTIL also allows a repartitioning of nitric acid and nitrate to account for the effects of ammonia limiting conditions.

If site-specific CALPUFF simulations involving the Ammonia Limiting Method are conducted, ESSROC will limit the Ammonia Limiting Method to a POSTUTIL repartitioning using just the NH_3 background concentrations listed in Table 2 of the MRPO BART Modeling Protocol.

5.3 PRESENTATION OF RESULTS

Results tables will be developed based on the CALPOST output file. The results from CALPOST will be copied into a spreadsheet and organized for presentation. Tables presented to the agency will be reviewed for accuracy against the CALPOST files.

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APPENDIX A

VISTAS BART MODELING PROTOCOL, REVISION 3.2

Protocol for the Application of the CALPUFF Model for Analyses of Best Available Retrofit Technology (BART)

December 22, 2005

(Revision 3.2 – 8/31/06)

Visibility Improvement State and Tribal Association of the Southeast (VISTAS)

TABLE OF CONTENTS

SUMMARY

This Protocol for the Application of the CALPUFF Model for Analyses of Best Available Retrofit Technology (BART) for the VISTAS Regional Planning Organization (RPO) describes common procedures for carrying out air quality modeling to support BART determinations that are consistent with guidelines of the U.S. Environmental Protection Agency in 40 CFR Part 51 Appendix W and Appendix Y. The Protocol is intended to serve as the basis for a common understanding among the organizations that will be performing BART analyses or reviewing the BART modeling results in the VISTAS region.

Background

Best Available Retrofit Technology is required for any BART-eligible source that ‘‘emits any air pollutant which may reasonably be anticipated to cause or contribute to any impairment of visibility” in any mandatory Class I federal area. According to 40 CFR Part 51 Appendix Y, “*You can use dispersion modeling to determine that an individual source cannot reasonably be anticipated to cause or contribute to visibility impairment in a Class I area and thus is not subject to BART*.” In the “individual source attribution approach,” a BART-eligible source that is responsible for a 1.0 deciview (dv) change or more is considered to “cause” visibility impairment. A BART-eligible source that is responsible for a 0.5 dv change or more is considered to “contribute” to visibility impairment in a Class I area. Any source determined to cause or contribute to visibility impairment in any Class I area is subject to BART.

The member states of the VISTAS RPO agreed to develop a common BART Modeling Protocol to guide them, their sources, and reviewers in the BART determination and review effort. The Protocol has been in preparation within VISTAS since January 2005. The original authors are Pat Brewer, VISTAS Technical Coordinator, and Ivar Tombach, VISTAS Technical Advisor. The VISTAS state BART contacts, particularly Tom Rogers, FL, Chris Arrington, WV, Leigh Bacon, AL, and Michael Kiss, VA, have directed and extensively reviewed the Protocol. The Protocol was enhanced and completed with the assistance of Joseph Scire, Christelle Escoffier-Czaja and Jelena Popovic of Earth Tech, Inc. and it has received extensive contributions and review from the VISTAS federal partners: Federal Land Managers and US EPA. The VISTAS RPO held a meeting on September 21, 2005 in Research Triangle Park, NC to discuss the Protocol with participants before starting a public comment period. The Protocol underwent formal external review during the period between September 26, 2005 and October 31, 2005. Numerous comments were received. All comments were carefully considered and discussed with VISTAS participants and federal partners. VISTAS gratefully acknowledges the very useful contributions of those that provided comments. On November 1st, 2005 VISTAS held another meeting with its participants in Nashville, TN to present and discuss the comments being considered for inclusion in the Protocol. No formal document will be prepared to address all the comments received on the Protocol.

Objectives

The objectives of the Protocol (discussed in Chapter 1) are to provide:

- A consistent approach to determine if a source is subject to BART
- A consistent model (CALPUFF) and modeling guidelines for BART determinations
- Clearly delineated modeling steps
- A common CALPUFF configuration
- Guidance for site-specific modeling
- Common expectations for reporting model results

The Protocol is not intended to define the engineering analyses required by the US EPA's BART Guidance, nor address model alternatives to the CALPUFF model, nor address emissions trading.

Chapter 2 is intended to provide summary background on EPA's guidance for BART modeling. The CALPUFF model system is reviewed in Chapter 3, while specific recommendations for applying the CALPUFF model for BART purposes appear in Chapter 4. Chapter 5 describes the specific information that should be included in site-specific protocols. Chapter 6 describes the quality assurance requirements for BART analyses in the VISTAS RPO.

Recommendations

The major recommendations for VISTAS BART modeling included in this Protocol are:

I. Process

Follow the BART process steps discussed in Chapter 2:

1. Identify BART eligible sources
2. Identify which pollutants have greater than *de minimis* emission levels
3. Identify sources that are subject to BART
4. Identify baseline visibility impact of each BART source
5. Identify feasible controls and emission changes
6. Identify the change in visibility impact for each candidate BART control option
7. Compare the visibility improvement of BART control options to other statutory factors in the engineering analysis

II. CALPUFF Model Configuration

Use the CALPUFF dispersion modeling system, as described in Chapter 4, to determine if a single source is subject to BART. VISTAS will use CALPUFF Version 5.754 and CALMET Version 5.7. These versions contain enhancements funded by the Minerals Management Service (MMS) and VISTAS. They were developed by Earth Tech, Inc. and are maintained on the CALPUFF website (www.src.com) for public access.

VISTAS is making publicly available 12-km CALMET output files for the entire VISTAS modeling domain (eastern United States) and intends to also provide CALMET output files for five 4-km grid subdomains covering the VISTAS states and VISTAS Class I areas. To create the CALMET input files, Earth Tech used the MM5 databases developed by EPA for 2001, VISTAS for 2002, and Midwest RPO for 2003. For the 12 km grid large domain covering the entire VISTAS region, Earth Tech used the No-Obs setting (i.e., did not include additional surface and upper air observations beyond those incorporated in the MM5 calculations). For finer resolution subdomains (4 km grid or less), available surface and upper air observations will be used in addition to MM5 meteorological model outputs. The specific model settings will be provided with the CALMET files and via the CALPUFF website so that users can review or replicate the work.

For CALPUFF modeling, source emissions should be defined using the maximum 24-hour actual emission rate during normal operation for the most recent 3 or 5 years. If maximum 24-hr actual emissions are not available, continuous emissions data, permit allowable emissions, potential emissions, and emissions factors from AP-42 source profiles may be used as available.

Key points from comments received on the specific CALPUFF, CALPOST, and POSTUTIL configurations are highlighted below.

- After running CALPUFF for an individual facility, repartition NO_3 in POSTUTIL.[1]
- Use ozone data from non-urban monitors as the background ozone input.
- Use the Pasquill-Gifford dispersion method.[2]

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[1] The original intent, as expressed in the Final VISTAS BART Modeling Protocol (22 December 2005) was to use CMAQ-derived background data for SO_2, NO_3 and NH_3 in POSTUTIL. After extensive discussion with the EPA and FLMs in early 2006, EPA did not approve the recommended approach so background gaseous concentrations from CMAQ 2002 modeling will not be provided by VISTAS for use in POSTUTIL. Rather the standard default NH_3 concentrations specified on page 14 of the IWAQM Phase 2 report (IWAQM, 1998) will be used.

[2] The Final VISTAS BART Modeling Protocol (Dec. 22, 2005) recommended using turbulence-based AERMOD dispersion methods, citing EPA's *Revision to the Guideline on Air Quality Models: Adoption of a Preferred General Purpose (Flat and Complex Terrain) Dispersion Model and Other Revisions; Final Rule.* 70 FR 68218-68261. 9 November 2005. Subsequently, EPA Region IV notified the VISTAS states that using turbulence-

- In CALPOST, use Method 6 with monthly average RH for calculating extinction, as recommended by the EPA.

- Use EPA default calculations of light extinction under current and natural background conditions. In addition to the default assumptions, a source may choose to also calculate visibility using the recently revised IMPROVE algorithm described by Pitchford, et al., (2005).

Provide results in tables as illustrated in Chapter 4 that describe, for each source:

- Number of receptors within a single Class I area with impact > 0.5 dv

- Number of days at all receptors in the Class I area with impact > 0.5 dv

- Number of Class I areas with impacts > 0.5 dv

III. CALPUFF Application for BART

For determining if a BART-eligible source is subject to BART CALPUFF modeling, use a two-tier approach. For the initial exemption modeling use CALPUFF with 12-km grid CALMET. For finer resolution of meteorological fields, use CALPUFF with CALMET of 4-km or smaller grid size.

VISTAS States are accepting EPA guidance that the threshold value to establish that a source contributes to visibility impairment is 0.5 deciview.

VISTAS States are using emissions (tons per year) divided by distance (km) from a Class I area boundary (Q/d) as a presumptive indicator that a BART-eligible source is subject to BART. If Q/d for SO_2 is greater than 10 for 2002 actual annual emissions, then the State presumes that the source is subject to BART and no exemption modeling will be performed using VISTAS funds. If the source agrees with this presumption, then the source can proceed to the BART determination using CALPUFF to evaluate impacts of control options and perform the engineering analyses. If a source disagrees, the source may perform fine grid modeling to determine if its impact is <0.5 dv.

For sources with Q/d less than or equal to 10, VISTAS intends to fund TRC Environmental Corp.[3] to assist States with the initial CALPUFF exemption modeling. Each State will prioritize which sources will be offered modeling by VISTAS. Modeling of these sources will be conducted in priority order to first accommodate States with nearer term timing constraints in their SIP development process. To conserve VISTAS resources, modeling will begin with sources at lower Q/d values and continue with sources with higher Q/d values until a Q/d value

based dispersion methods would be considered a non-guideline application of CALPUFF. Thus this Protocol has been revised to indicate Pasquill-Gifford dispersion coefficients should be used.

[3] In April 2006, Earth Tech's CALPUFF modeling staff became part of TRC Environmental Corporation. References to Earth Tech and to TRC in this protocol refer to the same technical staff, just at different times.

that consistently results in a greater than 0.5 dv impact is identified. Chapter 4 addresses the number of VISTAS sources eligible for BART based on Q/d analysis.

Note that VISTAS does not propose to use Q/d to exempt BART-eligible sources, but only to prioritize sources for modeling purposes. Thus this application is consistent with EPA guidance not to use Q/d for exemption purposes.

For the 12-km initial modeling exemption test, compare the highest single 24-hour average value across all receptors in the Class I area to the threshold value of 0.5 dv. If the highest 24-hr average value is below 0.5 dv at all Class I areas, then the source is not subject to BART. If the highest 24-hr average value is greater than 0.5 dv, then the source may choose to perform finer grid modeling for exemption purposes or may accept determination that the source is subject to BART and proceed to establish visibility impacts prior to and after BART controls. If using the single highest 24-hr average value proves, after initial 12-km grid CALPUFF modeling, to be too conservative a screening level, VISTAS may allow some exceedances of the threshold value for exemption purposes, up to no more than the 98th percentile value.

The 12-km modeling results can be used to focus finer grid modeling for exemption purposes on only those Class I areas where impacts greater than 0.5 dv were projected in the 12-km modeling.

For finer grid (4 km or less) analyses, use the 98th percentile impact value for the 24-hr average. Use either the 8th highest day in each year or the 22nd highest day in the 3-year period, whichever is more conservative, for comparison to the exemption threshold.

Use the same model assumptions for pre-BART visibility impact and for BART control options modeling: establish baseline visibility from the pre-BART run; change one control at a time; and evaluate the change in visibility impact, i.e. the delta-deciview. Note that “no control” may constitute BART.

Visibility impact is one of the five factors considered in the engineering analysis required under the USEPA BART guideline. If a source accepts to institute the most stringent control, the engineering analyses are not required.

This common VISTAS Protocol consistently recommends conservative assumptions. Individual States ultimately have responsibility to determine which, if any, BART controls are recommended in their State Implementation Plans (SIPs).

1. INTRODUCTION AND PROTOCOL OBJECTIVES

1.1 Background

Under regional haze regulations, the Environmental Protection Agency (EPA) has issued final guidelines dated July 6, 2005 for Best Available Retrofit Technology (BART) determinations (70 FR 39104-39172). The regional haze rule includes a requirement for BART for certain large stationary sources. Sources are BART-eligible if they meet three criteria including potential emissions of at least 250 tons per year of a visibility-impairing pollutant, were put in place between August 7, 1962 and August 7, 1977, and fall within one of the 26 listed source categories in the guidance. A BART engineering evaluation using five statutory factors -- 1) existing controls; 2) cost; 3) energy and non-air environmental impacts; 4) remaining useful life of the source; 5) degree of visibility improvement expected from the application of controls -- is required for any BART-eligible source that can be reasonably expected to cause or contribute to impairment of visibility in any of the 156 federal parks and wilderness (Class I) areas protected under the regional haze rule. (Note that, depending on the five factors, the evaluation may result in no control.) Air quality modeling is an important tool available to the States to determine whether a source can be reasonably expected to contribute to visibility impairment in a Class I area.

Throughout this document the term “BART-eligible emission unit” is defined as any single emission unit that meets the criteria described above. A “BART-eligible source” is defined as the total of all BART-eligible emission units at a single facility. If a source has several emission units, only those that meet the BART-eligible criteria are included in the definition “BART-eligible source”.

One of the listed categories is steam electric plants of more than 250 million BTU/hr heat input. To determine if such a plant has greater than 250 million BTU/hr heat input and is potentially subject to BART, the boiler capacities of all electric generating units (EGUs) should be added together regardless of construction date. In this category, electric generating sources greater than 750 MW have presumptive SO_2 and NO_x emission limits. States may presume the same limits for EGU sources between 250-750 MW. However, units at those sources constructed after the BART-eligibility dates are not subject to a BART engineering evaluation. EPA, in the Clean Air Interstate Rule (CAIR), determined that an EGU participating in the CAIR trading program satisfies the BART requirements for SO_2 and NO_x. VISTAS states are tentatively accepting this guidance. CAIR does not cover PM so EGUs would still need to evaluate impacts of PM if PM emissions are above *de minimis* values.

As illustrated in Table 1-1, as of December 5, 2005, VISTAS States had identified a total of 274 BART-eligible sources that fall into 20 of the 26 BART source categories. Of the 274 sources with BART-eligible units, 84 sources are utility EGUs and 190 are non-EGU industrial sources. (Note that these numbers are not final and are subject to slight adjustments and refinements.) No BART sources are located on Tribal lands.

Table 1-1. VISTAS BART Eligible Sources (not updated since December 2005)

State	Total Number of Sources	EGU Sources	Non-EGU Sources
AL	48	8	40
FL	50	23	27
GA	24	10	14
KY	29	12	17
MS	18	8	10
NC	16	5	11
SC	31	6	25
TN	13	2	11
VA	18	3	15
WV	26	7	19
Total	**273**	**84**	**189**

1.2 Objective of this Protocol

The objective of this VISTAS' BART Modeling Protocol is to describe common procedures for air quality modeling to support BART determinations that are consistent with the EPA guidelines. The protocol will serve as the basis for establishing a common understanding among the organizations who will be performing the BART analyses or reviewing the BART modeling results, including VISTAS State and Local air regulatory agencies, EPA, Federal Land Managers (FLMs), source operators, and contractors for the sources. This final protocol incorporates EPA final guidance and comments that were received on VISTAS' draft protocol[4] and provides additional description of modeling procedures. The original final protocol of 22 December 2005 has been revised since then to clarify items, resolve technical issues, and reflect decisions by the EPA and FLMs. This document is the third revision.

The VISTAS States have accepted EPA's guidance to use the CALPUFF modeling system to comply with the BART modeling requirements of the regional haze rule. A BART-eligible source will be required to submit a site-specific modeling protocol to the State for review and approval prior to performing CALPUFF modeling. States will consult with FLMs and the EPA when evaluating the site-specific BART protocols. The site-specific protocol will include the

[4] *Draft Protocol for the Application of the CALPUFF Model for Analyses of Best Available Retrofit Technology (BART). VISTAS*, March 22, 2005 and September 20, 2005.

source-specific data on source location, stack parameters, and emissions. The methods of the VISTAS common modeling protocol will be followed in the site-specific protocol unless the source proposes to the State, and the State approves, alternative methods or assumptions.

Each VISTAS State or Local agency retains responsibility for the specific procedures and processes it will follow in working with the BART sources under its jurisdiction, the FLMs, EPA, and public to determine BART controls for sources in the State. Nothing in the VISTAS process replaces States' responsibility to determine BART controls.

The remainder of this document describes the CALPUFF modeling system and the application of CALPUFF to two situations:

- Air quality modeling to determine whether a BART-eligible source is "subject to BART" and therefore the BART analysis process must be applied to its operations.

- Air quality modeling of emissions from sources that have been found to be subject to BART, to evaluate regional haze benefits of alternative control options and to document the benefits of the preferred option.

Chapters 2 and 3 of this document are intended to provide background information on EPA's guidance for BART analysis modeling and on the CALPUFF modeling system. Subsequent chapters include more specific recommendations. Chapter 2 of this document reviews EPA's guidance for regional haze BART analysis modeling, as outlined in the 6 July 2005 Federal Register notice. The CALPUFF model is the preferred model recommended by the EPA for BART modeling analyses and its characteristics and limitations are discussed in Chapter 3. The specific steps to determine whether a BART-eligible source is subject to BART and to evaluate BART controls are described in Chapter 4. The procedures include initial modeling of BART-eligible sources using CALPUFF run in a conservative mode with regional meteorological datasets. For sources determined to be subject to BART based on these first modeling analyses, further finer grid CALPUFF analyses would be performed. The model configuration for the common modeling protocol is described in Chapter 4. Details of the source-specific protocol are described in Chapter 5. A quality assurance plan is outlined in Chapter 6.

EPA's guidance allows for the use of appropriate alternative models, however VISTAS will not develop a protocol for alternative models. This protocol focuses on guidance for the application of the preferred CALPUFF modeling approach. If a source wants to use an alternative model in its BART demonstration, the source will need to submit a detailed written justification to the State for review and approval. The State will provide the documentation to the EPA and Federal Land Managers for their review.

Also, this protocol does not address a preferred modeling approach to demonstrate the effectiveness of an optional emissions cap and trade program. Such a cap and trade program is not required, but can be implemented in lieu of BART if desired by the VISTAS States. VISTAS

States are not pursuing a regional trading alternative under the proposed EPA trading guidance (70 FR 44154-44175) that is to be promulgated in 2006.

2. REVIEW OF EPA'S GUIDANCE FOR BART MODELING

The final guidance for regional haze BART determinations was published in the Federal Register on 6 July 2005 (70 FR 39104 to 39172). It prescribes the modeling approaches that are to be used for various stages of the BART analysis process.

This chapter provides a summary of EPA's guidance for BART modeling. It is not intended to provide a comprehensive review of the guidance. Nor does this chapter address specific recommendations for VISTAS' approach to CALPUFF BART modeling. Those recommendations appear in Chapter 4.

2.1 Overview of the Regional Haze BART Process

The process of establishing BART emission limitations consists of four steps:

1) Identify whether a source is "BART-eligible" based on its source category, when it was put in service, and the magnitude of its emissions of one or more "visibility-impairing" air pollutants. The BART guidelines list 26 source categories of stationary sources that are BART-eligible. Sources must have been put in service between August 7, 1962 and August 7, 1977 in order to be BART-eligible. Finally, a source is eligible for BART if potential emissions of visibility-impairing air pollutants are greater than 250 tons per year. Qualifying pollutants include primary particulate matter (PM_{10}) and gaseous precursors to secondary fine particulate matter, such as SO_2 and NO_x. Whether ammonia or volatile organic compounds (VOCs) should be included as visibility-impairing pollutants for BART eligibility is left for the States to determine on a case-by-case basis. The guidance states that high molecular weight VOCs with 25 or more carbon atoms and low vapor pressure should be considered as primary $PM_{2.5}$ emissions and not VOCs for BART purposes.

(Note: If the source is subject to BART because one visibility impairing pollutant has potential emissions > 250 TPY, the State may determine that other visibility impairing pollutants are not subject to BART if their potential emissions are less than the *de minimis* levels (40 TPY for SO_2 and NO_x and 15 TPY of PM_{10} or $PM_{2.5}$. This assumes that the other BART-eligibility criteria are met.)

2) Determine whether a BART-eligible source can be excluded from BART controls by demonstrating that the source cannot be reasonably expected to cause or contribute to visibility impairment in a Class I area. The preferred approach is an assessment with an air quality model such as CALPUFF or other appropriate model followed by comparison of the estimated 24-hr visibility impacts against a threshold above estimated natural conditions to be determined by the States.[5] The threshold to determine whether a single source "causes" visibility impairment is set at

[5] A recent draft settlement agreement with the EPA (to be published in the *Federal Register* for public comment) provides that a State has the discretion to decide whether annual average or 20% best natural conditions are to be used as the reference. This ruling resolves an ambiguity in EPA's BART guidance, where the BART guideline

1.0 deciview change from natural conditions over a 24-hour averaging period in the final BART rule (70 FR 39118). The guidance also states that the proposed threshold at which a source may "contribute" to visibility impairment should not be higher than 0.5 deciviews although, depending on factors affecting a specific Class I area, it may be set lower than 0.5 deciviews. The test against the threshold is "driven" by the contribution level, since if a source "causes", by definition it "contributes".

EPA recommends that the 98th percentile value from the modeling be compared to the contribution threshold of 0.5 deciviews (or a lower level set by a State) to determine if a source does not contribute to visibility impairment and therefore is not subject to BART. Whether or not the 98th percentile value exceeds the threshold must be determined at each Class I area. Over an annual period, this implies the 8th highest 24-hr value at a particular Class I area is compared to the contribution threshold. Over a 3-year modeling period, the 98th percentile value may be interpreted as the highest of the three annual 98th percentile values at a particular Class I area or the 22nd highest value in the combined three year record, whichever is more conservative.

Alternatively, States have the option of considering that all BART-eligible sources within the State are subject to BART and skipping the initial impact analysis. In rare cases, a State might be able to do exactly the opposite, and use regional modeling to conclude that all BART-eligible sources in the State do not cumulatively contribute to "measurable" visibility impairment in any Class I areas. Also, the States have an option to exempt individual sources based on model plant analysis conducted by EPA in finalizing the BART rule. Under this option, sources with potential emissions of SO_2 plus NO_x of less than 500 tons and a distance from any Class I area greater than 50 kilometers or sources with SO_2 plus NO_x potential emissions of less than 1000 tons and a distance from any Class I area greater than 100 kilometers can be exempted. PM emissions are not specifically addressed in the model plant analysis, but subsequent discussions with EPA staff indicate that PM may be considered along with SO_2 and NO_x, so that a plant could be exempted if the combined potential emissions of SO_2, NO_x, plus PM meet the criteria above.

3) Determine BART controls for the source by considering various control options and selecting the "best" alternative, taking into consideration:

a) Any pollution control equipment in use at the source (which affects the availability of options and their impacts),

b) The costs of compliance with control options,

c) The remaining useful life of the facility,

d) The energy and non air-quality environmental impacts of compliance, and

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text says "natural conditions" at 70 FR 39162, col. 3, while the preamble to the BART rule says "natural visibility baseline for the 20% best visibility days" at 70 FR 39125, col. 1.

e) The degree of improvement in visibility that may reasonably be anticipated to result from the use of such technology.

Note that if a source agrees to apply the most stringent controls available to BART-eligible units, the BART analysis is essentially complete and no further analysis is necessary (70 FR 39165).

4) Incorporate the BART determination into the State Implementation Plan for Regional Haze, which is due by December 2007.

Instead of applying BART on a source-by-source basis, a State (or a group of States) has the option of implementing an emissions trading program that is designed to achieve regional haze improvements that are greater than the visibility improvements that could be expected from BART. If the geographic distributions of emissions under the two approaches are similar, determining whether trading is "better than BART" may be possible by simply comparing emissions expected under the trading program against the emissions that could be expected if BART was applied to eligible sources. If the geographic distributions of emissions are likely to be different, however, air quality modeling comparing the expected improvements in visibility from the trading program and from BART would be required. (See the proposed BART Alternative rule, at 70 FR 44160.) EPA suggests that regional modeling using a photochemical grid model may be more appropriate than CALPUFF for this purpose.

Note that EPA has indicated in the BART rule (70 FR 39138-39139) that emissions reductions under the Clean Air Interstate Rule (CAIR) meet the BART requirement for SO_2 and NO_x control for those EGUs subject to BART. However, PM emissions from EGUs are not addressed by CAIR and therefore a BART analysis may still be required for PM.

2.2 Model Recommendations for the BART Analysis

To evaluate the visibility impacts of a BART-eligible source at Class I areas beyond 50 km from the source, the EPA guidance recommends the use of the CALPUFF model as "the best regulatory modeling application currently available for predicting a single source's contribution to visibility impairment" (70 FR 39162). The use of another "appropriate model" is allowed although the EPA prefers the use of CALPUFF. If a source wants to use an alternative model, the source needs to submit a written justification and source-specific modeling protocol to its State for review and approval. As part of the consultation process, the State will provide documentation to EPA and FLM.

For modeling the impact of a source closer than 50 km to a Class I area, EPA's BART guidance recommends that expert modeling judgment be used, "giving consideration to both CALPUFF and other methods." The PLUVUE-II plume visibility model is mentioned as a possible model to consider instead of CALPUFF for a source within less than 50 km of a Class I area**.**

The EPA guidance notes that "regional scale photochemical grid models may have merit, but such models have been designed to assess cumulative impacts, not impacts from individual sources" and they are "very resource intensive and time consuming relative to CALPUFF", but States may consider their use for SIP development in the future as they may be adapted and "demonstrated to be appropriate for single source applications" (70 FR 39123). Photochemical grid models may be more appropriate for cumulative modeling options such as in the determination of the aggregate contribution of all-BART-eligible sources to visibility impairment, but such use should involve consultation with the appropriate EPA Regional Office (70 FR 39163).

According to the BART guidance, a modeling protocol should be submitted for all modeling demonstrations regardless of the distance from the BART-eligible source to the Class I area. EPA's role in the development of the protocol is only advisory as the "States better understand the BART-eligible source configurations" and factors affecting their particular Class I areas (70 FR 39126).

In the BART modeling analyses the EPA recommends that the State use the highest 24-hour average actual emission rate for the most recent three to five-year period of record. Emissions on days influenced by periods of start-up, shutdown and malfunction are not to be considered in determining the appropriate emission rates. (70 FR 39129).

If a source is found to be subject to BART, CALPUFF or another appropriate model should be used to evaluate the improvement in visibility resulting from the application of BART controls. Visibility improvements may be evaluated on a pollutant-specific basis in the BART determination (70 FR 39129).

For evaluating the improvement in visibility resulting from the application of BART, the EPA guidelines state that States are "encouraged to account for the magnitude, frequency, and duration of the contributions to visibility impairment caused by the source based on the natural variability of meteorology" (70 FR 39129).

2.3 Performance of a Cap and Trade Program

If a State or States elect to pursue an optional cap and trade program, they are required to demonstrate greater "reasonable progress" in reducing haze than would result if BART were applied to the same sources. In some cases, a State may simply be able to demonstrate that a trading program that achieves greater progress at reducing emissions will also achieve greater progress at reducing haze. Such would be the case if the likely geographic distribution of emissions under the trading program would not be greatly different from the distribution if BART was in place.

If the expected distribution of emissions is different under the two approaches, then "dispersion modeling" of all sources must be used to determine the difference in visibility at each impacted Class I area, in order to establish that the optional trading program will result in visibility improvements aggregated over all Class I areas that are "better than BART" (70 FR 39137-39138). The BART guidance does not specify the method to be used for this modeling. From a technical perspective, either applying CALPUFF to every source or using a regional photochemical model would satisfy the need.

A rulemaking procedure is currently underway to establish final guidance for such alternatives to BART (70 FR 44154-44175). The rule is expected to be finalized in 2006.

3. OVERVIEW OF THE CALPUFF MODELING SYSTEM

This chapter contains a general description of the CALPUFF modeling system and its capabilities and limitations. It does not include specific recommendations regarding the use of the model for BART analysis in the VISTAS region. These specific recommendations can be found in Chapter 4.

3.1 Capabilities and features of CALPUFF

The CALPUFF modeling system (Scire et al., 2000a, b) is recommended as the preferred modeling approach for use in the BART analyses. CALPUFF and its meteorological model, CALMET, are designed to handle the complexities posed by the complex terrain, the large source-receptor distances, chemical transformation and deposition, and other issues related to Class I visibility impacts. The CALPUFF modeling system has been adopted by the EPA as a *Guideline Model* for source-receptor distances greater than 50 km, and for use on a case-by-case basis in complex flow situations for shorter distances (68 FR 18440-18482). CALPUFF is recommended for Class I impact assessments by the Federal Land Managers Workgroup (FLAG 2000) and the Interagency Workgroup on Air Quality Modeling (IWAQM) (EPA 1998). The final BART guidance recommends CALPUFF as "the best modeling application available for predicting a singe source's contribution to visibility impairment" (70 FR 39122). As a result of these recommendations, the VISTAS modeling protocol is based on the use of CALPUFF for its BART determinations.

The main components of the CALPUFF modeling system are shown in Figure 3-1. CALMET is a diagnostic meteorological model that is used to drive the CALPUFF dispersion model. It produces three-dimensional wind and temperature fields and two-dimensional fields of mixing heights and other meteorological fields. It contains slope flow effects, terrain channeling, and kinematic effects of terrain. CALMET includes special algorithms for treating the overwater boundary layer and coastal interaction effects. CALMET can use meteorological observational data and/or three-dimensional output from prognostic numerical meteorological models such as MM5 (Grell et al., 1995) or RUC (Benjamin et al., 2004) in the developments of its fine-scale meteorological fields.

CALPUFF is a non-steady-state Lagrangian puff transport and dispersion model that advects Gaussian puffs of multiple pollutants from modeled sources. CALPUFF's algorithms have been designed to be applicable on spatial scales from a few tens of meters to hundreds of kilometers from a source. It includes algorithms for near-field effects such as building downwash, stack tip downwash and transitional plume rise as well as processes important in the far-field such as chemical transformation, wet deposition, and dry deposition. CALPUFF contains an option to allow puff splitting in the horizontal and vertical directions, which extends the distance range of the model. The primary outputs from CALPUFF are hourly concentrations and hourly deposition fluxes evaluated at user-specified receptor locations.

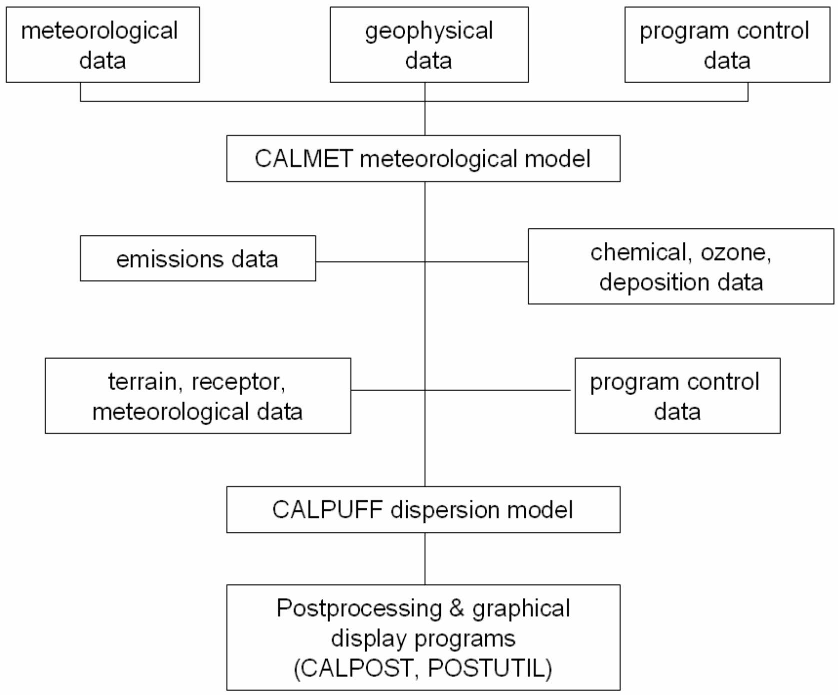

Figure 3-1. CALPUFF modeling system components.

A set of postprocessing programs associated with CALPUFF computes visibility effects and allows cumulative source impacts to be assessed, including potential non-linear effects of ammonia limitation on nitrate formation. The CALPOST postprocessor contains several options for computing change in extinction and deciviews for visibility assessments. The POSTUTIL postprocessor includes options for summing contributions of individual sources or groups of sources to assess cumulative impacts. POSTUTIL also contains CALPUFF's nitric acid-nitrate chemical equilibrium module, which allows the cumulative effects of ammonia consumption by background sources to be assessed in the postprocessor. In addition, the combination of CALPUFF and POSTUTIL allows the effects of source emissions of ammonia to be incrementally added to background ammonia levels when determining nitrate formation.

The rest of this chapter summarizes the capabilities and features of the CALPUFF modeling components in more detail.

3.1.1 Major Features of CALMET

The CALMET meteorological model consists of a diagnostic wind field module and micrometeorological modules for overwater and overland boundary layers. When modeling a large geographical area, as would be necessary for the regional VISTAS domain, the user has the option to use a Lambert Conformal Projection coordinate system to account for Earth's curvature.

The major features and options of the meteorological model are summarized in Table 3-1. The techniques used in the CALMET model are briefly described below.

Table 3-1. Major Features of the CALMET Meteorological Model

- **Boundary Layer Modules of CALMET**
  - Overland Boundary Layer - Energy Balance Method
  - Overwater Boundary Layer - Profile Method
    - -- COARE algorithm
    - -- OCD-based method
  - Produces Gridded Fields of:
    - -- Surface Friction Velocity
    - -- Convective Velocity Scale
    - -- Monin-Obukhov Length
    - -- Mixing Height
    - -- PGT Stability Class
    - -- Air Temperature (3-D)
    - -- Precipitation Rate

- **Diagnostic Wind Field Module of CALMET**
  - Slope Flows
  - Kinematic Terrain Effects
  - Terrain Blocking Effects
  - Divergence Minimization
  - Produces Gridded Fields of U, V, W Wind Components
  - Inputs Include Domain-Scale Winds, Observations, and (optionally) Coarse-Grid Prognostic Model Winds
  - Lambert Conformal Projection Capability

CALMET Boundary Layer Models

The CALMET model contains two boundary layer models for application to overland and overwater grid cells.

Overland Boundary Layer Model: Over land surfaces, the energy balance method of Holtslag and van Ulden (1983) is used to compute hourly gridded fields of the sensible heat flux, surface friction velocity, Monin-Obukhov length, and convective velocity scale. Mixing heights are determined from the computed hourly surface heat fluxes and observed temperature soundings using a modified Carson (1973) method based on Maul (1980). The model also determines gridded fields of Pasquill-Gifford-Turner (PGT) stability class and hourly precipitation rates.

Overwater Boundary Layer Model: The aerodynamic and thermal properties of water surfaces suggest that a different method is best suited for calculating the boundary layer parameters in the marine environment. A profile technique, using air-sea temperature differences, is used in CALMET to compute the micro-meteorological parameters in the marine boundary layer. The version of CALMET being used by VISTAS contains improvements in the overwater boundary layer parameterizations (Fairall et al., 2003) based on the Coupled Ocean Atmosphere Response Experiment (COARE) and enhancements in the calculation of overwater mixed layer heights (Batchvarova and Gryning, 1991, 1994). Further details and the results of an evaluation of the model containing these enhancements are described in Scire et al. (2005). An upwind-looking spatial averaging scheme is optionally applied to the mixing heights and three-dimensional temperature fields in order to account for important advective effects.

Diagnostic Wind Field Module

The diagnostic wind field module uses a two-step approach to the computation of the wind fields (Douglas and Kessler, 1988). In the first step, an initial-guess wind field is adjusted for kinematic effects of terrain, slope flows, and terrain blocking effects to produce a Step 1 wind field. Gridded MM5 can be used to define the initial guess field. The second step consists of an objective analysis procedure to introduce observational data into the Step 1 wind field to produce a final wind field.

Step 1 Wind Field. Development of the Step 1 wind field begins with the initial guess field defined by the MM5 prognostic meteorological model. Normally, the CALMET computational domain is specified to be at finer grid resolution than the MM5 dataset used to initialize the initial guess field. For example, 36-km MM5 data available for VISTAS modeling may be used to develop the initial guess field on a 12-km or even a 1-km CALMET grid. The Step 1 algorithms in CALMET described below apply terrain adjustments to the initial guess field on the fine-scale CALMET grid. Thus, the CALMET winds are adjusted to respond to fine-scale terrain features not necessarily seen by the coarser scale MM5 model.

Kinematic Effects of Terrain: The approach of Liu and Yocke (1980) is used to evaluate the effects of the terrain on the wind field. The initial guess field winds are used to compute a terrain-forced vertical velocity, subject to an exponential, stability-dependent decay function. The effects of terrain on the horizontal wind components are evaluated by applying a divergence-minimization scheme to the initial guess wind field. The divergence minimization scheme is applied iteratively until the three-dimensional divergence is less than a threshold value.

Slope Flows: The original slope flow algorithm in CALMET has been upgraded (Scire and Robe, 1997) based on the shooting flow algorithm of Mahrt (1982). This scheme includes both advective-gravity and equilibrium flow regimes. At night, the slope flow model parameterizes the flow down the sides of the valley walls into the floor of the valley, and during the day, upslope flows are parameterized. The magnitude of the slope flow depends on the local surface sensible heat flux and local terrain gradients. The slope flow wind components are added to the wind field adjusted for kinematic effects.

Blocking Effects: The thermodynamic blocking effects of terrain on the wind flow are parameterized in terms of the local Froude number (Allwine and Whiteman, 1985). If the Froude number at a particular grid point is less than a critical value and the wind has an uphill component, the wind direction is adjusted to be tangent to the terrain.

Step 2 Wind Field. The wind field resulting from the above adjustments of the initial-guess wind is the Step 1 wind field. The second step of the procedure may involve introduction of observational data into the Step 1 wind field through an objective analysis procedure. An inverse-distance squared interpolation scheme is used which weights observational data heavily in the vicinity of the observational station, while the Step 1 wind field dominates the interpolated wind field in regions with no observational data. The resulting wind field is subject to smoothing, an optional adjustment of vertical velocities based on the O'Brien (1970) method, and divergence minimization to produce a final Step 2 wind field.

The introduction of observational data in the Step 2 calculation is an option. It is also possible to run the model in "no observations" (No-Obs) mode, which involves the use only of MM5 gridded data for the initial guess field followed by fine-scale terrain adjustments by CALMET. In No-Obs mode, observational data are not used in the Step 2 calculations. The No-Obs mode is appropriate when the MM5 simulations adequately characterize the regional wind patterns and when local observations, especially surface observations, reflect local conditions on a scale smaller than that of the CALMET domain and hence their spatial representativeness may be limited. Such situations are most likely to occur when the CALMET grid scale is relatively large i.e., coarser than the scale of variation of the true wind field, which is particularly likely to occur in complex terrain or along the seashore,

3.1.2 Major Features of CALPUFF

By its puff-based formulation and through the use of three-dimensional meteorological data developed by the CALMET meteorological model, CALPUFF can simulate the effects of time- and space-varying meteorological conditions on pollutant transport from sources in complex terrain. The major features and options of the CALPUFF model are summarized in Table 3-2 at the end of this subsection. Some of the technical algorithms are briefly described below.

Complex Terrain: The effects of complex terrain on puff transport are derived from the CALMET winds. In addition, puff-terrain interactions at gridded and discrete receptor locations are simulated using one of two algorithms that modify the puff-height (either that of ISCST3 or a general "plume path coefficient" adjustment), or an algorithm that simulates enhanced vertical dispersion derived from the weakly-stratified flow and dispersion module of the Complex Terrain

Dispersion Model (CTDMPLUS) (Perry et al., 1989). The puff-height adjustment algorithms rely on the receptor elevation (relative to the elevation at the source) and the height of the puff above the surface. The enhanced dispersion adjustment relies on the slope of the gridded terrain in the direction of transport during the time step.

Subgrid Scale Complex Terrain (CTSG): An optional module in CALPUFF, CTSG treats terrain features that are not resolved by the gridded terrain field, and is based on the CTDMPLUS (Perry et al., 1989). Plume impingement on subgrid-scale hills is evaluated at the CTSG subgroup of receptors using a dividing streamline height (H_d) to determine which pollutant material is deflected around the sides of a hill (below H_d) and which material is advected over the hill (above H_d). The local flow (near the feature) used to define H_d is taken from the gridded CALMET fields. As in CTDMPLUS, each feature is modeled in isolation with its own set of receptors.

Puff Sampling Functions: A set of accurate and computationally efficient puff sampling routines is included in CALPUFF, which solve many of the computational difficulties encountered when applying a puff model to near-field releases. For near-field applications during rapidly-varying meteorological conditions, an elongated puff (slug) sampling function may be used. An integrated puff approach may be used during less demanding conditions. Both techniques reproduce continuous plume results under the appropriate steady state conditions.

Building Downwash: The Huber-Snyder and Schulman-Scire downwash models are both incorporated into CALPUFF. An option is provided to use either model for all stacks, or make the choice on a stack-by-stack and wind sector-by-wind sector basis. Both algorithms have been implemented in such a way as to allow the use of wind direction specific building dimensions. The PRIME building downwash model (Schulman et al., 2000) is also included in CALPUFF as an option.

Dispersion Coefficients: Several options are provided in CALPUFF for the computation of dispersion coefficients, including the use of turbulence measurements (σ_v and σ_w), the use of similarity theory to estimate σ_v and σ_w from modeled surface heat and momentum fluxes, or the use of Pasquill-Gifford (PG) or McElroy-Pooler (MP) dispersion coefficients, or dispersion equations based on the CTDM. Options are provided to apply an averaging time correction or surface roughness length adjustments to the PG coefficients. In version 5.754 of CALPUFF being used by VISTAS, an option is provided to use the AERMOD turbulence profiles for determining dispersion rates, which is the most recent approach to dispersion in EPA-approved regulatory modeling. In addition, turbulence advection is included. For additional details on these features, see Scire et al. (2005).

Overwater and Coastal Interaction Effects: Because the CALMET meteorological model contains both overwater and overland boundary layer algorithms, the effects of water bodies on plume transport, dispersion, and deposition can be simulated with CALPUFF. The puff formulation of CALPUFF is designed to handle spatial changes in meteorological and dispersion conditions, including the abrupt changes that occur at the coastline of a major body of water.

Dry Deposition: A resistance model is provided in CALPUFF for the computation of dry deposition rates of gases and particulate matter as a function of geophysical parameters, meteorological conditions, and pollutant species. For particles, source-specific mass distributions may be provided for use in the resistance model. Of particular interest for BART analyses is the ability to separately model the deposition of fine particulate matter (< 2.5 μm diameter) from coarse particulate matter (2.5-10 μm diameter).

Wind Shear Effects: CALPUFF contains an optional puff splitting algorithm that allows vertical wind shear effects across individual puffs to be simulated. Differential rates of dispersion and transport among the "new" puffs generated from the original, well-mixed puff can substantially increase the effective rate of horizontal spread of the material. Puffs may also be split in the horizontal when the puff size becomes large relative to the grid size, to account for wind shear across the puffs.

Wet Deposition: An empirical scavenging coefficient approach is used in CALPUFF to compute the depletion and wet deposition fluxes due to precipitation scavenging. The scavenging coefficients are specified as a function of the pollutant and precipitation type (i.e., frozen vs. liquid precipitation).

Chemical Transformation: CALPUFF includes options for parameterizing chemical transformation effects using the five species scheme (SO_2, $SO_4^{=}$, NO_x, HNO_3, and NO_3^-) employed in the MESOPUFF II model or a set of user-specified, diurnally-varying transformation rates. The MESOPUFF II scheme is recommended by IWAQM. It produces secondary fine particulate matter (sulfate and nitrate) from emissions of SO_2 and NO_x and thus allows analyses of visibility impacts. Ambient ozone concentrations are used in the parameterized chemical transformation module as a surrogate for OH radicals during daylight hours. Ambient ammonia concentrations are used together with a temperature and relative humidity-dependent equilibrium relationship to partition nitric acid and nitrate on an hour-by-hour and receptor-by-receptor basis.

Table 3-2. Major Features of the CALPUFF Dispersion Model

- **Source types**
  - Point sources (constant or variable emissions)
  - Line sources (constant or variable emissions)
  - Volume sources (constant or variable emissions)
  - Area sources (constant or variable emissions)

- **Non-steady-state emissions and meteorological conditions**
  - Gridded 3-D fields of meteorological variables (winds, temperature)
  - Spatially-variable fields of mixing height, friction velocity, convective velocity scale, Monin-Obukhov length, precipitation rate
  - Vertically and horizontally-varying turbulence and dispersion rates
  - Time-dependent source and emissions data for point, area, and volume sources
  - Temporal or wind-dependent scaling factors for emission rates, for all source types

- **Interface to the Emissions Production Model (EPM)**
  - Time-varying heat flux and emissions from controlled burns and wildfires

- **Efficient sampling functions**
  - Integrated puff formulation
  - Elongated puff (slug) formulation

- **Dispersion coefficient (σ_y, σ_z) options**
  - Direct measurements of σ_v and σ_w
  - Estimated values of σ_v and σ_w based on similarity theory
    - -- AERMOD turbulence profiles
    - -- Original turbulence profiles
  - Pasquill-Gifford (PG) dispersion coefficients (rural areas)
  - McElroy-Pooler (MP) dispersion coefficients (urban areas)
  - CTDM dispersion coefficients (neutral/stable)

- **Vertical wind shear**
  - Puff splitting
  - Differential advection and dispersion

- **Plume rise**
  - Buoyant and momentum rise
  - Stack tip effects
  - Building downwash effects
  - Partial penetration
  - Vertical wind shear

- **Building downwash**
  - Huber-Snyder method
  - Schulman-Scire method
  - PRIME method

- **Complex terrain**
  - Steering effects in CALMET wind field
  - Optional puff height adjustment: ISC3 or "plume path coefficient"
  - Optional enhanced vertical dispersion (neutral/weakly stable flow in CTDMPLUS)

Table 3-2. Major Features of the CALPUFF Dispersion Model (Cont'd)

- **Subgrid scale complex terrain (CTSG option)**
  - Dividing streamline, H_d, as in CTDMPLUS:
    - Above H_d, material flows over the hill and experiences altered diffusion rates
    - Below H_d, material deflects around the hill, splits, and wraps around the hill

- **Dry Deposition**
  - Gases and particulate matter
  - Three options:
    - Full treatment of space and time variations of deposition with a resistance model
    - User-specified diurnal cycles for each pollutant
    - No dry deposition

- **Overwater and coastal interaction effects**
  - Overwater boundary layer parameters (COARE algorithm or OCD-based method)
  - Abrupt change in meteorological conditions, plume dispersion at coastal boundary
  - Plume fumigation

- **Chemical transformation options**
  - Pseudo-first-order chemical mechanism for SO_2, $SO_4^{=}$, NO_x, HNO_3, and NO_3^- (MESOPUFF II method)
  - Pseudo-first-order chemical mechanism for SO_2, $SO_4^{=}$, NO, NO_2, HNO_3, and NO_3^- (RIVAD/ARM3 method)
  - User-specified diurnal cycles of transformation rates
  - No chemical conversion

- **Wet Removal**
  - Scavenging coefficient approach
  - Removal rate a function of precipitation intensity and precipitation type

3.1.3 Major Features of Postprocessors (CALPOST and POSTUTIL)

The two main postprocessors of interest for BART applications are the CALPOST and POSTUTIL programs. CALPOST is used to process the CALPUFF outputs, producing tabulations that summarize the results of the simulations, identifying, for example, the highest and second-highest hourly-average concentrations at each receptor. When performing visibility-related modeling, CALPOST uses concentrations from CALPUFF to compute light extinction and related measures of visibility (haze index in deciviews), reporting these for a 24-hour averaging time.

The CALPOST processor contains several options for evaluating visibility impacts, including the method described in the BART guidance, which uses monthly average relative humidity values. CALPOST contains implementations of the IWAQM-recommended and FLAG-recommended visibility techniques and additional options to evaluate the impact of natural weather events (fog, rain and snow) on background visibility and visibility impacts from modeled sources.

The POSTUTIL processor is a program that allows the cumulative impacts of multiple sources from different simulations to be summed, can compute the difference between two sets of predicted impacts (useful for evaluating the benefits of BART controls), and contains a chemistry module to evaluate the equilibrium relationship between nitric acid and nitrate aerosols. This capability allows the potential non-linear effects of ammonia scavenging by sulfate and nitrate sources to be evaluated in the formation of nitrate from an individual source. CALPUFF makes the full ambient ammonia concentration available to each puff without regard for any scavenging by other puffs. POSTUTIL corrects for such scavenging when the puffs generated by the CALPUFF model overlap, as could be the case for a single source when the wind speed is low, or when nitrate formation is to be attributed to each of several sources that are in a cluster and whose plumes overlap,

POSTUTIL will also compute the impacts of individual sources or groups of sources on sulfur and nitrogen deposition into aquatic, forest and coastal ecosystems. The postprocessor allows the changes in deposition fluxes resulting from changes in emissions to be quantified. For example the output of POSTUTIL and CALPOST can be used as input into an Acid Neutralizing Capacity (ANC) analysis, or for comparison to Deposition Analysis Thresholds (DATs).

3.2 Discussion of CALPUFF Applicability and Limitations

3.2.1 Transport and Diffusion

According to the IWAQM Phase 2 report (page 18), "CALPUFF is recommended for transport distances of 200 km or less. Use of CALPUFF for characterizing transport beyond 200 to 300 km should be done cautiously with an awareness of the likely problems involved."[6]

IWAQM's 200-km limitation derives from the observation that, when compared to the data of the Cross Appalachian Tracer Experiment (CAPTEX), the basic configuration of CALPUFF overestimated inert tracer concentrations by factors of 3 to 4 at receptors that were 300 to 1000 km from the source. The apparent reason was insufficient horizontal dispersion of the simulated plume, presumably because an actual large plume does not remain coherent in the presence of vertical wind shears that typically occur, especially during the night, and of horizontal wind shears over the large puffs that arise over long transport distances.

To better represent such situations, an optional puff splitting algorithm has since been added to CALPUFF to simulate wind shear effects across a well-mixed individual puff by dividing the puff horizontally and vertically into two or more pieces. Differential rates of transport among the new puffs thus generated can increase the horizontal spread of the material in the plume due to vertical wind speed shear and wind direction shear. The horizontal puff splitting algorithm is

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[6] The IWAQM presentation at EPA's 6th Modeling Conference provides the background for this recommendation: "The IWAQM concludes that CALPUFF be recommended as providing unbiased estimates of concentration impacts for transport distances of order 200 km and less, and for transport times of order 12 hours or less. For larger transport times and distances, our experience thus far is that CALPUFF tends to underestimate the horizontal extent of the dispersion and hence tends to overestimate the surface-level concentration maxima. This does not preclude the use of CALPUFF for transport beyond 300 km, but it does suggest that results in such instances be used cautiously and with some understanding." (From page D-12 of the IWAQM Phase 2 report.)

designed to allow large puffs that may grow to be several grid cells or more in size to split into smaller puffs that can then more accurately respond to variations in the local wind field across the original large puff. This will also tend to increase horizontal dispersion of the plume. Since the creation of additional puffs via puff splitting will increase the computational requirements of the model, possibly substantially, puff splitting is not enabled by default, but can be turned on at the option of the user. Puff splitting may be appropriate for transport distances over 200 to 300 km, or possibly over shorter distances in complex terrain.

Turning to the shorter distance end of the transport range, the CALPUFF section of Appendix A of the *Guideline on Air Quality Models* (40 CFR 51, Appendix W) states, "CALPUFF is intended for use on scales from tens of meters from a source to hundreds of kilometers." This is supported by the IWAQM Phase 2 report, which indicates that the diffusion algorithms in CALPUFF were designed to be suitable for both short and long distances. In this regard, CALPUFF does contain algorithms for such near-field effects as plume rise, building downwash, and terrain impingement and includes routines that deal with the computational difficulties encountered when applying a puff model in the field near to a source.

The recommendations for regulatory use in Appendix A of the *Guideline on Air Quality Models* state, "CALPUFF is appropriate for long range transport (source-receptor distance of 50 to several hundred kilometers)", but provisions for using CALPUFF in the near-field in "complex flow" situations are also included in the regulatory guidance. Complex flow situations may include complex terrain, coastal areas, situations where plume fumigation is likely, and areas where stagnation, flow reversals, recirculation or spatial variability in wind fields (e.g., as due to changes in valley orientation) are important.

The tracer studies with which CALPUFF transport and diffusion capabilities were evaluated in the IWAQM Phase 2 report were generally over distances greater than 50 km. More recently, additional studies of model performance have been performed at shorter distances, including at a power plant in New York state in complex terrain (at source-receptor distances of 2 to 8.5 km) and a second power plant in Illinois in simple terrain (at source-receptor distances in arcs ranging from 0.5 km to 50 km from the stack) (Strimaitis et al., 1998). Other CALPUFF evaluation studies over short-distances include ones by Chang et al. (2001) and Morrison et al. (2003). These studies demonstrate good model performance over source-receptor distances from a few hundred meters to 50 km.

An important factor in the performance of CALPUFF is the choice of dispersion coefficients. The EPA has defined the "regulatory default" option in CALPUFF to allow either Pasquill-Gifford (PG) or turbulence-based dispersion coefficients. CALPUFF has been evaluated and shown to perform better using turbulence-based dispersion for tall stacks (Strimaitis et al, 1998). CALPUFF with turbulence-based dispersion has also been evaluated for overwater transport and coastal situations (Scire et al., 2005). In many other studies, including AERMOD evaluation studies conducted by EPA, the use of PG-dispersion, or more specifically the lack of a convective probability density function (pdf) module, has been demonstrated to result in underprediction of peak concentrations.

In November 2005, EPA approved the AERMOD model, which relies on turbulence-based dispersion, as a regulatory Guideline Model[7]. The ISCST3 model and its PG dispersion coefficients are being phased out as an acceptable regulatory approach. However, EPA Region IV has indicated that the application of turbulence-based dispersion coefficients in CALPUFF needs to be further demonstrated before they are approved for BART application. They will consider accepting the use of turbulence dispersion coefficients on a case-by-case basis for sources that are close to Class I areas.

For regional haze light extinction calculations, use of a plume-simulating model such as CALPUFF is appropriate only when the plume is sufficiently diffuse that it is not visually discernible as a plume *per se*, but nevertheless its presence could alter the visibility through the background haze. The IWAQM Phase 2 report states that such conditions occur starting 30 to 50 km from a source. In this light, the BART guidance strongly recommends using CALPUFF for source-receptor distances greater than 50 km but also presents CALPUFF as an option that can be considered for shorter transport distances.

As discussed above, there do not appear to be any scientific reasons why CALPUFF cannot be used for even shorter transport distances than 30 km, though, as long as the scale of the plume is larger than the scale of the output grid so that the maximum concentrations and the width of the plume are adequately represented and so that the sub-grid details of plume structure can be ignored when estimating effects on light extinction. The standard 1-km output grid that has been established for Class I area analyses should serve down to source-receptor distances somewhat under 30 km; how much closer than 30 km will depend on the topography and meteorology of the area and should be evaluated on a case-by-case basis. For extremely short transport distances, depiction of the concentration distribution will require a grid that is finer than 1 km. (For reference, the width of a Gaussian plume, $2\sigma_y$, is roughly 1 km after 10 km of travel distance, assuming Pasquill-Gifford dispersion rates under neutral conditions.)

As an additional consideration, if the plume width is small compared to the visual range, the atmospheric extinction along a typical sight path of tens of kilometers through the plume will be inhomogeneous and the simple CALPOST point estimate of regional light extinction at a receptor point will not be correct. However, the effect of averaging light extinction estimates for 24 hours, during which the plume location shifts over various receptor points, is likely to mitigate this problem to some degree and suggests that using CALPUFF at distances under 30 km will often be appropriate. For the narrow plumes that result from short transport distances, though, the modeled peak 24-hr average extinction at a receptor will tend to overstate the effect of the source on regional haze.

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[7] *Revision to the Guideline on Air Quality Models: Adoption of a Preferred General Purpose (Flat and Complex Terrain) Dispersion Model and Other Revisions; Final Rule.* 70 FR 68218-68261. 9 November 2005.

The U.S. EPA has suggested that the plume visibility model, PLUVUE-II, could be used in lieu of CALPUFF for simulating visibility effects at such short distances.[8] PLUVUE-II is a Gaussian model that simulates the dispersion, chemical conversion, and optical effects of emissions of particles, SO_2, and NO_x from a single source. Its outputs include the discoloration of the sky by the plume (so called "plume blight") and the effect of the plume on visibility along user-selected sight paths that pass through the plume. The impacts of the plume on visibility depend not only on the plume composition, but also on the sight path chosen and its direction relative to the axis of the plume and the location of the sun. It isn't clear how such sight-path dependent results could be compared to the 0.5 and 1.0 deciview thresholds in the BART guidance. Since CALPUFF is designed to be useful for short transport distances (with features such as the simulation of plume downwash caused by structures at the source), CALPUFF seems more appropriate than PLUVUE-II for evaluating source impact at short distances for BART assessment purposes.

3.2.2 Aerosol Constituents

Primary $PM_{2.5}$

Appendix A of the *Guideline on Air Quality Models* (40 CFR 51, Appendix W) states that CALPUFF can treat primary pollutants such as PM_{10}. In actuality, CALPUFF can simulate PM_{10} or $PM_{2.5}$ or some other size range, because the assumed size distribution of the particles is a user input. The smaller the particles, the more they disperse like an inert gas. In most cases, the dispersion of inert $PM_{2.5}$ particles will be only minutely different from that of an inert gas, but the behavior of larger particles will differ.

A particularly important contributor to PM concentrations is the rate of deposition to the surface. $PM_{2.5}$ particles, which have a mass median diameter around 0.5 µm, have an average net deposition velocity of about 1 cm/min (or about 14 m/day) and thus the deposition of fine particles is usually not significant except for ground-level emissions. On the other hand, coarse particles (those PM_{10} particles larger than $PM_{2.5}$) have an average deposition velocity of more than 1 m/min (or 1440 m/day), which is significant, even for emissions from elevated stacks.

CALPUFF includes parametric representations of particle and gas deposition in terms of atmospheric, deposition layer, and vegetation layer "resistances" and, for particles, the gravitational settling speed. Gravitational settling, which is of particular importance for the coarse fraction of PM_{10}, is accounted for in the calculation of the deposition velocity. Effects of inertial impaction (important for the upper part of the PM_{10} distribution) and Brownian motion (important for small, sub-micron particles) and wet scavenging are also addressed. The BART guidance recommends that fine particulate matter (less than 2.5 µm diameter), which has higher light extinction efficiency than coarse particulate matter (2.5-10 µm diameters), should be treated separately in the model. CALPUFF allows for user-specified size categories to be treated as

[8] However, for the reasons given in this paragraph, VISTAS does not recommend PLUVUE-II for BART application

separate species, which includes calculating size-specific dry deposition velocities for each size category.

A primary $PM_{2.5}$ emission from coal-fired electric generating units (EGUs) that is of relevance to visibility calculations is that of primary sulfate. Although primary sulfate emissions account for only a small fraction of the total sulfur emissions from such sources, it may be important to simulate their effect with CALPUFF, especially at shorter distances before significant formation of secondary sulfate conversion from SO_2 has taken place.

Sulfur Dioxide and Secondary Particulate Sulfate

The MESOPUFF-II chemistry algorithm used in CALPUFF[9] simulates the gas phase oxidation of sulfur dioxide to sulfate by a linear transformation rate that was developed using regression relationships derived from the analysis of chemical conversion rates produced by a complex photochemical box model (see Scire et al., 1984, for a description of the development of the chemical module). As in all empirically-derived models, the relationships are based on easily-computed or observed parameters that are used as surrogates for the factors that control SO_2 oxidation.

The surrogate factors included in the parameterized chemistry during the daytime hours include solar radiation intensity, ambient ozone concentration, and atmospheric stability class. For example, gas phase SO_2 oxidation is a function of OH radical concentrations. Ozone concentrations are correlated with OH radical concentrations during daytime hours, and their use in the daytime SO_2 conversion rate in CALPUFF is based on this correlation relationship. The philosophy is that OH radical measurements are not available and cannot easily be computed within a model like CALPUFF, but ozone is commonly measured throughout the country, so the use of the well-known surrogate variable (ozone) is more useful in the empirical relationship than factors that are unknown or have a high degree of uncertainty. The same logic applies to the other variables in the relationship. They are surrogates for factors that the regression analysis has shown to be important in SO_2 oxidation rates. At night, the SO_2 conversion is set to a constant low value (default is 0.2%/hr). Aqueous phase oxidation of SO_2 is represented by an additive term that varies with relative humidity and peaks at 3%/hr at 100% relative humidity. CALPUFF represents the chemical conversion as a linear process because it requires linear independence between puffs, although as explained below, non-linear behavior in nitrate formation can be modeled.

[9] CALPUFF offers two options for parameterizing chemical transformations: the 5 species (SO_2, $SO_4^{=}$, NO_x, HNO_3, and NO_3^-) MESOPUFF-II system and the 6 species RIVAD system (which treats NO and NO_2 separately). IWAQM recommends using the MESOPUFF-II system with CALPUFF. The RIVAD system is believed to be more appropriate for clean environments, however, and therefore was used in the Southwest Wyoming Regional CALPUFF Air Quality Modeling Study in 2001. For the VISTAS region, the IWAQM- and FLM-recommended MESOPUFF-II chemistry is most appropriate.

The IWAQM Phase 2 report concludes that this chemistry algorithm is adequate for representing the gas phase sulfate formation but that it does not adequately account for the aqueous phase oxidation of SO_2. Actual aqueous phase oxidation in clouds or fog can proceed at rates much greater than 3% per hour, leading IWAQM to suggest that sulfate might be underestimated in such situations. However, aqueous phase oxidation depends on liquid water content, not relative humidity. In reality, liquid water does not exist in the atmosphere at relative humidity much below 100%, while the CALPUFF aqueous reaction term produces sulfate at lower relative humidity. This can lead CALPUFF to overestimate sulfate concentrations when the humidity is high but the cloud water that enables aqueous conversion is not present. Therefore, the direction of the bias in the aqueous chemistry simulation of sulfate formation can vary.

Other potential sources of error in the sulfate formation mechanism of CALPUFF include (1) overestimation of sulfate formation when NO_x concentrations in the plume are high and in actuality they deplete the local availability of ozone and hydrogen peroxide for oxidizing the SO_2; and (2) lack of direct consideration of the effect of temperature on the conversion rates, which may cause the model to overstate sulfate formation on cold days (below 10C or 50°F) (Morris et al., 2003). However, in CALPUFF, the effects of temperature are, to some degree, compensated for indirectly by the use of the solar radiation surrogate variable in the empirical conversion equations.

Whether these potential errors are important will depend on the setting. For example, Figure 3-2 shows a comparison of predicted and observed 24-hour sulfate concentrations, due to a large number of SO_2 sources, at the Pinedale IMPROVE site in Wyoming for the 1995 period (Scire et al., 2001). Overall, in this case there was very little bias in the sulfate predictions. Whether CALPUFF predictions would compare as well with measurements in the Southeast remains to be seen.

CALPUFF does not identify the chemical form of the sulfate compound that results from its reactions, which will generally be some form of ammoniated sulfate whose degree of neutralization will depend on the availability of ammonia in the atmosphere. This consideration, which has been found to be relevant for calculating light extinction in the VISTAS region, is not addressed by CALPUFF or CALPOST.

In most applications, the ozone concentrations required for the sulfate formation calculations are derived from ambient measurements, although concentrations simulated by regional models can be used.

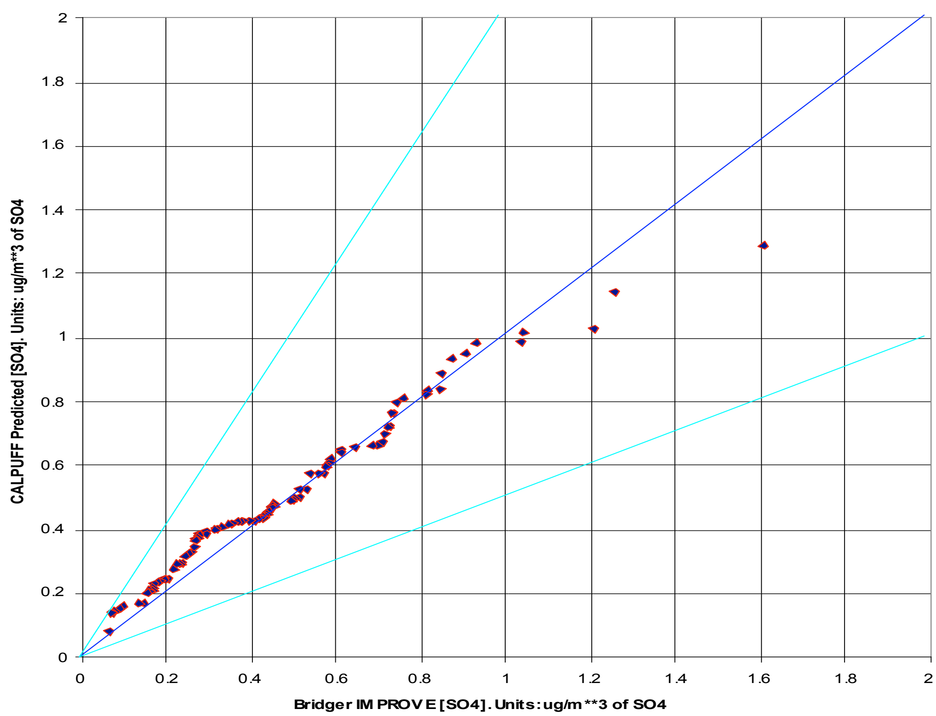

Figure 3-2. Observed vs. CALPUFF-predicted 24-hour sulfate concentrations at the IMPROVE monitoring site in Pinedale, Wyoming for 1995.

NO_x and Secondary Ammonium Nitrate

The MESOPUFF-II chemistry algorithm used in CALPUFF simulates the oxidation of NO_x to nitric acid and organic nitrates (both gases) by transformation rates that depend on NO_x concentration, ambient ozone concentration, and atmospheric stability class during the day. The conversion rate at night is set at to a constant value (default is 2.0 %/hr). The temperature- and humidity-dependent equilibrium between nitric acid gas and ammonium nitrate particles is taken into account when estimating the ammonium nitrate particle concentration, an equilibrium that depends on the ambient concentration of ammonia. The user supplies the value of the ambient concentration of ammonia. CALPUFF assumes that the sulfate reacts preferentially with that ammonia to form ammonium sulfate and the left over ammonia is available to form ammonium nitrate.

The IWAQM Phase 2 report considers that this mechanism is adequate for representing nitrate chemistry. Potential situations where this assumption may not be correct, however, include (1) plumes with high concentrations of NO_x that deplete the ambient ozone and thus limit the transformation of NO_x to nitric acid in the plume; and (2) when ambient temperature is below 10 C, and thus the transformation rate is much slower and the nitrate concentration may be lower than that simulated by CALPUFF (Morris et al., 2003). In both cases, CALPUFF may overestimate the amount of nitrate that is produced. In particular, the impact of ammonium nitrate concentrations on visibility at Class I areas in the VISTAS region is greatest in the winter, when temperatures are lowest, the nitrate concentrations are the greatest, and the sulfate concentrations tend to be the least. CALPUFF may overstate the impacts of NO_x emissions at those times, especially in the colder northern states**.** This potential overestimate of nitrate was not evident, however, in an evaluation of CALPUFF-modeled nitrate against actual observational data in the Wyoming study, as shown in Figure 3-3a (Scire et al., 2001),

Another factor in the calculation of nitrate is that CALPUFF makes the full amount of the background concentration of ammonia available to each puff, and that amount is scavenged by the sulfate in the puff. If puffs overlap, then that approach could overstate the amount of ammonium nitrate that is formed in total if, in reality, the combined scavenging by the overlapping puffs at a location would deplete the available ammonia enough that the combined nitrate formation was limited by the availability of ammonia. This effect of such ammonia limiting can be large in summer; for a source 75 km west of Mammoth Cave National Park, one modeling analysis found the maximum light extinction impact of the source to be 7.4% (roughly 0.74 deciviews) at the park when CALPUFF was used without consideration of ammonia limiting and about 30% less, between 5.5 and 5.8% (roughly 0.55 to 0.58 dv), when the effect of ammonia limiting was considered (Escoffier-Czaja and Scire, 2002).

To address the issue, since 1999 (i.e., after the IWAQM Phase 2 report) the CALPUFF system has included the optional POSTUTIL postprocessing program, which repartitions the ammonia and nitric acid concentrations estimated by CALPUFF to reflect potential ammonia-limiting effects on the development of nitrate**.** This allows non-linearity associated with ammonia limiting effects to be included in the CALPUFF model estimates. POSTUTIL computes the total sulfate concentrations from all sources (modeled sources plus inflow boundary conditions) and estimates the amount of ammonia available for total nitrate formation after the preferential scavenging of ammonia by sulfate. That is, as new sulfate, nitrate or ammonia from the source of interest is added to an existing mix of pollutants, POSTUTIL will estimate both the nitrate formed from the new source and the change in background nitrate as a result of the incremental depletion of ammonia (due to the new sulfate and nitrate) or addition of ammonia (from a new source of ammonia).

Reliable estimates of the ambient concentrations of ammonia, especially with the temporal and spatial resolution that would be optimal for use with CALPUFF, are needed to take full advantage of the increased accuracy provided by POSTUTIL. The processor requires estimated concentrations of ammonia throughout the modeling domain and period. Such estimates can be inferred from CASTNet measurements, which are integrated over a week, from 24-hr SEARCH measurements, or from the output of a regional photochemical model such as CMAQ or CAMx. The CASTNet network is fairly sparse and the uncertainty in the ammonia measurements is large, so defining the ammonia concentration throughout the Southeast would require extensive interpolation or extrapolation from the measured values. The quality of the SEARCH measurements is much better, but there are only 8 sites and they do not cover the entire VISTAS domain. Modeled concentrations have the advantage of being resolved in space and time, but their accuracy should be evaluated by comparison with measurements wherever possible.

Benefit is obtained by considering seasonal trends of ammonia and using POSTUTIL to determine the diurnal variability in available ammonia due to the daily cycle of nitrate formation associated with temperature and relative humidity effects. For example, results of the Wyoming study (see Figure 3-3a) show that POSTUTIL adjustments produced daily average nitrate concentrations well within the factor of two lines and with very little mean bias. On the other hand, analysis of the same results with use of constant ammonia of 0.5 ppb or 1.0 ppb produced consistent overpredictions of nitrate by factors of 2-3 and 3-4, respectively, as shown in Figure 3-3b (Scire et al., 2003).

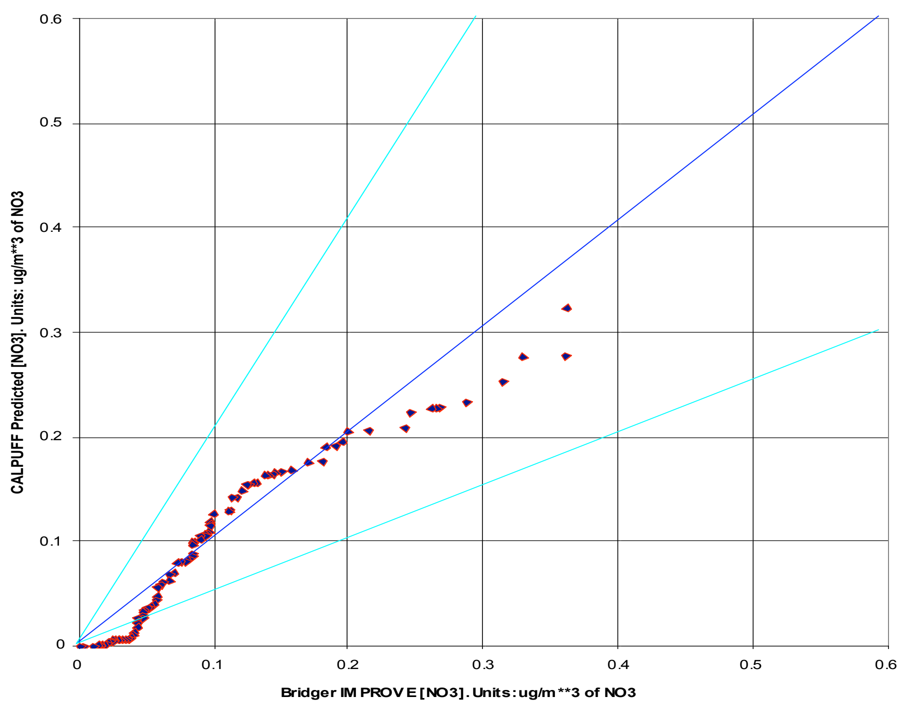

Figure 3-3a. Observed vs. CALPUFF-predicted 24-hour nitrate concentrations at the IMPROVE monitoring site in Pinedale, Wyoming for 1995 using the ammonia limiting method. (Scire et al., 2001)

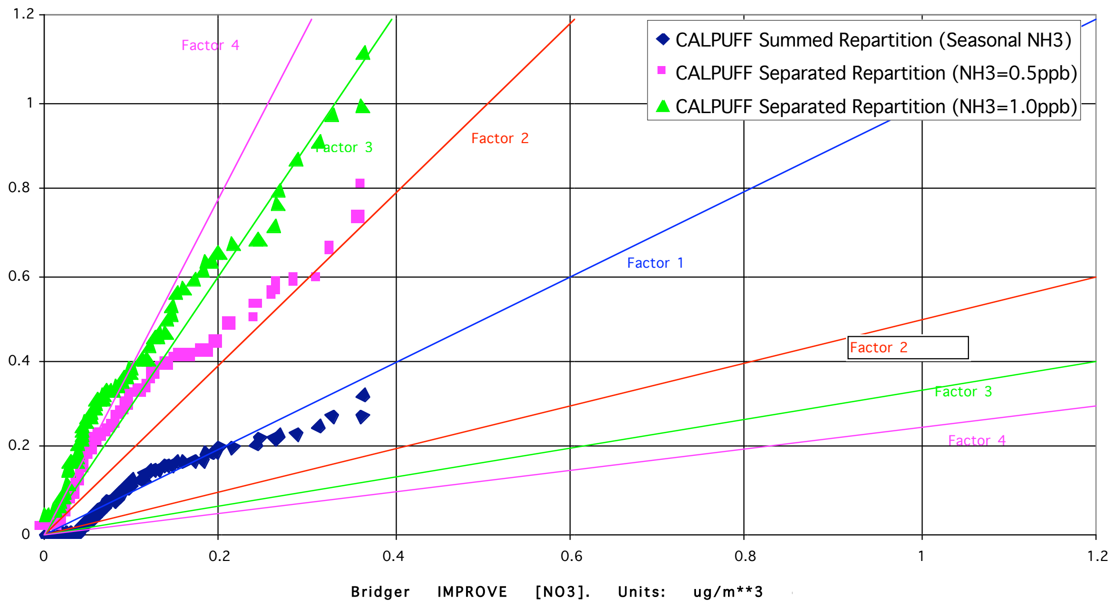

Figure 3-3b. Observed vs. CALPUFF-predicted 24-hour nitrate concentrations at the IMPROVE monitoring site in Pinedale, Wyoming for 1995 using the ammonia limiting method (blue), constant ammonia at 0.5 ppb (pink) and constant ammonia at 1.0 ppb (green). (Scire et al., 2003)

Secondary Organic Aerosol

Ongoing research studies at several Class I areas throughout the country (Fallon and Bench, 2004) and at SEARCH sites in the Southeast (Edgerton et al., 2004) are finding that, typically, 90 to 95% of the rural organic carbon fine particle concentration consists of modern carbon (e.g., that from the burning of vegetation and deriving from VOC emissions from vegetation) and only 5 to 10% is attributable to man's burning of fossil fuels. In addition, a field study at Great Smoky Mountains National Park in August 2002 (Tanner, et al., 2005) found that an average of 83% of the fine carbon was modern carbon

According to IMPROVE measurements, organics account for roughly 10% of the particle-caused light extinction in Class I areas in the Southeast. We can thus conclude that, in general, secondary organic carbon particles derived from anthropogenic fossil fuel burning emissions are unlikely to have a large impact (around 1%) on current visibility. (Man-caused burning of vegetation can have significant localized, short-term impacts, however.)

Current organic fine particle concentrations in the Southeast are typically within a factor of 2 of the 1.4 µg/m^3 concentration assumed for natural conditions by the EPA, which means that current fossil fuel burning would contribute less than 2% to visibility in an atmosphere that represents natural conditions. Thus, it is unlikely that VOC and organic particle contributions from BART sources will cause a large impact to visibility at Class I areas, but a 5% (0.5 dv) localized impact from a particularly large VOC source cannot be dismissed out of hand.

CALPUFF has only rudimentary capabilities for addressing formation of visibility-impairing organic particles from some forms of volatile organic carbon (VOC). The capabilities that do exist include the following.

First, PM_{10} emissions (such as from power plants) are often divided into filterable and condensable components, with the condensable mass being 100-200% of the filterable mass. For purposes of visibility analyses with CALPUFF, a fraction of the condensable part is typically treated as organic particles, i.e., it is assumed that a fraction of the condensable components in the PM_{10} emissions condense into organic $PM_{2.5}$ particles. The size of this organic fraction varies with process and process equipment, and can range from 20 to 100% of the condensable mass. These fine organic particles can be readily modeled by CALPUFF. (The remaining condensable material may be sulfuric, hydrochloric, or hydrofluoric acid.)

Second, a module that treats the formation of secondary organic particles from organic emissions was recently developed and is now part of the CALPUFF system. (Scire et al., 2001). This simplified secondary organic aerosol (SOA) module is a linear, parameterized representation that is currently considered best suited for biogenic organics. It relies on the conventional wisdom that only hydrocarbons with more than six carbon atoms can form significant SOA (Grosjean and Seinfeld, 1989). For example, according to this rule, isoprene (C_5H_8) does not make SOA but terpenes do, making pine trees more important biogenic contributors to SOA than oak trees.[10]

Limited evaluation of the performance of CALPUFF at simulating SOA with its biogenic SOA module at one IMPROVE site in a regional modeling study in Wyoming found that 95% of 101 estimated 24-hr SOA concentrations were within 2% of the measured values (Scire et al., 2001). This performance seems promising, although the developers view the SOA module as needing more testing and evaluation.

Thus, CALPUFF includes approaches for dealing with condensable VOC emissions that are characterized as condensable PM_{10} and with biogenic VOCs, although the soundness of concentration estimates by these approaches when modeling a plume from a single source is largely untested.[11] The CALPUFF simulation of VOC emissions from sources whose VOC emissions are predominantly anthropogenic is problematic, however. Perhaps the approach used for the simplified biogenic SOA module may be extended to anthropogenic VOCs when speciated VOC emissions information is available. If only those VOCs with more than six carbon atoms are presumed to be of importance, this eliminates many anthropogenic sources of VOC emissions. For example, the fugitive emissions of butane and ethane during petroleum processing

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[10] Recent research suggests that isoprene may be a SOA precursor, however.

[11] Note that neither of these VOC-related simulation approaches is described in the current (Version 5) CALPUFF User's Guide dated January 2001. See the Wyoming report referenced above for a description of this module.

are not important, while aromatic emissions (such as of toluene and xylene) are considered by the SOA module's mechanism. Development, testing, and evaluation would be needed before one could rely on such a module for estimating SOA from anthropogenic SOA emissions, though.

Therefore, to demonstrate the visibility impacts of VOC emissions from BART-eligible sources, means other than CALPUFF will be needed. A technical approach using a regional photochemical model to evaluate visibility impacts of VOC emissions is presented in Section 4.1.3. CALPUFF can be used to estimate the contribution from the primary condensable fraction of PM_{10} emissions, though.

3.2.3 Regional Haze

Calculation of the impact of the simulated plume particulate matter component concentrations on light extinction is carried out in the CALPOST postprocessor. The formula used is the usual IMPROVE/EPA formula, which is applied to determine a change in light extinction due to changes in component concentrations. Using the notation of CALPOST, the formula is the following:

$$b_{ext} = 3\,f(RH)\,[(NH_4)_2SO_4] + 3\,f(RH)\,[NH_4NO_3] + 4[OC] + 1[Soil] + \\ + 0.6[Coarse\ Mass] + 10[EC] + b_{Ray} \qquad (3\text{-}1)$$

The concentrations, in square brackets, are in $\mu g/m^3$ and b_{ext} is in units of Mm^{-1}. The Rayleigh scattering term (b_{Ray}) has a default value of 10 Mm^{-1}, as recommended in EPA guidance for tracking reasonable progress (EPA, 2003a).

There are a few important differences in detail and in notation between the CALPOST formula for estimating light extinction (i.e., Equation 3-1) and that of IMPROVE and EPA. First, the *OC* in the formula above represents organic carbonaceous matter (OMC in IMPROVE's notation), which is 1.4 times the *OC* (i.e., organic carbon alone) in the IMPROVE formula. The *EC* above is synonymous with *LAC* in the IMPROVE formula. CALPOST now offers the option of using the old IMPROVE *f(RH)* curve, whose values are documented in the December 2000 FLAG report, or the *f(RH)* now used by IMPROVE and EPA (as documented in EPA's regional haze guidance documents). Also, CALPOST sets the maximum *RH* at 98% by default (although the user can change it), while the EPA's guidance now caps it at 95%.

The haze index (HI) is calculated from the extinction coefficient via the following formula:

$$HI = 10\ ln\ (b_{ext}/10) \qquad (3\text{-}2)$$

where *HI* is in units of deciviews (dv) and b_{ext} is in Mm^{-1}. The impact of a source is determined by comparing HI for estimated natural background conditions with the impact of the source and without the impact of the source.

CALPOST Methods

CALPOST uses Equation 3-1 to calculate the extinction increment due to the source of interest and provides various methods for estimating the background extinction against which the increment is compared in terms of percent or deciviews.

For background extinction, the CALPOST processor contains seven techniques for computing the change in light extinction due to a source or group of sources (called Methods 1-7). These are usually reported as 24-hour average values, consistent with EPA and FLM guidance. In addition, there are two techniques for computing the 24-hour average change in extinction (i.e., as the ratio of 24-hour average extinctions, or as the average of 24-hour ratios). A brief summary of the techniques is provided below. Method 2 is the current default, recommended by both IWAQM (EPA, 1998) and FLAG (2000) for refined analyses. Method 6 is recommended by EPA's BART guidance (70 FR 39162).

Methods 4 and 5 use optically measured hourly background extinctions, which represent current actual levels of extinction and thus are not consistent with the "natural conditions" the BART proposal says should be used as a baseline. Methods 1 through 3 and 6 and 7 allow for user inputs of estimated (e.g., natural conditions) background extinction or component concentrations, and thus are consistent with the BART proposal.

Method 1 allows the user to specify a single value of a "dry" background extinction coefficient for each receptor, specify that a certain fraction of that coefficient is due to hygroscopic species, and use relative humidity measurements to vary the extinction hourly via a 1993 IWAQM *f(RH)* curve or, optionally, the EPA regional haze f(RH) curve (EPA, 2003b). The *RH* is capped at 98% or a user-selected value (95% for the EPA curve). The same *f(RH)* is applied to both the modeled sulfate and nitrate.

For an example of the use of Method 1, one could use the dry particle extinction coefficient of 9.09 Mm^{-1} that results from EPA's default natural conditions concentrations, together with an assumption that for natural conditions, say, 0.9 Mm^{-1} (or 10%) of this amount results from hygroscopic ammonium sulfate and ammonium nitrate, and then apply *f(RH)* to this 10%.

In Method 2, user-specified, speciated monthly concentration values are used to describe the background. When applied to natural conditions, for which EPA's default natural conditions concentrations are annual averages, the same component concentrations would have to be used throughout the year (unless potential refinements to those default values resulted in concentrations that vary during the year). Hourly background extinction is then calculated using these concentrations and hourly, site-specific *f(RH)* from a 1993 IWAQM curve (a different one than that in Method 1) or, optionally, the EPA regional haze f(RH) curve.[12] Again the *RH* is capped at either 98% (default) or a user-selected value (most commonly at 95%).

Method 3 is the same as Method 2, except that any hour in which the RH exceeds 98% (or the selected maximum) is dropped from the analysis. When 24-hr extinction is computed, no fewer than 6 valid hours are accepted at each receptor; otherwise the value for the day is tabulated as "missing".

Method 6 is similar to Method 2, except monthly f(RH) values (e.g., EPA's monthly climatologically representative values in EPA (2003a, b)) are used in place of hourly values for calculating both the extinction impact of the source emissions and the background conditions extinction. Hourly source impacts, with the effect on extinction due to sulfates and nitrates calculated using the monthly-average relative humidity in f(RH), are compared against the monthly default natural background concentrations. Thus the monthly-averaged relative humidity is applied to the hygroscopic components (i.e., sulfate and nitrate) of both the source impact and the background extinction with Method 6**.**

Method 7 is a new variant of Method 2 that was developed as a result of a ruling by the Assistant Secretary of the Interior for Fish and Wildlife and Parks, in response to a New Source Review case in Montana, that "natural conditions" should reflect the visibility impairment caused by significant meteorological events such as fog, precipitation, or naturally occurring haze (DOI, 2003).[13] Under Method 7, during hours when visibility is obscured by meteorological conditions, the actual measured visibility is used to represent natural conditions instead of the value that is calculated from EPA's default natural conditions concentrations under Method 2. A recent modification developed in response to FLM comments on Method 7, in which the daily average natural extinction is calculated somewhat differently, is called Method 7', i.e., "7 prime".

Refined Estimates of Extinction and Natural Background Visibility

Separate from the BART discussions, IMPROVE, EPA, and the Regional Planning Organizations are evaluating whether refinements are warranted to the methods recommended in EPA's guidance to calculate default estimates of natural background visibility. In particular, IMPROVE has recently approved an alternative to the formula (Eq. 3-1) it uses to estimate extinction from particle concentration measurements (Pitchford et al., 2005).

Refinements in the revised IMPROVE formula include the following:

- Adding a sea salt term, including a growth factor due to relative humidity

[12] Note that the hourly-varying natural background extinction in this method is not consistent with that prescribed by the EPA's natural conditions guidance (EPA, 2003b), for which a "climatologically-representative" f(RH) that only varies monthly is to be used. Method 6 uses these monthly average humidity values.

[13] The Secretary's guidance applies only to Federal Land Managers. EPA's position on this interpretation of natural conditions is unknown.

- Increasing the factor used to calculate the mass of particulate organic matter (OC in Eq. 3-1) from organic carbon measurements

- Modifying the relative humidity growth formula, f(RH), for sulfates and nitrates

- Revising the extinction efficiencies (the numerical constants in Equation 3-1) for sulfates, nitrates, and organic carbon so that they vary with concentration

- Adding a site-specific Rayleigh scattering term to the formula. Values will be calculated by IMPROVE for all Class I areas.

For the purposes of calculating current, future, and natural background visibility at VISTAS Class I areas as part of the reasonable progress analyses, VISTAS intends to present regional air quality modeling results using both the current EPA recommended assumptions and the newly revised aerosol extinction formula. If a BART-eligible source chooses to consider its projected impacts using the newly revised formula as well as the current formula, then modifications would need to be made to CALPOST to carry out calculations with the new algorithm.

4. VISTAS' COMMON MODELING PROTOCOL

4.1 Overview of Common Modeling Approach

In this section, guidance is provided on the use of the CALPUFF modeling system for two purposes:

1) Evaluating whether a BART-eligible source is exempt from BART controls because it is not reasonably expected to cause or contribute to impairment of visibility in Class I areas, and

2) Quantifying the visibility benefits of BART control options.

For purpose 1), States must determine whether a source emits any air pollutant (SO_2, NO_x, PM, and in certain cases VOC and NH_3) that "may reasonably be anticipated to cause or contribute to any impairment of visibility" in a Class I area. The States have 3 options to accomplish this:

A) Conclude that all BART-eligible sources in State are subject to BART.

B) Demonstrate that all BART-eligible sources in the State together do not cause or contribute to any visibility impairment

C) Determine if the impact from each individual BART-eligible source is greater than a threshold value.

VISTAS States intend to follow Option C (determine if the visibility impact from individual sources exceeds a contribution threshold) for SO_2 and NO_x emissions. The methods for Option C are described in Section 4.1.1. In early 2006, VISTAS pursued Option B (demonstrate that all BART eligible sources in a State do not impact visibility) for VOC, NH_3 and PM emissions. The approach and results for Option B are described in Section 4.1.3. As a result of this exercise, the VISTAS States have determined that the Option C exemption analyses should also include PM emissions and, for sources with large NH_3 emissions, NH_3. The States determined that anthropogenic VOC emissions do not cause or contribute to visibility impairment at VISTAS Class I areas and that VOC emissions do not need to be considered in BART analyses.

4.1.1 BART Exemption Analysis

As illustrated in Figure 4-1, three steps will evaluate whether a BART-eligible source of SO_2, NO_x, or PM is subject to BART:

1) VISTAS plans to use Q/d as a presumptive indicator that a source is subject to BART. If Q/d for SO_2 > 10 for 2002 actual emissions, then the State presumes that the source is subject to BART. If the source agrees with this presumption, then no exemption modeling is required and the source can proceed to the BART determination using CALPUFF to evaluate impacts of control options and can perform the engineering analyses. If a source disagrees, the source

may perform fine grid modeling as described in Section 4.4 to determine if its impact is < 0.5 dv.

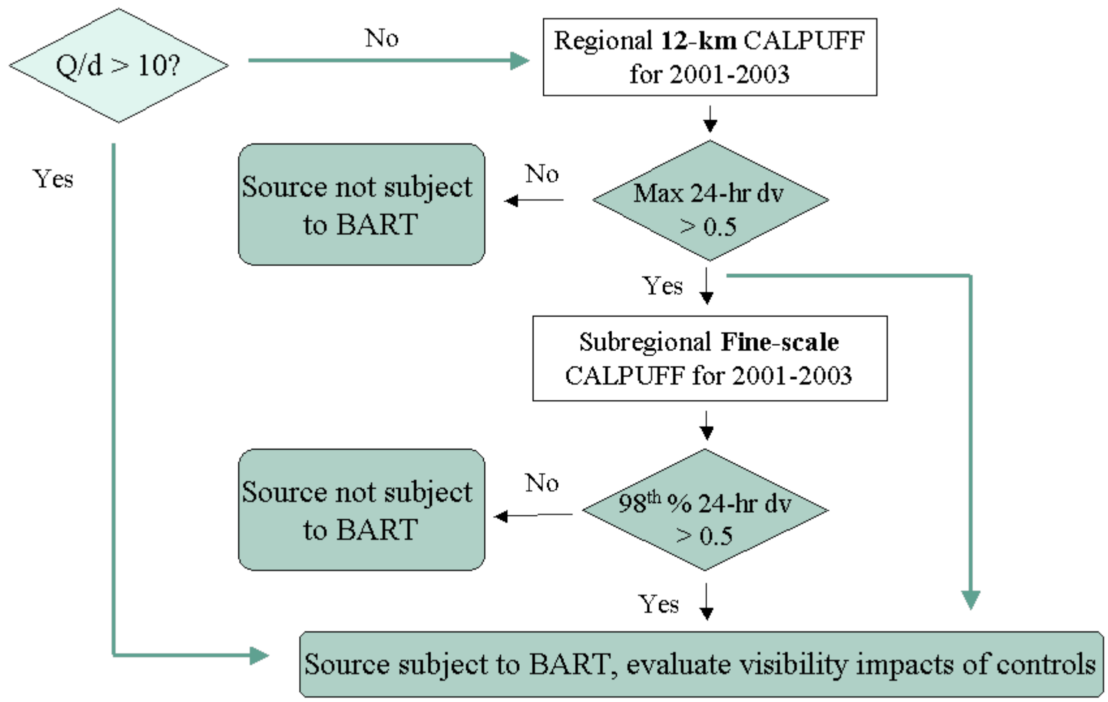

Figure 4-1. Flow chart showing the components of the VISTAS common modeling protocol. Assessment should be made for each Class I Area. (If a source agrees to install the most stringent controls then the modeling steps indicated above and engineering analyses and visibility impact modeling would not be required.)

2) An optional initial modeling assessment using the CALPUFF model with the coarse scale 12-km regional VISTAS domain can be used to answer questions whether (a) a particular source may be exempted from further BART analyses and (b) if finer grid CALPUFF analysis were to be undertaken, which Class I areas should be included. Assumptions for the initial modeling assessment are conservative so that a source that contributes to visibility impairment is not exempted in error. If a source is shown not to contribute to visibility impairment using the initial modeling assessment, the source would not be subject to BART and would be exempted from further BART analyses. If a source is shown to contribute to visibility impairment using the initial modeling assessment, the source has the option to undertake finer grid CALPUFF modeling to evaluate further whether it is subject to BART.

3) A finer grid CALPUFF modeling analysis using a subregional CALMET domain will be the definitive test as to whether a source is subject to BART.

For large sources that will clearly exceed the initial screening thresholds, this step can be skipped and the analysis may proceed directly to the finer grid modeling analysis, which is described in Section 4.4.

4.1.2 BART Control Evaluation

For sources that are determined to be subject to BART controls, part of the BART review process involves evaluating the visibility benefits of different BART control measures. These benefits will be determined by making additional CALPUFF simulations using the same CALMET and CALPUFF configuration as those used in the finer grid analysis of Step 2. The only exception is that the source and emissions data used in the CALPUFF control evaluation simulations will reflect the BART control measures being evaluated. Using the same model configuration will produce an "apples-to-apples" comparison, where differences in impacts are due to the effectiveness of the controls rather than model configuration differences. For example, a control scenario evaluation that uses more conservative assumptions than the base case simulation may produce results showing no or little improvement in visibility impacts. That control scenario run with the same model configuration as the base case may show significant visibility improvement. Therefore, in order to not obscure the response to predicted visibility improvements by differences in the modeling approach, the same model configuration should be used in the BART control evaluation simulation as in the base case simulation.

The base case to which the effectiveness of BART controls is to be compared is the "current emissions" scenario for which the finer grid Step 2 modeling was performed. The postprocessing steps and procedures are the same as in the BART eligibility simulation. Side-by-side comparison of the visibility impacts will be tabulated to quantify the effectiveness of each control scenario relative to the base case.

The modeling evaluation is a unit-by-unit evaluation and can be conducted on a pollutant specific basis. Modeling results are used with the other four statutory factors mentioned in Section 2.1 to decide which control technology, if any, is appropriate. Finally, if a source decides to use the most stringent control technology available, the BART control analysis, including modeling, is not necessary.

4.1.3 VISTAS' Treatment of VOC, NH_3, and PM

Volatile Organic Compounds

CALPUFF is currently not recommended for addressing visibility impacts from VOC because its capability to simulate secondary organic aerosol formation from VOC emissions is not adequately tested, especially for anthropogenic emissions. (Separately, condensable organic carbon can be calculated from PM_{10}.)

VISTAS has performed a weight of evidence analysis to demonstrate, using the CMAQ regional air quality model, that the combined VOC emissions from all point sources (BART-eligible and non-BART) in each State do not contribute to visibility impairment. Emissions sensitivity simulations run for VISTAS by Georgia Institute of Technology using VISTAS' 12 x 12 km grid and CMAQ v 4.3 for episodes in July 2001 and January 2002 demonstrated very low to no response of organic carbon levels and light extinction at Class I areas to changing VOC emissions from all anthropogenic sources in the VISTAS 12-km modeling domain (eastern US). Georgia Tech repeated the sensitivity analyses using the VISTAS 12-km domain and CMAQ v 4.4 with a refined SOA module for summer (Jun 1-Jul 10) and winter (Nov 19-Dec 19) periods in 2002. VOC emissions from all anthropogenic point sources in every VISTAS State were reduced by 100% (i.e., eliminated). The maximum 24-hr impact of all VOC emissions from all point sources throughout the VISTAS domain was thus determined to be less than 0.5 dv (compared to annual average natural background) at every Class I area in the VISTAS domain and in adjacent States. It follows that the impact of any one BART-eligible source would be much less than 0.5 dv. Based on these analyses, the VISTAS States have concluded that VOC emissions from BART sources do not cause or contribute to visibility impairment and do not need to be included in BART analyses.

Ammonia

EPA has given states the option to address ammonia (NH_3) emissions from BART-eligible sources. VISTAS also contracted with Georgia Tech to calculate NH_3 emissions sensitivities using CMAQ v 4.4 with a refined SOA module and the same Jun-Jul and Nov-Dec periods in 2002 that were used for the VOC sensitivity evaluation. The NH_3 emissions from all point sources (BART-eligible and not-BART) in every State were reduced by 100% for these analyses. This sensitivity evaluation showed that the collective impact of all VISTAS region point NH_3 emissions is greater than 0.5 dv (compared to annual average natural background) at several Class I areas. When the NH_3 emissions were scaled to represent 100% reduction from only the BART-eligible sources in each State, then the maximum impact of those sources was under 0.5 dv at most, but not all Class I areas. The high values appear to result primarily from emissions from 13 large NH_3 sources. In the absence of those 13 facilities, the scaled NH_3 emissions peak impacts at Class I areas were 0.3 dv or less. Based on these analyses, the VISTAS States recommended that, except for these 13 facilities, NH_3 emissions not be included in BART modeling. States will provide instructions to those 13 sources as to how to evaluate contributions of their NH_3 emissions to visibility impairment. For documentation purposes, in summer 2006 VISTAS is repeating the NH_3 emissions sensitivity calculations, using CMAQ v4.5 with Base F emissions and reducing 100% of NH_3 emissions from only the BART-eligible sources in the VISTAS states.

Primary Particulate Matter

Primary particulate matter is considered a visibility impairing pollutant. However, the extent to which primary PM from BART-eligible sources contributes to impairment at Class I areas in the southeastern US is not clear. For EGUs, the EPA has determined that emissions reductions of SO_2 and NO_x under the CAIR rule meet the BART requirements, but these EGUs may still be subject to BART for primary PM. To determine the potential impacts of PM from EGU and non-EGU sources in the VISTAS states, two CMAQ sensitivity runs for the first and third quarters of 2002 were carried out by VISTAS' CMAQ modeling team of ENVIRON, UCR, and Alpine

Geophysics In one run, all primary PM from EGUs was removed while in the other run all primary PM from non-EGU sources was removed. All other CMAQ modeling components were held constant. At almost all Class I areas in the VISTAS region, primary PM emissions contribute to regional haze, with the collective impact of all EGU and non-EGU point primary PM emissions being greater than 0.5 dv compared to annual average natural background. In fact, the impacts of EGU PM emissions alone or of non-EGU PM emissions alone were each mostly greater than 0.5 dv. Although the impacts of BART sources alone would be smaller, the VISTAS States have concluded that all BART-eligible sources need to consider the impacts of their PM emissions.

4.2 Optional Source-Specific Modeling

In some circumstances, a source may want to apply techniques designed to evaluate the impacts in a more detailed way than the standard VISTAS common protocol. A source may propose source-specific modeling procedures to address special issues to the State for State review. For example, sources very close to Class I areas may be better treated by a finer grid resolution that the generic Step 2 “fine” grid resolution meteorological fields provided by VISTAS. In some situations, higher resolution MM5 or other prognostic meteorological datasets may be available than the standard 12-km or 36-km MM5 datasets provided by VISTAS. Because it is not possible to anticipate all of the situations where there would be a benefit to conducting more detailed source-specific analyses, the option to pursue this option is left as an open issue, to be resolved and justified based on specific factors relevant for the source in question.

A source-specific modeling protocol is required for each source. This document should describe the data sources and model configuration, and provide rationale for any changes in the model approach from the common protocol. This source-specific protocol must be provided for review and approval by the State. The State will share the protocol with EPA and the Federal Land Managers for their review. Discussion of approaches to source-specific modeling and an outline of the typical contents of the source-specific protocol are presented in Chapter 5. Discussions with the regulatory authorities should be conducted prior to development of a source-specific protocol to ensure all of the relevant issues are included in the protocol.

4.3 Initial Procedure for BART Exemption

4.3.1 Overview of Initial Approach

The first step in the common protocol, the initial assessment in Figure 4-1, is a simple procedure to evaluate whether a source can be exempted from BART controls using a consistent set of meteorological and dispersion options. A pre-computed set of meteorological files and a pre-defined CALPUFF input option configuration, based on guidance in the final BART rule (70 FR 39104-39172) and other EPA and FLAG model guidance, will allow relatively simple initial simulations. The regional initial domain is designed to allow any Class I areas within the VISTAS area to be evaluated with a single meteorological database and consistent CALPUFF modeling options. The second important question that this first screening step will answer is, if initial modeling indicates a source may impact visibility significantly, what Class I areas should be included in a finer grid analysis? Due to the multitude of factors affecting the contribution of a source to visibility in a Class I area, simple screens or rules of thumb alone (such as that the closest Class I area will produce the controlling visibility impacts) are not likely to be universally reliable.

4.3.2 Discussion of 12-km Initial Exemption Modeling

Meteorological Fields

A regional initial domain and a set of pre-computed regional CALMET meteorological files will be prepared for VISTAS, to allow any Class I areas within the VISTAS area to be evaluated with a consistent meteorological database and consistent CALPUFF modeling options.

The following three years of MM5 meteorological data have been assembled by VISTAS for use in the regional CALPUFF modeling effort:

- 2001 MM5 dataset at 12 km and 36 km grid (developed for EPA)
- 2002 MM5 dataset at 12 km and 36 km grid (developed by VISTAS)
- 2003 MM5 dataset at 36 km grid (developed by the Midwest Regional Planning Organization).

These data sets have been provided to Earth Tech by VISTAS, and from them Earth Tech has produced annual CALMET meteorological files at 12-km grid resolution for the domain shown in Figure 4-2. The CALMET modeling output files in the form of CALPUFF-ready three-dimensional meteorological files will be available on external hard drives to the States and other parties.

The initial procedure to determine if a BART-eligible source is subject to BART uses the pre-computed CALMET meteorological fields for the years 2001-2003 on the 12-km CALMET domain in Figure 4-2 and simulates with CALPUFF any BART-eligible source to be screened. The CALMET simulations will be developed using the highest resolution MM5 data available for each year (i.e., 36-km MM5 data for 2003, 12-km MM5 data for 2001 and 2002).

The development of the regional CALMET meteorological fields from MM5 data will be conducted in No-Observations ("No-Obs") mode. The MM5 data already reflect assimilation of observational data and are likely to adequately characterize regional wind patterns that are consistent with the 12-km grid scale. Blending of MM5 data with local observations (which are mainly at the surface) could lead to wind structures that may not be realistic under some conditions and may result in poorer characterization of the regional winds. Thus, the effort required to prepare observational data sets for CALMET for the large regional domain involves considerable effort that may not provide corresponding improvement of the wind field.

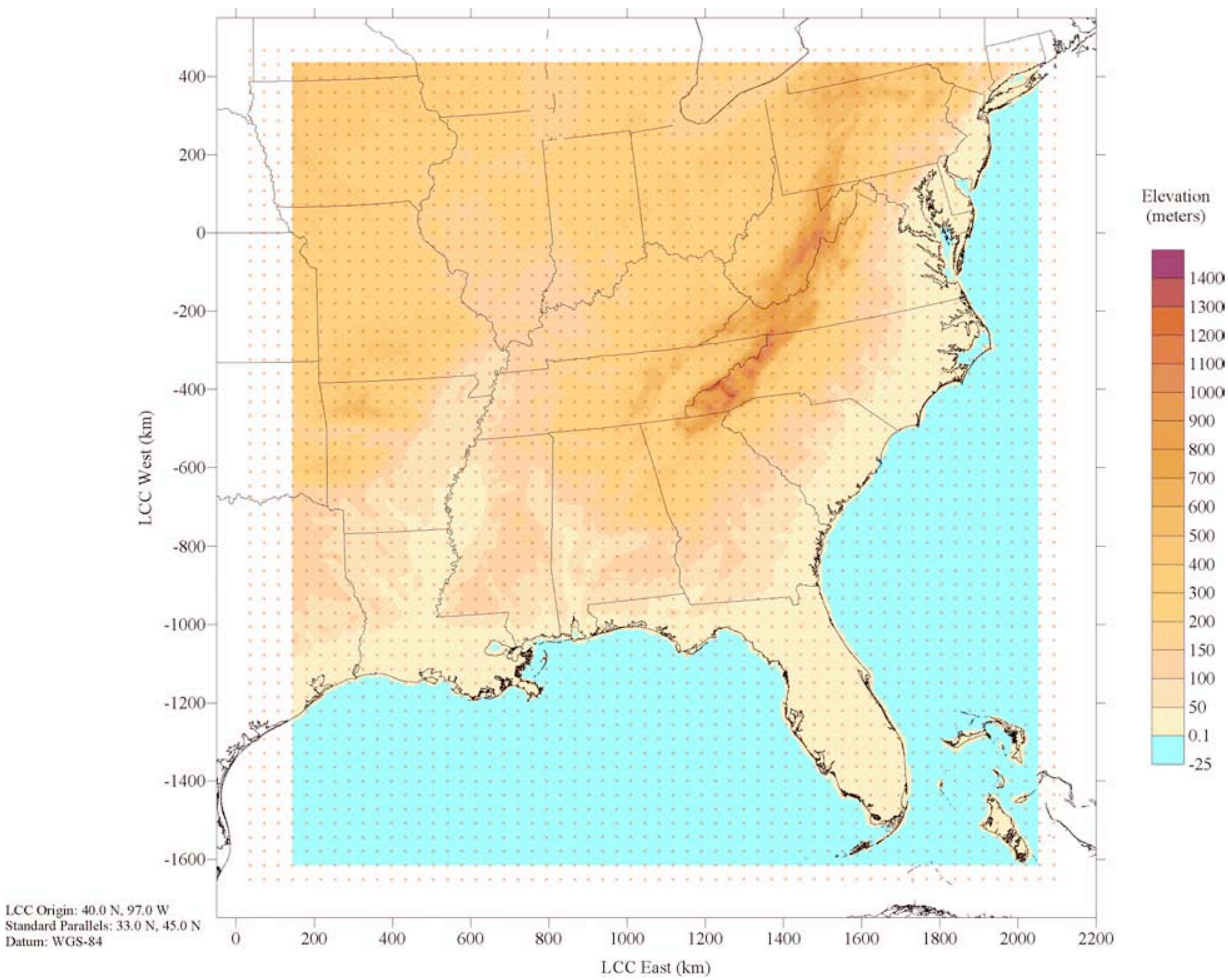

Figure 4-2. VISTAS Regional 12-km Resolution CALMET Modeling Domain (color area with terrain contours). The locations of the 36-km resolution MM5 grid points are shown on the plot.

For 2003, the 36-km MM5 data will be used as CALMET's initial guess field and then the CALMET diagnostic terrain adjustments (see Section 3.1.1) will be applied to reflect terrain on the scale of the CALMET grid (i.e., 12-km). When the 12-km MM5 (2001 and 2002) data are used, the diagnostic CALMET terrain adjustments will be turned off since the grid resolution of the MM5 data is the same as the CALMET grid and the terrain adjustments on the 12-km grid scale will already be reflected in the MM5 dataset. In this case, the MM5 winds will be interpolated by CALMET to the CALMET layers and CALMET's boundary layer modules will compute mixing heights, turbulence parameters and other meteorological parameters that are required by CALPUFF.

Impact Threshold

The final BART guidance recommends that the threshold value to define whether a source "contributes" to visibility impairment is 0.5 dv change from natural conditions[14] (although States may set a lower threshold). The 98th percentile (8th highest annual) 24-hr average predicted impact at the Class I area, as calculated using CALPOST Method 6 (monthly average relative humidity values), is to be compared to this contribution threshold value. For this comparison, the predicted impact at the Class I area on any day is taken to be the highest 24-hr average impact at any receptor in the Class I area on that day. (Note that the receptor where the highest impact occurs can change from day to day.) According to clarification of the BART guidance received from EPA, for a three-year simulation the modeling values to be compared with the threshold are the greatest of the three annual 8th highest values or the 22nd highest value over all three years combined, whichever is greater.

For the purposes of the initial analysis, however, the *highest value* over the three-year period (not the 98th percentile value) is to be compared to the contribution threshold. This ensures a significant measure of conservatism in the initial approach. VISTAS will evaluate the initial CALPUFF results to determine if using the single highest value provides too conservative a screen for exemption purposes. If so, VISTAS may increase the number of exceedances of the contribution threshold that would be allowed and still qualify to exempt a source.

4.3.3 Model Configuration and Settings for Initial Analysis

VISTAS will use CALPUFF Version 5.754 and CALMET Version 5.7. These versions contain enhancements funded by the Minerals Management Service (MMS) and VISTAS. They were developed by Earth Tech, Inc. and they are maintained on the CALPUFF website (www.src.com) for public access. This version includes CALMET, CALPUFF, CALPOST, CALSUM, and POSTUTIL as well as CALVIEW.

The initial analysis uses a CALPUFF computational domain that includes all Class I areas within 300 km of a source. These Class I areas are specified in the CALPUFF control file for analysis. States could decide to require a different value for the maximum distance threshold for the CALPUFF domain, depending on the locations of the Class I areas in their states and other factors such as meteorological conditions and the magnitudes of the emissions from BART-eligible sources. The regional CALMET domain will be unchanged by these adjustments.

Also, the initial approach is designed to significantly reduce the CALPUFF simulation time by restricting the CALPUFF computational domain size to include only areas where significant impacts are feasible rather than the entire regional domain. CALPUFF allows its computational domain to be specified as a subset of the CALMET meteorological domain by settings within the

[14] As described in Footnote 5 on page 6, States have the option of defining natural conditions as either the annual average default conditions or the average of the 20% best natural condition days.

CALPUFF input file. The advantage of selecting a smaller CALPUFF computational domain in the regional CALPUFF simulations is that CALPUFF run time is proportional to the number and residence time of the puffs on the domain (and other factors such as the number of receptors and the internal time step computed by the model). A CALPUFF domain covering an area 300 km from a source in all directions would involve only 50 x 50 12-km grid cells, which will require modest computational resources.

CALMET output files for the VISTAS regional domain shown in Figure 4-2 will be provided to VISTAS by Earth Tech. These files will be in CALPUFF-ready format, and as such, no CALMET user inputs will be required. An option in CALMET allows finer grid CALMET input files to be calculated from the 12-km CALMET files.

The basic characteristics of the CALMET, CALPUFF and CALPOST configurations for the initial analyses are listed below.

CALMET Modeling Configuration (12-km initial exemption modeling)

The CALMET model configuration for the regional CALMET simulations will be defined by Earth Tech in collaboration with the VISTAS States. The basic model configuration will follow the recommended IWAQM guidance (EPA, 1998; Pages A-1 through A-6), except as noted below.

The basic features of the modeling simulation are the following:

- Modeling period: 3 years (2001-2003)

- Meteorological inputs: MM5 data provide initial guess fields in CALMET

- CALMET grid resolution: 12-km (same Lambert Conformal coordinate system and grid cells as the 12-km 2001/2002 MM5 simulations)

- CALMET vertical layers: 10 layers. Cell face heights (meters): 0, 20, 40, 80, 160, 320, 640, 1200, 2000, 3000, 4000.

- CALMET mode: No-Observations mode including option to read overwater data directly from MM5.

- Diagnostic options: IWAQM default values, except as follows: diagnostic terrain blocking and slope flow algorithms used for 2003 simulations (using 36-km MM5 data), but no diagnostic terrain adjustments in 2001 and 2002 simulation (using 12-km MM5 data)

- CALMET options dealing with radius of influence parameters (R1, R2, RMAX1, RMAX2, RMAX3), BIAS, ICALM parameters are <u>not used</u> in No-Observations mode.

- TERRAD (terrain scale) is required for runs with diagnostic terrain adjustments (i.e., the 2003 simulations). Values of ~10-20 km will be tested, and an appropriate value determined.

- Land use defining water: JWAT1 = 55, JWAT2 = 55 (large bodies of water). This feature allows the temperature field over large bodies of water such as the Atlantic Ocean and the Great lakes to be properly characterized by buoy observations.

- Mixing height averaging parameter (MNMDAV) will be determined by Earth Tech for the regional simulations based on sensitivity tests. The purpose of the testing is to optimize the variable to allow spatial variability in the mixing height field, but without excessive noise.

- Geophysical data for regional runs: SRTM-GTOPO30 30-arcsec terrain data, Composite Theme Grid (CTG) USGS 200m land use dataset. References for these and other CALMET datasets can be found on the CALPUFF data page of the official CALPUFF site (www.src.com).

CALPUFF Modeling Configuration (Initial exemption modeling)

The CALPUFF model configuration for the regional CALPUFF initial simulations will follow the recommended IWAQM guidance (EPA, 1998; Pages B-1 through B-8), except as noted below:

- CALPUFF domain configured to include the source and all Class I areas within 300km of the source plus 50km buffer zone in each direction. CALPUFF is recommended for all source-receptor distances to be considered in the BART analyses.

- Chemical mechanism: MESOPUFF II module

- Species modeled: SO_2, SO_4, NO_x, HNO_3, NO_3 and particulate matter in size categories of <0.625 µm, 0.625-1.0 µm, 1.0-1.25 µm, 1.25-2.5 µm, 2.5-6.0 µm and 6-10 µm aerodynamic diameters. As noted below, the particulate matter emissions by size category will be combined into the appropriate species for the visibility analysis (i.e., elemental carbon (EC), fine PM or "soil" (< 2.5 µm in diameter), coarse PM (between 2.5-10 µm in diameter) and organics (called secondary organic aerosols (SOA) in the CALPOST postprocessor).

- Emission rates for modeling based on EPA BART guidance, i.e., maximum 24-hour actual emission rate with normal operations from the highest emitting day of the meteorological period modeled (excluding days where start-up, shutdown or malfunctions occurred sometime during the day.) Note that potential emissions are used to determine if a source is BART-eligible, but 24-hour average maximum emissions are used for modeling purposes (70 FR 39162). Pollutants considered include SO_2, H_2SO_4, NO_x and PM_{10}.

Condensable emissions are considered as primary fine particulate matter and allocated equally to the two submicrometer-particle size classes. If actual source emissions data are not available, the modeling should be based on permit limits. If source-specific size categories are not available, then AP-42 factors may be used for sources where AP-42 factors are available. For sources where AP-42 factors are not available, alternative approaches to speciation are given below.

Excluded from the modeling are pollutants with plant-wide emissions less than *de minimis* levels (40 tons per year for SO_2 and NO_x and 15 tons per year for PM_{10}). *De minimis* levels are plant wide for each visibility-impairing pollutant, so individual units may be modeled even if they have emissions below *de minimis* if the plant total is greater than *de minimis*.

- Particulate emissions speciation: Break down, as appropriate, filterable and condensable particulate matter into the following species categories: elemental carbon (soot), "soil" (fine PM < 2.5 µm diameter), coarse particulate matter (2.5-10 µm diameter) and organics. The process is illustrated in Figure 4-3. If source-specific speciated emissions factors are not available, AP-42 factors or speciation information developed by the National Park Service (http://www2.nature.nps.gov/air/permits/ect/index.cfm) can be used to estimate the PM speciation for many source sectors.

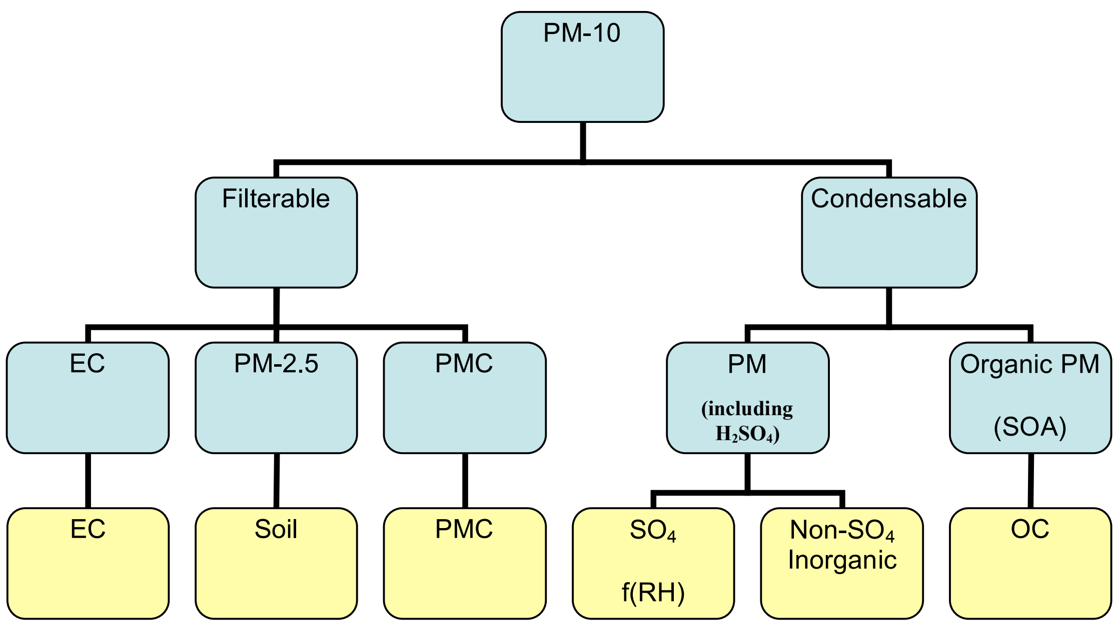

Figure 4-3. Speciation of PM-10 Emissions. (PMC is coarse particulate matter -- 2.5 to 10 µm diameter.)

Otherwise, assumptions will need to be proposed by the source, and reviewed and approved by the State. Possible acceptable alternative approaches to estimating speciation include the following:

- Speciation profiles developed by the SMOKE emissions model for use in VISTAS' CMAQ regional air quality modeling (available at http://www.vistas-sesarm.org/BART/calpuff.asp).
- The approach described in a memo available at http://www.vistas-sesarm.org/BART/calpuff.asp, which provides reasonably conservative estimates in situations where data are incomplete.

- Class I receptors: Use FLM Class I receptor list with receptor elevations provided (available from the NPS).

- CALPUFF model options: Use IWAQM (EPA, 1998) default guidance, including Pasquill-Gifford dispersion coefficients.

- Ozone dataset – use observed ozone data for 2001-2003 from CASTNet and AIRS stations. Only non-urban ozone stations should be used in the OZONE.DAT file. Monthly average ozone (backup) background values are to be computed based on daytime average ozone concentrations from the OZONE.DAT file (6am-6pm average ozone concentrations computed by month).

- Background ammonia concentration: In CALPUFF, use constant (0.5 ppb) value for ammonia.

- Puff representation: integrated puff sampling methodology.

- Building downwash: Ignore building downwash unless source is within 50-km of a Class I area and the State instructs the source to specifically consider building downwash.

CALPOST and POSTUTIL Configuration (Initial exemption modeling)

- Use Visibility Method 6 in CALPOST

- Species considered in visibility analysis: SO_4, NO_3, EC, SOA (i.e., condensable organic emissions), soil, coarse PM

- Natural background light extinction: Several options are acceptable at the discretion of the State: (1) A single annual average natural background extinction for each Class I area, as presented in Appendix B of EPA's natural conditions guidance (EPA, 2003b); (2) A single value that represents the average haze index on the 20% best natural conditions days, again as presented in the same Appendix B; or (3) A monthly average natural background as calculated by CALPOST under Method 6, based on annual average default natural conditions component concentrations and monthly average f(RH) values for the centroid of the Class I area, from Table A-3 in the natural conditions guidance document,.

A special procedure is needed for options 1 and 2, since CALPOST requires input of natural background concentrations of PM components while the backgrounds for options 1 and 2 are expressed in EPA's guidance document as extinction coefficients or haze indices (in deciviews). In order to produce the appropriate natural background in CALPOST for these options, use Equation 3-2 to calculate the extinction coefficient that corresponds to EPA's haze index value for the Class I area (if necessary), subtract the Rayleigh scattering value of 10 Mm^{-1}, and enter a soil concentration (in $\mu g/m^3$) into CALPOST that is numerically equal to this result. (Since the extinction efficiency of soil is 1 m^2/g, Equation 3-1 shows that this process produces a background extinction that equals the EPA's value.) Leave the concentrations of all other species blank, since the number that is entered represents extinction by all components.

- Light extinction efficiencies: Use EPA (2003a) values. If a source chooses, the new IMPROVE algorithm for calculating light extinction (see Section 3.2.3) may be used in addition to the default IMPROVE algorithm. (Calculations would need to be performed outside CALPOST or CALPOST would need to be modified to accommodate the new algorithm.)

- Nitrate repartitioning in POSTUTIL: Do not use for the initial modeling.

The initial run results will be based on the highest change in light extinction (deciviews) from natural conditions over the three-year modeling period for each Class I area considered. Predicted changes exceeding the "contribution" threshold (0.5 deciviews) will trigger a finer grid CALPUFF modeling analysis.

4.4 Finer Grid Modeling Procedures

4.4.1 Rationale for and Overview of Finer Grid Modeling Approach

There are two potential applications for finer grid CALPUFF modeling:

BART Exclusion Modeling. First, finer grid CALPUFF modeling can be used to demonstrate that a source does not cause or contribute to visibility impairment in any Class I areas, and thus can be excluded from BART controls. As shown in Figure 4-1, if the initial regional modeling results are not below the threshold for visibility impacts, the next step is to conduct modeling using a finer grid resolution for the meteorological fields and the treatment of terrain effects and land use variability. In the finer grid modeling the predicted visibility impairment that is compared to the threshold is based on the BART guidance of the 98^{th} percentile change in deciviews value rather than the more conservative highest value used in the initial analysis.

The BART guidance indicates that the emissions rate to be used for such modeling is the highest 24-hr rate during the modeling period. Depending on the availability of source data, the following emissions information (listed in order of priority) should be used with CALPUFF for BART exclusion modeling:

- 24 hr maximum value emissions for the period 2001-2003 (Continuous Emission Monitor, CEM data)
- 24 hr maximum value from continuous emissions monitoring data
- facility stack test emissions
- potential to emit
- permit allowable emissions, if available
- emissions factors from AP-42 source profiles

Quantify Benefits of BART. The second application of refined modeling is to quantify the visibility benefits from the BART control options. This is accomplished by running CALPUFF with the baseline emissions rates and again with emissions after BART controls. It is important that emission reductions be evaluated in the postprocessing step rather than by using "negative" emission rates in the CALPUFF model. The chemical scheme requires that emission rates always be positive.

For any of these applications, a source-specific modeling protocol that defines source properties and the specific model configuration is required. As discussed in Section 5, the source specific protocol should include source-specific emissions data and can refer to this document for all methods and assumptions that follow this common protocol.

4.4.2 Model Configuration and Settings for Finer Grid Modeling

Grid resolution substantially better than 12-km is needed for a finer grid CALPUFF assessment of visibility impacts in most cases involving Class I areas in complex terrain or coastal areas. Thus, the CALMET fine grid resolution in the subregional modeling domains used for finer grid modeling will depend on the terrain, land use (especially coastal boundaries), location of the source, distance of the source from Class I areas, and total size of the subregional modeling domain.

VISTAS States have 2001-2003 CALMET files for five 4-km sub-regional domains as illustrated in Figure 4-4. The subdomains are designed to address all BART eligible sources within each VISTAS states and all Class I areas within 300 km of the BART-eligible sources. For application for a single source, a smaller domain of roughly 200-300 km by 200-300 km is recommended. Requests to obtain the 4-km CALMET files should be made to the State BART representatives.

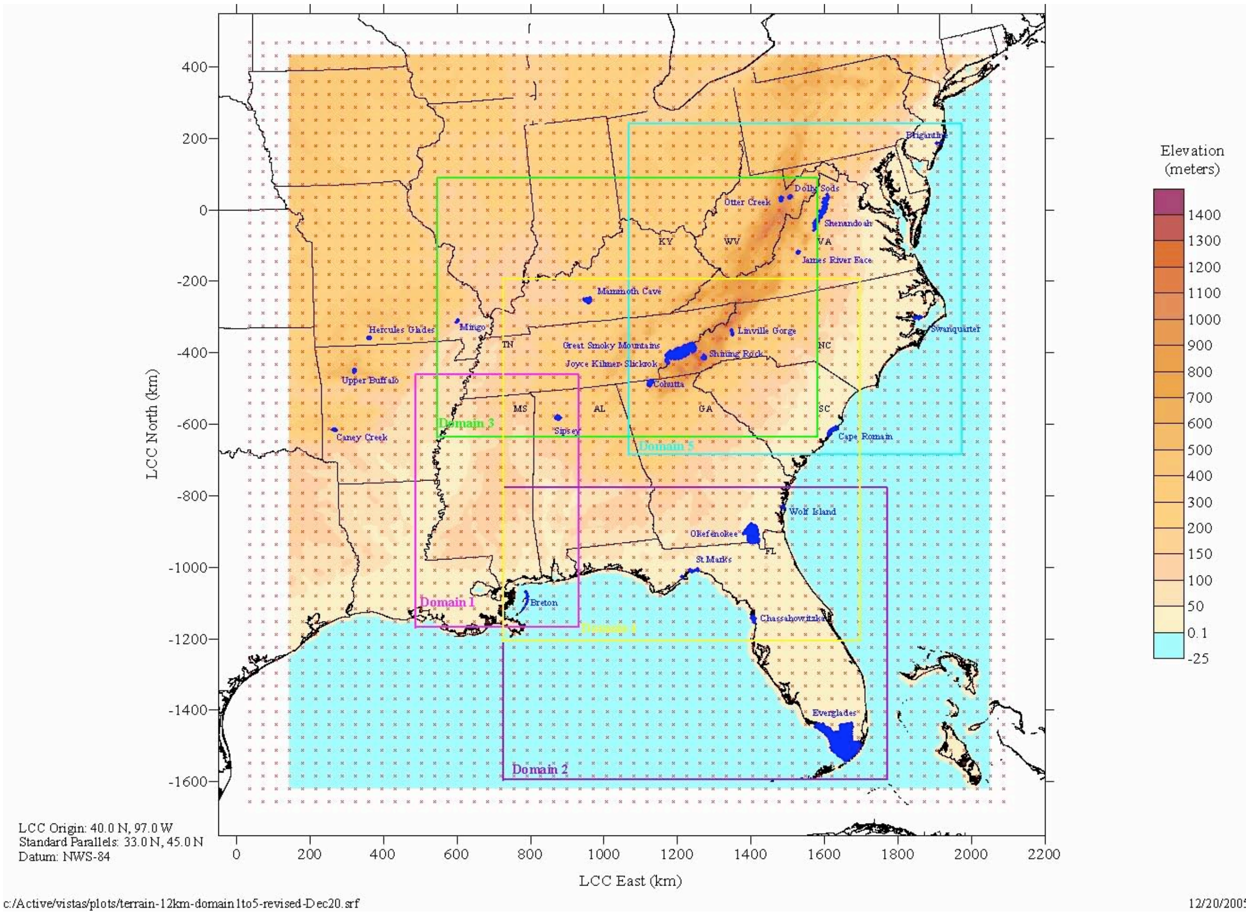

Figure 4-4. The five subregional domains for 4-km CALMET modeling.

In some instances, as part of the source-specific protocol, a source may propose to the State to use an even finer grid simulation to properly characterize the flow fields and land use changes that affect dispersion. An application for source-receptor distances within about 50 km may require a grid resolution less than 1 km if complex terrain effects are likely to be important. This determination should be made on a case-by-case basis. There is not a single distance at which a particular grid size is appropriate. It depends on factors such as the complexity of the terrain, the source-receptor distances involved, the location of the source relative to the terrain features, the physical stack parameters (e.g., a tall stack in complex terrain may be unaffected by the terrain-forced flow), proximity of the source and Class I area to a coastline, and other factors including availability of representative observational data.

The finer grid CALMET simulations were run in hybrid mode, using both MM5 data to define the initial guess fields and meteorological observational data in the Step 2 calculations. Overwater (buoy) data will be provided in addition to the hourly surface meteorological observations, precipitation observations and twice-daily upper air sounding data.

A domain-specific set of modeling parameters will be defined for each subregional domain. The proper selection of the CALMET diagnostic wind field parameters that are used to blend observations with the Step 1 wind field depends on factors such as the locations of the meteorological stations relative to terrain and coastal features (which affects the representativeness of the observational data), the terrain length scale, and the quality (resolution) of the MM5 data used to define the initial guess field and its ability to properly resolve wind flows on the fine-scale CALMET domain. The definition of the proper CALMET parameters is done as part of sensitivity testing where model performance is evaluated against available observations and expected terrain effects, such as channeling of flows within a valley.

In addition to the better grid resolution and the introduction of observational data in the finer grid simulations, several other modeling refinements can enhance the accuracy of the finer grid modeling. These include use of the higher resolution terrain DEM data (~3 arc sec USGS data) in defining the gridded terrain fields and application of the ammonia limiting method in the POSTUTIL post-processor. Otherwise, the source configuration, emissions, pollutant speciation, Class I receptors, ozone datasets and CALPUFF model options will be the same as in the initial runs. Similarly, CALPOST will be used in the same manner as for the initial analyses. However, POSTUTIL can be used to repartition nitrate in the finer grid modeling, using background ammonia concentrations according to the IWAQM Phase 2 report (IWAQM, 1998).

For the finer grid BART exclusion analysis, the test for evaluating whether a source is contributing to visibility impairment is based on the 98th percentile modeled value (rather than the highest predicted value used for the initial evaluation), which is consistent with EPA's BART guidance.

4.5 Presentation of Modeling Results

The CALPOST processing computes the daily maximum change in deciviews. A sample of the summary table produced by CALPOST is shown in Table 4-1. For evaluating compliance with the VISTAS screening threshold, the highest change in extinction value, located at the bottom of the CALPOST list file is compared to the threshold value (e.g., 0.5 dv). For example, in the sample shown in Table 4-1, the summary at the bottom shows that the highest visibility impact is 1.219 dv, with 9 days over the year showing values greater than 0.5 dv. Therefore this source would not pass the initial analysis, and finer grid modeling would be required.

In addition to the highest change in deciview value on each day over all the receptors in a particular Class I area, the CALPOST summary table in Table 4-1 contains the coordinates of the receptor, receptor type (D indicates discrete receptors), the total haze level (background + source, in dv), the background haze in deciviews, the change in haziness (delta dv), the humidity term applied to hygroscopic aerosols (f(RH)), and the contribution of each species to light extinction (in percent of the total source contribution) for SO_4, NO_3, organics, elemental carbon, coarse and fine particulate matter.

Table 4-1. Example of CALPOST Output, Showing Maximum Daily Impacts of Source and Locations of Those Impacts.

YEAR	DAY	HR	RECEPTOR	COORDINATES (km)		TYPE	DV(Total)	DV(BKG)	DELTA DV	F(RH)	%_SO4	%_NO3	%_OC	%_EC	%_PMC	%_PMF
2001	2	0	3	20.540	79.782	D	5.397	5.358	0.039	4.314	44.33	47.22	3.07	1.07	0.00	4.30
2001	3	0	9	31.680	79.822	D	4.566	4.421	0.145	1.767	40.75	33.89	9.19	3.24	0.00	12.94
2001	4	0	1	24.723	77.951	D	4.540	4.540	0.000	2.076	0.00	0.00	0.00	0.00	0.00	0.00
2001	5	0	77	30.228	94.571	D	4.950	4.939	0.011	3.144	43.13	44.74	4.64	1.45	0.00	6.05
2001	6	0	1	24.723	77.951	D	5.181	5.166	0.015	3.772	38.58	56.05	1.90	0.70	0.00	2.76
2001	7	0	3	20.540	79.782	D	6.366	5.745	0.620	5.439	44.98	44.99	3.69	1.26	0.00	5.08
.																
.																
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2001	363	0	113	27.414	103.782	D	5.725	5.652	0.073	5.164	53.49	35.51	4.03	1.39	0.00	5.58
2001	364	0	113	27.414	103.782	D	6.554	6.521	0.033	7.826	48.12	47.09	1.67	0.64	0.00	2.48
2001	365	0	1	24.723	77.951	D	6.499	6.499	0.000	7.757	0.00	0.00	0.00	0.00	0.00	0.00

```
 --- Number of days with Delta-Deciview  =>   0.50:         9
 --- Number of days with Delta-Deciview  =>   1.00:         2
 ---             Largest Delta-Deciview  =            1.219
```

For the finer grid analysis, the data in the table can be imported into a spreadsheet and sorted on the delta dv column. Table 4-2 shows an example of the ranked visibility impacts (change in dv) for each of three years at six different Class I areas. The 98th percentile (8th highest value) in the sorted table would be compared to the contribution threshold (e.g., 0.5 dv). In the example shown in this table, the source passes the finer grid analysis because the highest 98th percentile visibility impact is below the contribution threshold of 0.5 dv.

The Results section of the CALPUFF modeling report should contain the following information:

1. Map of source location and Class I areas within 300 km of the source

2. For the VISTAS 12-km CALPUFF initial exemption modeling domain, a table listing all Class I areas in the VISTAS domain and those in neighboring states and impacts at those Class I areas within 300 km of the source, as illustrated in Table 4-3**.**

3. A discussion of the number of Class I areas with visibility impairment from the source on 98th percentile days in each year greater than 0.5 dv (total visibility impairment minus impairment on 20% best days for natural background visibility equals delta-dv, the visibility impact attributed to the source).

4. For the Class I area with the maximum impact, discussion of the number of days below the 98th percentile that the impact of the source exceeds 0.5 dv, the number of receptors in the Class I area where the impact exceeds 0.5 dv, and the maximum impact.

5. For finer grid CALPUFF exemption modeling, results for those Class I areas for which impacts of the source exceeded 0.5 dv in the 12-km initial exemption modeling. Report same results as provided for 12-km initial exemption modeling.

6. For control option modeling, each control option tested should be listed in tabular format. For each control option and for each Class I area where the impact of the source exceeded 0.5 dv, report the change in pollutant emissions and the change in visibility impact from the source as a result of the control option. The effectiveness of candidate control options are to be compared to each other, not to a specific target improvement.

   States will provide further guidance on graphic presentation of results to simplify evaluation of effectiveness of control measures. For example, a temporal plot of the change in deciviews between the controlled and uncontrolled cases could be developed for the receptor with the maximum modeled impact in each Class I area.

7. Copies of all input files and input data in electronic format for the CALMET, CALPUFF, CALPOST and POSTUTIL runs should be archived and provided to the State.

Table 4-2. Example of Visibility Impact Rankings at Six Class I Areas

Class I Area	2001	2002	2003
	Delta-Deciview Ranks 1-8	Delta-Deciview Ranks 1-8	Delta-Deciview Ranks 1-8
Great Smoky NP	0.99	0.95	1.20
	0.88	0.63	0.90
	0.62	0.51	0.73
	0.59	0.50	0.72
	0.55	0.46	0.59
	0.52	0.42	0.47
	0.48	0.37	0.45
	0.47	0.36	0.42
Linville Gorge	0.67	0.81	0.76
	0.45	0.69	0.47
	0.43	0.65	0.37
	0.33	0.50	0.35
	0.29	0.45	0.31
	0.27	0.33	0.30
	0.25	0.31	0.28
	0.23	0.29	0.28
Shining Rock	0.66	0.73	0.75
	0.43	0.69	0.45
	0.41	0.63	0.36
	0.35	0.52	0.34
	0.26	0.46	0.28
	0.24	0.34	0.27
	0.23	0.29	0.26
	0.22	0.26	0.25
Cohutta	0.26	0.54	0.61
	0.23	0.47	0.42
	0.22	0.43	0.30
	0.21	0.37	0.29
	0.20	0.37	0.28
	0.19	0.31	0.28
	0.18	0.31	0.25
	0.16	0.30	0.25
Joyce Kilmer-Slickrock	0.34	0.52	0.27
	0.33	0.43	0.24
	0.31	0.32	0.23
	0.26	0.31	0.20
	0.24	0.30	0.14
	0.20	0.28	0.13
	0.18	0.24	0.11
	0.17	0.24	0.10
Mammoth Cave NP	0.56	0.57	0.50
	0.44	0.56	0.37
	0.38	0.53	0.36
	0.29	0.35	0.35
	0.25	0.33	0.31
	0.24	0.33	0.24
	0.22	0.30	0.21
	0.21	0.29	0.19

Table 4-3. Format of Summary of Results for CALPUFF Modeling in VISTAS' 12-km Modeling Domain to Determine if a BART Eligible Source is Subject to BART.

Class I area	Distance (km) from source to Class I area boundary	# of days[1] and # of receptors with impact > 0.5 dv in Class I area: 2001		# of days[1] and # of receptors with impact > 0.5 dv in Class I area: 2002		# of days[1] and # of receptors with impact > 0.5 dv in Class I area: 2003		# of days[1] and # of receptors with impact > 1.0 dv in Class I area for 3-yr period		Max. 24-hr impact over 3-yr period
Dolly Sods, WV										
Shenandoah, VA										
James River Face, VA										
Mammoth Cave, KY										
Sipsey, AL										
Great Smoky Mtns, TN										
Cohutta, GA										
Shining Rock, NC										
Linville Gorge, NC										
Swanquarter, NC										
Cape Romain, SC										
Okefenokee, GA										
Saint Marks, FL										
Chassahowitzka, FL										
Everglades, FL										
Brigantine, NJ										
Breton Island, LA										
Caney Creek, AR										
Upper Buffalo, AR										
Mingo, MO										
Hercules Glade, MO										

[1]Days below the 98^{th} percentile of days in each year or the three-year modeling period, as appropriate

4.6 VISTAS Contribution to CALPUFF Modeling of BART Eligible Sources

VISTAS will provide updates and supporting information concerning the Common Modeling Protocol (this document) on the VISTAS website. In addition, VISTAS will make publicly available the following data bases developed by Earth Tech:

- VISTAS version of the CALPUFF modeling system, maintained on the CALPUFF website. Version 5.754 includes CALMET, CALPUFF, CALPOST, and POSTUTIL files, updated in December 2005. The last update in this VISTAS version is a CALMET update that addresses over water dispersion, which was developed for the Minerals Management Service (MMS) in fall 2005. This VISTAS version of CALPUFF will not be updated further unless errors are found in the code, except that a new one-step POSTUTIL procedure will be incorporated. BART-eligible sources in the VISTAS states will be able to use this VISTAS version throughout the BART modeling exercise.

- 12-km CALMET output files for 2001, 2002, and 2003 produced as described in previous sections. Further detail on model configuration and settings will be provided with the output files and will be made available on the CALPUFF website.

- CALMET will include a software modification to allow the meteorological data inputs into CALMET to be used to generate finer grid CALMET files without having to go back to the original MM5 output files

- Five 4-km CALMET subdomains for 2001, 2002, and 2003, produced as described in previous sections. Further detail on model configuration and settings will be provided with the output files and will be made available on the website.

- File with CALPUFF model configuration and settings sufficient to replicate CALPUFF modeling done for VISTAS using 12 km CALMET, including

    - Ozone data used to run CALPUFF

    - Ammonia concentrations used to run CALPUFF.

    - All other set up files used in VISTAS 12-km CALPUFF run

Samples of these data files and examples of their application with CALPUFF for BART screening analyses can be found on the CALPUFF web site at (http://www.src.com/verio/download/sample_files.htm).

5. SOURCE-SPECIFIC MODELING PROTOCOL

Sources are required to submit a source-specific protocol to the State for review and approval prior to source-specific modeling. States will provide the documentation to EPA and FLM for their review. An outline of the typical contents of the site-specific protocol is provided in Table 5-1.

If a source-specific modeling approach is proposed that differs from the common approach in Chapter 4, a more-detailed modeling protocol than that required under the common procedures is required. This protocol must explain the data sources, model configuration, and rationale for changes in the model approach from the common protocol and must be approved by the State.

Unit-specific source data include the following parameters:

- Location (e.g., UTM coordinates, UTM zone and datum)
- Stack height above the ground
- Stack diameter
- Exit velocity
- Exit temperature
- Emission rates (SO_2, H_2SO_4, NO_x and PM_{10}).

Additional building dimension information (building width, length, height and corner locations) is needed for short stacks that are less than Good Engineering Practice (GEP) height. This information is used in providing effective structure dimensions for building downwash calculations. (The requirement to conduct building downwash modeling may be waived by individual States or if the transport distance is greater than 50 km.)

The source coordinates must be expressed in the coordinate system used to define the CALMET and CALPUFF modeling domains. For the regional screening simulations, a Lambert Conformal Conic (LCC) coordinate system will be used. The required parameters to define an LCC coordinate include two matching parallels, latitude/longitude of the projection origin, coordinate datum, and false Easting and Northing (if used) of the projection origin. Subregional and source-specific domains may be using either an LCC or UTM projection.

The CALPUFF Graphical User Interface (GUI) system provides software (called COORDS) to compute to/from latitude/longitude, LCC and UTM coordinates for a large number of datums. In addition, the CALVIEW graphics feature allows the use of georeferenced satellite or aerial photographs to be used as base maps to confirm source locations. Links to sources of suitable base maps can be found on the CALPUFF data site (www.src.com) in the section on "Aerial Photos".

Table 5-1. Sample Table of Contents of a Source-Specific Fine-Scale Modeling Protocol.

1. INTRODUCTION
   - 1.1 Objectives
   - 1.2 Location of Source vs. Relevant Class I Areas
   - 1.3 Source Impact Evaluation Criteria
2. SOURCE DESCRIPTION
   - 2.1 Unit-specific Source Data
   - 2.2 Boundary Conditions
3. GEOPHYSICAL AND METEOROLOGICAL DATA
   - 3.1 Modeling Domain and Terrain
   - 3.2 Land Use
   - 3.3 Meteorological Data Base
     - 3.3.1 MM5 Simulations
     - 3.3.2 Measurements and Observations
   - 3.4 Air Quality Data Base
     - 3.4.1 Ozone Concentrations – Measured or Modeled
     - 3.4.2 Ammonia Concentrations – Measured or Modeled
     - 3.4.3 Concentrations of Other Pollutants – Measured or Modeled
   - 3.5 Natural Conditions at Class I Areas
4. AIR QUALITY MODELING METHODOLOGY
   - 4.1 Plume Model Selection
     - 4.1.1 Major Relevant Features of CALMET
     - 4.2.2 Major Relevant Features of CALPUFF
   - 4.2 Modeling Domain Configuration
   - 4.3 CALMET Meteorological Modeling
   - 4.4 CALPUFF Computational Domain and Receptors
   - 4.5 CALPUFF Modeling Option Selections
   - 4.6 Light Extinction and Haze Impact Calculations
   - 4.7 Modeling Products
5. REVIEW PROCESS
   - 6.1 CALMET Fields
   - 6.2 CALPUFF, CALPOST, and POSTUTIL Results
6. REFERENCES

APPENDICES

A.1 VISTAS BART MODELING PROTOCOL

A.2 … other appendices as needed

An example of the data that need to be reported is provided in Table 5-2. More detail on the stack data, emissions species, and particulate size fractions to be reported will be made available on the CALPUFF website, www.src.com, Check with your State for the more detailed format of Table 5-2 that is to be used.

Discussions with the regulatory authorities should be conducted prior to development of a protocol to ensure all of the relevant issues are included in the protocol.

Table 5-2. Example of Source Documentation for BART Eligible Source.

Unit name and/or description	**Start-up dates**	**SO_2 potential emissions (tpy)**	**NO_x potential emissions (tpy)**	**Total PM potential emissions (tpy)**
Emissions source name				
…				
Total emissions				
Potential BART-eligible emissions				

6. QUALITY ASSURANCE

6.1 Scope and Purpose of the QA program

Air quality modeling covered under this protocol is an important tool for use in determining whether a BART-eligible source can be reasonable expected to cause or contribute to visibility impairment in a Class I area, and therefore whether this source should be subject to BART controls, and if so, to determine the relative benefits of various BART controls. The purpose of the quality assurance (QA) program is to establish procedures for ensuring that products produced by the application of the modeling techniques for BART studies satisfy the regulatory objectives of the BART program.

The scope of the QA program affects different users differently. Common features of most applications will be the setup and execution of the CALPUFF air quality model and processing of modeling results to determine if a source contributes to visibility impairment at a Class I area. In many cases, users will be provided meteorological datasets that have been developed with VISTAS funding under a suitable QA program for use in the BART modeling. Other users will be involved in site-specific or source-specific analyses that will use additional datasets and potentially different modeling options and/or tools. More extensive quality assurance will be required in these latter types of applications. It is the responsibility of the modeler to ensure that an adequate QA protocol is in place for a particular application.

The CALPUFF modeling system contains built-in features to facilitate quality assurance of the modeling results. These include the automatic production of "QA" files for various datasets, including geophysical fields, sources and receptors, and imbedded tracking of model options and switches within the output files from the major modeling units of the modeling system. The Graphical User Interface system (GUI) provided as part of the latest CALPUFF modeling system allows these QA files to be displayed graphically.

In addition, a detailed software management system is in place to track version and level numbers associated each program and utility within the CALPUFF modeling system. This information is carried forward in all of the output files to create an audit trail of software versions and major model options used that can be retrieved and displayed from the model output files.

Because the required QA procedures will depend heavily on the exact application, there will be differences among different users and different applications.

In addition, the BART modeling process involves multiple organizations. The States have overall responsibility for the process and may also execute some or all of the modeling. VISTAS is contributing general guidance via this protocol and is preparing meteorological fields and performing modeling under the guidance of the States. The sources that are BART-eligible need to provide process information and emissions data for use in the analyses. In addition, those sources that are involved in BART assessments will need to be actively involved in control technology decisions and assessments. Finally, some of the modeling steps may be carried out by contractors on behalf of VISTAS, a State, or a source.

Each of these organizations has a responsibility to ensure that it is providing correct information to others and to evaluate the quality of any analyses it is performing, whether with data of its own or from others. This chapter provides general guidance and information on those aspects of quality assurance that are specific to the CALPUFF modeling effort, irrespective of which organization is carrying out the effort. The focus is on the common protocol efforts described in Chapter 4. As described in Section 6.3, more comprehensive QA may be needed for the unique aspects of the source-specific modeling described in Chapter 5.

6.2 QA Procedures for Common Protocol Modeling

The VISTAS common protocol (Section 4) describes the methods and procedures for use in conducting regional scale screening modeling to determine the whether a particular source or group of sources is subject to BART controls. In the initial application, the regional CALPUFF-ready meteorological data files will be provided by VISTAS. The amount of effort for end-users performing QA of these pre-defined meteorological fields will be reduced from what is required in developing source-specific meteorological fields, as described below. Also, VISTAS is planning to provide five subregional CALMET meteorological datasets in a CALPUFF-ready format. The development of these CALMET datasets will be subject to a QA program as part of their development, so the necessary quality assurance activity of end-users is again reduced from what would be required in the development of the dataset. It is not expected that the quality assurance steps in the development will be repeated in each application. The VISTAS-provided regional and subregional meteorological fields will include a test case simulation for demonstrating that expected modeling results are obtained on the user's computer platform. This test should be repeated by every user.

Although the CALPUFF modeling system is recommended by the U.S. Environmental Protection Agency for application to BART analyses, a considerable amount of expertise and modeling judgment is needed at certain stages of the analysis. The modeling is not a "cookbook" exercise, a fact that was recognized by the U.S. EPA in describing the expertise needed for CALMET modeling (EPA, 1998; pp. 9-10,). Current methods for performing refined chemistry calculation also require an understanding of the chemical and meteorological processing affecting ammonium nitrate formation. VISTAS has committed to provide appropriate CALPUFF training to assist States in obtaining the necessary expertise with the latest CALPUFF modeling tools and techniques. An appropriate level of knowledge of the model formulation, technical approach and assumptions is essential for successful BART modeling.

6.2.1 Quality Control of Input Data

The input data required by the model depends on the application. At a minimum, source data is required by CALPUFF (see Section 6.2.3) along with a list of choices made about model options and switches. Most of the modeling option choices are specified or recommended by regulatory guidance and default values (see references in Section 4.3.3). However, remodeling of the boundary conditions is not required for VISTAS-provided finer grid domains so the expertise level is not as high as it would be for development of the boundary conditions files from scratch.

To the extent that modeling applications are using pre-defined CALMET files and CALPUFF templates, the quality assurance will be straightforward. More detailed steps are needed for the setup of modeling files for source-specific applications of subregional domains finer than 4 km.

The basic procedures that will apply to all CALPUFF model applications will include a confirmation of the source data, including units, verification of the correct source and receptor locations, including datum and projection, confirmation of the switch selections relative to modeling guidance, checks of the program switches and file names for the various processing steps, and confirmation of the use of the proper version and level of each model program. It is a common and recommended procedure for an independent modeler not involved in the setup of the modeling files to independently confirm the model switches and data entry in the actual model input files and to conduct an independent run of the worst case event as a confirmation check.

In addition, common practice requires that a model project CD (or DVD or set of DVDs) be created that contains all of the data and program files needed to reproduce the model results presented in a report. The model list files from each step are included on the project CD. This information allows independent checking and confirmation of the modeling process.

6.2.2 Quality Control of Application of CALMET

For users of the VISTAS CALPUFF-ready CALMET meteorological files, a number of large datafiles will be provided by VISTAS on external USB2 or Firewire hard drives in a format ready for use with the CALPUFF model. The QA steps associated with the development of the VISTAS common datasets will be provided separately as part of the modeling documentation. It is not expected that the QA steps conducted in the development of the meteorological datasets will be repeated in each application, although tests to confirm that the dataset is suitable for the application for which it is being used should be performed as part of the QA. This is discussed in more detail below.

The regional screening CALMET grid is defined in Chapter 4 on a 12-km Lambert Conformal Conic (LCC) grid system. The subregional and source-specific domains may be defined in either LCC or Universal Transverse Mercator (UTM) coordinates. In the case of the LCC projection, two matching parallels, latitude/longitude of the projection origin, coordinate datum, and false Easting and Northing (if used) of the projection origin must also be defined. For any domains in UTM coordinates, the UTM zone (see Appendix D of the CALMET User’s Guide) and datum must be defined. The appropriate projection and map factors are provided as part of the definition of the VISTAS regional grid system. For a source-specific domain, the grid parameters will be provided as part of the source-specific protocol.

Appendix A of the IWAQM report (EPA, 1998) contains a list of recommended CALMET switch settings. Except as modified in Chapter 4 of this protocol or in a source-specific protocol, the IWAQM guidance should be used in setting up the CALMET simulations. The CALMET model obtains the switch settings from an ASCII "control file" with a default name of CALMET.INP. Whether the model is run using a GUI or from the control line in a DOS, Linux, or Unix window, it is essential that the control file be reviewed as part of the CALMET QA analysis. The CALMET GUI retains all of the input descriptive information that is part of the standard CALPUFF.INP file structure. This includes the default value for each variable, a text description of the variable, the meaning of each variable option, the units of the variable and inter-relationships among variables indicating if/when the variable is used. Some third-party commercial GUIs strip out this descriptive information, which makes the QA step more difficult, although it is essential for perform nonetheless using the variable names as references for the variables in the file.

Part of the CALPUFF modeling system's built-in QA capabilities is a variable tracking system that retains the control file inputs for CALMET and CALPUFF in the output files create by the models. This information includes the Version and Level numbers of the processor codes and main model codes used in the simulations as well as the control files from the main models (CALMET and CALPUFF). The information from the preprocessing steps and the CALMET and CALPUFF model simulations is all carried forward and saved in the CALPUFF/postprocessor output files so that the final concentration/flux files contain a history of the model options and switch settings. This allows a user or reviewing agency to confirm the switch settings provided in a control file with that actually used in the model simulations. An optional switch in the CALPOST processor creates a complete listing of the QA data. This step requires access to the output CALPUFF concentration and/or flux files, which are normally practical to store on CDs or DVDs and to provide a part of the Project CD/DVD set.

6.2.3 Quality Control of Application of CALPUFF

The quality assurance of the source and emissions data is a major component of the CALPUFF modeling. Also, many errors are found in source coordinates and related projection/datum parameters, so confirmation of the source location is an important part of the modeling QA.

The locations of the Class I area receptors are another important CALPUFF input. The use of pre-defined receptors as provided by the National Park Service (NPS) receptor dataset is recommended in the VISTAS common protocol. However, although the latitude and longitude of each receptor point is provided, it is necessary to ensure that the proper UTM or LCC coordinates have been computed for computational domain selected. In particular, the datum of the NPS conversion software is not specified, so it is recommended that coordinates be checked using the CALPUFF GUI's COORDS software or another comparable coordinate translation software package that recognizes various datums.

Most of the CALPUFF input variables contain default values. Appendix B of the IWAQM report contains a list of recommended CALPUFF switch settings. Except as modified in Chapter 4 of this protocol or in a source-specific protocol, the IWAQM guidance should be used in setting up the CALPUFF simulations. The CALPUFF model obtains the switch settings from an ASCII "control file" with a default name called the CALPUFF.INP file. As is the case with the comparable CALMET file, it is essential that the control file be reviewed manually as part of the CALPUFF QA analysis. To facilitate this process, as was the case with the CALMET GUI, the CALPUFF GUI retains all of the input descriptive information that is part of the standard CALPUFF.INP file structure. Some third-party commercial GUIs strip out this descriptive information, which makes the QA step more difficult, although it is essential for perform nonetheless using the variable names as references for the variables in the file.

6.2.4 Quality Control of Application of CALPOST and POSTUTIL

CALPOST is run separately for each Class I area in order to obtain the necessary visibility statistics for evaluating compliance with the BART screening and finer grid modeling thresholds. The inputs to CALPOST involve selection of the visibility method (Method 6 in the standard EPA BART guidance), entry of Class I area-specific data for computing background extinction (either average or best 20% natural conditions, as prescribed by the State) and monthly relative humidity factors for hygroscopic aerosols. CALPOST contains a receptor screening that allow subsets of a receptor network modeling in CALPUFF to be selected for processing in a given CALPOST run. This is how receptors within a single Class I area are selected for processing from a CALPUFF output file that may contain receptors from several Class I areas. CALPOST contains options for creating plot files that will help in the confirmation that the proper receptor subset is extracted.

The CALPOST output file contains a listing of the highest visibility impact each day of the model simulation over all receptors included in CALPOST analysis. Receptors will normally be selected in each CALPOST run so that each CALPOST run represents the impacts at a single Class I area. The table includes the data shown in the example in Table 4-1. For a screening assessment, the peak value of the change in extinction is shown at the bottom of the visibility table (see Table 4-1). For a finer grid simulation, the 98th percentile value (8th highest day) is used for comparison against the BART threshold of 0.5 deciviews. It is necessary to import the results of the CALPOST table into a sorting program such as a spreadsheet to rank the daily change in extinction values such as is presented in Table 4-2.

The CALPOST inputs that need to be carefully checked as part of the CALPOST quality assurance are:

- Visibility technique (Method 6 in the common VISTAS protocol)

- Monthly Class I-specific relative humidity factors for Method 6

- Background light extinction values

- Inclusion of all appropriate species from modeled sources (e.g., sulfate, nitrate, organics, (as SOA), coarse and fine particulate matter and elemental carbon.

- Appropriate species names for coarse PM used

- Extinction efficiencies for each species

- Appropriate Rayleigh scattering term (10 Mm^{-1} for screening modeling but Class I area specific value for finer grid modeling)

- Screen to select appropriate Class I receptors for each CALPOST simulation.

The CALPOST program produces plot files compatible with CALVIEW that allow confirmation of receptor locations that is useful in evaluating the receptor screening step.

POSTUTIL allows the user to sum the contributions of sources from different CALPUFF simulations into a total concentration file. In addition, it contains options to scale the concentrations from different modeled species (e.g., different particle sizes) into species-dependent size distributions for the particulate matter. For example, PM is often simulated with unit emission rates for each particle size category and, in the POSTUTIL stage, the contributions of each size category based on the species being considered (e.g., elemental carbon, coarse particulate matter, etc.) are combined to form the species concentrations for input into CALPOST. This process, although simple, requires a careful review of the weighting factors for each source. POSTUTIL also allows a repartitioning of nitric acid and nitrate to account for the effects of ammonia limiting conditions.

If source-specific modeling is performed using different sources of data or different techniques, the source-specific modeling protocol should provide justification for deviations from the VISTAS common protocol, and a QA plan specific for the application provided to address the quality assurance of the data used.

6.3 Additional QA Issues for Alternative Source-Specific Modeling

The level of QA required for application of source-specific protocols will be substantially higher than for the use of datasets that have already been subject to a QA procedure. For example, source-specific protocols may include the use of on-site meteorological datasets, the use of higher resolution prognostic meteorological (e.g., MM5) datasets, alternative visibility calculations, different extinction coefficients, or other changes to the common protocol. In addition to providing a source-specific modeling protocol describing and justifying the changes to the modeling approach from the VISTAS common protocol, the site-specific applications should include the development of a QA plan to properly evaluate the data used in the site-specific modeling.

The critical CALMET input parameters depend on the mode in which the model is run (observations mode, hybrid mode or no-observations mode), and the location and spatial representativeness of any observational data. In a site specific protocol involving the development of a meteorological dataset, the elements of the QA process include preparation of wind rose (using observed, MM5 and CALMET-derived data), including examination of the data as a function of season and time of day (e.g., 4am, 10am, 4pm wind roses), time series analyses, and presentation of 2-D vector plots illustrating terrain effects/sea breeze circulation or other features of the flow expected to occur within the domain. For example, 2-D vector plots produced during light wind speed stable conditions (e.g., early morning such as 4 am) are good for assessing the performance of the CALMET model configuration and switches in reproducing terrain effects because these conditions are likely to maximize the terrain impacts in the model. Season wind roses at 4 am, 10 am and 4 pm would be expected to show the development of sea breeze circulations that may be important for certain applications. Customization of the QA process for the individual site-specific domain based on the availability of data and the physical processes expected to be important at that location should be conducted as part of the site-specific QA plan development.

If site-specific CALPUFF simulations involving the Ammonia Limiting Method are conducted, performance of the model in reproducing observed CASTNet or IMPROVE sulfate and nitrate concentrations at measurement sites within the site-specific modeling domain should be evaluated. The use of alternative ammonia concentration data (e.g., CMAQ output rather than derived ammonia based on aerosol measurements) will require an evaluation of the model performance relative to the techniques in the VISTAS common protocol.

In any site-specific protocol a site-specific QA plan should be prepared.

6.4 Assessment of Uncertainty in Modeling Results

Chapter 3 discussed the uncertainties and known limitations in CALPUFF. The source specific modeling report does not need to repeat the uncertainties listed in Chapter 3, but the reviewer should interpret results in light of these limitations. It is expected that the performance of the model will be better in predicting changes in visibility impacts due to BART controls than in predicting absolute visibility values. This is because uncertainties in meteorological conditions transport and dispersion are expected to be less important in evaluating a change in impact, since a comparable effect will be included in both the base and sensitivity simulations.

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APPENDIX B

SINGLE SOURCE MODELING TO SUPPORT REGIONAL HAZE BART MODELING PROTOCOL

Single Source Modeling to Support Regional Haze BART
Modeling Protocol

March 21, 2006
Lake Michigan Air Directors Consortium
Des Plaines, IL

Modeling may be necessary to support a decision by the States about which BART eligible sources "cause or contribute" to visibility impairment and are subject to BART. The threshold used to determine whether a source "contributes" to visibility impairment is 0.5 deciviews, or lower, which is suggested in U.S. Environmental Protection Agency (EPA) guidance (EPA, 2005). For the purposes of this analysis, the threshold used to determine whether a source "contributes" to visibility impairment is 0.5 deciviews. EPA guidance recommends CALPUFF for modeling single source visibility impacts at Class I areas (EPA, 2005).

POLLUTANTS

EPA guidance lists SO2, NOX, and primary particulate matter (PM) as visibility impairing pollutants (EPA, 2005). Emissions of SO2, NOX, and PM must be examined for source contribution to visibility impairment. EPA recommends using the CALPUFF modeling system. EPA guidance recommends the use of judgment to determine whether VOC, ammonia, or primary PM emissions contribute to visibility impairment (EPA, 2005). An additional modeling analysis will be performed to determine whether VOC, ammonia, and primary PM emissions need to be considered.

VISIBILITY IMPAIRMENT MODELING: SUBJECT TO BART

The list of BART-eligible sources in each state will include all 26 applicable source categories (i.e., both EGUs and non-EGUs). For EGUs, EPA states the CAIR rule will result in controls for electric generating units (EGUs) better than those achievable by the BART provision of the Regional Haze rule. Each State will need to make a policy decision to either accept this position or to impose BART controls on their EGUs. Since the CAIR rule regulates SOX and NOX emissions, some consideration for other EGU emissions including primary PM, VOC, and ammonia is necessary. An additional modeling analysis will be performed to determine whether VOC, ammonia, and primary PM emissions from all elevated point sources in the Midwest RPO States contribute to visibility impairment at Class I areas.

For non-EGUs, the options in the BART guideline for determining which sources need not be subject to BART will be considered. The three options are individual source attribution approach (i.e., CALPUFF modeling), use of model plants to exempt individual sources, and cumulative modeling to show that certain elevated point source emissions species do not contribute to visibility degradation at nearby Class I areas. All three options will be used here. Specifically, the following approach will be taken:

(1) Calculate the Q/d value for all sources based on actual emissions and minimum distance to a Class I area. (Note, the Q/d metric was

identified in EPA's proposed rule and is similar to the emissions-distance criteria suggested in the final rule.)

(2) Conduct individual source CALPUFF modeling for those sources with a Q/d value $\geq$ 5. (Note, the CALPUFF modeling conducted in response to EPA's proposed BART rule showed that the emissions-distance criteria associated with less than 0.5 dv visibility impacts on nearby Class I areas was consistent with a Q/d value of < 5.)

(3) Review the results of the new CALPUFF modeling to determine which sources have less than a 0.5 dv impact on nearby Class I areas and which can, therefore, be assumed to be exempt from the BART process.

(4) Also review the results of the new CALPUFF modeling for sources with a Q/d value between 5 and 20 to determine if 5 is an appropriate cut-off for exempting sources from the BART process.

(5) Cumulative modeling will also be performed with CAMx to determine if ammonia, VOC, and direct PM (fine and coarse mass) emissions can be exempt from the BART process.

CUMULATIVE VISBILITY IMPAIRMENT MODELING

A photochemical model (CAMx4) will be applied with the VOC, ammonia, and PM fine and coarse mass emissions "zeroed-out" from all point sources in the Midwest RPO States, both BART-eligible and non-BART-eligible. The "zero-out" run will include EGU and non-EGU point sources. The results of this run will be compared to a base run with these emissions included to determine if these emissions species impair visibility. This type of cumulative modeling is consistent with option 3 under the section on determining which sources are subject to BART (EPA, 2005). The CAMx4 modeling system is applied with the same inputs and parameters as used for the PM2.5 and regional haze SIP. CAMx4 will be applied for the 2002 calendar year at 36 km grid resolution.

SINGLE SOURCE VISIBILITY IMPAIRMENT MODELING: SUBJECT TO BART

The CALPUFF modeling system is used to estimate visibility impairment from single sources. CALPUFF consists of the plume transport model (CALPUFF), meteorological data pre-processors (CALMM5, CALMET), inorganic chemistry parameterization module (POSTUTIL), and post-processor (CALPOST) (Scire et al, 2000a; Scire et al, 2000b). The versions of the CALPUFF modeling system code used for this analysis are shown in Table 1.

Table 1. CALPUFF Modeling System Versions

	Version	Level
CALPUFF	5.771a	040716
CALPOST	5.51	030709
CALMET	5.53a	040716
CALMM5	2.0	021111
POSTUTIL	1.4	040818

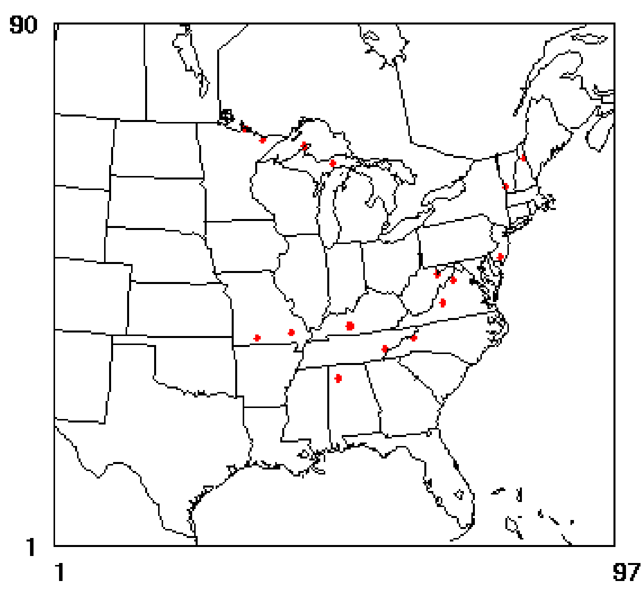
The modeling system is applied consistently with the EPA guidance recommendation of following the guidelines set forth in EPA's Interagency Workgroup on Air Quality Modeling (IWAQM) Phase 2 Summary Report and Recommendations for Modeling Long Range Transport Impacts (EPA, 2005; EPA, 1998). None of the BART eligible sources in the Midwest Regional Planning Organization are less than 50 km from a

Class I area so modeling analysis in addition to CALPUFF is not applicable. The IWAQM guidance states that less than 5 years of meteorological data may be used if a meteorological model using FDDA is used to supply data.

CALPUFF will be applied to each source for a 3 annual simulations, covering calendar years 2002 to 2004. CALPUFF will be applied using discrete receptor points covering the Class I areas with an approximate resolution of 1 km. POSTUTIL is used to re-partition nitrate into the gas or particulate phase depending on the estimated ammonia availability. This option has been shown to improve model performance (Scire et al, 2001). CALPOST is then applied to the POSTUTIL output for each group of Class I area receptors (shown in Figure 1 and in Table 3). CALPUFF, POSUTIL, and CALPOST are also run for 3 consecutive years for each source for gridded receptors that match the CALMET/CALPUFF domain shown in Figure 1. These runs allow for quality assurance and quality control by plotting the results for visual inspection. The results are checked for reasonableness of stack location, stack parameters, and emission rates. Each source is applied in CALPUFF for 3 years in a discrete receptor mode to meet regulatory requirements and for 3 years in a gridded receptor mode as a quality assurance and control measure.

The CALPUFF/CALMET modeling domain is a Lambert conformal grid projection centered at (97 W, 40 N) with true latitudes at 33 N and 45 N and origin at (-900 km, -1620 km). The horizontal domain consists of 97 36 km cells in the east-west direction and 90 36 km cells in the north-south direction (see Figure 1). The vertical atmosphere up to approximately 15 km is resolved with 16 vertical layers, most of which are in the boundary layer to appropriately resolve the diurnal fluctuations in boundary layer mixing depths.

Figure 1. Model Domain



Landuse and terrain data are extracted from the global datasets, USGS Composite Theme Grid landuse and USGS Digital Elevation Model terrain height, distributed with CALPUFF and match the horizontal grid specifications. Meteorological inputs to CALPUFF are output from a prognostic meteorological model using four-dimensional data assimilation. MM5v3.6 output is used to supply hourly meteorological data to CALPUFF.

Observation data is included in the ETA analysis fields used to initialize MM5 so additional assimilation of observational data in CALMET is redundant to the specific purpose of a prognostic meteorological model, which is to appropriately fill in the data around the surface monitoring network and sparse upper air monitoring network. The MM5 output used to support the BART CALPUFF modeling has extensive model performance evaluation and is used to support regional photochemical modeling applications for the ozone, PM2.5, and regional haze State Implementation Plans (Baker, 2004; Baker, 2005; Johnson, 2003).

Modeling options are set to be consistent with the IWAQM guidance. A few modifications to the suggested parameter settings are discussed in this section. For CALMET, several options were selected to use the MM5 output as input to CALMET rather than observation data; ICLOUD=3, IPROG=14, ITPROG=2, and IEXTRP=-1. Several options are selected in CALPUFF that differ from the IWAQM recommendations: the IDRY and IWET variables are set to 0 since dry and wet deposition flux output is not applicable for this analysis. The IPRTU variable is set to 3 to output specie concentrations in units of ug/m^3 to be consistent with measured regional concentrations.

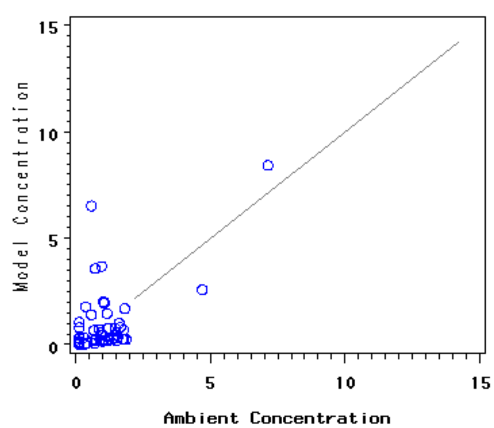
CALPUFF requires the input of ozone (O3) and ammonia (NH3) concentrations as a monthly background value applicable for the entire modeling domain. Seasonal domain averaged concentrations of each will be obtained from an annual 2002 calendar year CAMx4 simulation. These values are shown in Table 2.

Table 2. Domain Seasonal Average Concentrations (ppb)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
O3 (ppb)	31	31	31	37	37	37	33	33	33	27	27	27
NH3 (ppb)	.3	.3	.3	.5	.5	.5	.5	.5	.5	.5	.5	.5

CAMx4 prediction of ammonia at the rural Illinois site in Bondville shows good agreement between model predictions and ambient observations. A scatter plot showing the prediction-observation pairs over the entire calendar year of 2004 is shown in Figure 2.

Figure 2. CAMx4 model and ambient ammonia Predictions at Bondville, Illinois



SOURCE SPECIFIC INPUTS: EMISSIONS and STACK PARAMETERS

States will use the 24-hr maximum emissions rate between 2002 and 2004. If this data is not available, then a short term “allowable” or “potential” emission rate of emissions between 2002-2004 will be used. If neither of these types of emission rates is available, then the highest actual annual emissions divided by hours of operation of NOX, SOX, and primary PM between 2002 and 2004 will be applied in CALPUFF.

EPA recommends the States should determine the specific stacks that BART process emissions will exit and use stack information specific to those stacks (EPA, 2005b).

CLASS I AREA RECEPTORS

The receptors used to determine visibility impacts are taken from the National Park Service’s Class I area receptor index (NPS, 2005). The receptors “should be located in the nearest Class I area with sufficient density to identify likely visibility effects” according to the BART modeling guidance (EPA, 2005). The spatial resolution of the discrete receptors is not changed in any way from the NPS files. Table 3 shows the list of Class I areas and the total number of discrete receptors covering the Class I area used as the receptor field in CALPUFF.

Table 3. Class I Receptor areas and total discrete rectors

Boundary Waters Canoe Area	MN	856
Brigantine National Wildlife Refuge	NJ	16
Dolly Sods /Otter Creek Wilderness	WV	187
Great Gulf Wilderness	NH	38
Great Smoky Mountains National Park	TN	736
Hercules-Glades	MO	80
Isle Royale National Park	MI	966
James River Face	VA	52
Linville Gorge	NC	66
Lye Brook Wilderness	VT	103
Mammoth Cave National Park	KY	302
Mingo	MO	47
Seney	MI	173
Shenandoah National Park	VA	298
Sipsy Wilderness	AL	148
Voyageurs National Park	MN	366

CALPUFF OUTPUT: POST PROCESSING and INTERPRETATION

The light extinction equation will use the monthly average relative humidity (RH) rather than the daily average humidity as detailed in the BART modeling guidance (EPA, 1998; FLAG, 2000). This necessitates using the CALPOST background light extinction option 6, which computes light extinction from speciated PM measurements with a monthly RH adjustment factor. These Class I area centroid specific monthly RH adjustment factors are taken from Table A-3 of the EPA’s “Regional Haze: Estimating Natural Visibility Conditions under the Regional Haze Rule: Guidance Document.” (EPA, 2003).

The daily visibility metric for each receptor is expressed as the change in deciviews compared to natural visibility conditions as outlined in the IWAQM guidance (EPA, 1998). Natural visibility conditions, the 20% best days, for Class I areas used in this analysis are found in Appendix B of EPA's Guidance for Estimating Natural Visibility Conditions under the Regional Haze Rule (EPA, 2003). The 20% best days for each Class I area are listed in Appendix B in deciviews and not as chemically speciated constituents of the light extinction equation, which are needed for CALPOST option 6. Annual background concentrations for the eastern United States are given in the Guidance for Estimating Natural Visibility Conditions in Table 2-1 (EPA, 2003). These values are scaled back to lower concentrations until the Class I area specific natural visibility metric is produced (North Dakota Department of Health, 2005). This scaling procedure is done for each Class I area and uses an annual average fRH calculated from the 12 monthly site specific fRH values mentioned in the first paragraph of this section (EPA, 2003).

The annual average Class I area specific natural conditions are given in deciviews, so they must be converted to light extinction.

Natural conditions (1/Mm) = 10*exp(natural conditions in deciviews/10)

Second, the chemically speciated natural background concentrations for the eastern United States are scaled to equal the site specific natural background light extinction value.

Natural conditions in 1/Mm = 3*fRH*[ammonium sulfate]*X + 3*fRH*[ammonium nitrate]*X + 4*[OC]*X + 10*[EC]*X + 1*[SOIL]*X + 0.6*[CM]*X + [$\beta_{(Raleigh)}$]

The bracketed concentrations are expressed as ug/m3. The fRH values represent annual average fRH calculated from the 12 monthly site specific fRH values mentioned in the first paragraph of this section (EPA, 2003). Solving for X gives the dimensionless scaling factor which is applied to each of the chemically speciated natural background concentrations given for the eastern United States. The natural background values and scaling factors used for each Class I area are shown in Table 4.

Table 4. Scaled natural background values by Class I area

Class I Area	Nat. Back. deciview	Nat. Back. 1/Mm	Scaling Factor	Annual average fRH	Amm. Sulfate	Amm. Nitrate	Organic Carbon	Elemental Carbon	Soil	Coarse Mass
BOWA	3.53	14.233	0.39	2.93	0.089	0.038	0.539	0.008	0.192	1.155
BRIG	3.60	14.333	0.39	3.05	0.090	0.039	0.546	0.008	0.195	1.169
DOSO	3.64	14.391	0.39	3.20	0.090	0.039	0.546	0.008	0.195	1.169
GRGU	3.63	14.376	0.39	3.13	0.090	0.039	0.547	0.008	0.195	1.172
GRSM	3.76	14.564	0.40	3.46	0.091	0.040	0.555	0.008	0.198	1.188
HEGL	3.59	14.319	0.39	3.13	0.089	0.039	0.540	0.008	0.193	1.157
ISLE	3.54	14.248	0.39	2.90	0.089	0.039	0.542	0.008	0.194	1.161
JARI	3.56	14.276	0.39	3.04	0.089	0.038	0.539	0.008	0.192	1.155
LIGO	3.75	14.550	0.39	3.54	0.090	0.039	0.549	0.008	0.196	1.176
LYBR	3.57	14.290	0.39	2.99	0.089	0.039	0.543	0.008	0.194	1.164
MACA	3.85	14.696	0.41	3.36	0.095	0.041	0.575	0.008	0.206	1.233
MING	3.59	14.319	0.39	3.14	0.089	0.039	0.539	0.008	0.193	1.156
SENE	3.69	14.463	0.39	3.30	0.090	0.039	0.550	0.008	0.196	1.178
SHEN	3.57	14.290	0.38	3.19	0.088	0.038	0.533	0.008	0.191	1.143
SIPS	3.71	14.492	0.39	3.43	0.090	0.039	0.547	0.008	0.195	1.172
VOYA	3.41	14.064	0.38	2.71	0.087	0.038	0.528	0.008	0.188	1.131

The visibility degradation beyond natural conditions expressed in deciviews is kept for each Class I area and ranked over the length of the modeling simulation. The criteria used to determine if a source is "contributing" to visibility impairment is the 98th percentile that is equal to .5 deciviews for MRPO States using a maximum 24-hour emission rate and the peak value that is equal to .5 deciviews for MRPO States using an actual 24-hour emission rate. The 98th percentile is interpreted as any source with more than 21 days of visibility impairment over the 3 year modeling period or 7 days of visibility impairment in any one of the 3 years modeled is "contributing" to visibility impairment. The peak value is interpreted as any source with more than 1 day of visibility impairment over the 3 year modeling period is "contributing" to visibility impairment.

The gridded receptor run will be post processed through CALPOST for plotting purposes. The plots show the number of days at each receptor that have 24-hr average 1% degradation in light extinction (1/Mm) over background conditions. This is approximate, but not equal, to 0.5 deciview degradation over background conditions. These plots allow for a qualitative visual inspection of the extent impact over the region.

VISIBILITY IMPROVEMENT DETERMINATION

Once a source is considered subject to BART the visibility improvement determination requires additional single source modeling. CALPUFF will be used to determine the visibility improvement at Class I area receptors from the potential BART control technology applied to the source. Post-control emission rates are calculated as a percentage of the pre-control emission rates (EPA, 2005).

The post-control CALPUFF simulation will be compared to the pre-control CALPUFF simulation by the change in the value of the highest degradation in visibility over natural conditions between the pre-control and post-control simulations (EPA, 2005). Further information on the sources and control levels to be used in this additional modeling will be provided later.

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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January 31, 2007

Ian Donaldson
Trinity Consultants
5320 Spectrum Dr.
Suite C
Frederick, MD 21703

Re: ESSROC BART Modeling Protocol

Dear Mr. Donaldson:

On January 18, 2007, The Indiana Department of Environmental Management, Office of Air Quality (IDEM-OAQ) received the ESSROC Cement Corporation – Speed Plant Best Available Retrofit Technology (BART) Applicability Analysis Air Quality Modeling Protocol. The protocol was submitted by ESSROC's environmental consultants, Trinity Consultants through email. IDEM-OAQ has reviewed the protocol and offers the following comments:

Page 6, Section 1.1.2: IDEM requires all surrounding Class 1 areas to be analyzed as indicated in the MRPO modeling protocol. Additional Class 1 areas to Table 1-1 of the BART Modeling protocol would be Boundary Waters, MN; Brigantine Wilderness, NJ; Great Gulf Wilderness, NH; Isle Royale, MI; Lye Brook Wilderness, VT; Seney, MI; Voyageurs, MN.

IDEM-OAQ will review all BART modeling submittals and conducts its reviews using the Midwest Regional Planning Organization (MRPO) BART modeling configuration, which will include the Class 1 areas included on page 5 of the MRPO BART modeling protocol.

Page 10, Section 2.1: PM10/PM2.5 modeling for BART determination using CALPUFF may be required at a later time. Evaluation of PM2.5 emissions rates and stack test information is in the process of being conducted. IDEM-OAQ may use available PM10 or PM2.5 emissions to analyze their impacts, separate from the NOx and SO2 pollutant impacts.

MRPO will be conducting photochemical modeling to determine air quality impacts on Class 1 areas and regional haze. This modeling will be conducted at a later date.

Pages 20/21, Section 3.5.1 and 3.5.2: IDEM prefers that the 20% best visibility days (Option 1) be used, as set forth in the MRPO BART modeling protocol. The natural background computation can be found on page 6 of the MRPO protocol.

Page 25, Section 4.1: EPA Region V has recently indicated that regulatory approval has not yet been granted for CALPUFF version 5.756 for BART modeling at this time. EPA has approved the use of CALPUFF version 5.711a and is the CALPUFF model version that IDEM prefers for BART modeling.

Page 32. Section 4.6: It is IDEM's approach to use the maximum 24-hour average actual emission rate from the highest emitting day of the meteorological period modeled. If this information is not available, potential emissions should be used, in order to be conservative. Emissions to be modeled should represent a conservative approach in BART determination. It is IDEM's approach to use the maximum 24-hour average actual emission rate from the highest emitting day of the meteorological period modeled. If this information is not available, potential emissions should be used, in order to be conservative.

Use of another threshold, other than the 98^{th} percentile or 0.5 deciview thresholds would need to be more conservative (i.e. use of the 99^{th} percentile or the exceeding the deciview threshold on any impact day. Discussions with EPA concerning the 98^{th} percentile and 0.5 deciview thresholds have resulted in modeling maximum 24-hour average actual emission rates from the highest emitting day of the meteorological period modeled or potential emissions and comparing with the 98^{th} percentile/0.5 deciview thresholds. It is IDEM's desire to follow the guidance available for BART modeling.

Upon ESSROC's receipt of this letter and submittal of BART modeling for ESSROC, IDEM-OAQ will review emissions and stack information used in the ESSROC and IDEM-OAQ BART modeling. IDEM-OAQ will then review the modeling results and compare with IDEM-OAQ's results using the MRPO modeling protocol. Any discrepancies between the two sets of results that result in a difference in the BART determination will be brought to ESSROC and Trinity Consultant's attention and addressed.

In IDEM-OAQ's initial determination of BART eligible sources, ESSROC Materials, Inc in Logansport was identified as likely to have BART eligible emissions units. IDEM-OAQ sent out BART survey forms in order to collect emissions and stack information in order to conduct CALPUFF modeling in-house to determine whether all BART eligible sources would be subject to BART. To date, IDEM-OAQ has not received BART survey forms from either of the ESSROC companies located in Logansport or Speed. IDEM-OAQ did use the emissions and stack information from the ESSROC CEMENT Corp – Speed BART modeling protocol and determined that the ESSROC - Speed company will be subject to BART. IDEM-OAQ requests that ESSROC submit the BART survey forms for both the Speed and Logansport companies so IDEM-OAQ can review and model the information for both companies to make a subject to BART determination using CALPUFF.

If you have any questions concerning the comments listed above, please call me at (317) 234-3576 or email me at mderf@idem.in.gov.

Sincerely,

Mark Derf, Senior Environmental Manager
Air Programs Branch
Office of Air Quality

cc: Hector Ybanez - ESSROC
File – Clark County

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VIA E-MAIL

February 14, 2007

Mr. Mark Derf
Indiana Department of Environmental Management
Air Programs Branch
Bureau of Air Quality
100 N. Senate Ave.
Mail Code 61-50
Indianapolis, IN 46204-2251

Subject: Response to IDEM Comments on ESSROC Speed Plant BART Modeling Protocol

Dear Mr. Derf:

We have prepared the following responses to the Department's letter dated January 29, 2007 regarding the BART Modeling Protocol for ESSROC's Speed, IN Plant. For each comment provided, ESSROC is providing our response on how we proposed to the comment raised.

1. IDEM Comment

> ***Page 6, Section 1.1.2:*** *IDEM requires all surrounding Class 1 areas to be analyzed as indicated in the MRPO modeling protocol. Additional Class 1 areas to Table 1-1 of the BART Modeling protocol would be Boundary Waters, MN; Brigantine Wilderness, NJ; Great Gulf Wilderness, NH; Isle Royale, MI; Lye Brook Wilderness, VT; Seney, MI; Voyageurs, MN.*
>
> *IDEM-OAQ will review all BART modeling submittals and conducts its reviews using the Midwest Regional Planning Organization (MRPO) BART modeling configuration, which will include the Class 1 areas included on page 5 of the MRPO BART modeling protocol.*

ESSROC Response to IDEM Comment 1

Based on previous conversations with IDEM and with this understanding ESSROC will proceed with conducting site-specific refined modeling for the Class I areas specified within 300 km of the site. As it is logical that maximum impacts from the Speed Plant will be identified by the evaluation we propose, it is reasonable to expect that a BART exemption determination can be made by the Department. Nonetheless, we understand the MPRO and IDEM requirements and should those analyses provide a different result that our site-specific analysis we would request the opportunity to review the Department's analysis for possible refinements.

2. IDEM Comment

Page 10, Section 2.1: *PM10/PM2.5 modeling for BART determination using CALPUFF may be required at a later time. Evaluation of PM2.5 emissions rates and stack test information is in the process of being conducted. IDEM-OAQ may use available PM10 or PM2.5 emissions to analyze their impacts, separate from the NOx and SO2 pollutant impacts.*

MRPO will be conducting photochemical modeling to determine air quality impacts on Class 1 areas and regional haze. This modeling will be conducted at a later date.

ESSROC Response to IDEM Comment 2

ESSROC will proceed in conducting the site-specific modeling without PM_{10} or $PM_{2.5}$ emissions. However, in anticipating the potential need for the inclusion of these pollutants in future BART modeling, ESSROC will work to define a set of emission rates for PM_{10} or $PM_{2.5}$ for use by the Department at a later date. These modeled emission rates will be determined in the manner described in response #5 below.

3. IDEM Comment

Pages 20/21, Section 3.5.1 and 3.5.2: *IDEM prefers that the 20% best visibility days (Option 1) be used, as set forth in the MRPO BART modeling protocol. The natural background computation can be found on page 6 of the MRPO protocol.*

ESSROC Response to IDEM Comment 3

ESSROC agrees to utilize the 20% best visibility days option in the CALPOST processing. ESSROC understands that the values of ammonium sulfate, ammonium nitrate, organic carbon, elemental carbon, soil and coarse mass listed in Table 4 of the MRPO BART modeling protocol are to be used in CALPOST.

4. IDEM Comment

Page 25, Section 4.1: *EPA Region V has recently indicated that regulatory approval has not yet been granted for CALPUFF version 5.756 for BART modeling at this time. EPA has approved the use of CALPUFF version 5.711a and is the CALPUFF model version that IDEM prefers for BART modeling.*

ESSROC Response to IDEM Comment 4

Based on our telephone conversation on February 6, 2007, we understand this comment has been resolved between EPA Region 5 and the Department. Therefore, we will use CALPUFF version 5.756 as detailed in their BART Modeling Protocol.

IDEM Comment

Page 32. Section 4.6: *It is IDEM's approach to use the maximum 24-hour average actual emission rate from the highest emitting day of the meteorological period modeled. If this information is not available, potential emissions should be used, in order to be conservative. Emissions to be modeled should represent a conservative approach in BART determination. It is IDEM's approach to use the maximum 24-hour average actual emission rate from the highest emitting day of the meteorological period modeled. If this information is not available, potential emissions should be used, in order to be conservative.*

Use of another threshold, other than the 98^{th} percentile or 0.5 deciview thresholds would need to be more conservative (i.e. use of the 99^{th} percentile or the exceeding the deciview threshold on any impact day. Discussions with EPA concerning the 98^{th} percentile and 0.5 deciview thresholds have resulted in modeling maximum 24-hour average actual emission rates from the highest emitting day of the meteorological period modeled or potential emissions and comparing with the 98^{th} percentile/0.5 deciview thresholds. It is IDEM's desire to follow the guidance available for BART modeling.

ESSROC Response to IDEM Comment 5

ESSROC understands that where possible maximum 24-hour average actual emission rates are to be utilized in BART exemption modeling. As such, ESSROC will work to identify a set of emission rates representative of maximum operating conditions (e.g. maximum 24-hour average actual emissions, potential emissions, etc.). The basis for the modeled emission rates will be documented in our evaluation report.

Presuming our evaluation is based on emission rates that are permit allowables or representative of emissions during maximum operating conditions, ESSROC will compare the 98^{th} percentile visibility impact to the 0.5 deciview threshold per IDEM and MRPO guidance.

If you have any questions or concerns, please call me at (240) 379-7490. We appreciate your assistance in completing this BART modeling analysis.

Sincerely,

TRINITY CONSULTANTS

Ian W. Donaldson
Consultant

cc: Mr. Hector Ybanez – ESSROC Cement Corp.
Mr. Mike Remsberg – Trinity Consultants

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BEST AVAILABLE RETROFIT TECHNOLOGY APPLICABILITY ANALYSIS
AIR QUALITY MODELING REPORT
ESSROC CEMENT CORPORATION – SPEED PLANT

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July 2007

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1. INTRODUCTION

ESSROC Cement Corporation (ESSROC) operates a portland cement manufacturing facility in Speed, Indiana. ESSROC is currently operating in accordance with Indiana Department of Environmental Management (IDEM) Title V operating permit T019-6016-00008, issued on June 15, 2004. The current Title V permit expires June 15, 2009. The facility is considered eligible to be regulated under the Best Available Retrofit Technology (BART) provisions of the Regional Haze Rule. This BART Applicability Analysis report summarizes ESSROC's determination that the Speed Plant is exempt from BART because the air quality modeling analysis described in this report demonstrates that the facility does not cause or contribute to visibility impairment at any federally protected Class I areas (i.e. modeled impacts are less than the 0.5 deciview visibility impairment contribution threshold).

ESSROC submitted a source-specific BART Applicability Modeling Protocol on January 18, 2007, and subsequently received comments from IDEM on January 29, 2007. ESSROC's responses to each of the comments on protocol are attached in Appendix A. In addition to these comments on the source-specific modeling protocol for the Speed Plant, ESSROC's evaluation of BART-eligibility and the modeling methods used to determine applicability of BART as described in this report are consistent with the following guidance documents:

- U.S. EPA, "Regional Haze Regulations and Guideline for Best Available Retrofit Technology (BART) Determinations," *Federal Register* Volume 70, Number 128, July 6, 2005.
- U.S. EPA, *Guidance for Tracking Progress under the Regional Haze Rule* (EPA-54/B-03-004), September 2003.
- U.S. EPA, *Guidance for Estimating Natural Visibility Conditions under the Regional Haze Rule* (EPA-454/B-03-005), October 2003.
- U.S. EPA, *Interagency Workgroup on Air Quality Modeling (IWAQM) Phase 2 Summary Report* (EPA-454/R-98-019), December 1998.
- U.S. EPA, *Guideline on Air Quality Models*, 40 CFR Part 51, Appendix W (Revised, November 9, 2005).
- Visibility Improvement State and Tribal Association of the Southeast (VISTAS), *Protocol for the Application of the CALPUFF Model for Analyses of Best Available Retrofit Technology (BART)*, *Revision 3.2*, August 31, 2006.
- VISTAS and U.S. EPA, "Q&A for Source by Source BART Rule" (Draft), October 28, 2005.
- MRPO, *Regional Haze and Visibility in the Upper Midwest, Final Draft*, September 1, 2001.
- MRPO, *Midwest Regional Planning Organization Modeling Protocol*, October 21, 2005.
- MRPO, *Single Source Modeling to Support Regional Haze BART Modeling Protocol*, March 21, 2006.

The *VISTAS BART Modeling Protocol* as revised on August 31, 2006, and the *Single Source Modeling to Support Regional Haze BART Modeling Protocol*, from this point forward referred to as the Midwest Regional Planning Organization (MRPO) BART Modeling Protocol, are incorporated by reference for ESSROC's source-specific modeling analyses, and are presented in Appendix B and Appendix C, respectively of this modeling report. The *VISTAS BART Modeling Protocol* and MRPO BART Modeling Protocol establish common technical approaches for quantifying emissions from BART-eligible emission units and conducting modeling analyses using the CALPUFF modeling system. ESSROC's analyses generally adhere to the recommendations made in these protocols as described in this report.

1.1 OVERVIEW OF REGIONAL HAZE RULE AND BART REQUIREMENTS

On July 6, 2005, the EPA published amendments to its 1999 Regional Haze Rule (RHR), often called the BART rule, which included guidance for making source-specific BART determinations. The BART rule defines BART-eligible sources as sources that meet the following criteria:

1. Are listed as one of the 26 listed source categories in the guidance,
2. Were in existence on August 7, 1977 and began operation after August 7, 1962, and
3. Have potential emissions of at least 250 tons per year of a visibility-impairing pollutant.

To avoid confusion when discussing BART applicability modeling, Trinity wishes to note that a BART-eligible source includes all emission units at a single facility that meet EPA's BART-eligible source criteria listed above. Thus, there can only be one BART-eligible source per facility.

1.1.1 DETERMINATION OF BART-ELIGIBILITY

The U.S. EPA BART guidelines outline the following three steps for determining which sources at a facility are BART-eligible:

1. Identify the emission units in the BART source categories,
2. Identify the start-up dates of those units, and
3. Compare potential emissions to the 250 tpy cutoff.

ESSROC has determined that the 30 emission units at Speed Plant shown in Table 1-1 below are BART-eligible, since (1) the units operate at a Portland cement manufacturing facility which is one of the 26 BART-eligible source categories (only units considered to fall under the Standard Industrial Classification 32 – Stone, Clay, Glass, and Concrete Products were included in the BART-eligible source), (2) the units were in existence on August 7, 1977 and began operation after August 7, 1962, and (3) the units collectively have potential emissions of at least one visibility affecting pollutant that are greater than 250 tpy[1]. Accordingly, these units were evaluated to determine whether they are exempt from BART or whether they are subject to BART and thus require a BART determination.

[1] Sources with the potential to emit less than 5 tpy of each visibility affecting pollutant (i.e. PM_{10}, NO_X, SO_2 or VOC) as well as sources that are insignificant under the Title V operating permit program were not considered in this analysis.

Specific information about these emission units is provided in Section 2 of this BART Applicability Analysis report.

TABLE 1-1. LIST OF BART-ELIGIBLE EMISSION UNITS AT ESSROC'S SPEED PLANT

Emission Unit Description	Emission Unit ID
Clay Crusher	EU08
C-15 Covered Conveyor (Clay)	EU09
Hopper (Raw Mill)	EU109
South Reclaim Clinker Covered Conveyor	EU124
Truck Loading Station	EU125
Truck Unloading Station	EU126
Finish Mill Feed Belt	EU132
Gypsum Elevator (2D Finish Mill)	EU135
Loesche Raw Mill	EU14
CKD/Lime Tank	EU146
Blend Silo #1	EU16
Blend Silo #2	EU17
Feed System for Kiln No. 1	EU19
Cement Kiln No. 1	EU20
Cooler No. 1	EU22
No. 1 Clinker Drag Conveyor (Clinker)	EU23
Cement Kiln No. 2	EU27
Cooler No. 2	EU29
No. 2 Clinker Drag Conveyor (Clinker)	EU30
Covered Incline Belt (Clinker)	EU33
Gypsum/Stone Transfer Circuit	EU35
Clinker Transfer Circuit ABC Mills	EU36
Elevators (2ABC Finish Mill)	EU37
Finish Mill Circuit 2D	EU47
502 Silos	EU50
501 Silos	EU54
Coal Crusher Mill No. 1	EU66
Coal Crusher Mill No. 2	EU67
Truck Dump Hopper	EU96
Limestone Conveyor	EU97

1.1.2 ASSESSMENT OF CONTRIBUTION TO VISIBILITY IMPAIRMENT AND BART APPLICABILITY

In its role as the technical analysis coordinator for the State of Indiana, MRPO developed a BART Modeling Protocol that was issued on March 21, 2006 to provide regional planning organization-specific data and techniques for completing BART exemption modeling. Since the Speed facility is also located on the fringe of the southeastern states RPO boundary and because the meteorological domains developed by VISTAS overlap the Speed facility and adjacent Class I areas, VISTAS guidance was used in conjunction with that from the MRPO. VISTAS developed a common modeling protocol and data resources for use by state regulatory agencies and BART-eligible sources. The final *VISTAS BART Modeling Protocol* was issued on December 22, 2005, was revised most recently on August 31, 2006, and prescribes modeling techniques and data resources to conduct modeling analyses to assess whether a BART-eligible source is subject to BART.

A BART-eligible source is determined to be subject to BART if the source causes or contributes to visibility impairment at a federally protected Class I area. Causation is defined as a single-source impact of 1.0 delta deciviews (Δdv, where delta means a source-specific impact compared to a natural background) or more; contribution is defined as a single-source impact of 0.5 Δdv or more (each evaluated on a 24-hour average basis). The deciview is a metric used to represent normalized light extinction attributable to visibility-affecting pollutants. To determine whether a BART-eligible facility causes or contributes to visibility impairment, U.S. EPA guidance requires the use of an air quality model, specifically recommending the CALPUFF modeling system, to quantify the impacts attributable to a single BART-eligible source. Because contribution to visibility impairment is sufficient cause to require a BART determination, 0.5 Δdv is the critical threshold for assessment of BART applicability.

Regional haze is measured using the light extinction coefficient (b_{ext}) in units of Mm^{-1}, which is expressed in terms of the haze index expressed in dv. The haze index (*HI*) is calculated as shown in the following equation.

$$HI = 10 \ln\left(\frac{b_{ext}}{10}\right)$$

Since BART-applicability is based on source-specific visibility impacts compared to the visibility impairment associated with a natural background, both the source's visibility impacts as well as the natural background visibility must be determined. This requires the determination of a source-specific light extinction coefficient and the light extinction coefficient associated with a natural background.

The source-specific light extinction coefficient, $b_{ext,source}$, is affected by particulate species either directly emitted from a source or formed as a result of emissions directly emitted from a source (precursor emissions), including sulfates (SO_4), nitrates (NO_3), coarse particulate matter (PMC), fine particulate matter (PMF), secondary organic aerosols (SOA), and elemental carbon (EC). The source-specific light extinction coefficient is calculated as shown in the following equation:

$$b_{ext,source}\left(Mm^{-1}\right) = b_{SO_4} + b_{NO_3} + b_{PMC} + b_{PMF} + b_{SOA} + b_{EC}$$

where,

$b_{SO_4} = 3 * [(\mathrm{NH}_4)_2\mathrm{SO}_4] * f(RH)$

$b_{NO_3} = 3 * [\mathrm{NH}_4\mathrm{NO}_3] * f(RH)$

$b_{PMC} = 0.6 * [\text{Coarse Particulate Matter}]$

$b_{PMF} = 1 * [\text{Fine Particulate Matter}]$

$b_{SOA} = 4 * [\text{Organic Condensable Particulate Matter}]$

$b_{EC} = 10 * [\text{Elemental Carbon}]$

$[\ \ ] = \text{Concentration in } \mu\text{g/m}^3$

The background light extinction coefficient, $b_{\text{ext, background}}$, is affected by various particulate species that exist naturally in the atmosphere and the Rayleigh scattering phenomenon. The background light extinction coefficient is calculated as shown in the following equation.

$$b_{back}(Mm^{-1}) = b_{SO_4} + b_{NO_3} + b_{OC} + b_{Soil} + b_{Coarse} + b_{EC} + b_{Ray}$$

where,

$b_{SO_4} = 3*[(\mathrm{NH}_4)_2\mathrm{SO}_4]*f(RH)$

$b_{NO_3} = 3*[\mathrm{NH}_4\mathrm{NO}_3]*f(RH)$

$b_{OC} = 4*[\mathrm{OC}]$

$b_{Soil} = 1*[\mathrm{Soil}]$

$b_{Coarse} = 0.6*[\text{Coarse Mass}]$

$b_{EC} = 10*[\text{Elemental Carbon}]$

$b_{Ray} = 10\ Mm^{-1}$

$[\ \ ] = \text{Concentration in } \mu\text{g/m}^3$

More detailed information about the natural background conditions particular to the Class I areas which are potentially affected by the BART-eligible source at the Speed Plant is provided in Section 3.4.2 of this report.

The U.S. EPA BART guidelines prescribe that the 98^{th} percentile, 24-hour average, visibility impact computed in a modeling analysis that evaluates three years of meteorological data should be compared to the visibility contribution threshold (0.5 Δdv). Thus, to assess whether the Speed Plant's BART eligible source contributes to visibility impairment, this BART Applicability Analysis quantifies the 8^{th} high 24-hour average visibility impacts of each year modeled which illustrates the distribution (i.e., frequency, duration, and magnitude) of peak visibility impairment episodes attributable to the Speed Plant.

1.1.3 LOCATION

The VISTAS modeling protocol specifies that all Class I areas within 300 km of a BART-eligible source must be initially evaluated to determine whether the source contributes to visibility impairment. Table 1-2 summarizes the distances separating ESSROC's Speed Plant from all Class I areas within the MRPO region and adjacent states. Consistent with the *VISTAS BART Modeling Protocol*, only modeling results from those Class I areas within 300 km are presented in this BART applicability modeling report.

Figure 1-1 illustrates the location of the Speed Plant relative to any Class I areas that are within 300 km of the plant. Note that Figure 1-1 shows that Mammoth Cave is the only Class I area within 300 km of the Speed Plant, at 130 km south of the facility. The Great Smoky Mountains National Park is just over 300 km at 347 km southeast of the Speed Plant and therefore the visibility impacts from the Speed Plant at this site are not presented.

The receptor locations in Mammoth Cave National Park at which Trinity evaluated visibility impacts were obtained from the National Park Service.[2]

TABLE 1-2. DISTANCES (KILOMETERS) SEPARATING CLASS I AREAS AND ESSROC'S SPEED PLANT

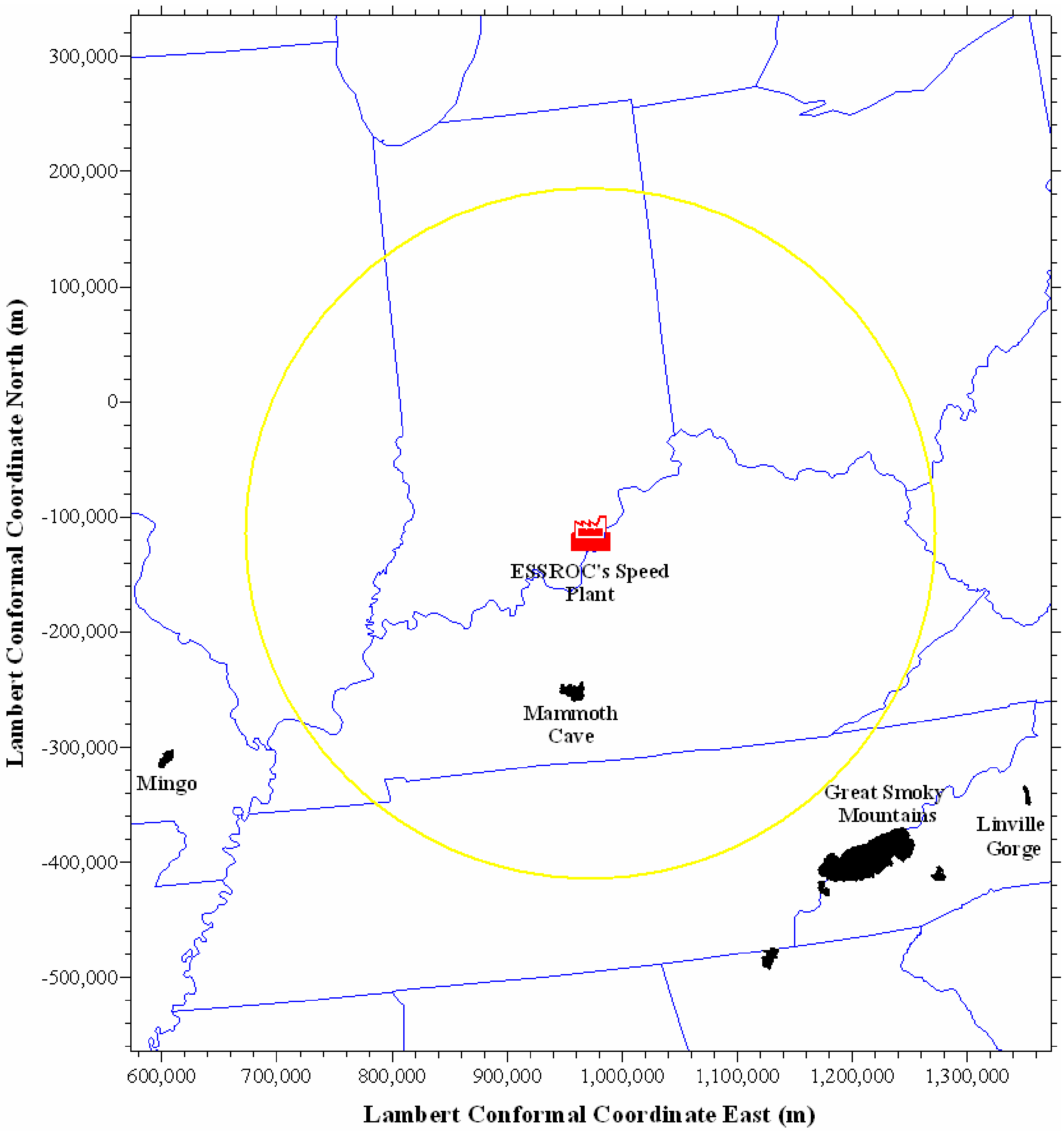
Class I Area	Distance (km)
Boundary Waters (MN)	1,119
Brigantine (NJ)	979
Dolly Sods (WV)	551
Great Gulf (NH)	1,361
Great Smoky Mountains (NC/TN)	347
Hercules Glade (MO)	653
Isle Royale (MI)	1,072
James River Face (VA)	553
Linville Gorge (NC)	434
Lye Brook (VT)	1,178
Mammoth Cave (KY)	**130**
Mingo (MO)	416
Otter Creek (WV)	525
Seney (MI)	867
Shenandoah (VA)	601
Sipsey (AL)	471
Voyageurs (MN)	1,225

1.1.4 CALPUFF MODELING ANALYSES

As recommended by the U.S. EPA BART guidelines and VIST*AS BART Modeling Protocol,* the CALPUFF modeling system was used to compute the 24-hour average visibility impairment attributable to the Speed Plant BART-eligible source to assess whether the 0.5 dv contribution threshold is exceeded, and if so, the frequency, duration, and magnitude of any exceedance events. Both the approach proposed by IDEM per 326 IAC 26-1-4 (a)(3) and the VISTAS refined approach prescribe that the 98th percentile impact be evaluated in modeling analyses as the eighth-highest, 24-hour average, visibility impact of each of three years modeled, or the 22nd-highest, 24-hour average, visibility impact over the three years modeled, whichever is more conservative. This impact is generally represented as the highest, 24-hour average, impact at any receptor in the Class I area on the day modeled. This method is identical to that provided in the MRPO BART Modeling Protocol with the lone exception that if actual annual emissions were modeled using a 36-km meteorological grid resolution, then the peak, or maximum, impact must be less than 0.5 dv for a source to be deemed exempt from a BART determination. Since ESSROC has performed refined modeling using a VISTAS sub-regional 4-km grid resolution meteorological domain and 24-hour maximum actual emission rates, the 98th percentile impact is the appropriate visibility metric.

[2] National Park Service compilation of Class I area receptors, http://www2.nature.nps.gov/air/maps/receptors/.

FIGURE 1-1. LOCATION OF ESSROC'S SPEED PLANT RELATIVE TO CLASS I AREAS WITHIN 300 KM



Note: Only Class I areas in the MRPO protocol are named.

CALPUFF is a refined air quality modeling system that is capable of simulating the dispersion, chemical transformation, and long-range transport of multiple visibility-affecting pollutant emissions from a single source and is therefore preferred for BART applicability and determination analyses. The CALPUFF modeling system is described in technical detail in the *VISTAS BART Modeling Protocol* as revised and its use in the BART applicability assessment of ESSROC's Speed Plant is described in Section 3 of this BART Applicability Analysis Modeling Report.

1.2 ORGANIZATION OF MODELING REPORT

The remainder of this BART Applicability Analysis report is organized as follows.

- ▲ Section 2 describes the BART-eligible emission units at the Speed Plant and the emission rates modeled in the BART Applicability Analysis.
- ▲ Section 3 describes the procedural and technical guidance for conducting Class I area analyses using the CALPUFF modeling system, including the data resources, technical modeling options, and quality assurance methods used in the CALMET, CALPUFF, and CALPOST analyses.
- ▲ Section 4 describes the results of the BART applicability modeling analyses.
- ▲ Section 5 presents a summary of the BART Applicability Analysis and conclusion that the Speed Plant is not subject to BART.

Supplemental information is provided in several appendices to this report. Appendix A contains the responses to all comments received from IDEM regarding the BART Applicability Analysis Modeling Protocol. Appendices B and C provide the VIST*AS BART Modeling Protocol* and the MRPO BART Modeling Protocol for reference. Electronic copies of model input and output files are provided on electronic media accompanying this BART Applicability Analysis Report, a file index for which is presented in Appendix D. Appendix E provides the checklists used to QA all modeling files created in support of the BART applicability analysis.

2. BART-ELIGIBLE SOURCE DESCRIPTION

This section of the BART Applicability Analysis describes the emission units that make up the BART-eligible source at ESSROC's Speed Plant. Emissions and exhaust characteristics of the emission units are quantified to demonstrate how each source was represented in the modeling analysis.

2.1 BART-ELIGIBLE EMISSION UNITS

ESSROC reviewed the criteria for BART-eligibility and determined that the emission units described in Table 2-1 comprise the BART eligible source at the Speed Plant. As previously mentioned, these units were determined to be BART-eligible based on the dates the sources were in existence (between August 7, 1962 and August 7, 1977) and the combined annual potential emissions of the sources (greater than 250 tpy for any single visibility affecting pollutant) where the dates and annual potential emissions are summarized in Table 2-1 below and the details regarding the methodology used to calculate the emission rates of NO_x and SO_2 are described in Section 2.2 below..

TABLE 2-1. POTENTIAL EMISSIONS FROM BART-ELIGIBLE EMISSION UNITS AT ESSROC'S SPEED PLANT[3]

Emission Unit Description	Emission Unit ID	BART Source Category*	Construction Date	Potential Emissions (tpy) NOx	SO2	PM_{10}††	VOC
Clay Crusher	EU08	4	1977	-	-	8.45	-
C-15 Covered Conveyor (Clay)	EU09	4	1977	-	-	17.46	-
Hopper (Raw Mill)	EU109	4	1976	-	-	0.00	-
South Reclaim Clinker Covered Conveyor	EU124	4	1971	-	-	5.07	-
Truck Loading Station	EU125	4	1971	-	-	0.02	-
Truck Unloading Station	EU126	4	1971	-	-	0.02	-
Finish Mill Feed Belt	EU132	4	1977	-	-	1.90	-
Gypsum Elevator (2D Finish Mill)	EU135	4	1964	-	-	5.86	-
Loesche Raw Mill	EU14	4	1977	-	-	270.31	-
CKD/Lime Tank	EU146	4	1964	-	-	6.76	-
Blend Silo No. 1	EU16	4	1971	-	-	10.59	-
Blend Silo No. 2	EU17	4	1977	-	-	15.20	-
Feed System for Kiln No. 1	EU19	4	1971	-	-	6.42	-
Cement Kiln No. 1	EU20	4	1971	1,576.80	4,835.52	133.39	6.75
Cooler No. 1	EU22	4	1971	-	-	20.65	-
Clinker Drag Conveyor No. 1 (Clinker)	EU23	4	1971	-	-	5.63	-
Cemenet Kiln No. 2†	EU27	4	1977	2,023.56	7,936.56	185.49	75.79
Cooler No. 2	EU29	4	1977	-	-	36.37	-
Clinker Drag Conveyor No. 2 (Clinker)	EU30	4	1977	-	-	5.52	-
Covered Incline Belt (Clinker)	EU33	4	1972	-	-	5.63	-
Gypsum/Stone Transfer Circuit	EU35	4	1964	-	-	14.87	-
Clinker Transfer Circuit ABC Mills	EU36	4	1964	-	-	5.29	-
Elevators (2ABC Finish Mill)	EU37	4	1969	-	-	5.01	-
Finish Mill Circuit 2D	EU47	4	1964	-	-	52.98	-
502 Silos	EU50	4	1966	-	-	5.26	-
501 Silos	EU54	4	1965	-	-	21.93	-
Coal Crusher Mill No. 1	EU66	4	1971	-	-	11.96	-
Coal Crusher Mill No. 2	EU67	4	1977	-	-	26.47	-
Truck Dump Hopper	EU96	4	1977	-	-	5.30	-
Limestone Conveyor	EU97	4	1977	-	-	5.30	-
Total BART Eligible Emissions (tpy)				3,600.4	12,772.1	895.1	82.5

* Category 4 denotes Portland Cement Plants
† Kiln No. 2 system also includes a bypass stack. This bypass stack operates intermittently and for practical purposes of this analysis it is reasonable to assume that the maximum average daily emissions from Kiln No. 2 for the purposes of this modeling analysis are representative of when the bypass stack is in operation.
†† Note that since potential emissions were not readily available for EU109, EU125, EU126, EU132, EU96 and EU97 and PM is not considered a polactual 2005 PM_{10} emissions are listed.

Based on conversations with IDEM staff, ESSROC understood that VOC and ammonia emissions are not required to be included in BART applicability modeling for Non-EGU sources, and that source-wide PM_{10} emissions will be modeled by IDEM to assess the contribution to visibility impairment attributable to PM_{10} alone. For completeness' sake, however, Trinity has decided to model PM_{10} emissions in the BART applicability analysis of ESSROC's BART-eligible source. As such,

[3] Note the Speed Plant is seeking a plantwide applicability limitation (PAL) for emissions of nitrogen oxides (NO_x). The proposed limit is 2,672 tpy of NO_x.

subsequent analyses using CALPUFF do not include VOC and ammonia, however, ESSROC has provided estimates for the potentials emission of VOC from each BART-eligible emission unit.[4]

2.2 BART-ELIGIBLE SOURCE EMISSION INVENTORY

Whereas the BART eligibility determination relies on the annual potential emissions of visibility-affecting pollutants, EPA's BART guidelines indicate that the BART applicability modeling should utilize the maximum actual 24-hour average emission rates. The *VISTAS BART Modeling Protocol* specifies the following hierarchy of information resources to establish the maximum actual 24-hour average emission rate for BART applicability modeling over the prior three-to-five year period:

- 24-hour maximum emissions observed using a Continuous Emission Monitor (CEM) for the period 2001 through 2003
- 24-hour maximum emissions observed using a CEM for any representative period
- Facility stack test emissions
- Potential to emit
- Permit allowable emissions
- Emissions factors from U.S. EPA *AP-42* source profiles

The MRPO confirms this hierarchy in the MRPO BART Modeling Protocol by stating:

> *"States will use the 24-hr maximum emissions rate between 2002 and 2004. If this data is not available, then a short term "allowable" or "potential" emission rate of emissions between 2002-2004 will be used. If neither of these types of emission rates is available, then the highest actual annual emissions divided by hours of operation of NO_x, SO_x, and primary PM between 2002 and 2004 will be applied in CALPUFF."*

As previously stated, MRPO is performing modeling to determine whether VOC and ammonia emissions need to be considered for source-specific BART analyses. Per guidance from IDEM, ESSROC has only modeled emissions of NO_x, SO_2, and PM_{10} from the two cement kilns. All other PM_{10} emissions sources, which primarily consist of raw material handling operations producing only fugitive emissions, were not considered in the modeling analysis, due to their emission characteristics and the large source receptor distances considered in the analysis. The modeled maximum actual 24-hour average emission rates of NO_x and SO_2 provided in Table 2-2 below were derived from site-specific CEM data for the two kilns and from historical production and emissions levels, respectively. The modeled maximum actual 24-hour average emission rates of PM_{10} in Table 2-2 were conservatively derived from potential emissions for the two kilns.

[4] Per conversation between Trinity Consultants and Mark Derf of IDEM on December 1, 2006, sources conducting CALPUFF site-specific modeling should not model emissions of VOC and ammonia. These otherwise BART-eligible pollutants will initially be analyzed by the RPO using CAMx. Should IDEM require modeling of these at a later date, ESSROC reserves the right to revise the modeling analysis presented in this report.

TABLE 2-2. SUMMARY OF POTENTIAL AND MODELED SO_2, NO_X, AND PM_{10} EMISSION RATES

Emission Unit	Potential SO_2 Emissions (lb/hr) [1]	Potential NO_x Emissions (lb/hr) [1]	Potential PM_{10} Emissions (lb/hr) [1]	Modeled SO_2 Emissions (lb/hr) [2]	Modeled NOx Emissions (lb/hr) [3]	Modeled PM_{10} Emissions (lb/hr) [4]
Cement Kiln No. 1	1,104.0	360.0	30.5	472.5	356.7	30.5
Cement Kiln No. 2	1,812.0	462.0	42.3	266.3	362.8	42.3
Total Emissions (lb/hr)	**2,916.0**	**822.0**	**72.8**	**738.8**	**719.5**	**72.8**

1. Calculated hourly potential emissions assuming continuous operation.
2. Based on historical emissions and production levels, as well as maximum actual 24-hour average emission rates from 2001-2003.
3. Maximum actual 24-hour average emission rates from 2001-2003 calcuated in the develpoment of the PAL limit.
4. Hourly potential emissions assuming continuous operation.

2.3 MODELED STACK PARAMETERS

Actual stack parameters were input to the CALPUFF model to represent the point of visibility-affecting pollutant emissions. The location of each point source was represented using the Lambert Conformal Coordinate system projection established for the meteorological data analyses prepared by VISTAS. Both the EU20 and EU27 stacks discharge vertically without obstruction. Since the nearest Class I area is located more than 100 km from the facility, effects of building downwash were not considered in this modeling analysis per the MRPO BART Modeling Protocol.

The actual EU20 and EU27 stacks are 120 and 214 feet respectively. Since the height of Kiln No. 2 stack is greater than nominal default GEP stack height in the state of Indiana of 65 meters (213 ft),in order to conform to modeling requirements the stack was modeled at the default GEP height instead of the actual height[5]. The Kiln No. 1 stack complies with the definition of GEP as its height is less than GEP. Table 2-3 summarizes the stack parameters for BART-eligible emission units at ESSROC's Speed Plant.

TABLE 2-3. STACK PARAMETERS FOR MODELED BART-ELIGIBLE EMISSION UNITS

Emission Unit Description	Emission Unit ID	LCC East (km)	LCC North (km)	Stack Height (m)	Elevation (m)	Stack Diameter (m)	Exhaust Velocity (m/sec)	Exhaust Temperature (°K)
Cement Kiln No. 1	EU20	972.493	-114.574	36.58	137.16	2.44	22.159	513.7
Cement Kiln No. 2	EU27	972.438	-114.621	64.92	138.07	2.97	16.31	422.0

[5] GEP stack height is defined in 326 IAC 1-7-4.

3. AIR QUALITY MODELING ANALYSES

Section 3 of this BART Applicability Analysis report for ESSROC's Speed Plant describes the modeling methods, data resources, and technical options used to conduct the applicability modeling analyses to assess visibility impacts. The information in this Section 3 is largely adapted from the *VISTAS BART Modeling Protocol*, the MRPO BART Modeling Protocol and sample model files made available by IDEM and on the VISTAS technical contractor website.[6]

3.1 AIR QUALITY MODELING SYSTEM

CALPUFF is a multi-layer, multi-species, non-steady-state Lagrangian puff model, which can simulate the effects of time- and space-varying meteorological conditions on pollutant transport, transformation, and removal. The modeling system is designed to handle the complexities posed by the complex terrain, large source-receptor distances, chemical transformation and deposition, and other issues related to Class I visibility impacts. A complete description of the model formulation and capabilities is provided in the *User's Guides* for the CALPUFF modeling system and the *VISTAS BART Modeling Protocol*.

The CALPUFF modeling system has been adopted by the U.S. EPA as a recommended regulatory guideline model for source-receptor distances greater than 50 km, and for use on a case-by-case basis in complex flow situations for shorter distances. CALPUFF is recommended for Class I area impact assessments by the Interagency Workgroup on Air Quality Models (IWAQM). The U.S. EPA's BART guidance recommends CALPUFF as "the best modeling application available for predicting a single source's contribution to visibility impairment."

As a result of these recommendations, the *VISTAS BART Modeling Protocol* was based on the use of CALPUFF and was used by ESSROC for the source-specific analysis of visibility impacts attributable to the Speed Plant. Specifically, CALPUFF Version 5.756/060725, POSTUTIL Version 1.52/060412, and CALPOST Version 5.6393/060202 were designated as the "VISTAS Recommended Version for BART Modeling" by the VISTAS Technical Contractor and were used in the CALPUFF BART Applicability Analyses for ESSROC's Speed Plant.[7]

3.2 CALMET METEOROLOGICAL PROCESSING

CALMET is the meteorological preprocessor that compiles three-dimensional meteorological fields from mesoscale model (MM) output, raw observations of surface and upper air conditions, precipitation measurements, and geophysical parameters into a single hourly, gridded data set for input to CALPUFF. The *CALMET User's Guide* and *VISTAS BART Modeling Protocol* provide a detailed description of the model's formulation and capabilities.

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[6] http://www.src.com/calpuff/download/sample_files.htm.

[7] http://www.src.com/calpuff/download/download.htm#VISTAS_VERSION

The federal *Guideline* for CALPUFF processing provides the following recommendations for the meteorological data period at Section 9.3.1.2:

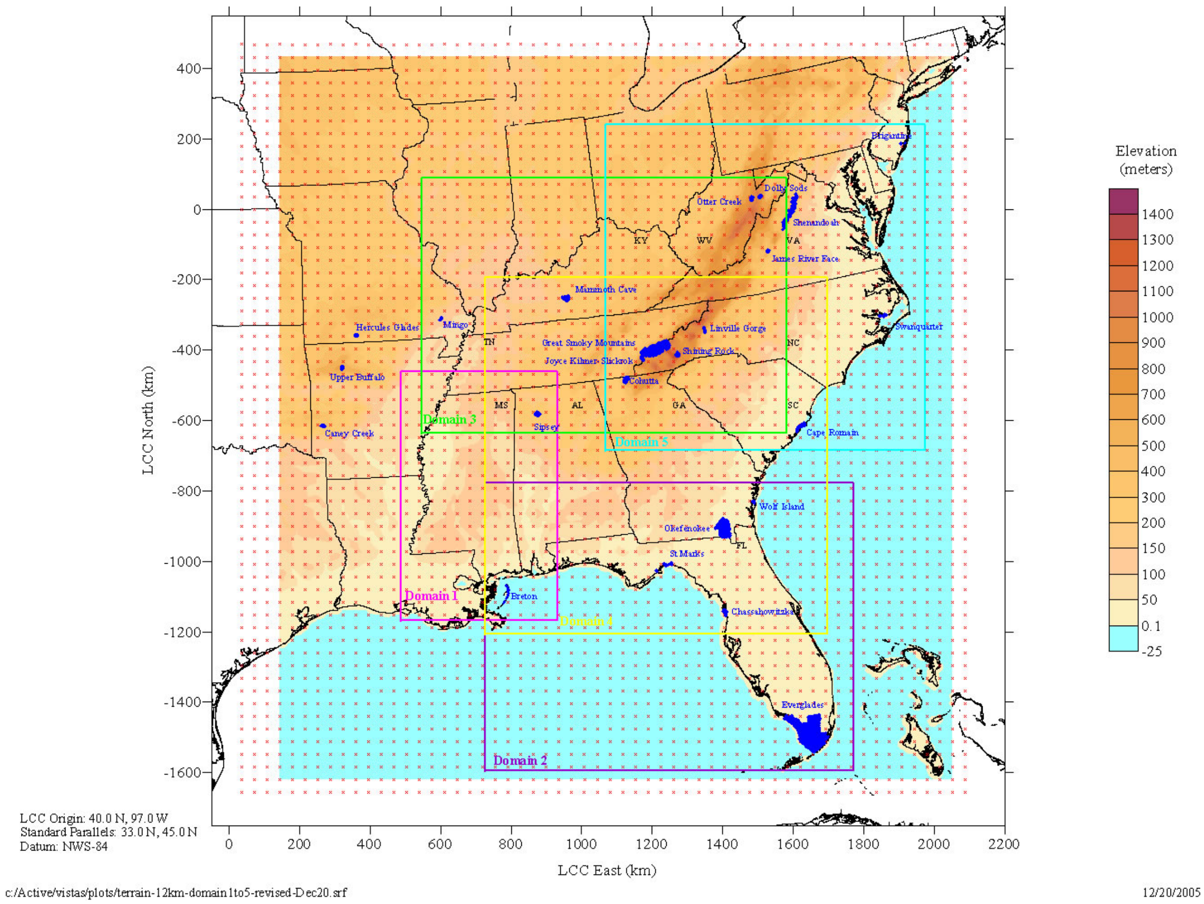
> *Less than five, but at least three, years of meteorological data (need not be consecutive) may be used if mesoscale meteorological fields are available, as discussed in paragraph 9.3(c). These mesoscale meteorological fields should be used in conjunction with available standard [National Weather Service] NWS or comparable meteorological observations within and near the modeling domain.*

The *VISTAS BART Modeling Protocol* prescribes the years 2001 through 2003 for BART Applicability Analyses. The primary basis for this data analysis period was the availability of quality assured MM5 data for the entire VISTAS area. For its BART Applicability Analyses, ESSROC utilized the 4-km CALMET data prepared by the VISTAS Technical Contractor using the data resources and CALMET modeling techniques described in the *BART Modeling Protocol*.

3.2.1 CALMET METEOROLOGICAL DOMAIN

The 4-km CALMET meteorological data sets were prepared for the domains depicted in Figures 3-1. ESSROC's BART Applicability Analyses utilized the sub-regional Domain 3 with a 4-km grid resolution. The CALPUFF computational domain was selected as a subset of this domain as described in the Section 3.3.4 of this report.

FIGURE 3-1. 4-KM SUB-REGIONAL CALMET DOMAINS



The VISTAS regional modeling domain was designed to allow any Class I areas within the VISTAS area to be evaluated with a single meteorological database and consistent CALPUFF modeling options. The horizontal domain is comprised of grid cells, each containing a central grid point at which meteorological and computational parameters are calculated at each time step. The LCC projection system is used to describe the horizontal grid, with origin at 40 degrees North latitude and 97 degrees West longitude. Standard parallels for the projection were set at 33 degrees North and 45 degrees North.

Table 3-1 summarizes the vertical grid structure selected for this analysis, which comprises ten vertical layers. The cell face height of each layer indicates its vertical extent. The vertical domain is composed of terrain-following grid cells, the number and size of which are chosen so as to constrain the boundary layer in which dispersion and chemical transformations take place. The highest cell face was selected to be 4,000 meters to constrain the default maximum mixing height of 3,000 meters.

TABLE 3-1. VERTICAL GRID STRUCTURE

Vertical Grid Cell	Cell Face Height (meters)
1	20
2	40
3	80
4	160
5	320
6	640
7	1,200
8	2,000
9	3,000
10	4,000

Sub-regional Domain 3, which ESSROC utilized for its modeling analyses, contains part of Indiana and all of Kentucky in which the BART-eligible source and potentially affected Class I areas are located.

3.2.2 MM5 SIMULATIONS

MM data are used as “observed” or “first-guess” fields in CALMET due to its high-resolution representation of meteorological conditions on a uniform three-dimensional grid. The following three years of MM5 meteorological data were assembled by VISTAS for use in the regional CALPUFF modeling effort:

- ▲ 2001 MM5 dataset at 12 km and 36 km grid (developed for EPA)
- ▲ 2002 MM5 dataset at 12 km and 36 km grid (developed by VISTAS)
- ▲ 2003 MM5 dataset at 36 km grid (developed by the Midwest Regional Planning Organization).

These data sets were provided to the VISTAS Technical Contractor, which produced three-dimensional, CALMET-ready meteorological files for the VISTAS domain, which were subsequently used to run CALMET for the 4-km sub-regional analyses.

3.2.3 GEOPHYSICAL DATA

According to the *VISTAS BART Modeling Protocol*, terrain elevations within the modeling domain were processed from SRTM-GTOPO30 digital terrain data format with 30-arcsec resolution. SRTM30 is a digital elevation data set that spans the globe from 60° north latitude to 56° south latitude, approximately from the southern tip of Greenland to below the southern tip of South America. It has a horizontal grid spacing of 30 arc-seconds (approximately 1 kilometer). GTOPO30 is a global digital elevation model with a horizontal grid spacing of 30 arc-seconds (approximately 1 kilometer) that was derived from several raster and vector sources of topographic information that include U.S. Geological Survey (USGS) digital elevation models. The VISTAS Technical Contractor used data preprocessors to format and assimilate these data into a single geophysical data file for processing by CALMET to generate the 12-km screening data set. According to the *VISTAS BART Modeling Protocol*, higher resolution 3 arc-second DEM data were used to simulate terrain elevations in the 4-km refined data set.

Land use and land cover (LULC) within the modeling domain was assimilated by the VISTAS technical contractor into a single geophysical data file for processing by CALMET using Composite Theme Grid (CTG) data archived by the USGS at a resolution of 200 meters. CALMET was used to calculate the fractional land use types within each cell of the CALMET grid. LULC in each grid cell was used by CALMET to compute the micrometeorological parameters (i.e., surface roughness, Bowen ratio, albedo, soil heat flux) that affect turbulent dispersion in the boundary layer. According to the *VISTAS BART Modeling Protocol*, 200-meter CTG LULC data was utilized for the 4-km analyses.

3.2.4 4-KM REFINED GRID CALMET PROCESSING

The finer grid (4 km) CALMET simulations were run by the VISTAS Technical Contractor in hybrid mode, using MM5 data to define the initial guess fields, diagnostic terrain adjustments to create the Step 1 wind fields, and NWS meteorological observational data in the Step 2 smoothing calculations. In this manner, actual observations of three-dimensional meteorological conditions were used in the model to smooth the coarse MM5 resolution to better represent areas in which terrain features and coastlines may have an important effect on meteorological conditions, but not be well resolved in the mesoscale model. Surface, upper air, precipitation, and offshore buoy observation points are readily available for use in CALMET. The following generally describes the use of NWS observations in Step 2 of the CALMET analyses.

Parameters affecting turbulent dispersion that are observed hourly at surface stations include wind speed and direction, temperature, cloud cover and ceiling, relative humidity, and precipitation type. Surface data would be selected from the available data inventory to optimize spatial coverage and representation of the domain. Raw observations were obtained from the National Climatic Data Center (NCDC), quality assured, and merged using the SMERGE pre-processor to create a single assimilated data file of surface observations for each year analyzed.

Observations of meteorological conditions in the upper atmosphere provide a profile of turbulence from the surface through the depth of the boundary layer in which dispersion occurs. Upper air data are collected by balloons launched simultaneously across the observation network at 0000 Greenwich Mean Time (GMT) (7 o'clock PM in Kentucky and Indiana) and 1200 GMT (7 o'clock AM in Kentucky and Indiana). Sensors observe pressure, wind speed and direction, and temperature (among other parameters) as the balloon rises through the atmosphere. The upper air observation network is less dense than surface observation points since upper air conditions vary less and are generally not as affected by local effects (e.g., terrain or coastlines). Upper air data were extracted from the NCDC's available data inventory to optimize spatial coverage and representation of the domain, and utilization from year to year may vary due to availability and data quality.

The effects of wet deposition processes on ambient pollutant concentrations are an important part of the BART applicability analysis. Therefore, it is necessary to include observations of precipitation in the CALMET analysis. Precipitation data were collected from selected surface meteorological data stations included in the analysis, plus Cooperative Observation Network (COOP) stations nearer to or within the domain. Precipitation data were extracted from among the NCDC's available data inventory to optimize spatial coverage and representation of the domain. Raw observations from these stations were quality assured and merged using the PMERGE pre-processor to create a single assimilated data file of precipitation observations.

3.2.5 QUALITY ASSURANCE OF CALMET ANALYSES

ESSROC's BART Applicability Analyses were conducted using the 4-km CALMET data prepared by the VISTAS Technical Contractor. The *VISTAS BART Modeling Protocol* describes quality assurance techniques used by the contractor to validate the model's performance.

3.3 CALPUFF MODEL PROCESSING

CALPUFF analyses to assess the visibility impacts attributable to ESSROC's Speed Plant were conducted in accordance with sample CALPUFF modeling files provided by IDEM which generally follow the recommendations of IWAQM *Phase 2 Summary Report and Recommendations for Modeling Long Range Transport Impacts*, Appendix B of which provides recommended default CALPUFF parameters. Appendix D of this BART Applicability Analysis report contains sample CALPUFF input files that can be compared to the IDEM and IWAQM recommendations to demonstrate that default options were used, including the following important model options.

3.3.1 CALPUFF DISPERSION ALGORITHMS

As specified in a March 16, 2006 U.S. EPA memorandum and the most recent revision to the *VISTAS BART Modeling Protocol*, the use of Pasquill-Gifford (ISC-like) dispersion coefficients was enabled as the default option in all CALPUFF analyses[8].

3.3.2 BUILDING DOWNWASH

In accordance with the MRPO BART Modeling Protocol, the effects of building downwash were not considered in the BART applicability analyses since the BART eligible source is greater than 100 km from any Class I area.

[8] U.S. EPA Memorandum "Dispersion Coefficients for Regulatory Air Quality Modeling in CALPUFF" from Mr. Dennis Atkinson and Mr. Tyler Fox (Air Quality Modeling Group) to Ms. Kay Prince (Regulatory Planning Branch) dated March 16, 2006.

3.3.3 CALPUFF MODELING DOMAINS AND CLASS I AREA RECEPTORS

CALPUFF modeling for the 4-km analysis was performed on a computational domain that is a subset of the VISTAS Sub-regional Domain 3. The size of the computational domain was selected to encompass the Speed Plant and Mammoth Cave and to extend at least 75 km beyond in all directions. The size of the domain allows for the possible recirculation of puffs beyond the facility and areas being evaluated. Computational domains use the same vertical grid structure as described in the CALMET model formulation in Section 3.2.1 of this report. Figures 3-2 through 3-4 illustrate the locations of, and land use and terrain elevations within, the 4-km computational domain used in ESSROC's BART Applicability Analyses.

The ground level receptors at which concentrations of visibility-affecting pollutants and visibility impacts were calculated at Mammoth Cave were obtained from the National Park Service as depicted in Figures 3-5.[9]

[9] http://www2.nature.nps.gov/air/maps/Receptors/index.htm

FIGURE 3-2. 4-KM MODELING AND COMPUTATIONAL DOMAINS

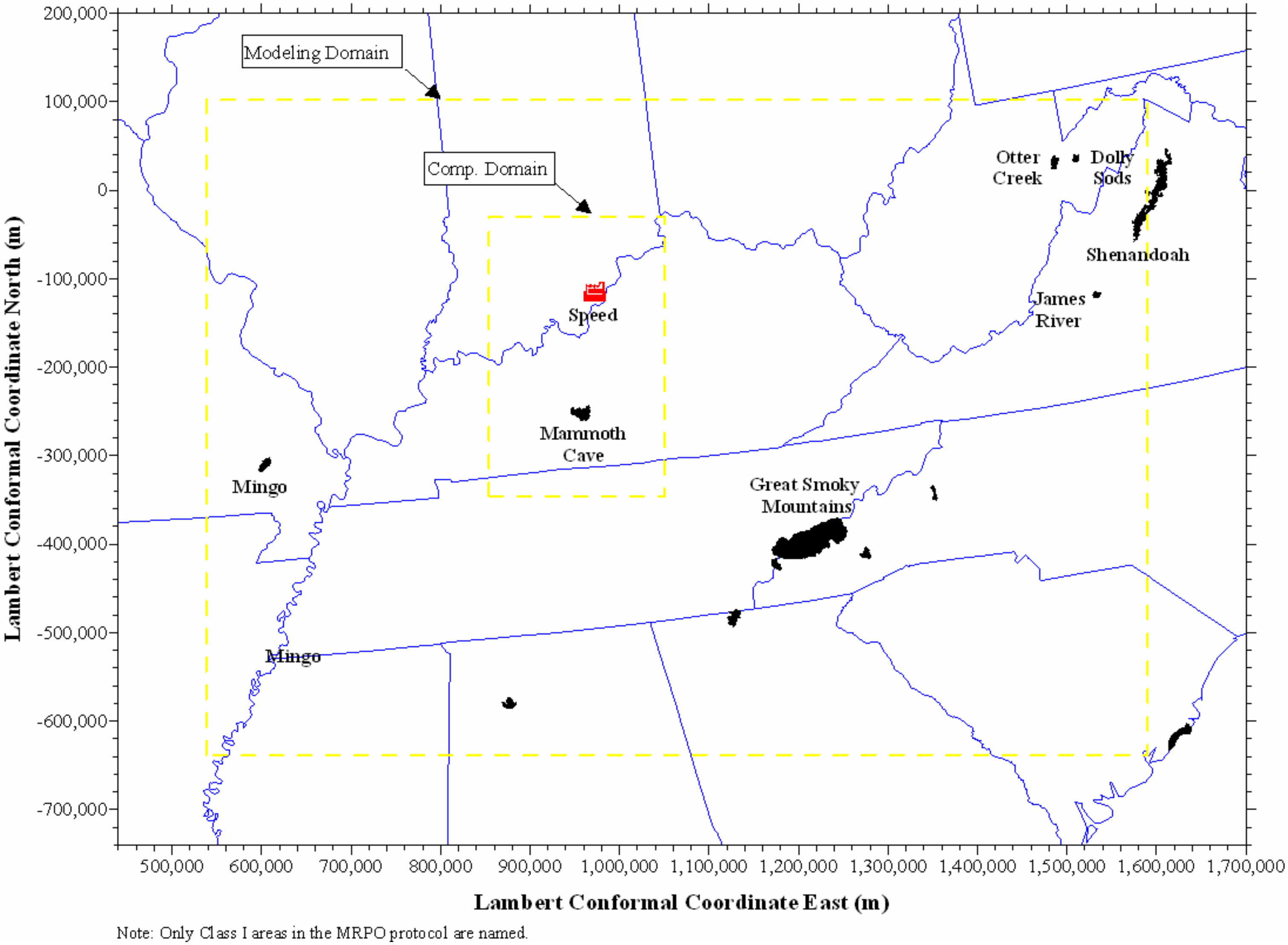
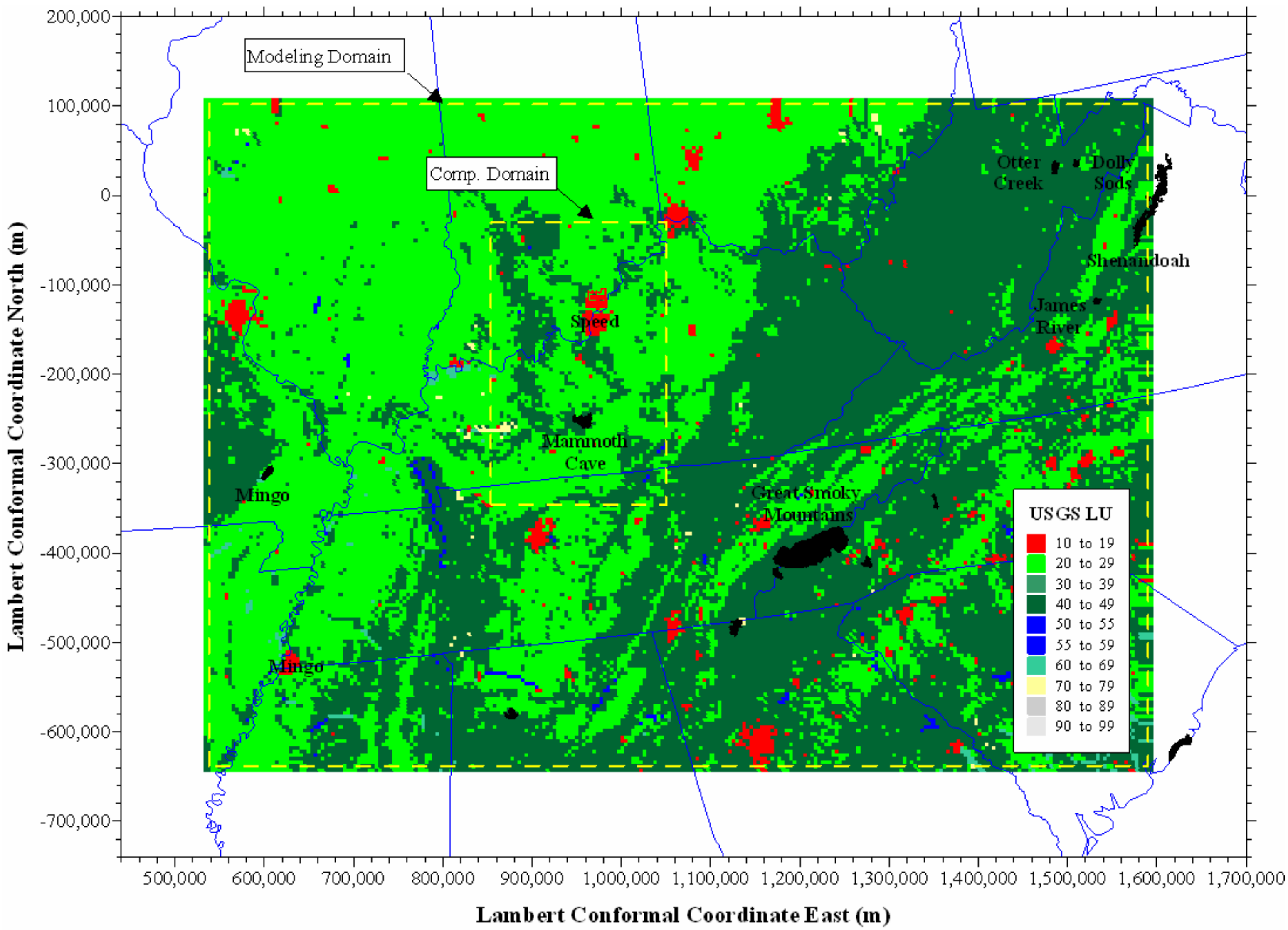
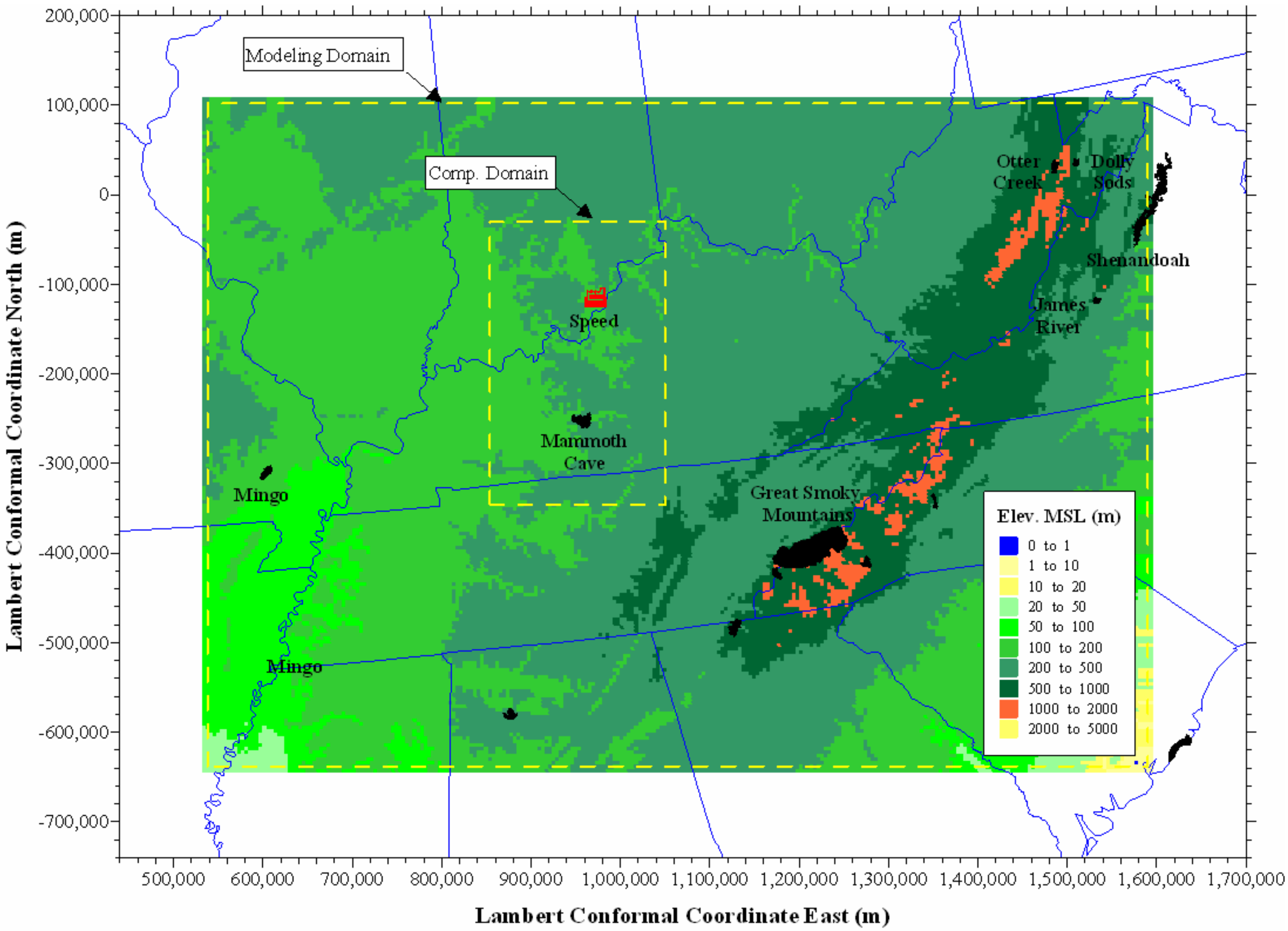


FIGURE 3-3. LAND USE WITHIN THE 4-KM MODELING DOMAIN



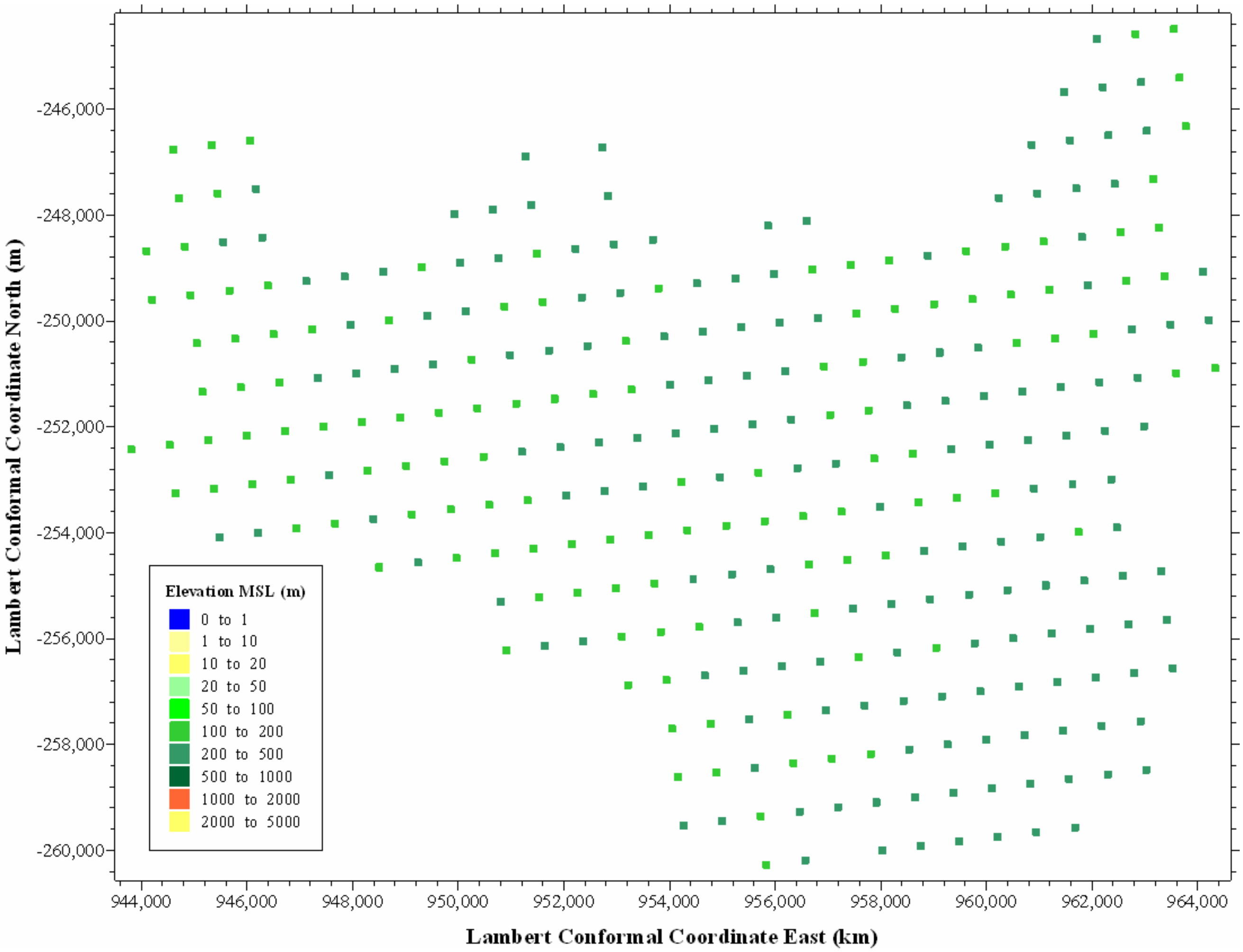
Note: Only Class I areas in the MRPO protocol are named.

FIGURE 3-4. TERRAIN ELEVATIONS WITHIN THE 4-KM MODELING DOMAIN



Note: Only Class I areas in the MRPO protocol are named.

FIGURE 3-5. LOCATION AND ELEVATION OF RECEPTORS AT MAMMOTH CAVE



3.3.4 BACKGROUND OZONE AND AMMONIA CONCENTRATIONS

The CALPUFF model is capable of simulating linear chemical transformation effects by using pseudo-first-order chemical reaction mechanisms for the conversions of SO_2 to SO_4, and NO_X, which consists of nitrogen oxide (NO) and nitrogen dioxide (NO_2), to NO_3 and HNO_3. In this study, chemical transformations involving five species (SO_2, SO_4, NO_X, HNO_3, and NO_3) were modeled using the MESOPUFF II chemical transformation scheme. Ambient concentrations of ammonia and ozone concentrations as represented in the model drive the MESOPUFF II chemical transformation simulation.

The applicability analysis utilized the monthly average ozone background concentrations included in Table 2 of the MRPO BART Modeling Protocol. These values are listed in Table 3-2 below.

TABLE 3-2. SEASONAL AVERAGE OZONE CONCENTRATIONS USED FOR THE ENTIRE MODELING DOMAIN

	January	February	March	April	May	June	July	August	September	October	November	December
O_3 (ppb)	31	31	31	37	37	37	33	33	33	27	27	27

A background value of 0.3 ppb for ammonia was utilized for the months of January, February and March, while a value of 0.5 ppb was used for the remainder of the year. The use of these default values is consistent with the MRPO BART Modeling Protocol. For refined analyses, both the MRPO Modeling Protocol and the revised *VISTAS BART Modeling Protocol* recommend postprocessing of CALPUFF results to repartition HNO_3 and NO_3 using the ammonia limiting method (ALM) in POSTUTIL with domain wide ammonia background levels.

3.3.5 QUALITY ASSURANCE OF CALPUFF ANALYSES

Copies of all CALPUFF input and output files are included on the electronic media enclosed with this report. Comparison of the CALPUFF model inputs indicates that default values, as prescribed by IWAQM (Appendix B) and in the sample files provided by IDEM which follow the MRPO BART Modeling Protocol, were used with the exception of the source-specific model options described in this report. Source parameters input for each BART-eligible emissions unit were verified with the information presented in Section 2 of this report. The location and elevations of Class I area receptors as illustrated in Figure 3-5 of this report were verified by comparison to NPS maps.

3.4 CALPOST POSTPROCESSING AND NATURAL BACKGROUND CONDITIONS FOR LIGHT EXTINCTION AND HAZE INDEX CALCULATIONS

Using the concentrations of visibility-affecting pollutants computed by CALPUFF, two postprocessors, POSTUTIL and CALPOST, were used to compute light extinction attributable to ESSROC's Speed Plant and the relevant metrics for the BART Applicability Analysis determination.

The computation of light extinction attributable to the natural background and source was generally described in Section 1.1.2 of this report.

3.4.1 POSTUTIL PROCESSING

The first postprocessing step involves running POSTUTIL to re-partition the distribution of HNO_3 and NO_3 concentrations at each Class I area as a function of the temperature, relative humidity, and free ammonia during each hour. ALM re-partitioning using the default ammonia background levels described in Section 3.3.4 above was conducted in ESSROC's BART applicability modeling analyses.

3.4.2 NATURAL CONDITIONS AT CLASS I AREAS

The visibility goal of the Clean Air Act is both the remedying of existing visibility impairment and prevention of future visibility impairment. In its *BART Implementation Guidance*, U.S. EPA affirms that it interprets the goal to mean return atmospheric conditions to "natural visibility conditions." For the purposes of BART analyses, the U.S. EPA has determined that it "did not intend to limit States to the use of the 20% best visibility days…States may use 20% best visibility days or annual average" to assess BART applicability.[10] The August 31, 2006 revision to the *VISTAS BART Modeling Protocol* indicates that three options are available at the discretion of the state including Option (1) a single annual average natural background condition for each Class I area; Option (2), a single value representing the average haze index on the 20% estimated best visibility days at each Class I area; or, Option (3) monthly average natural background conditions computed from estimated components of visibility-affecting pollutants and monthly average relative humidity values specific to each Class I area. Since IDEM intends to conduct source specific modeling on a coarse 36 km CALMET grid which uses only MM5 data as an input to the CALMET processor and despite the statements made by the EPA described above, IDEM and the MRPO require the use a 20% best days analysis which is a combination of Options (2) and (3) described above.

For Mammoth Cave the only Class I areas within 300 km of the Speed Plant and potentially affected by ESSROC's operations, Table 3-3 summarizes the default natural background conditions as tabulated in Appendix B of U.S. EPA's *Guidance for Estimating Natural Visibility Conditions under the Regional Haze Rule.*

[10] U.S. EPA Memorandum from Mr. Joseph Paisie to Ms. Kay Prince, as Attachment A to a proposed settlement agreement between the Utility Air Regulatory Group and U.S. EPA, published at 71 Federal Register No. 84, pp. 25,838-25,840, May 2, 2006.

TABLE 3-3. NATURAL BACKGROUND VISIBILITY CONDITIONS FOR CLASS I AREAS POTENTIALLY AFFECTED BY THE SPEED PLANT

Class I Area	b_{ext} (Mm^{-1})	Annual Average Haze Index (dv)	Best Days Haze Index (dv)	Worst Days Haze Index (dv)
Mammoth Cave	21.58	7.69	3.85	11.53

To represent natural conditions in the absence of anthropogenic sources of sulfates and nitrates, the background extinction coefficient is expressed in terms of Rayleigh scattering and scattering due to soils (i.e., fine particles) based on the 20% best days, and is calculated from the tabulated "Best Days" value from Table 3-3 above using the equations summarized below.

$$b_{back} = 10\exp\left(\frac{HI}{10}\right),$$

Where *HI* is Haze Index expressed in units of deciviews (dv). Therefore, total b_{back} for the best days at Mammoth Cave and Mingo, including the Rayleigh scattering coefficient, are calculated as follows.

$$b_{back} = 10\exp\left(\frac{3.85}{10}\right) = 14.69\ \text{Mm}^{-1} = b_{ray} + b_{soil}$$

$$\therefore b_{soil} = b_{back} - b_{ray} = 14.69\ \text{Mm}^{-1} - 10\ \text{Mm}^{-1} = 4.69\ Mm^{-1}\ \textit{for Mammoth Cave}$$

Rather than use this 20% best days deciview value as a natural background directly, the MRPO goes further to calculate the relative contribution of sulfates, nitrates, organic carbon, elemental carbon, soils and coarse mass to this overall natural background. Table 3-4 summarizes the default natural background conditions using average natural concentrations of sulfate, nitrate, and particulate species for areas in the Eastern U.S. as tabulated in Table 2-1 of U.S. EPA's *Guidance for Estimating Natural Visibility Conditions under the Regional Haze Rule* that were used by the MRPO to calculate Class I area specific extinction coefficients for each species. Using the 20% best days deciview value for Mammoth Cave, the species specific background concentrations shown in Table 3-3 and the annual average relative humidity factor *f(RH)* specific to Mammoth Cave shown in Table 3-5 below, the MRPO calculated the extinction coefficients of sulfates, nitrates, organic carbon, elemental carbon, soils and coarse mass specific to Mammoth Cave by solving for the scaling factor X shown in the following equations, and multiplying this factor by the other terms in each species extinction coefficient equation.

TABLE 3-3. NATURAL BACKGROUND CONCENTRATIONS OF VISIBILITY-AFFECTING POLLUTANTS

Component	West (μg/m³)	East (μg/m³)	Error Factor	Dry Extinction Efficiency (m²/g)
Ammonium sulfate	0.12	0.23	2	3
Ammonium nitrate	0.1	0.1	2	3
Organic carbon mass	0.47	1.4	2	4
Elemental carbon	0.02	0.02	2-3	10
Soil	0.5	0.5	1½ - 2	1
Coarse Mass	3	3	1½ - 2	0.6

$$b_{ext,background}\left(Mm^{-1}\right) = 4.69\ Mm^{-1} = b_{SO_4} + b_{NO_3} + b_{OC} + b_{Soil} + b_{Coarse} + b_{ap} + b_{Ray}$$

where,

$$b_{SO_4} = 3 \times \left[(\mathrm{NH_4})_2\mathrm{SO_4}\right] \times f(RH) \times \mathrm{X}$$
$$b_{NO_3} = 3 \times \left[\mathrm{NH_4NO_3}\right] \times f(RH) \times \mathrm{X}$$
$$b_{OC} = 4 \times [\mathrm{OC}] \times \mathrm{X}$$
$$b_{Soil} = 1 \times [\mathrm{Soil}] \times \mathrm{X}$$
$$b_{Coarse} = 0.6 \times [\mathrm{Coarse\ Mass}] \times \mathrm{X}$$
$$b_{ap} = 10 \times [\mathrm{EC}] \times \mathrm{X}$$
$$b_{Ray} = \mathrm{Rayleigh\ Scattering}\left(10\ \mathrm{Mm^{-1}\ by\ default}\right)$$
$$f(RH) = \mathrm{Ann.\ Avg.RH\ Factor\ (Specfic\ to\ Mammoth\ Cave)}$$
$$\mathrm{X} = \mathrm{Scaling\ Factor}$$
$$[\ ] = \mathrm{Concentration\ in\ \mu g/m^3}$$

$$\left[(\mathrm{NH_4})_2\mathrm{SO_4}\right] = \mathrm{Bckgd.\ Conc.\ of\ Ammonium\ Sulfate\ in\ Eastern\ U.S.}$$
$$\left[\mathrm{NH_4NO_3}\right] = \mathrm{Bckgd.\ Conc.\ of\ Ammonium\ Nitrate\ in\ Eastern\ U.S.}$$
$$[\mathrm{OC}] = \mathrm{Bckgd.\ Conc.\ of\ Organic\ Carbon\ in\ Eastern\ U.S.}$$
$$[\mathrm{Soil}] = \mathrm{Bckgd.\ Conc.\ of\ Soil\ in\ Eastern\ U.S.}$$
$$[\mathrm{Coarse\ Mass}] = \mathrm{Bckgd.\ Conc.\ of\ Coarse\ Mass\ in\ Eastern\ U.S.}$$
$$[\mathrm{EC}] = \mathrm{Bckgd.\ Conc.\ of\ Elemental\ in\ Eastern\ U.S.}$$

The effects of relative humidity to amplify the visibility impairment of hygroscopic sulfates and nitrates were characterized using "Method 6," which computes Δb_{ext} using a *monthly average* relative humidity adjustment particular specific to each Class I area which is applied to modeled sulfate and nitrate concentrations. Table 3-5 summarizes the monthly average humidity values that were applied for Mammoth Cave, as tabulated in Table A-3 of U.S. EPA's *Guidance for Estimating Natural Visibility Conditions under the Regional Haze Rule*.

TABLE 3-5. MONTHLY AVERAGE *f*(RH) FOR MAMMOTH CAVE*

Class I Area	January	February	March	April	May	June	July	August	September	October	November	December
Mammoth Cave	3.4	3.1	2.9	2.6	3.2	3.5	3.7	3.9	3.9	3.4	3.2	3.5

3.4.3 VISIBILITY IMPACT CALCULATION

CALPOST is run separately for each Class I area to obtain the necessary visibility statistics for evaluating compliance with the BART visibility impairment thresholds. The inputs to CALPOST involve selection of the visibility method (i.e., Method 6) and entry of Class I area-specific data for computing background extinction and monthly relative humidity factors for hygroscopic aerosols as described in Section 3.4.2. CALPOST contains a receptor selection option that allow subsets of a receptor network modeling in CALPUFF to be selected for processing in a given CALPOST run. This selection specifies which receptors representing a single Class I area are selected for processing from a CALPUFF output file that may contain receptors from several Class I areas.

The CALPUF modeling results for this BART Applicability Analysis were analyzed by tabulating the 8^{th} highest (98^{th} percentile) 24-hour average visibility impact for each year and the 22^{nd} highest (98^{th} percentile) 24-hour average visibility impact for the full three year period modeled. Which ever of the two 98^{th} percentile analyses produced the highest deciview impact (i.e. highest 8^{th} high, or 22^{nd} high) was then compared against the threshold to assess contribution or causation of visibility impairment at Mammoth Cave.

3.4.4 QUALITY ASSURANCE OF POSTPROCESSING ANALYSES

Quality assurance of postprocessing analyses was conducted by verifying the sequence of postprocessing (i.e., POSTUTIL followed by CALPOST) and that appropriate data files are referenced throughout the calculation sequence. The CALPOST inputs that were checked include the following:

- ▲ Visibility technique (Method 6).
- ▲ Monthly Class I-specific relative humidity factors for Method 6.
- ▲ Background light extinction values calculated as appropriate using the MRPO method for characterizing natural background conditions [combination of Options (2) and (3) above].
- ▲ Inclusion of all appropriate species from modeled sources (e.g., sulfate, nitrate, organics), coarse and fine particulate matter, and elemental carbon.
- ▲ Appropriate species names for coarse PM used.
- ▲ Extinction efficiencies for each species.
- ▲ Appropriate Rayleigh scattering term (10 Mm^{-1}).

4. BART APPLICABILITY ANALYSIS MODELING RESULTS

BART Applicability modeling analyses were conducted using the emissions data represented in Section 2 of this report, the CALMET and CALPUFF methods described in Sections 3.2, 3.3, and 3.4 of this report, and the postprocessing methods described in Section 3.5. Since Mammoth Cave is the only Class I area within 300 km of the Speed Plant, it was the only area for which modeling results are presented. IDEM has conducted a complete set of CALPUFF, POSTUTIL, and CALPOST modeling runs for the Speed Plant using the 2002-2004 CALMET dataset with a grid resolution of 36 km and potential emissions of NO_x, SO_2, and PM_{10} represented in Table 2-1. This set of modeling runs showed that the BART-eligible source at the Speed Plant had 98th percentile visibility impacts at Mammoth Cave which exceeded the contribution threshold of 0.5 Δdv. For the purposes of comparison only, Trinity has conducted a set of modeling runs using the IDEM meteorological data platform and following exactly the switch settings used in IDEM's previous analysis for all Class I areas in the MRPO, but with the refined $SO_{2,}$ NO_x, and PM_{10} emission rates in Table 2-2 rather than potential rates (see Appendix D for the complete set of 36 km results for all Class I areas in the MRPO). Although the 4-km grid results for Mammoth Cave were used exclusively to determine whether the Speed Plant BART-eligible source is subject to BART, the 36-km modeling results using the 24-hr maximum actual emission rates for the two cement kilns as shown in Table 2-2, if relied upon, support the same conclusion that the Speed Plant is not subject to BART, as it does not produce visibility impacts above the contribution threshold at Mammoth Cave or any other Class I area.

4.1 VISIBILITY IMPACTS AT MAMMOTH CAVE

Tables 4-1 and 4-2 summarize the top eight modeled 24-hour average visibility impacts of each data analysis year at Mammoth Cave attributable to ESSROC's Speed Plant returned using the 4-km VISTAS CALMET data and the 36-km IDEM data, respectively. These results were determined using the modeling methods described in this report and the modeling protocol previously submitted. These tables summarize results calculated using the MRPO method described in Section 3.5 for representing natural background conditions (i.e., 20% best days using multiple background species). The 98th percentile impact is represented as the highest, 8th-high 24-hour average impact among the three meteorological years analyzed. The total number of days exceeding the 1.0 dv causation and 0.5 dv contribution thresholds are also summarized. Figure 4-1 below provides a chart of the 8th high visibility impacts for each year modeled as presented in Tables 4-1 and 4-2 for both the 4 and 36 km grid resolution results.

TABLE 4-1. HIGHEST EIGHT 24-HOUR AVERAGE VISIBILITY IMPACTS AT MAMMOTH CAVE FOR EACH YEAR MODELED (USING THE 4-KM VISTAS CALMET DATA)

	2001 CALMET		2002 CALMET		2003 CALMET		
Rank	**Highest 24-hr Average Visibility Impacts (Δdv)**	**(Days >0.5 dv, Receptors > 0.5 dv)**	**Highest 24-hr Average Visibility Impacts (Δdv)**	**(Days >0.5 dv, Receptors > 0.5 dv)**	**Highest 24-hr Average Visibility Impacts (Δdv)**	**(Days >0.5 dv, Receptors > 0.5 dv)**	**Highest 8th-High Δdv (Total Days > 1.0 dv, > 0.5 dv)**
1	1.089		0.610		0.879		
2	0.998		0.541		0.716		
3	0.599		0.468		0.703		
4	0.494	(3,3)	0.437	(2,2)	0.608	(3,3)	**0.421**
5	0.434		0.424		0.502		(1,8)
6	0.406		0.395		0.462		
7	0.383		0.384		0.435		
8	0.380		0.384		0.421		

TABLE 4-2. HIGHEST EIGHT 24-HOUR AVERAGE VISIBILITY IMPACTS AT MAMMOTH CAVE FOR EACH YEAR MODELED (USING THE 36-KM IDEM CALMET DATA)

	2002 CALMET		2003 CALMET		2004 CALMET		
Rank	**Highest 24-hr Average Visibility Impacts (Δdv)**	**(Days >0.5 dv, Receptors > 0.5 dv)**	**Highest 24-hr Average Visibility Impacts (Δdv)**	**(Days >0.5 dv, Receptors > 0.5 dv)**	**Highest 24-hr Average Visibility Impacts (Δdv)**	**(Days >0.5 dv, Receptors > 0.5 dv)**	**Highest 8th-High Δdv (Total Days > 1.0 dv, > 0.5 dv)**
1	0.723		1.034		1.170		
2	0.661		0.806		1.152		
3	0.637		0.772		0.710		
4	0.532	(7,5)	0.680	(7,6)	0.686	(5,5)	**0.484**
5	0.526		0.602		0.595		(3,19)
6	0.525		0.578		0.532		
7	0.523		0.557		0.484		
8	**0.484**		0.480		0.439		

FIGURE 4-1. 8TH HIGH 24-HOUR AVERAGE VISIBILITY IMPACTS AT MAMMOTH CAVE FOR EACH YEAR MODELED

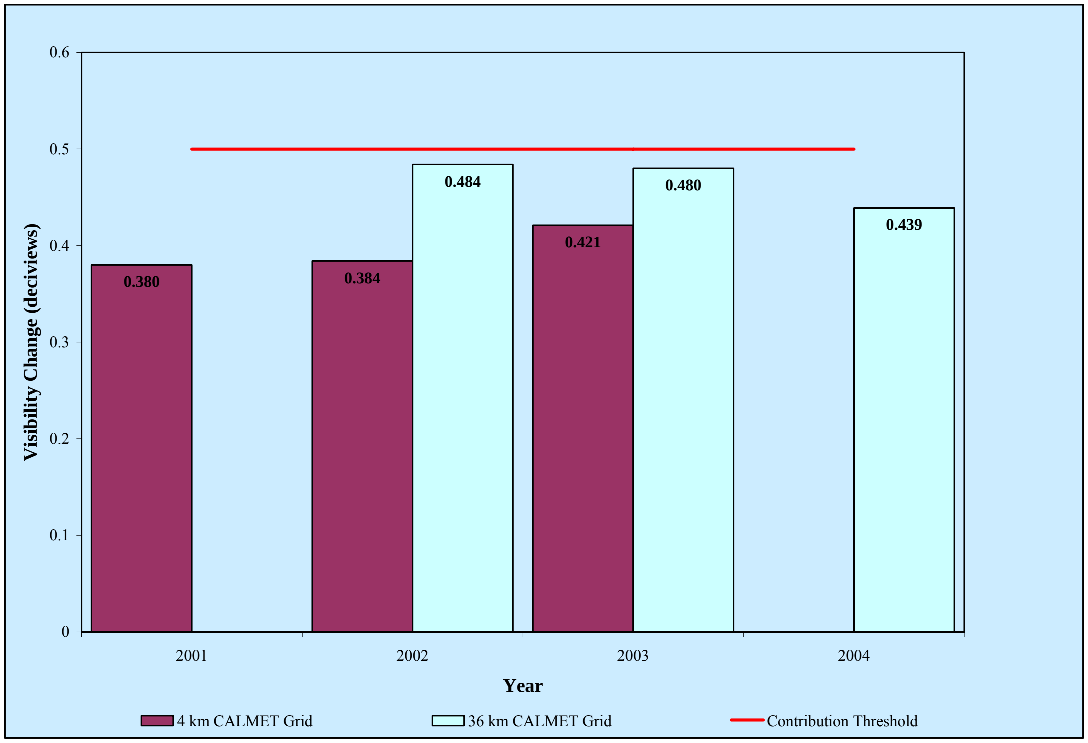


Table 4-3 summarizes the top twenty-two (98th percentile) modeled 24-hour average visibility impacts of the entire three year period modeled using the 4-km VISTAS CALMET data. This table demonstrates the highest 8th high yearly visibility impact of 0.421 Δdv is more conservative than the 22nd highest three year visibility impact of 0.389 Δdv, and therefore the highest 8th high was used in the BART applicability assessment for the Speed Plant.

TABLE 4-3. 98TH PERCENTILE 24-HOUR AVERAGE VISIBILITY IMPACTS AT MAMMOTH CAVE FOR THE ENTIRE THREE YEAR PERIOD MODELED (USING THE 4-KM VISTAS CALMET DATA)

Rank for 2001-2003	Model Year and Yearly Rank	Ranked Δdv for 2001 to 2003
1	'01-1	1.089
2	'01-2	0.998
3	'03-1	0.879
4	'03-2	0.716
5	'03-3	0.703
6	'02-1	0.61
7	'03-4	0.608
8	'01-3	0.599
9	'02-2	0.541
10	'03-5	0.502
11	'01-4	0.494
12	'02-3	0.468
13	'03-6	0.462
14	'02-4	0.437
15	'03-7	0.435
16	'01-5	0.434
17	'02-5	0.424
18	'03-8	0.421
19	'01-6	0.406
20	'03-9	0.400
21	'02-6	0.395
22	'03-10	0.389
22nd High (‘01-‘03)	'03-10	0.389
Highest 8th High (‘03)	'02-8	0.421

5. CONCLUSIONS

Using analysis methods prescribed by VISTAS, MRPO and IDEM, ESSROC conducted BART Applicability Analyses of emissions of visibility-affecting pollutants from the BART-eligible source at the Speed Plant. The results of this analysis indicate that ESSROC is exempt from a BART determination analysis, because the BART-eligible source does not contribute to visibility impairment at Mammoth Cave (the only Class I area within 300 km), as demonstrated by a modeling analysis that quantified the 98^{th} percentile 24-hour average visibility impact as being less than the 0.5 dv contribution threshold.

Upon review of this BART Applicability Analysis, IDEM is asked to confirm ESSROC's determination of BART non-applicability, and therefore definitively exempt ESSROC's Speed Plant from any BART applicability and any further BART determinations.

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APPENDIX A

RESPONSES TO COMMENTS BY IDEM (RECEIVED ON JANUARY 29, 2007) ON THE SOURCE-SPECIFIC BART MODELING PROTOCOL (SUBMITTED JANUARY 18, 2007)

Trinity Consultants

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VIA E-MAIL

February 14, 2007

Mr. Mark Derf
Indiana Department of Environmental Management
Air Programs Branch
Bureau of Air Quality
100 N. Senate Ave.
Mail Code 61-50
Indianapolis, IN 46204-2251

Subject: Response to IDEM Comments on ESSROC Speed Plant BART Modeling Protocol

Dear Mr. Derf:

We have prepared the following responses to the Department's letter dated January 29, 2007 regarding the BART Modeling Protocol for ESSROC's Speed, IN Plant. For each comment provided, ESSROC is providing our response on how we proposed to the comment raised.

1. IDEM Comment

> ***Page 6, Section 1.1.2:*** *IDEM requires all surrounding Class 1 areas to be analyzed as indicated in the MRPO modeling protocol. Additional Class 1 areas to Table 1-1 of the BART Modeling protocol would be Boundary Waters, MN; Brigantine Wilderness, NJ; Great Gulf Wilderness, NH; Isle Royale, MI; Lye Brook Wilderness, VT; Seney, MI; Voyageurs, MN.*
>
> *IDEM-OAQ will review all BART modeling submittals and conducts its reviews using the Midwest Regional Planning Organization (MRPO) BART modeling configuration, which will include the Class 1 areas included on page 5 of the MRPO BART modeling protocol.*

ESSROC Response to IDEM Comment 1

Based on previous conversations with IDEM and with this understanding ESSROC will proceed with conducting site-specific refined modeling for the Class I areas specified within 300 km of the site. As it is logical that maximum impacts from the Speed Plant will be identified by the evaluation we propose, it is reasonable to expect that a BART exemption determination can be made by the Department. Nonetheless, we understand the MPRO and IDEM requirements and should those analyses provide a different result that our site-specific analysis we would request the opportunity to review the Department's analysis for possible refinements.

2. IDEM Comment

> ***Page 10, Section 2.1:*** *PM10/PM2.5 modeling for BART determination using CALPUFF may be required at a later time. Evaluation of PM2.5 emissions rates and stack test information is in the process of being conducted. IDEM-OAQ may use available PM10 or PM2.5 emissions to analyze their impacts, separate from the NOx and SO2 pollutant impacts.*
>
> *MRPO will be conducting photochemical modeling to determine air quality impacts on Class 1 areas and regional haze. This modeling will be conducted at a later date.*

ESSROC Response to IDEM Comment 2

ESSROC will proceed in conducting the site-specific modeling without PM_{10} or $PM_{2.5}$ emissions. However, in anticipating the potential need for the inclusion of these pollutants in future BART modeling, ESSROC will work to define a set of emission rates for PM_{10} or $PM_{2.5}$ for use by the Department at a later date. These modeled emission rates will be determined in the manner described in response #5 below.

3. IDEM Comment

> ***Pages 20/21, Section 3.5.1 and 3.5.2:*** *IDEM prefers that the 20% best visibility days (Option 1) be used, as set forth in the MRPO BART modeling protocol. The natural background computation can be found on page 6 of the MRPO protocol.*

ESSROC Response to IDEM Comment 3

ESSROC agrees to utilize the 20% best visibility days option in the CALPOST processing. ESSROC understands that the values of ammonium sulfate, ammonium nitrate, organic carbon, elemental carbon, soil and coarse mass listed in Table 4 of the MRPO BART modeling protocol are to be used in CALPOST.

4. IDEM Comment

> ***Page 25, Section 4.1:*** *EPA Region V has recently indicated that regulatory approval has not yet been granted for CALPUFF version 5.756 for BART modeling at this time. EPA has approved the use of CALPUFF version 5.711a and is the CALPUFF model version that IDEM prefers for BART modeling.*

ESSROC Response to IDEM Comment 4

Based on our telephone conversation on February 6, 2007, we understand this comment has been resolved between EPA Region 5 and the Department. Therefore, we will use CALPUFF version 5.756 as detailed in their BART Modeling Protocol.

IDEM Comment

> ***Page 32. Section 4.6:*** *It is IDEM's approach to use the maximum 24-hour average actual emission rate from the highest emitting day of the meteorological period modeled. If this information is not available, potential emissions should be used, in order to be conservative. Emissions to be modeled should represent a conservative approach in BART determination. It is IDEM's approach to use the maximum 24-hour average actual emission rate from the highest emitting day of the meteorological period modeled. If this information is not available, potential emissions should be used, in order to be conservative.*
>
> *Use of another threshold, other than the 98^{th} percentile or 0.5 deciview thresholds would need to be more conservative (i.e. use of the 99^{th} percentile or the exceeding the deciview threshold on any impact day. Discussions with EPA concerning the 98^{th} percentile and 0.5 deciview thresholds have resulted in modeling maximum 24-hour average actual emission rates from the highest emitting day of the meteorological period modeled or potential emissions and comparing with the 98^{th} percentile/0.5 deciview thresholds. It is IDEM's desire to follow the guidance available for BART modeling.*

ESSROC Response to IDEM Comment 5

ESSROC understands that where possible maximum 24-hour average actual emission rates are to be utilized in BART exemption modeling. As such, ESSROC will work to identify a set of emission rates representative of maximum operating conditions (e.g. maximum 24-hour average actual emissions, potential emissions, etc.). The basis for the modeled emission rates will be documented in our evaluation report.

Presuming our evaluation is based on emission rates that are permit allowables or representative of emissions during maximum operating conditions, ESSROC will compare the 98^{th} percentile visibility impact to the 0.5 deciview threshold per IDEM and MRPO guidance.

If you have any questions or concerns, please call me at (240) 379-7490. We appreciate your assistance in completing this BART modeling analysis.

Sincerely,

TRINITY CONSULTANTS

Ian W. Donaldson
Consultant

cc: Mr. Hector Ybanez – ESSROC Cement Corp.
Mr. Mike Remsberg – Trinity Consultants

APPENDIX B

COPY OF THE VISTAS BART MODELING PROTOCOL (REVISION 3.2 - 08/31/2006)

Protocol for the Application of the CALPUFF Model for Analyses of Best Available Retrofit Technology (BART)

December 22, 2005

(Revision 3.2 – 8/31/06)

Visibility Improvement State and Tribal Association of the Southeast (VISTAS)

TABLE OF CONTENTS

SUMMARY

This Protocol for the Application of the CALPUFF Model for Analyses of Best Available Retrofit Technology (BART) for the VISTAS Regional Planning Organization (RPO) describes common procedures for carrying out air quality modeling to support BART determinations that are consistent with guidelines of the U.S. Environmental Protection Agency in 40 CFR Part 51 Appendix W and Appendix Y. The Protocol is intended to serve as the basis for a common understanding among the organizations that will be performing BART analyses or reviewing the BART modeling results in the VISTAS region.

Background

Best Available Retrofit Technology is required for any BART-eligible source that ‘‘emits any air pollutant which may reasonably be anticipated to cause or contribute to any impairment of visibility” in any mandatory Class I federal area. According to 40 CFR Part 51 Appendix Y, “*You can use dispersion modeling to determine that an individual source cannot reasonably be anticipated to cause or contribute to visibility impairment in a Class I area and thus is not subject to BART*.” In the “individual source attribution approach,” a BART-eligible source that is responsible for a 1.0 deciview (dv) change or more is considered to “cause” visibility impairment. A BART-eligible source that is responsible for a 0.5 dv change or more is considered to “contribute” to visibility impairment in a Class I area. Any source determined to cause or contribute to visibility impairment in any Class I area is subject to BART.

The member states of the VISTAS RPO agreed to develop a common BART Modeling Protocol to guide them, their sources, and reviewers in the BART determination and review effort. The Protocol has been in preparation within VISTAS since January 2005. The original authors are Pat Brewer, VISTAS Technical Coordinator, and Ivar Tombach, VISTAS Technical Advisor. The VISTAS state BART contacts, particularly Tom Rogers, FL, Chris Arrington, WV, Leigh Bacon, AL, and Michael Kiss, VA, have directed and extensively reviewed the Protocol. The Protocol was enhanced and completed with the assistance of Joseph Scire, Christelle Escoffier-Czaja and Jelena Popovic of Earth Tech, Inc. and it has received extensive contributions and review from the VISTAS federal partners: Federal Land Managers and US EPA. The VISTAS RPO held a meeting on September 21, 2005 in Research Triangle Park, NC to discuss the Protocol with participants before starting a public comment period. The Protocol underwent formal external review during the period between September 26, 2005 and October 31, 2005. Numerous comments were received. All comments were carefully considered and discussed with VISTAS participants and federal partners. VISTAS gratefully acknowledges the very useful contributions of those that provided comments. On November 1st, 2005 VISTAS held another meeting with its participants in Nashville, TN to present and discuss the comments being considered for inclusion in the Protocol. No formal document will be prepared to address all the comments received on the Protocol.

Objectives

The objectives of the Protocol (discussed in Chapter 1) are to provide:

- A consistent approach to determine if a source is subject to BART
- A consistent model (CALPUFF) and modeling guidelines for BART determinations
- Clearly delineated modeling steps
- A common CALPUFF configuration
- Guidance for site-specific modeling
- Common expectations for reporting model results

The Protocol is not intended to define the engineering analyses required by the US EPA's BART Guidance, nor address model alternatives to the CALPUFF model, nor address emissions trading.

Chapter 2 is intended to provide summary background on EPA's guidance for BART modeling. The CALPUFF model system is reviewed in Chapter 3, while specific recommendations for applying the CALPUFF model for BART purposes appear in Chapter 4. Chapter 5 describes the specific information that should be included in site-specific protocols. Chapter 6 describes the quality assurance requirements for BART analyses in the VISTAS RPO.

Recommendations

The major recommendations for VISTAS BART modeling included in this Protocol are:

I. Process

Follow the BART process steps discussed in Chapter 2:

1. Identify BART eligible sources
2. Identify which pollutants have greater than *de minimis* emission levels
3. Identify sources that are subject to BART
4. Identify baseline visibility impact of each BART source
5. Identify feasible controls and emission changes
6. Identify the change in visibility impact for each candidate BART control option
7. Compare the visibility improvement of BART control options to other statutory factors in the engineering analysis

II. CALPUFF Model Configuration

Use the CALPUFF dispersion modeling system, as described in Chapter 4, to determine if a single source is subject to BART. VISTAS will use CALPUFF Version 5.754 and CALMET Version 5.7. These versions contain enhancements funded by the Minerals Management Service (MMS) and VISTAS. They were developed by Earth Tech, Inc. and are maintained on the CALPUFF website (www.src.com) for public access.

VISTAS is making publicly available 12-km CALMET output files for the entire VISTAS modeling domain (eastern United States) and intends to also provide CALMET output files for five 4-km grid subdomains covering the VISTAS states and VISTAS Class I areas. To create the CALMET input files, Earth Tech used the MM5 databases developed by EPA for 2001, VISTAS for 2002, and Midwest RPO for 2003. For the 12 km grid large domain covering the entire VISTAS region, Earth Tech used the No-Obs setting (i.e., did not include additional surface and upper air observations beyond those incorporated in the MM5 calculations). For finer resolution subdomains (4 km grid or less), available surface and upper air observations will be used in addition to MM5 meteorological model outputs. The specific model settings will be provided with the CALMET files and via the CALPUFF website so that users can review or replicate the work.

For CALPUFF modeling, source emissions should be defined using the maximum 24-hour actual emission rate during normal operation for the most recent 3 or 5 years. If maximum 24-hr actual emissions are not available, continuous emissions data, permit allowable emissions, potential emissions, and emissions factors from AP-42 source profiles may be used as available.

Key points from comments received on the specific CALPUFF, CALPOST, and POSTUTIL configurations are highlighted below.

- After running CALPUFF for an individual facility, repartition NO_3 in POSTUTIL.[1]
- Use ozone data from non-urban monitors as the background ozone input.
- Use the Pasquill-Gifford dispersion method.[2]

---

[1] The original intent, as expressed in the Final VISTAS BART Modeling Protocol (22 December 2005) was to use CMAQ-derived background data for SO_2, NO_3 and NH_3 in POSTUTIL. After extensive discussion with the EPA and FLMs in early 2006, EPA did not approve the recommended approach so background gaseous concentrations from CMAQ 2002 modeling will not be provided by VISTAS for use in POSTUTIL. Rather the standard default NH_3 concentrations specified on page 14 of the IWAQM Phase 2 report (IWAQM, 1998) will be used.

[2] The Final VISTAS BART Modeling Protocol (Dec. 22, 2005) recommended using turbulence-based AERMOD dispersion methods, citing EPA's *Revision to the Guideline on Air Quality Models: Adoption of a Preferred General Purpose (Flat and Complex Terrain) Dispersion Model and Other Revisions; Final Rule.* 70 FR 68218-68261. 9 November 2005. Subsequently, EPA Region IV notified the VISTAS states that using turbulence-

- In CALPOST, use Method 6 with monthly average RH for calculating extinction, as recommended by the EPA.

- Use EPA default calculations of light extinction under current and natural background conditions. In addition to the default assumptions, a source may choose to also calculate visibility using the recently revised IMPROVE algorithm described by Pitchford, et al., (2005).

Provide results in tables as illustrated in Chapter 4 that describe, for each source:

- Number of receptors within a single Class I area with impact > 0.5 dv

- Number of days at all receptors in the Class I area with impact > 0.5 dv

- Number of Class I areas with impacts > 0.5 dv

III. CALPUFF Application for BART

For determining if a BART-eligible source is subject to BART CALPUFF modeling, use a two-tier approach. For the initial exemption modeling use CALPUFF with 12-km grid CALMET. For finer resolution of meteorological fields, use CALPUFF with CALMET of 4-km or smaller grid size.

VISTAS States are accepting EPA guidance that the threshold value to establish that a source contributes to visibility impairment is 0.5 deciview.

VISTAS States are using emissions (tons per year) divided by distance (km) from a Class I area boundary (Q/d) as a presumptive indicator that a BART-eligible source is subject to BART. If Q/d for SO_2 is greater than 10 for 2002 actual annual emissions, then the State presumes that the source is subject to BART and no exemption modeling will be performed using VISTAS funds. If the source agrees with this presumption, then the source can proceed to the BART determination using CALPUFF to evaluate impacts of control options and perform the engineering analyses. If a source disagrees, the source may perform fine grid modeling to determine if its impact is <0.5 dv.

For sources with Q/d less than or equal to 10, VISTAS intends to fund TRC Environmental Corp.[3] to assist States with the initial CALPUFF exemption modeling. Each State will prioritize which sources will be offered modeling by VISTAS. Modeling of these sources will be conducted in priority order to first accommodate States with nearer term timing constraints in their SIP development process. To conserve VISTAS resources, modeling will begin with sources at lower Q/d values and continue with sources with higher Q/d values until a Q/d value

---

based dispersion methods would be considered a non-guideline application of CALPUFF. Thus this Protocol has been revised to indicate Pasquill-Gifford dispersion coefficients should be used.

[3] In April 2006, Earth Tech's CALPUFF modeling staff became part of TRC Environmental Corporation. References to Earth Tech and to TRC in this protocol refer to the same technical staff, just at different times.

that consistently results in a greater than 0.5 dv impact is identified. Chapter 4 addresses the number of VISTAS sources eligible for BART based on Q/d analysis.

Note that VISTAS does not propose to use Q/d to exempt BART-eligible sources, but only to prioritize sources for modeling purposes. Thus this application is consistent with EPA guidance not to use Q/d for exemption purposes.

For the 12-km initial modeling exemption test, compare the highest single 24-hour average value across all receptors in the Class I area to the threshold value of 0.5 dv. If the highest 24-hr average value is below 0.5 dv at all Class I areas, then the source is not subject to BART. If the highest 24-hr average value is greater than 0.5 dv, then the source may choose to perform finer grid modeling for exemption purposes or may accept determination that the source is subject to BART and proceed to establish visibility impacts prior to and after BART controls. If using the single highest 24-hr average value proves, after initial 12-km grid CALPUFF modeling, to be too conservative a screening level, VISTAS may allow some exceedances of the threshold value for exemption purposes, up to no more than the 98th percentile value.

The 12-km modeling results can be used to focus finer grid modeling for exemption purposes on only those Class I areas where impacts greater than 0.5 dv were projected in the 12-km modeling.

For finer grid (4 km or less) analyses, use the 98th percentile impact value for the 24-hr average. Use either the 8th highest day in each year or the 22nd highest day in the 3-year period, whichever is more conservative, for comparison to the exemption threshold.

Use the same model assumptions for pre-BART visibility impact and for BART control options modeling: establish baseline visibility from the pre-BART run; change one control at a time; and evaluate the change in visibility impact, i.e. the delta-deciview. Note that "no control" may constitute BART.

Visibility impact is one of the five factors considered in the engineering analysis required under the USEPA BART guideline. If a source accepts to institute the most stringent control, the engineering analyses are not required.

This common VISTAS Protocol consistently recommends conservative assumptions. Individual States ultimately have responsibility to determine which, if any, BART controls are recommended in their State Implementation Plans (SIPs).

1. INTRODUCTION AND PROTOCOL OBJECTIVES

1.1 Background

Under regional haze regulations, the Environmental Protection Agency (EPA) has issued final guidelines dated July 6, 2005 for Best Available Retrofit Technology (BART) determinations (70 FR 39104-39172). The regional haze rule includes a requirement for BART for certain large stationary sources. Sources are BART-eligible if they meet three criteria including potential emissions of at least 250 tons per year of a visibility-impairing pollutant, were put in place between August 7, 1962 and August 7, 1977, and fall within one of the 26 listed source categories in the guidance. A BART engineering evaluation using five statutory factors -- 1) existing controls; 2) cost; 3) energy and non-air environmental impacts; 4) remaining useful life of the source; 5) degree of visibility improvement expected from the application of controls -- is required for any BART-eligible source that can be reasonably expected to cause or contribute to impairment of visibility in any of the 156 federal parks and wilderness (Class I) areas protected under the regional haze rule. (Note that, depending on the five factors, the evaluation may result in no control.) Air quality modeling is an important tool available to the States to determine whether a source can be reasonably expected to contribute to visibility impairment in a Class I area.

Throughout this document the term "BART-eligible emission unit" is defined as any single emission unit that meets the criteria described above. A "BART-eligible source" is defined as the total of all BART-eligible emission units at a single facility. If a source has several emission units, only those that meet the BART-eligible criteria are included in the definition "BART-eligible source".

One of the listed categories is steam electric plants of more than 250 million BTU/hr heat input. To determine if such a plant has greater than 250 million BTU/hr heat input and is potentially subject to BART, the boiler capacities of all electric generating units (EGUs) should be added together regardless of construction date. In this category, electric generating sources greater than 750 MW have presumptive SO_2 and NO_x emission limits. States may presume the same limits for EGU sources between 250-750 MW. However, units at those sources constructed after the BART-eligibility dates are not subject to a BART engineering evaluation. EPA, in the Clean Air Interstate Rule (CAIR), determined that an EGU participating in the CAIR trading program satisfies the BART requirements for SO_2 and NO_x. VISTAS states are tentatively accepting this guidance. CAIR does not cover PM so EGUs would still need to evaluate impacts of PM if PM emissions are above *de minimis* values.

As illustrated in Table 1-1, as of December 5, 2005, VISTAS States had identified a total of 274 BART-eligible sources that fall into 20 of the 26 BART source categories. Of the 274 sources with BART-eligible units, 84 sources are utility EGUs and 190 are non-EGU industrial sources. (Note that these numbers are not final and are subject to slight adjustments and refinements.) No BART sources are located on Tribal lands.

Table 1-1. VISTAS BART Eligible Sources (not updated since December 2005)

State	Total Number of Sources	EGU Sources	Non-EGU Sources
AL	48	8	40
FL	50	23	27
GA	24	10	14
KY	29	12	17
MS	18	8	10
NC	16	5	11
SC	31	6	25
TN	13	2	11
VA	18	3	15
WV	26	7	19
Total	**273**	**84**	**189**

1.2 Objective of this Protocol

The objective of this VISTAS' BART Modeling Protocol is to describe common procedures for air quality modeling to support BART determinations that are consistent with the EPA guidelines. The protocol will serve as the basis for establishing a common understanding among the organizations who will be performing the BART analyses or reviewing the BART modeling results, including VISTAS State and Local air regulatory agencies, EPA, Federal Land Managers (FLMs), source operators, and contractors for the sources. This final protocol incorporates EPA final guidance and comments that were received on VISTAS' draft protocol[4] and provides additional description of modeling procedures. The original final protocol of 22 December 2005 has been revised since then to clarify items, resolve technical issues, and reflect decisions by the EPA and FLMs. This document is the third revision.

The VISTAS States have accepted EPA's guidance to use the CALPUFF modeling system to comply with the BART modeling requirements of the regional haze rule. A BART-eligible source will be required to submit a site-specific modeling protocol to the State for review and approval prior to performing CALPUFF modeling. States will consult with FLMs and the EPA when evaluating the site-specific BART protocols. The site-specific protocol will include the

[4] *Draft Protocol for the Application of the CALPUFF Model for Analyses of Best Available Retrofit Technology (BART). VISTAS*, March 22, 2005 and September 20, 2005.

source-specific data on source location, stack parameters, and emissions. The methods of the VISTAS common modeling protocol will be followed in the site-specific protocol unless the source proposes to the State, and the State approves, alternative methods or assumptions.

Each VISTAS State or Local agency retains responsibility for the specific procedures and processes it will follow in working with the BART sources under its jurisdiction, the FLMs, EPA, and public to determine BART controls for sources in the State. Nothing in the VISTAS process replaces States' responsibility to determine BART controls.

The remainder of this document describes the CALPUFF modeling system and the application of CALPUFF to two situations:

- Air quality modeling to determine whether a BART-eligible source is "subject to BART" and therefore the BART analysis process must be applied to its operations.

- Air quality modeling of emissions from sources that have been found to be subject to BART, to evaluate regional haze benefits of alternative control options and to document the benefits of the preferred option.

Chapters 2 and 3 of this document are intended to provide background information on EPA's guidance for BART analysis modeling and on the CALPUFF modeling system. Subsequent chapters include more specific recommendations. Chapter 2 of this document reviews EPA's guidance for regional haze BART analysis modeling, as outlined in the 6 July 2005 Federal Register notice. The CALPUFF model is the preferred model recommended by the EPA for BART modeling analyses and its characteristics and limitations are discussed in Chapter 3. The specific steps to determine whether a BART-eligible source is subject to BART and to evaluate BART controls are described in Chapter 4. The procedures include initial modeling of BART-eligible sources using CALPUFF run in a conservative mode with regional meteorological datasets. For sources determined to be subject to BART based on these first modeling analyses, further finer grid CALPUFF analyses would be performed. The model configuration for the common modeling protocol is described in Chapter 4. Details of the source-specific protocol are described in Chapter 5. A quality assurance plan is outlined in Chapter 6.

EPA's guidance allows for the use of appropriate alternative models, however VISTAS will not develop a protocol for alternative models. This protocol focuses on guidance for the application of the preferred CALPUFF modeling approach. If a source wants to use an alternative model in its BART demonstration, the source will need to submit a detailed written justification to the State for review and approval. The State will provide the documentation to the EPA and Federal Land Managers for their review.

Also, this protocol does not address a preferred modeling approach to demonstrate the effectiveness of an optional emissions cap and trade program. Such a cap and trade program is not required, but can be implemented in lieu of BART if desired by the VISTAS States. VISTAS

States are not pursuing a regional trading alternative under the proposed EPA trading guidance (70 FR 44154-44175) that is to be promulgated in 2006.

2. REVIEW OF EPA'S GUIDANCE FOR BART MODELING

The final guidance for regional haze BART determinations was published in the Federal Register on 6 July 2005 (70 FR 39104 to 39172). It prescribes the modeling approaches that are to be used for various stages of the BART analysis process.

This chapter provides a summary of EPA's guidance for BART modeling. It is not intended to provide a comprehensive review of the guidance. Nor does this chapter address specific recommendations for VISTAS' approach to CALPUFF BART modeling. Those recommendations appear in Chapter 4.

2.1 Overview of the Regional Haze BART Process

The process of establishing BART emission limitations consists of four steps:

1) Identify whether a source is "BART-eligible" based on its source category, when it was put in service, and the magnitude of its emissions of one or more "visibility-impairing" air pollutants. The BART guidelines list 26 source categories of stationary sources that are BART-eligible. Sources must have been put in service between August 7, 1962 and August 7, 1977 in order to be BART-eligible. Finally, a source is eligible for BART if potential emissions of visibility-impairing air pollutants are greater than 250 tons per year. Qualifying pollutants include primary particulate matter (PM_{10}) and gaseous precursors to secondary fine particulate matter, such as SO_2 and NO_x. Whether ammonia or volatile organic compounds (VOCs) should be included as visibility-impairing pollutants for BART eligibility is left for the States to determine on a case-by-case basis. The guidance states that high molecular weight VOCs with 25 or more carbon atoms and low vapor pressure should be considered as primary $PM_{2.5}$ emissions and not VOCs for BART purposes.

(Note: If the source is subject to BART because one visibility impairing pollutant has potential emissions > 250 TPY, the State may determine that other visibility impairing pollutants are not subject to BART if their potential emissions are less than the *de minimis* levels (40 TPY for SO_2 and NO_x and 15 TPY of PM_{10} or $PM_{2.5}$. This assumes that the other BART-eligibility criteria are met.)

2) Determine whether a BART-eligible source can be excluded from BART controls by demonstrating that the source cannot be reasonably expected to cause or contribute to visibility impairment in a Class I area. The preferred approach is an assessment with an air quality model such as CALPUFF or other appropriate model followed by comparison of the estimated 24-hr visibility impacts against a threshold above estimated natural conditions to be determined by the States.[5] The threshold to determine whether a single source "causes" visibility impairment is set at

[5] A recent draft settlement agreement with the EPA (to be published in the *Federal Register* for public comment) provides that a State has the discretion to decide whether annual average or 20% best natural conditions are to be used as the reference. This ruling resolves an ambiguity in EPA's BART guidance, where the BART guideline

1.0 deciview change from natural conditions over a 24-hour averaging period in the final BART rule (70 FR 39118). The guidance also states that the proposed threshold at which a source may "contribute" to visibility impairment should not be higher than 0.5 deciviews although, depending on factors affecting a specific Class I area, it may be set lower than 0.5 deciviews. The test against the threshold is "driven" by the contribution level, since if a source "causes", by definition it "contributes".

EPA recommends that the 98th percentile value from the modeling be compared to the contribution threshold of 0.5 deciviews (or a lower level set by a State) to determine if a source does not contribute to visibility impairment and therefore is not subject to BART. Whether or not the 98th percentile value exceeds the threshold must be determined at each Class I area. Over an annual period, this implies the 8th highest 24-hr value at a particular Class I area is compared to the contribution threshold. Over a 3-year modeling period, the 98th percentile value may be interpreted as the highest of the three annual 98th percentile values at a particular Class I area or the 22nd highest value in the combined three year record, whichever is more conservative.

Alternatively, States have the option of considering that all BART-eligible sources within the State are subject to BART and skipping the initial impact analysis. In rare cases, a State might be able to do exactly the opposite, and use regional modeling to conclude that all BART-eligible sources in the State do not cumulatively contribute to "measurable" visibility impairment in any Class I areas. Also, the States have an option to exempt individual sources based on model plant analysis conducted by EPA in finalizing the BART rule. Under this option, sources with potential emissions of SO_2 plus NO_x of less than 500 tons and a distance from any Class I area greater than 50 kilometers or sources with SO_2 plus NO_x potential emissions of less than 1000 tons and a distance from any Class I area greater than 100 kilometers can be exempted. PM emissions are not specifically addressed in the model plant analysis, but subsequent discussions with EPA staff indicate that PM may be considered along with SO_2 and NO_x, so that a plant could be exempted if the combined potential emissions of SO_2, NO_x, plus PM meet the criteria above.

3) Determine BART controls for the source by considering various control options and selecting the "best" alternative, taking into consideration:

a) Any pollution control equipment in use at the source (which affects the availability of options and their impacts),

b) The costs of compliance with control options,

c) The remaining useful life of the facility,

d) The energy and non air-quality environmental impacts of compliance, and

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text says "natural conditions" at 70 FR 39162, col. 3, while the preamble to the BART rule says "natural visibility baseline for the 20% best visibility days" at 70 FR 39125, col. 1.

e) The degree of improvement in visibility that may reasonably be anticipated to result from the use of such technology.

Note that if a source agrees to apply the most stringent controls available to BART-eligible units, the BART analysis is essentially complete and no further analysis is necessary (70 FR 39165).

4) Incorporate the BART determination into the State Implementation Plan for Regional Haze, which is due by December 2007.

Instead of applying BART on a source-by-source basis, a State (or a group of States) has the option of implementing an emissions trading program that is designed to achieve regional haze improvements that are greater than the visibility improvements that could be expected from BART. If the geographic distributions of emissions under the two approaches are similar, determining whether trading is "better than BART" may be possible by simply comparing emissions expected under the trading program against the emissions that could be expected if BART was applied to eligible sources. If the geographic distributions of emissions are likely to be different, however, air quality modeling comparing the expected improvements in visibility from the trading program and from BART would be required. (See the proposed BART Alternative rule, at 70 FR 44160.) EPA suggests that regional modeling using a photochemical grid model may be more appropriate than CALPUFF for this purpose.

Note that EPA has indicated in the BART rule (70 FR 39138-39139) that emissions reductions under the Clean Air Interstate Rule (CAIR) meet the BART requirement for SO_2 and NO_x control for those EGUs subject to BART. However, PM emissions from EGUs are not addressed by CAIR and therefore a BART analysis may still be required for PM.

2.2 Model Recommendations for the BART Analysis

To evaluate the visibility impacts of a BART-eligible source at Class I areas beyond 50 km from the source, the EPA guidance recommends the use of the CALPUFF model as "the best regulatory modeling application currently available for predicting a single source's contribution to visibility impairment" (70 FR 39162). The use of another "appropriate model" is allowed although the EPA prefers the use of CALPUFF. If a source wants to use an alternative model, the source needs to submit a written justification and source-specific modeling protocol to its State for review and approval. As part of the consultation process, the State will provide documentation to EPA and FLM.

For modeling the impact of a source closer than 50 km to a Class I area, EPA's BART guidance recommends that expert modeling judgment be used, "giving consideration to both CALPUFF and other methods." The PLUVUE-II plume visibility model is mentioned as a possible model to consider instead of CALPUFF for a source within less than 50 km of a Class I area**.**

The EPA guidance notes that "regional scale photochemical grid models may have merit, but such models have been designed to assess cumulative impacts, not impacts from individual sources" and they are "very resource intensive and time consuming relative to CALPUFF", but States may consider their use for SIP development in the future as they may be adapted and "demonstrated to be appropriate for single source applications" (70 FR 39123). Photochemical grid models may be more appropriate for cumulative modeling options such as in the determination of the aggregate contribution of all-BART-eligible sources to visibility impairment, but such use should involve consultation with the appropriate EPA Regional Office (70 FR 39163).

According to the BART guidance, a modeling protocol should be submitted for all modeling demonstrations regardless of the distance from the BART-eligible source to the Class I area. EPA's role in the development of the protocol is only advisory as the "States better understand the BART-eligible source configurations" and factors affecting their particular Class I areas (70 FR 39126).

In the BART modeling analyses the EPA recommends that the State use the highest 24-hour average actual emission rate for the most recent three to five-year period of record. Emissions on days influenced by periods of start-up, shutdown and malfunction are not to be considered in determining the appropriate emission rates. (70 FR 39129).

If a source is found to be subject to BART, CALPUFF or another appropriate model should be used to evaluate the improvement in visibility resulting from the application of BART controls. Visibility improvements may be evaluated on a pollutant-specific basis in the BART determination (70 FR 39129).

For evaluating the improvement in visibility resulting from the application of BART, the EPA guidelines state that States are "encouraged to account for the magnitude, frequency, and duration of the contributions to visibility impairment caused by the source based on the natural variability of meteorology" (70 FR 39129).

2.3 Performance of a Cap and Trade Program

If a State or States elect to pursue an optional cap and trade program, they are required to demonstrate greater "reasonable progress" in reducing haze than would result if BART were applied to the same sources. In some cases, a State may simply be able to demonstrate that a trading program that achieves greater progress at reducing emissions will also achieve greater progress at reducing haze. Such would be the case if the likely geographic distribution of emissions under the trading program would not be greatly different from the distribution if BART was in place.

If the expected distribution of emissions is different under the two approaches, then "dispersion modeling" of all sources must be used to determine the difference in visibility at each impacted Class I area, in order to establish that the optional trading program will result in visibility improvements aggregated over all Class I areas that are "better than BART" (70 FR 39137-39138). The BART guidance does not specify the method to be used for this modeling. From a technical perspective, either applying CALPUFF to every source or using a regional photochemical model would satisfy the need.

A rulemaking procedure is currently underway to establish final guidance for such alternatives to BART (70 FR 44154-44175). The rule is expected to be finalized in 2006.

3. OVERVIEW OF THE CALPUFF MODELING SYSTEM

This chapter contains a general description of the CALPUFF modeling system and its capabilities and limitations. It does not include specific recommendations regarding the use of the model for BART analysis in the VISTAS region. These specific recommendations can be found in Chapter 4.

3.1 Capabilities and features of CALPUFF

The CALPUFF modeling system (Scire et al., 2000a, b) is recommended as the preferred modeling approach for use in the BART analyses. CALPUFF and its meteorological model, CALMET, are designed to handle the complexities posed by the complex terrain, the large source-receptor distances, chemical transformation and deposition, and other issues related to Class I visibility impacts. The CALPUFF modeling system has been adopted by the EPA as a *Guideline Model* for source-receptor distances greater than 50 km, and for use on a case-by-case basis in complex flow situations for shorter distances (68 FR 18440-18482). CALPUFF is recommended for Class I impact assessments by the Federal Land Managers Workgroup (FLAG 2000) and the Interagency Workgroup on Air Quality Modeling (IWAQM) (EPA 1998). The final BART guidance recommends CALPUFF as "the best modeling application available for predicting a singe source's contribution to visibility impairment" (70 FR 39122). As a result of these recommendations, the VISTAS modeling protocol is based on the use of CALPUFF for its BART determinations.

The main components of the CALPUFF modeling system are shown in Figure 3-1. CALMET is a diagnostic meteorological model that is used to drive the CALPUFF dispersion model. It produces three-dimensional wind and temperature fields and two-dimensional fields of mixing heights and other meteorological fields. It contains slope flow effects, terrain channeling, and kinematic effects of terrain. CALMET includes special algorithms for treating the overwater boundary layer and coastal interaction effects. CALMET can use meteorological observational data and/or three-dimensional output from prognostic numerical meteorological models such as MM5 (Grell et al., 1995) or RUC (Benjamin et al., 2004) in the developments of its fine-scale meteorological fields.

CALPUFF is a non-steady-state Lagrangian puff transport and dispersion model that advects Gaussian puffs of multiple pollutants from modeled sources. CALPUFF's algorithms have been designed to be applicable on spatial scales from a few tens of meters to hundreds of kilometers from a source. It includes algorithms for near-field effects such as building downwash, stack tip downwash and transitional plume rise as well as processes important in the far-field such as chemical transformation, wet deposition, and dry deposition. CALPUFF contains an option to allow puff splitting in the horizontal and vertical directions, which extends the distance range of the model. The primary outputs from CALPUFF are hourly concentrations and hourly deposition fluxes evaluated at user-specified receptor locations.

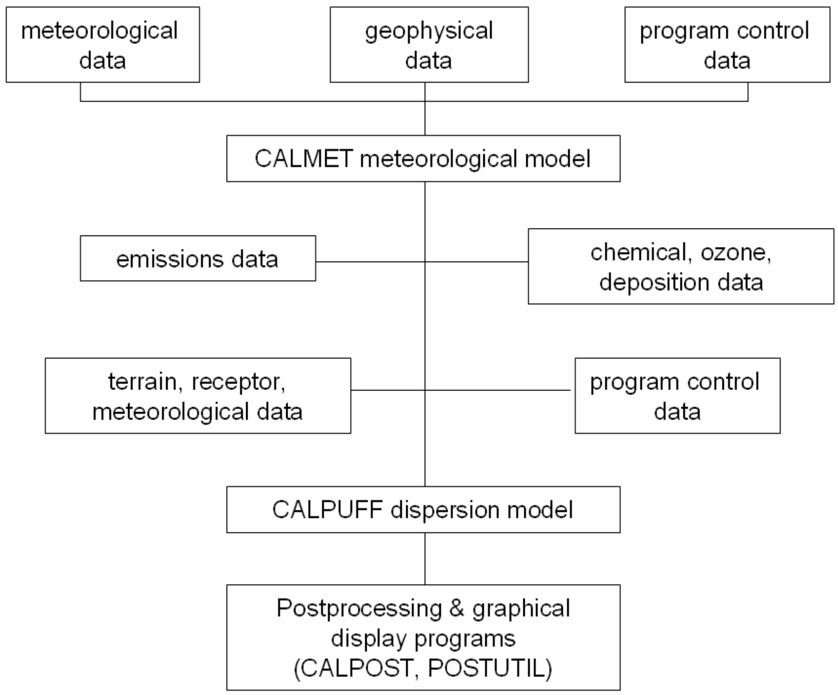

Figure 3-1. CALPUFF modeling system components.

A set of postprocessing programs associated with CALPUFF computes visibility effects and allows cumulative source impacts to be assessed, including potential non-linear effects of ammonia limitation on nitrate formation. The CALPOST postprocessor contains several options for computing change in extinction and deciviews for visibility assessments. The POSTUTIL postprocessor includes options for summing contributions of individual sources or groups of sources to assess cumulative impacts. POSTUTIL also contains CALPUFF's nitric acid-nitrate chemical equilibrium module, which allows the cumulative effects of ammonia consumption by background sources to be assessed in the postprocessor. In addition, the combination of CALPUFF and POSTUTIL allows the effects of source emissions of ammonia to be incrementally added to background ammonia levels when determining nitrate formation.

The rest of this chapter summarizes the capabilities and features of the CALPUFF modeling components in more detail.

3.1.1 Major Features of CALMET

The CALMET meteorological model consists of a diagnostic wind field module and micrometeorological modules for overwater and overland boundary layers. When modeling a large geographical area, as would be necessary for the regional VISTAS domain, the user has the option to use a Lambert Conformal Projection coordinate system to account for Earth's curvature.

The major features and options of the meteorological model are summarized in Table 3-1. The techniques used in the CALMET model are briefly described below.

Table 3-1. Major Features of the CALMET Meteorological Model

- **Boundary Layer Modules of CALMET**
  - Overland Boundary Layer - Energy Balance Method
  - Overwater Boundary Layer - Profile Method
    - -- COARE algorithm
    - -- OCD-based method
  - Produces Gridded Fields of:
    - -- Surface Friction Velocity
    - -- Convective Velocity Scale
    - -- Monin-Obukhov Length
    - -- Mixing Height
    - -- PGT Stability Class
    - -- Air Temperature (3-D)
    - -- Precipitation Rate

- **Diagnostic Wind Field Module of CALMET**
  - Slope Flows
  - Kinematic Terrain Effects
  - Terrain Blocking Effects
  - Divergence Minimization
  - Produces Gridded Fields of U, V, W Wind Components
  - Inputs Include Domain-Scale Winds, Observations, and (optionally) Coarse-Grid Prognostic Model Winds
  - Lambert Conformal Projection Capability

CALMET Boundary Layer Models

The CALMET model contains two boundary layer models for application to overland and overwater grid cells.

Overland Boundary Layer Model: Over land surfaces, the energy balance method of Holtslag and van Ulden (1983) is used to compute hourly gridded fields of the sensible heat flux, surface friction velocity, Monin-Obukhov length, and convective velocity scale. Mixing heights are determined from the computed hourly surface heat fluxes and observed temperature soundings using a modified Carson (1973) method based on Maul (1980). The model also determines gridded fields of Pasquill-Gifford-Turner (PGT) stability class and hourly precipitation rates.

Overwater Boundary Layer Model: The aerodynamic and thermal properties of water surfaces suggest that a different method is best suited for calculating the boundary layer parameters in the marine environment. A profile technique, using air-sea temperature differences, is used in CALMET to compute the micro-meteorological parameters in the marine boundary layer. The version of CALMET being used by VISTAS contains improvements in the overwater boundary layer parameterizations (Fairall et al., 2003) based on the Coupled Ocean Atmosphere Response Experiment (COARE) and enhancements in the calculation of overwater mixed layer heights (Batchvarova and Gryning, 1991, 1994). Further details and the results of an evaluation of the model containing these enhancements are described in Scire et al. (2005). An upwind-looking spatial averaging scheme is optionally applied to the mixing heights and three-dimensional temperature fields in order to account for important advective effects.

Diagnostic Wind Field Module

The diagnostic wind field module uses a two-step approach to the computation of the wind fields (Douglas and Kessler, 1988). In the first step, an initial-guess wind field is adjusted for kinematic effects of terrain, slope flows, and terrain blocking effects to produce a Step 1 wind field. Gridded MM5 can be used to define the initial guess field. The second step consists of an objective analysis procedure to introduce observational data into the Step 1 wind field to produce a final wind field.

Step 1 Wind Field. Development of the Step 1 wind field begins with the initial guess field defined by the MM5 prognostic meteorological model. Normally, the CALMET computational domain is specified to be at finer grid resolution than the MM5 dataset used to initialize the initial guess field. For example, 36-km MM5 data available for VISTAS modeling may be used to develop the initial guess field on a 12-km or even a 1-km CALMET grid. The Step 1 algorithms in CALMET described below apply terrain adjustments to the initial guess field on the fine-scale CALMET grid. Thus, the CALMET winds are adjusted to respond to fine-scale terrain features not necessarily seen by the coarser scale MM5 model.

Kinematic Effects of Terrain: The approach of Liu and Yocke (1980) is used to evaluate the effects of the terrain on the wind field. The initial guess field winds are used to compute a terrain-forced vertical velocity, subject to an exponential, stability-dependent decay function. The effects of terrain on the horizontal wind components are evaluated by applying a divergence-minimization scheme to the initial guess wind field. The divergence minimization scheme is applied iteratively until the three-dimensional divergence is less than a threshold value.

Slope Flows: The original slope flow algorithm in CALMET has been upgraded (Scire and Robe, 1997) based on the shooting flow algorithm of Mahrt (1982). This scheme includes both advective-gravity and equilibrium flow regimes. At night, the slope flow model parameterizes the flow down the sides of the valley walls into the floor of the valley, and during the day, upslope flows are parameterized. The magnitude of the slope flow depends on the local surface sensible heat flux and local terrain gradients. The slope flow wind components are added to the wind field adjusted for kinematic effects.

Blocking Effects: The thermodynamic blocking effects of terrain on the wind flow are parameterized in terms of the local Froude number (Allwine and Whiteman, 1985). If the Froude number at a particular grid point is less than a critical value and the wind has an uphill component, the wind direction is adjusted to be tangent to the terrain.

Step 2 Wind Field. The wind field resulting from the above adjustments of the initial-guess wind is the Step 1 wind field. The second step of the procedure may involve introduction of observational data into the Step 1 wind field through an objective analysis procedure. An inverse-distance squared interpolation scheme is used which weights observational data heavily in the vicinity of the observational station, while the Step 1 wind field dominates the interpolated wind field in regions with no observational data. The resulting wind field is subject to smoothing, an optional adjustment of vertical velocities based on the O'Brien (1970) method, and divergence minimization to produce a final Step 2 wind field.

The introduction of observational data in the Step 2 calculation is an option. It is also possible to run the model in "no observations" (No-Obs) mode, which involves the use only of MM5 gridded data for the initial guess field followed by fine-scale terrain adjustments by CALMET. In No-Obs mode, observational data are not used in the Step 2 calculations. The No-Obs mode is appropriate when the MM5 simulations adequately characterize the regional wind patterns and when local observations, especially surface observations, reflect local conditions on a scale smaller than that of the CALMET domain and hence their spatial representativeness may be limited. Such situations are most likely to occur when the CALMET grid scale is relatively large i.e., coarser than the scale of variation of the true wind field, which is particularly likely to occur in complex terrain or along the seashore,

3.1.2 Major Features of CALPUFF

By its puff-based formulation and through the use of three-dimensional meteorological data developed by the CALMET meteorological model, CALPUFF can simulate the effects of time- and space-varying meteorological conditions on pollutant transport from sources in complex terrain. The major features and options of the CALPUFF model are summarized in Table 3-2 at the end of this subsection. Some of the technical algorithms are briefly described below.

Complex Terrain: The effects of complex terrain on puff transport are derived from the CALMET winds. In addition, puff-terrain interactions at gridded and discrete receptor locations are simulated using one of two algorithms that modify the puff-height (either that of ISCST3 or a general "plume path coefficient" adjustment), or an algorithm that simulates enhanced vertical dispersion derived from the weakly-stratified flow and dispersion module of the Complex Terrain

Dispersion Model (CTDMPLUS) (Perry et al., 1989). The puff-height adjustment algorithms rely on the receptor elevation (relative to the elevation at the source) and the height of the puff above the surface. The enhanced dispersion adjustment relies on the slope of the gridded terrain in the direction of transport during the time step.

Subgrid Scale Complex Terrain (CTSG): An optional module in CALPUFF, CTSG treats terrain features that are not resolved by the gridded terrain field, and is based on the CTDMPLUS (Perry et al., 1989). Plume impingement on subgrid-scale hills is evaluated at the CTSG subgroup of receptors using a dividing streamline height (H_d) to determine which pollutant material is deflected around the sides of a hill (below H_d) and which material is advected over the hill (above H_d). The local flow (near the feature) used to define H_d is taken from the gridded CALMET fields. As in CTDMPLUS, each feature is modeled in isolation with its own set of receptors.

Puff Sampling Functions: A set of accurate and computationally efficient puff sampling routines is included in CALPUFF, which solve many of the computational difficulties encountered when applying a puff model to near-field releases. For near-field applications during rapidly-varying meteorological conditions, an elongated puff (slug) sampling function may be used. An integrated puff approach may be used during less demanding conditions. Both techniques reproduce continuous plume results under the appropriate steady state conditions.

Building Downwash: The Huber-Snyder and Schulman-Scire downwash models are both incorporated into CALPUFF. An option is provided to use either model for all stacks, or make the choice on a stack-by-stack and wind sector-by-wind sector basis. Both algorithms have been implemented in such a way as to allow the use of wind direction specific building dimensions. The PRIME building downwash model (Schulman et al., 2000) is also included in CALPUFF as an option.

Dispersion Coefficients: Several options are provided in CALPUFF for the computation of dispersion coefficients, including the use of turbulence measurements (σ_v and σ_w), the use of similarity theory to estimate σ_v and σ_w from modeled surface heat and momentum fluxes, or the use of Pasquill-Gifford (PG) or McElroy-Pooler (MP) dispersion coefficients, or dispersion equations based on the CTDM. Options are provided to apply an averaging time correction or surface roughness length adjustments to the PG coefficients. In version 5.754 of CALPUFF being used by VISTAS, an option is provided to use the AERMOD turbulence profiles for determining dispersion rates, which is the most recent approach to dispersion in EPA-approved regulatory modeling. In addition, turbulence advection is included. For additional details on these features, see Scire et al. (2005).

Overwater and Coastal Interaction Effects: Because the CALMET meteorological model contains both overwater and overland boundary layer algorithms, the effects of water bodies on plume transport, dispersion, and deposition can be simulated with CALPUFF. The puff formulation of CALPUFF is designed to handle spatial changes in meteorological and dispersion conditions, including the abrupt changes that occur at the coastline of a major body of water.

Dry Deposition: A resistance model is provided in CALPUFF for the computation of dry deposition rates of gases and particulate matter as a function of geophysical parameters, meteorological conditions, and pollutant species. For particles, source-specific mass distributions may be provided for use in the resistance model. Of particular interest for BART analyses is the ability to separately model the deposition of fine particulate matter (< 2.5 μm diameter) from coarse particulate matter (2.5-10 μm diameter).

Wind Shear Effects: CALPUFF contains an optional puff splitting algorithm that allows vertical wind shear effects across individual puffs to be simulated. Differential rates of dispersion and transport among the "new" puffs generated from the original, well-mixed puff can substantially increase the effective rate of horizontal spread of the material. Puffs may also be split in the horizontal when the puff size becomes large relative to the grid size, to account for wind shear across the puffs.

Wet Deposition: An empirical scavenging coefficient approach is used in CALPUFF to compute the depletion and wet deposition fluxes due to precipitation scavenging. The scavenging coefficients are specified as a function of the pollutant and precipitation type (i.e., frozen vs. liquid precipitation).

Chemical Transformation: CALPUFF includes options for parameterizing chemical transformation effects using the five species scheme (SO_2, $SO_4^{=}$, NO_x, HNO_3, and NO_3^-) employed in the MESOPUFF II model or a set of user-specified, diurnally-varying transformation rates. The MESOPUFF II scheme is recommended by IWAQM. It produces secondary fine particulate matter (sulfate and nitrate) from emissions of SO_2 and NO_x and thus allows analyses of visibility impacts. Ambient ozone concentrations are used in the parameterized chemical transformation module as a surrogate for OH radicals during daylight hours. Ambient ammonia concentrations are used together with a temperature and relative humidity-dependent equilibrium relationship to partition nitric acid and nitrate on an hour-by-hour and receptor-by-receptor basis.

Table 3-2. Major Features of the CALPUFF Dispersion Model

- **Source types**
  - Point sources (constant or variable emissions)
  - Line sources (constant or variable emissions)
  - Volume sources (constant or variable emissions)
  - Area sources (constant or variable emissions)

- **Non-steady-state emissions and meteorological conditions**
  - Gridded 3-D fields of meteorological variables (winds, temperature)
  - Spatially-variable fields of mixing height, friction velocity, convective velocity scale, Monin-Obukhov length, precipitation rate
  - Vertically and horizontally-varying turbulence and dispersion rates
  - Time-dependent source and emissions data for point, area, and volume sources
  - Temporal or wind-dependent scaling factors for emission rates, for all source types

- **Interface to the Emissions Production Model (EPM)**
  - Time-varying heat flux and emissions from controlled burns and wildfires

- **Efficient sampling functions**
  - Integrated puff formulation
  - Elongated puff (slug) formulation

- **Dispersion coefficient (σ_y, σ_z) options**
  - Direct measurements of σ_v and σ_w
  - Estimated values of σ_v and σ_w based on similarity theory
    - -- AERMOD turbulence profiles
    - -- Original turbulence profiles
  - Pasquill-Gifford (PG) dispersion coefficients (rural areas)
  - McElroy-Pooler (MP) dispersion coefficients (urban areas)
  - CTDM dispersion coefficients (neutral/stable)

- **Vertical wind shear**
  - Puff splitting
  - Differential advection and dispersion

- **Plume rise**
  - Buoyant and momentum rise
  - Stack tip effects
  - Building downwash effects
  - Partial penetration
  - Vertical wind shear

- **Building downwash**
  - Huber-Snyder method
  - Schulman-Scire method
  - PRIME method

- **Complex terrain**
  - Steering effects in CALMET wind field
  - Optional puff height adjustment: ISC3 or "plume path coefficient"
  - Optional enhanced vertical dispersion (neutral/weakly stable flow in CTDMPLUS)

Table 3-2. Major Features of the CALPUFF Dispersion Model (Cont'd)

- **Subgrid scale complex terrain (CTSG option)**
  - Dividing streamline, H_d, as in CTDMPLUS:
    - Above H_d, material flows over the hill and experiences altered diffusion rates
    - Below H_d, material deflects around the hill, splits, and wraps around the hill

- **Dry Deposition**
  - Gases and particulate matter
  - Three options:
    - Full treatment of space and time variations of deposition with a resistance model
    - User-specified diurnal cycles for each pollutant
    - No dry deposition

- **Overwater and coastal interaction effects**
  - Overwater boundary layer parameters (COARE algorithm or OCD-based method)
  - Abrupt change in meteorological conditions, plume dispersion at coastal boundary
  - Plume fumigation

- **Chemical transformation options**
  - Pseudo-first-order chemical mechanism for SO_2, $SO_4^{=}$, NO_x, HNO_3, and NO_3^- (MESOPUFF II method)
  - Pseudo-first-order chemical mechanism for SO_2, $SO_4^{=}$, NO, NO_2, HNO_3, and NO_3^- (RIVAD/ARM3 method)
  - User-specified diurnal cycles of transformation rates
  - No chemical conversion

- **Wet Removal**
  - Scavenging coefficient approach
  - Removal rate a function of precipitation intensity and precipitation type

3.1.3 Major Features of Postprocessors (CALPOST and POSTUTIL)

The two main postprocessors of interest for BART applications are the CALPOST and POSTUTIL programs. CALPOST is used to process the CALPUFF outputs, producing tabulations that summarize the results of the simulations, identifying, for example, the highest and second-highest hourly-average concentrations at each receptor. When performing visibility-related modeling, CALPOST uses concentrations from CALPUFF to compute light extinction and related measures of visibility (haze index in deciviews), reporting these for a 24-hour averaging time.

The CALPOST processor contains several options for evaluating visibility impacts, including the method described in the BART guidance, which uses monthly average relative humidity values. CALPOST contains implementations of the IWAQM-recommended and FLAG-recommended visibility techniques and additional options to evaluate the impact of natural weather events (fog, rain and snow) on background visibility and visibility impacts from modeled sources.

The POSTUTIL processor is a program that allows the cumulative impacts of multiple sources from different simulations to be summed, can compute the difference between two sets of predicted impacts (useful for evaluating the benefits of BART controls), and contains a chemistry module to evaluate the equilibrium relationship between nitric acid and nitrate aerosols. This capability allows the potential non-linear effects of ammonia scavenging by sulfate and nitrate sources to be evaluated in the formation of nitrate from an individual source. CALPUFF makes the full ambient ammonia concentration available to each puff without regard for any scavenging by other puffs. POSTUTIL corrects for such scavenging when the puffs generated by the CALPUFF model overlap, as could be the case for a single source when the wind speed is low, or when nitrate formation is to be attributed to each of several sources that are in a cluster and whose plumes overlap,

POSTUTIL will also compute the impacts of individual sources or groups of sources on sulfur and nitrogen deposition into aquatic, forest and coastal ecosystems. The postprocessor allows the changes in deposition fluxes resulting from changes in emissions to be quantified. For example the output of POSTUTIL and CALPOST can be used as input into an Acid Neutralizing Capacity (ANC) analysis, or for comparison to Deposition Analysis Thresholds (DATs).

3.2 Discussion of CALPUFF Applicability and Limitations

3.2.1 Transport and Diffusion

According to the IWAQM Phase 2 report (page 18), "CALPUFF is recommended for transport distances of 200 km or less. Use of CALPUFF for characterizing transport beyond 200 to 300 km should be done cautiously with an awareness of the likely problems involved."[6]

IWAQM's 200-km limitation derives from the observation that, when compared to the data of the Cross Appalachian Tracer Experiment (CAPTEX), the basic configuration of CALPUFF overestimated inert tracer concentrations by factors of 3 to 4 at receptors that were 300 to 1000 km from the source. The apparent reason was insufficient horizontal dispersion of the simulated plume, presumably because an actual large plume does not remain coherent in the presence of vertical wind shears that typically occur, especially during the night, and of horizontal wind shears over the large puffs that arise over long transport distances.

To better represent such situations, an optional puff splitting algorithm has since been added to CALPUFF to simulate wind shear effects across a well-mixed individual puff by dividing the puff horizontally and vertically into two or more pieces. Differential rates of transport among the new puffs thus generated can increase the horizontal spread of the material in the plume due to vertical wind speed shear and wind direction shear. The horizontal puff splitting algorithm is

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[6] The IWAQM presentation at EPA's 6th Modeling Conference provides the background for this recommendation: "The IWAQM concludes that CALPUFF be recommended as providing unbiased estimates of concentration impacts for transport distances of order 200 km and less, and for transport times of order 12 hours or less. For larger transport times and distances, our experience thus far is that CALPUFF tends to underestimate the horizontal extent of the dispersion and hence tends to overestimate the surface-level concentration maxima. This does not preclude the use of CALPUFF for transport beyond 300 km, but it does suggest that results in such instances be used cautiously and with some understanding." (From page D-12 of the IWAQM Phase 2 report.)

designed to allow large puffs that may grow to be several grid cells or more in size to split into smaller puffs that can then more accurately respond to variations in the local wind field across the original large puff. This will also tend to increase horizontal dispersion of the plume. Since the creation of additional puffs via puff splitting will increase the computational requirements of the model, possibly substantially, puff splitting is not enabled by default, but can be turned on at the option of the user. Puff splitting may be appropriate for transport distances over 200 to 300 km, or possibly over shorter distances in complex terrain.

Turning to the shorter distance end of the transport range, the CALPUFF section of Appendix A of the *Guideline on Air Quality Models* (40 CFR 51, Appendix W) states, "CALPUFF is intended for use on scales from tens of meters from a source to hundreds of kilometers." This is supported by the IWAQM Phase 2 report, which indicates that the diffusion algorithms in CALPUFF were designed to be suitable for both short and long distances. In this regard, CALPUFF does contain algorithms for such near-field effects as plume rise, building downwash, and terrain impingement and includes routines that deal with the computational difficulties encountered when applying a puff model in the field near to a source.

The recommendations for regulatory use in Appendix A of the *Guideline on Air Quality Models* state, "CALPUFF is appropriate for long range transport (source-receptor distance of 50 to several hundred kilometers)", but provisions for using CALPUFF in the near-field in "complex flow" situations are also included in the regulatory guidance. Complex flow situations may include complex terrain, coastal areas, situations where plume fumigation is likely, and areas where stagnation, flow reversals, recirculation or spatial variability in wind fields (e.g., as due to changes in valley orientation) are important.

The tracer studies with which CALPUFF transport and diffusion capabilities were evaluated in the IWAQM Phase 2 report were generally over distances greater than 50 km. More recently, additional studies of model performance have been performed at shorter distances, including at a power plant in New York state in complex terrain (at source-receptor distances of 2 to 8.5 km) and a second power plant in Illinois in simple terrain (at source-receptor distances in arcs ranging from 0.5 km to 50 km from the stack) (Strimaitis et al., 1998). Other CALPUFF evaluation studies over short-distances include ones by Chang et al. (2001) and Morrison et al. (2003). These studies demonstrate good model performance over source-receptor distances from a few hundred meters to 50 km.

An important factor in the performance of CALPUFF is the choice of dispersion coefficients. The EPA has defined the "regulatory default" option in CALPUFF to allow either Pasquill-Gifford (PG) or turbulence-based dispersion coefficients. CALPUFF has been evaluated and shown to perform better using turbulence-based dispersion for tall stacks (Strimaitis et al, 1998). CALPUFF with turbulence-based dispersion has also been evaluated for overwater transport and coastal situations (Scire et al., 2005). In many other studies, including AERMOD evaluation studies conducted by EPA, the use of PG-dispersion, or more specifically the lack of a convective probability density function (pdf) module, has been demonstrated to result in underprediction of peak concentrations.

In November 2005, EPA approved the AERMOD model, which relies on turbulence-based dispersion, as a regulatory Guideline Model[7]. The ISCST3 model and its PG dispersion coefficients are being phased out as an acceptable regulatory approach. However, EPA Region IV has indicated that the application of turbulence-based dispersion coefficients in CALPUFF needs to be further demonstrated before they are approved for BART application. They will consider accepting the use of turbulence dispersion coefficients on a case-by-case basis for sources that are close to Class I areas.

For regional haze light extinction calculations, use of a plume-simulating model such as CALPUFF is appropriate only when the plume is sufficiently diffuse that it is not visually discernible as a plume *per se*, but nevertheless its presence could alter the visibility through the background haze. The IWAQM Phase 2 report states that such conditions occur starting 30 to 50 km from a source. In this light, the BART guidance strongly recommends using CALPUFF for source-receptor distances greater than 50 km but also presents CALPUFF as an option that can be considered for shorter transport distances.

As discussed above, there do not appear to be any scientific reasons why CALPUFF cannot be used for even shorter transport distances than 30 km, though, as long as the scale of the plume is larger than the scale of the output grid so that the maximum concentrations and the width of the plume are adequately represented and so that the sub-grid details of plume structure can be ignored when estimating effects on light extinction. The standard 1-km output grid that has been established for Class I area analyses should serve down to source-receptor distances somewhat under 30 km; how much closer than 30 km will depend on the topography and meteorology of the area and should be evaluated on a case-by-case basis. For extremely short transport distances, depiction of the concentration distribution will require a grid that is finer than 1 km. (For reference, the width of a Gaussian plume, $2\sigma_y$, is roughly 1 km after 10 km of travel distance, assuming Pasquill-Gifford dispersion rates under neutral conditions.)

As an additional consideration, if the plume width is small compared to the visual range, the atmospheric extinction along a typical sight path of tens of kilometers through the plume will be inhomogeneous and the simple CALPOST point estimate of regional light extinction at a receptor point will not be correct. However, the effect of averaging light extinction estimates for 24 hours, during which the plume location shifts over various receptor points, is likely to mitigate this problem to some degree and suggests that using CALPUFF at distances under 30 km will often be appropriate. For the narrow plumes that result from short transport distances, though, the modeled peak 24-hr average extinction at a receptor will tend to overstate the effect of the source on regional haze.

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[7] *Revision to the Guideline on Air Quality Models: Adoption of a Preferred General Purpose (Flat and Complex Terrain) Dispersion Model and Other Revisions; Final Rule.* 70 FR 68218-68261. 9 November 2005.

The U.S. EPA has suggested that the plume visibility model, PLUVUE-II, could be used in lieu of CALPUFF for simulating visibility effects at such short distances.[8] PLUVUE-II is a Gaussian model that simulates the dispersion, chemical conversion, and optical effects of emissions of particles, SO_2, and NO_x from a single source. Its outputs include the discoloration of the sky by the plume (so called "plume blight") and the effect of the plume on visibility along user-selected sight paths that pass through the plume. The impacts of the plume on visibility depend not only on the plume composition, but also on the sight path chosen and its direction relative to the axis of the plume and the location of the sun. It isn't clear how such sight-path dependent results could be compared to the 0.5 and 1.0 deciview thresholds in the BART guidance. Since CALPUFF is designed to be useful for short transport distances (with features such as the simulation of plume downwash caused by structures at the source), CALPUFF seems more appropriate than PLUVUE-II for evaluating source impact at short distances for BART assessment purposes.

3.2.2 Aerosol Constituents

Primary $PM_{2.5}$

Appendix A of the *Guideline on Air Quality Models* (40 CFR 51, Appendix W) states that CALPUFF can treat primary pollutants such as PM_{10}. In actuality, CALPUFF can simulate PM_{10} or $PM_{2.5}$ or some other size range, because the assumed size distribution of the particles is a user input. The smaller the particles, the more they disperse like an inert gas. In most cases, the dispersion of inert $PM_{2.5}$ particles will be only minutely different from that of an inert gas, but the behavior of larger particles will differ.

A particularly important contributor to PM concentrations is the rate of deposition to the surface. $PM_{2.5}$ particles, which have a mass median diameter around 0.5 µm, have an average net deposition velocity of about 1 cm/min (or about 14 m/day) and thus the deposition of fine particles is usually not significant except for ground-level emissions. On the other hand, coarse particles (those PM_{10} particles larger than $PM_{2.5}$) have an average deposition velocity of more than 1 m/min (or 1440 m/day), which is significant, even for emissions from elevated stacks.

CALPUFF includes parametric representations of particle and gas deposition in terms of atmospheric, deposition layer, and vegetation layer "resistances" and, for particles, the gravitational settling speed. Gravitational settling, which is of particular importance for the coarse fraction of PM_{10}, is accounted for in the calculation of the deposition velocity. Effects of inertial impaction (important for the upper part of the PM_{10} distribution) and Brownian motion (important for small, sub-micron particles) and wet scavenging are also addressed. The BART guidance recommends that fine particulate matter (less than 2.5 µm diameter), which has higher light extinction efficiency than coarse particulate matter (2.5-10 µm diameters), should be treated separately in the model. CALPUFF allows for user-specified size categories to be treated as

[8] However, for the reasons given in this paragraph, VISTAS does not recommend PLUVUE-II for BART application

separate species, which includes calculating size-specific dry deposition velocities for each size category.

A primary $PM_{2.5}$ emission from coal-fired electric generating units (EGUs) that is of relevance to visibility calculations is that of primary sulfate. Although primary sulfate emissions account for only a small fraction of the total sulfur emissions from such sources, it may be important to simulate their effect with CALPUFF, especially at shorter distances before significant formation of secondary sulfate conversion from SO_2 has taken place.

Sulfur Dioxide and Secondary Particulate Sulfate

The MESOPUFF-II chemistry algorithm used in CALPUFF[9] simulates the gas phase oxidation of sulfur dioxide to sulfate by a linear transformation rate that was developed using regression relationships derived from the analysis of chemical conversion rates produced by a complex photochemical box model (see Scire et al., 1984, for a description of the development of the chemical module). As in all empirically-derived models, the relationships are based on easily-computed or observed parameters that are used as surrogates for the factors that control SO_2 oxidation.

The surrogate factors included in the parameterized chemistry during the daytime hours include solar radiation intensity, ambient ozone concentration, and atmospheric stability class. For example, gas phase SO_2 oxidation is a function of OH radical concentrations. Ozone concentrations are correlated with OH radical concentrations during daytime hours, and their use in the daytime SO_2 conversion rate in CALPUFF is based on this correlation relationship. The philosophy is that OH radical measurements are not available and cannot easily be computed within a model like CALPUFF, but ozone is commonly measured throughout the country, so the use of the well-known surrogate variable (ozone) is more useful in the empirical relationship than factors that are unknown or have a high degree of uncertainty. The same logic applies to the other variables in the relationship. They are surrogates for factors that the regression analysis has shown to be important in SO_2 oxidation rates. At night, the SO_2 conversion is set to a constant low value (default is 0.2%/hr). Aqueous phase oxidation of SO_2 is represented by an additive term that varies with relative humidity and peaks at 3%/hr at 100% relative humidity. CALPUFF represents the chemical conversion as a linear process because it requires linear independence between puffs, although as explained below, non-linear behavior in nitrate formation can be modeled.

[9] CALPUFF offers two options for parameterizing chemical transformations: the 5 species (SO_2, $SO_4^{=}$, NO_x, HNO_3, and NO_3^-) MESOPUFF-II system and the 6 species RIVAD system (which treats NO and NO_2 separately). IWAQM recommends using the MESOPUFF-II system with CALPUFF. The RIVAD system is believed to be more appropriate for clean environments, however, and therefore was used in the Southwest Wyoming Regional CALPUFF Air Quality Modeling Study in 2001. For the VISTAS region, the IWAQM- and FLM-recommended MESOPUFF-II chemistry is most appropriate.

The IWAQM Phase 2 report concludes that this chemistry algorithm is adequate for representing the gas phase sulfate formation but that it does not adequately account for the aqueous phase oxidation of SO_2. Actual aqueous phase oxidation in clouds or fog can proceed at rates much greater than 3% per hour, leading IWAQM to suggest that sulfate might be underestimated in such situations. However, aqueous phase oxidation depends on liquid water content, not relative humidity. In reality, liquid water does not exist in the atmosphere at relative humidity much below 100%, while the CALPUFF aqueous reaction term produces sulfate at lower relative humidity. This can lead CALPUFF to overestimate sulfate concentrations when the humidity is high but the cloud water that enables aqueous conversion is not present. Therefore, the direction of the bias in the aqueous chemistry simulation of sulfate formation can vary.

Other potential sources of error in the sulfate formation mechanism of CALPUFF include (1) overestimation of sulfate formation when NO_x concentrations in the plume are high and in actuality they deplete the local availability of ozone and hydrogen peroxide for oxidizing the SO_2; and (2) lack of direct consideration of the effect of temperature on the conversion rates, which may cause the model to overstate sulfate formation on cold days (below 10C or 50°F) (Morris et al., 2003). However, in CALPUFF, the effects of temperature are, to some degree, compensated for indirectly by the use of the solar radiation surrogate variable in the empirical conversion equations.

Whether these potential errors are important will depend on the setting. For example, Figure 3-2 shows a comparison of predicted and observed 24-hour sulfate concentrations, due to a large number of SO_2 sources, at the Pinedale IMPROVE site in Wyoming for the 1995 period (Scire et al., 2001). Overall, in this case there was very little bias in the sulfate predictions. Whether CALPUFF predictions would compare as well with measurements in the Southeast remains to be seen.

CALPUFF does not identify the chemical form of the sulfate compound that results from its reactions, which will generally be some form of ammoniated sulfate whose degree of neutralization will depend on the availability of ammonia in the atmosphere. This consideration, which has been found to be relevant for calculating light extinction in the VISTAS region, is not addressed by CALPUFF or CALPOST.

In most applications, the ozone concentrations required for the sulfate formation calculations are derived from ambient measurements, although concentrations simulated by regional models can be used.

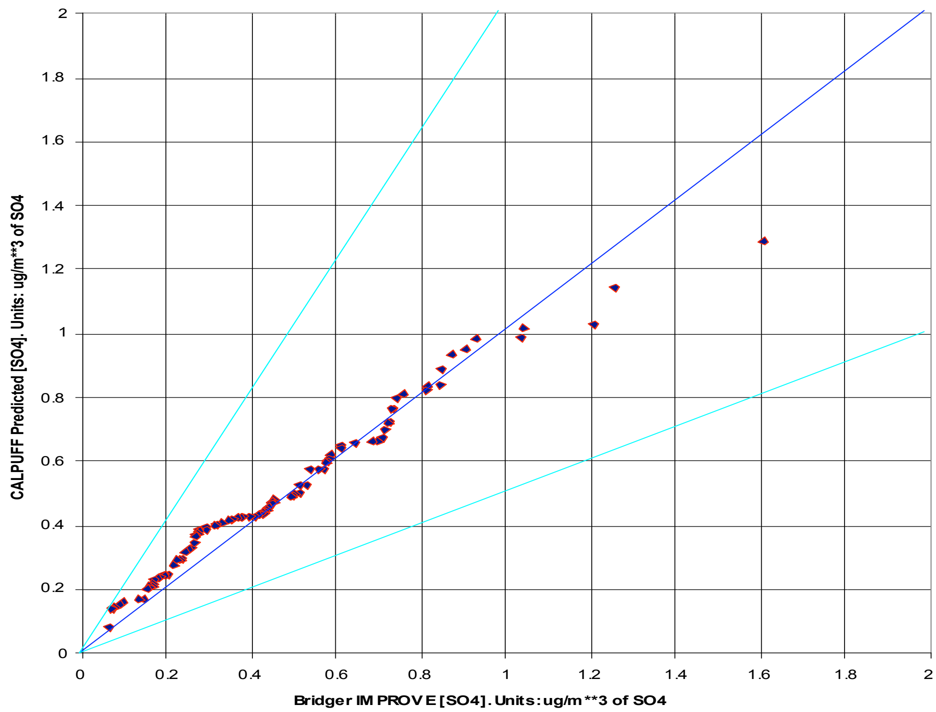

Figure 3-2. Observed vs. CALPUFF-predicted 24-hour sulfate concentrations at the IMPROVE monitoring site in Pinedale, Wyoming for 1995.

NO_x and Secondary Ammonium Nitrate

The MESOPUFF-II chemistry algorithm used in CALPUFF simulates the oxidation of NO_x to nitric acid and organic nitrates (both gases) by transformation rates that depend on NO_x concentration, ambient ozone concentration, and atmospheric stability class during the day. The conversion rate at night is set at to a constant value (default is 2.0 %/hr). The temperature- and humidity-dependent equilibrium between nitric acid gas and ammonium nitrate particles is taken into account when estimating the ammonium nitrate particle concentration, an equilibrium that depends on the ambient concentration of ammonia. The user supplies the value of the ambient concentration of ammonia. CALPUFF assumes that the sulfate reacts preferentially with that ammonia to form ammonium sulfate and the left over ammonia is available to form ammonium nitrate.

The IWAQM Phase 2 report considers that this mechanism is adequate for representing nitrate chemistry. Potential situations where this assumption may not be correct, however, include (1) plumes with high concentrations of NO_x that deplete the ambient ozone and thus limit the transformation of NO_x to nitric acid in the plume; and (2) when ambient temperature is below 10 C, and thus the transformation rate is much slower and the nitrate concentration may be lower than that simulated by CALPUFF (Morris et al., 2003). In both cases, CALPUFF may overestimate the amount of nitrate that is produced. In particular, the impact of ammonium nitrate concentrations on visibility at Class I areas in the VISTAS region is greatest in the winter, when temperatures are lowest, the nitrate concentrations are the greatest, and the sulfate concentrations tend to be the least. CALPUFF may overstate the impacts of NO_x emissions at those times, especially in the colder northern states**.** This potential overestimate of nitrate was not evident, however, in an evaluation of CALPUFF-modeled nitrate against actual observational data in the Wyoming study, as shown in Figure 3-3a (Scire et al., 2001),

Another factor in the calculation of nitrate is that CALPUFF makes the full amount of the background concentration of ammonia available to each puff, and that amount is scavenged by the sulfate in the puff. If puffs overlap, then that approach could overstate the amount of ammonium nitrate that is formed in total if, in reality, the combined scavenging by the overlapping puffs at a location would deplete the available ammonia enough that the combined nitrate formation was limited by the availability of ammonia. This effect of such ammonia limiting can be large in summer; for a source 75 km west of Mammoth Cave National Park, one modeling analysis found the maximum light extinction impact of the source to be 7.4% (roughly 0.74 deciviews) at the park when CALPUFF was used without consideration of ammonia limiting and about 30% less, between 5.5 and 5.8% (roughly 0.55 to 0.58 dv), when the effect of ammonia limiting was considered (Escoffier-Czaja and Scire, 2002).

To address the issue, since 1999 (i.e., after the IWAQM Phase 2 report) the CALPUFF system has included the optional POSTUTIL postprocessing program, which repartitions the ammonia and nitric acid concentrations estimated by CALPUFF to reflect potential ammonia-limiting effects on the development of nitrate**.** This allows non-linearity associated with ammonia limiting effects to be included in the CALPUFF model estimates. POSTUTIL computes the total sulfate concentrations from all sources (modeled sources plus inflow boundary conditions) and estimates the amount of ammonia available for total nitrate formation after the preferential scavenging of ammonia by sulfate. That is, as new sulfate, nitrate or ammonia from the source of interest is added to an existing mix of pollutants, POSTUTIL will estimate both the nitrate formed from the new source and the change in background nitrate as a result of the incremental depletion of ammonia (due to the new sulfate and nitrate) or addition of ammonia (from a new source of ammonia).

Reliable estimates of the ambient concentrations of ammonia, especially with the temporal and spatial resolution that would be optimal for use with CALPUFF, are needed to take full advantage of the increased accuracy provided by POSTUTIL. The processor requires estimated concentrations of ammonia throughout the modeling domain and period. Such estimates can be inferred from CASTNet measurements, which are integrated over a week, from 24-hr SEARCH measurements, or from the output of a regional photochemical model such as CMAQ or CAMx. The CASTNet network is fairly sparse and the uncertainty in the ammonia measurements is large, so defining the ammonia concentration throughout the Southeast would require extensive interpolation or extrapolation from the measured values. The quality of the SEARCH measurements is much better, but there are only 8 sites and they do not cover the entire VISTAS domain. Modeled concentrations have the advantage of being resolved in space and time, but their accuracy should be evaluated by comparison with measurements wherever possible.

Benefit is obtained by considering seasonal trends of ammonia and using POSTUTIL to determine the diurnal variability in available ammonia due to the daily cycle of nitrate formation associated with temperature and relative humidity effects. For example, results of the Wyoming study (see Figure 3-3a) show that POSTUTIL adjustments produced daily average nitrate concentrations well within the factor of two lines and with very little mean bias. On the other hand, analysis of the same results with use of constant ammonia of 0.5 ppb or 1.0 ppb produced consistent overpredictions of nitrate by factors of 2-3 and 3-4, respectively, as shown in Figure 3-3b (Scire et al., 2003).

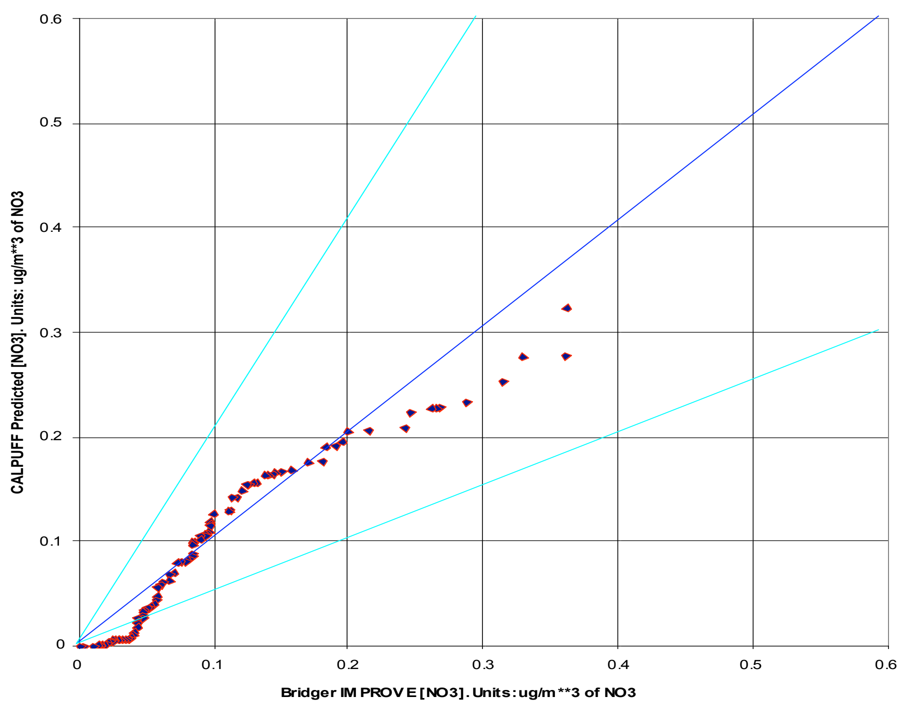

Figure 3-3a. Observed vs. CALPUFF-predicted 24-hour nitrate concentrations at the IMPROVE monitoring site in Pinedale, Wyoming for 1995 using the ammonia limiting method. (Scire et al., 2001)

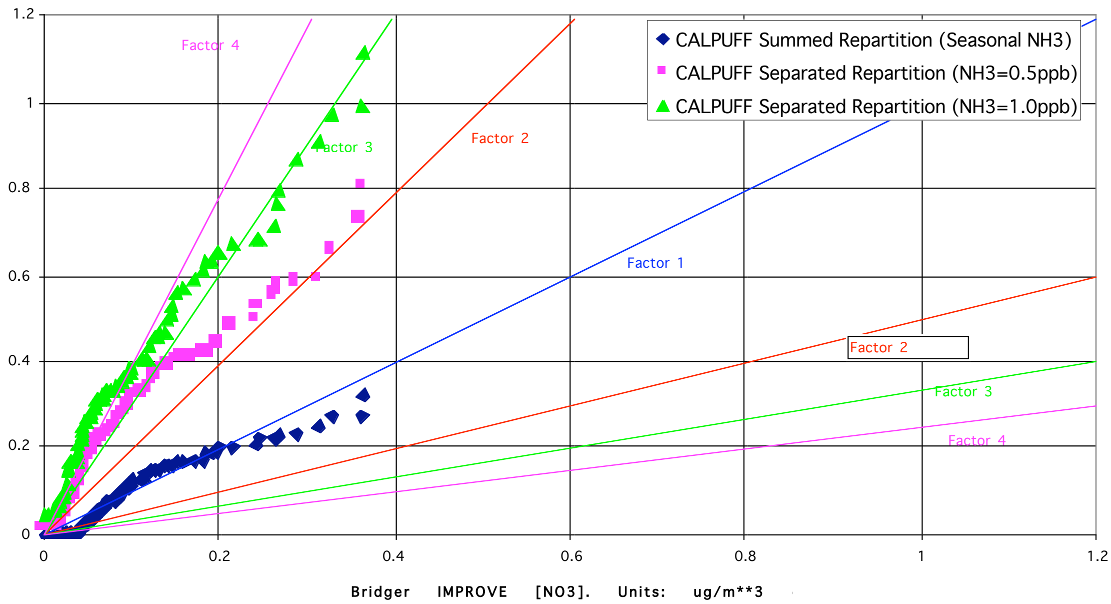

Figure 3-3b. Observed vs. CALPUFF-predicted 24-hour nitrate concentrations at the IMPROVE monitoring site in Pinedale, Wyoming for 1995 using the ammonia limiting method (blue), constant ammonia at 0.5 ppb (pink) and constant ammonia at 1.0 ppb (green). (Scire et al., 2003)

Secondary Organic Aerosol

Ongoing research studies at several Class I areas throughout the country (Fallon and Bench, 2004) and at SEARCH sites in the Southeast (Edgerton et al., 2004) are finding that, typically, 90 to 95% of the rural organic carbon fine particle concentration consists of modern carbon (e.g., that from the burning of vegetation and deriving from VOC emissions from vegetation) and only 5 to 10% is attributable to man's burning of fossil fuels. In addition, a field study at Great Smoky Mountains National Park in August 2002 (Tanner, et al., 2005) found that an average of 83% of the fine carbon was modern carbon

According to IMPROVE measurements, organics account for roughly 10% of the particle-caused light extinction in Class I areas in the Southeast. We can thus conclude that, in general, secondary organic carbon particles derived from anthropogenic fossil fuel burning emissions are unlikely to have a large impact (around 1%) on current visibility. (Man-caused burning of vegetation can have significant localized, short-term impacts, however.)

Current organic fine particle concentrations in the Southeast are typically within a factor of 2 of the 1.4 $\mu g/m^3$ concentration assumed for natural conditions by the EPA, which means that current fossil fuel burning would contribute less than 2% to visibility in an atmosphere that represents natural conditions. Thus, it is unlikely that VOC and organic particle contributions from BART sources will cause a large impact to visibility at Class I areas, but a 5% (0.5 dv) localized impact from a particularly large VOC source cannot be dismissed out of hand.

CALPUFF has only rudimentary capabilities for addressing formation of visibility-impairing organic particles from some forms of volatile organic carbon (VOC). The capabilities that do exist include the following.

First, PM_{10} emissions (such as from power plants) are often divided into filterable and condensable components, with the condensable mass being 100-200% of the filterable mass. For purposes of visibility analyses with CALPUFF, a fraction of the condensable part is typically treated as organic particles, i.e., it is assumed that a fraction of the condensable components in the PM_{10} emissions condense into organic $PM_{2.5}$ particles. The size of this organic fraction varies with process and process equipment, and can range from 20 to 100% of the condensable mass. These fine organic particles can be readily modeled by CALPUFF. (The remaining condensable material may be sulfuric, hydrochloric, or hydrofluoric acid.)

Second, a module that treats the formation of secondary organic particles from organic emissions was recently developed and is now part of the CALPUFF system. (Scire et al., 2001). This simplified secondary organic aerosol (SOA) module is a linear, parameterized representation that is currently considered best suited for biogenic organics. It relies on the conventional wisdom that only hydrocarbons with more than six carbon atoms can form significant SOA (Grosjean and Seinfeld, 1989). For example, according to this rule, isoprene (C_5H_8) does not make SOA but terpenes do, making pine trees more important biogenic contributors to SOA than oak trees.[10]

Limited evaluation of the performance of CALPUFF at simulating SOA with its biogenic SOA module at one IMPROVE site in a regional modeling study in Wyoming found that 95% of 101 estimated 24-hr SOA concentrations were within 2% of the measured values (Scire et al., 2001). This performance seems promising, although the developers view the SOA module as needing more testing and evaluation.

Thus, CALPUFF includes approaches for dealing with condensable VOC emissions that are characterized as condensable PM_{10} and with biogenic VOCs, although the soundness of concentration estimates by these approaches when modeling a plume from a single source is largely untested.[11] The CALPUFF simulation of VOC emissions from sources whose VOC emissions are predominantly anthropogenic is problematic, however. Perhaps the approach used for the simplified biogenic SOA module may be extended to anthropogenic VOCs when speciated VOC emissions information is available. If only those VOCs with more than six carbon atoms are presumed to be of importance, this eliminates many anthropogenic sources of VOC emissions. For example, the fugitive emissions of butane and ethane during petroleum processing

[10] Recent research suggests that isoprene may be a SOA precursor, however.

[11] Note that neither of these VOC-related simulation approaches is described in the current (Version 5) CALPUFF User's Guide dated January 2001. See the Wyoming report referenced above for a description of this module.

are not important, while aromatic emissions (such as of toluene and xylene) are considered by the SOA module's mechanism. Development, testing, and evaluation would be needed before one could rely on such a module for estimating SOA from anthropogenic SOA emissions, though.

Therefore, to demonstrate the visibility impacts of VOC emissions from BART-eligible sources, means other than CALPUFF will be needed. A technical approach using a regional photochemical model to evaluate visibility impacts of VOC emissions is presented in Section 4.1.3. CALPUFF can be used to estimate the contribution from the primary condensable fraction of PM_{10} emissions, though.

3.2.3 Regional Haze

Calculation of the impact of the simulated plume particulate matter component concentrations on light extinction is carried out in the CALPOST postprocessor. The formula used is the usual IMPROVE/EPA formula, which is applied to determine a change in light extinction due to changes in component concentrations. Using the notation of CALPOST, the formula is the following:

$$b_{ext} = 3\,f(RH)\,[(NH_4)_2SO_4] + 3\,f(RH)\,[NH_4NO_3] + 4[OC] + 1[Soil] + \\ + 0.6[Coarse\ Mass] + 10[EC] + b_{Ray} \qquad (3\text{-}1)$$

The concentrations, in square brackets, are in $\mu g/m^3$ and b_{ext} is in units of Mm^{-1}. The Rayleigh scattering term (b_{Ray}) has a default value of 10 Mm^{-1}, as recommended in EPA guidance for tracking reasonable progress (EPA, 2003a).

There are a few important differences in detail and in notation between the CALPOST formula for estimating light extinction (i.e., Equation 3-1) and that of IMPROVE and EPA. First, the *OC* in the formula above represents organic carbonaceous matter (OMC in IMPROVE's notation), which is 1.4 times the *OC* (i.e., organic carbon alone) in the IMPROVE formula. The *EC* above is synonymous with *LAC* in the IMPROVE formula. CALPOST now offers the option of using the old IMPROVE *f(RH)* curve, whose values are documented in the December 2000 FLAG report, or the *f(RH)* now used by IMPROVE and EPA (as documented in EPA's regional haze guidance documents). Also, CALPOST sets the maximum *RH* at 98% by default (although the user can change it), while the EPA's guidance now caps it at 95%.

The haze index (HI) is calculated from the extinction coefficient via the following formula:

$$HI = 10\ln(b_{ext}/10) \qquad (3\text{-}2)$$

where *HI* is in units of deciviews (dv) and b_{ext} is in Mm^{-1}. The impact of a source is determined by comparing HI for estimated natural background conditions with the impact of the source and without the impact of the source.

CALPOST Methods

CALPOST uses Equation 3-1 to calculate the extinction increment due to the source of interest and provides various methods for estimating the background extinction against which the increment is compared in terms of percent or deciviews.

For background extinction, the CALPOST processor contains seven techniques for computing the change in light extinction due to a source or group of sources (called Methods 1-7). These are usually reported as 24-hour average values, consistent with EPA and FLM guidance. In addition, there are two techniques for computing the 24-hour average change in extinction (i.e., as the ratio of 24-hour average extinctions, or as the average of 24-hour ratios). A brief summary of the techniques is provided below. Method 2 is the current default, recommended by both IWAQM (EPA, 1998) and FLAG (2000) for refined analyses. Method 6 is recommended by EPA's BART guidance (70 FR 39162).

Methods 4 and 5 use optically measured hourly background extinctions, which represent current actual levels of extinction and thus are not consistent with the "natural conditions" the BART proposal says should be used as a baseline. Methods 1 through 3 and 6 and 7 allow for user inputs of estimated (e.g., natural conditions) background extinction or component concentrations, and thus are consistent with the BART proposal.

Method 1 allows the user to specify a single value of a "dry" background extinction coefficient for each receptor, specify that a certain fraction of that coefficient is due to hygroscopic species, and use relative humidity measurements to vary the extinction hourly via a 1993 IWAQM *f(RH)* curve or, optionally, the EPA regional haze f(RH) curve (EPA, 2003b). The *RH* is capped at 98% or a user-selected value (95% for the EPA curve). The same *f(RH)* is applied to both the modeled sulfate and nitrate.

For an example of the use of Method 1, one could use the dry particle extinction coefficient of 9.09 Mm^{-1} that results from EPA's default natural conditions concentrations, together with an assumption that for natural conditions, say, 0.9 Mm^{-1} (or 10%) of this amount results from hygroscopic ammonium sulfate and ammonium nitrate, and then apply *f(RH)* to this 10%.

In Method 2, user-specified, speciated monthly concentration values are used to describe the background. When applied to natural conditions, for which EPA's default natural conditions concentrations are annual averages, the same component concentrations would have to be used throughout the year (unless potential refinements to those default values resulted in concentrations that vary during the year). Hourly background extinction is then calculated using these concentrations and hourly, site-specific *f(RH)* from a 1993 IWAQM curve (a different one than that in Method 1) or, optionally, the EPA regional haze f(RH) curve.[12] Again the *RH* is capped at either 98% (default) or a user-selected value (most commonly at 95%).

Method 3 is the same as Method 2, except that any hour in which the RH exceeds 98% (or the selected maximum) is dropped from the analysis. When 24-hr extinction is computed, no fewer than 6 valid hours are accepted at each receptor; otherwise the value for the day is tabulated as "missing".

Method 6 is similar to Method 2, except monthly f(RH) values (e.g., EPA's monthly climatologically representative values in EPA (2003a, b)) are used in place of hourly values for calculating both the extinction impact of the source emissions and the background conditions extinction. Hourly source impacts, with the effect on extinction due to sulfates and nitrates calculated using the monthly-average relative humidity in f(RH), are compared against the monthly default natural background concentrations. Thus the monthly-averaged relative humidity is applied to the hygroscopic components (i.e., sulfate and nitrate) of both the source impact and the background extinction with Method 6**.**

Method 7 is a new variant of Method 2 that was developed as a result of a ruling by the Assistant Secretary of the Interior for Fish and Wildlife and Parks, in response to a New Source Review case in Montana, that "natural conditions" should reflect the visibility impairment caused by significant meteorological events such as fog, precipitation, or naturally occurring haze (DOI, 2003).[13] Under Method 7, during hours when visibility is obscured by meteorological conditions, the actual measured visibility is used to represent natural conditions instead of the value that is calculated from EPA's default natural conditions concentrations under Method 2. A recent modification developed in response to FLM comments on Method 7, in which the daily average natural extinction is calculated somewhat differently, is called Method 7', i.e., "7 prime".

Refined Estimates of Extinction and Natural Background Visibility

Separate from the BART discussions, IMPROVE, EPA, and the Regional Planning Organizations are evaluating whether refinements are warranted to the methods recommended in EPA's guidance to calculate default estimates of natural background visibility. In particular, IMPROVE has recently approved an alternative to the formula (Eq. 3-1) it uses to estimate extinction from particle concentration measurements (Pitchford et al., 2005).

Refinements in the revised IMPROVE formula include the following:

- Adding a sea salt term, including a growth factor due to relative humidity

[12] Note that the hourly-varying natural background extinction in this method is not consistent with that prescribed by the EPA's natural conditions guidance (EPA, 2003b), for which a "climatologically-representative" f(RH) that only varies monthly is to be used. Method 6 uses these monthly average humidity values.

[13] The Secretary's guidance applies only to Federal Land Managers. EPA's position on this interpretation of natural conditions is unknown.

- Increasing the factor used to calculate the mass of particulate organic matter (OC in Eq. 3-1) from organic carbon measurements

- Modifying the relative humidity growth formula, f(RH), for sulfates and nitrates

- Revising the extinction efficiencies (the numerical constants in Equation 3-1) for sulfates, nitrates, and organic carbon so that they vary with concentration

- Adding a site-specific Rayleigh scattering term to the formula. Values will be calculated by IMPROVE for all Class I areas.

For the purposes of calculating current, future, and natural background visibility at VISTAS Class I areas as part of the reasonable progress analyses, VISTAS intends to present regional air quality modeling results using both the current EPA recommended assumptions and the newly revised aerosol extinction formula. If a BART-eligible source chooses to consider its projected impacts using the newly revised formula as well as the current formula, then modifications would need to be made to CALPOST to carry out calculations with the new algorithm.

4. VISTAS' COMMON MODELING PROTOCOL

4.1 Overview of Common Modeling Approach

In this section, guidance is provided on the use of the CALPUFF modeling system for two purposes:

1) Evaluating whether a BART-eligible source is exempt from BART controls because it is not reasonably expected to cause or contribute to impairment of visibility in Class I areas, and

2) Quantifying the visibility benefits of BART control options.

For purpose 1), States must determine whether a source emits any air pollutant (SO_2, NO_x, PM, and in certain cases VOC and NH_3) that "may reasonably be anticipated to cause or contribute to any impairment of visibility" in a Class I area. The States have 3 options to accomplish this:

A) Conclude that all BART-eligible sources in State are subject to BART.

B) Demonstrate that all BART-eligible sources in the State together do not cause or contribute to any visibility impairment

C) Determine if the impact from each individual BART-eligible source is greater than a threshold value.

VISTAS States intend to follow Option C (determine if the visibility impact from individual sources exceeds a contribution threshold) for SO_2 and NO_x emissions. The methods for Option C are described in Section 4.1.1. In early 2006, VISTAS pursued Option B (demonstrate that all BART eligible sources in a State do not impact visibility) for VOC, NH_3 and PM emissions. The approach and results for Option B are described in Section 4.1.3. As a result of this exercise, the VISTAS States have determined that the Option C exemption analyses should also include PM emissions and, for sources with large NH_3 emissions, NH_3. The States determined that anthropogenic VOC emissions do not cause or contribute to visibility impairment at VISTAS Class I areas and that VOC emissions do not need to be considered in BART analyses.

4.1.1 BART Exemption Analysis

As illustrated in Figure 4-1, three steps will evaluate whether a BART-eligible source of SO_2, NO_x, or PM is subject to BART:

1) VISTAS plans to use Q/d as a presumptive indicator that a source is subject to BART. If Q/d for SO_2 > 10 for 2002 actual emissions, then the State presumes that the source is subject to BART. If the source agrees with this presumption, then no exemption modeling is required and the source can proceed to the BART determination using CALPUFF to evaluate impacts of control options and can perform the engineering analyses. If a source disagrees, the source

may perform fine grid modeling as described in Section 4.4 to determine if its impact is < 0.5 dv.

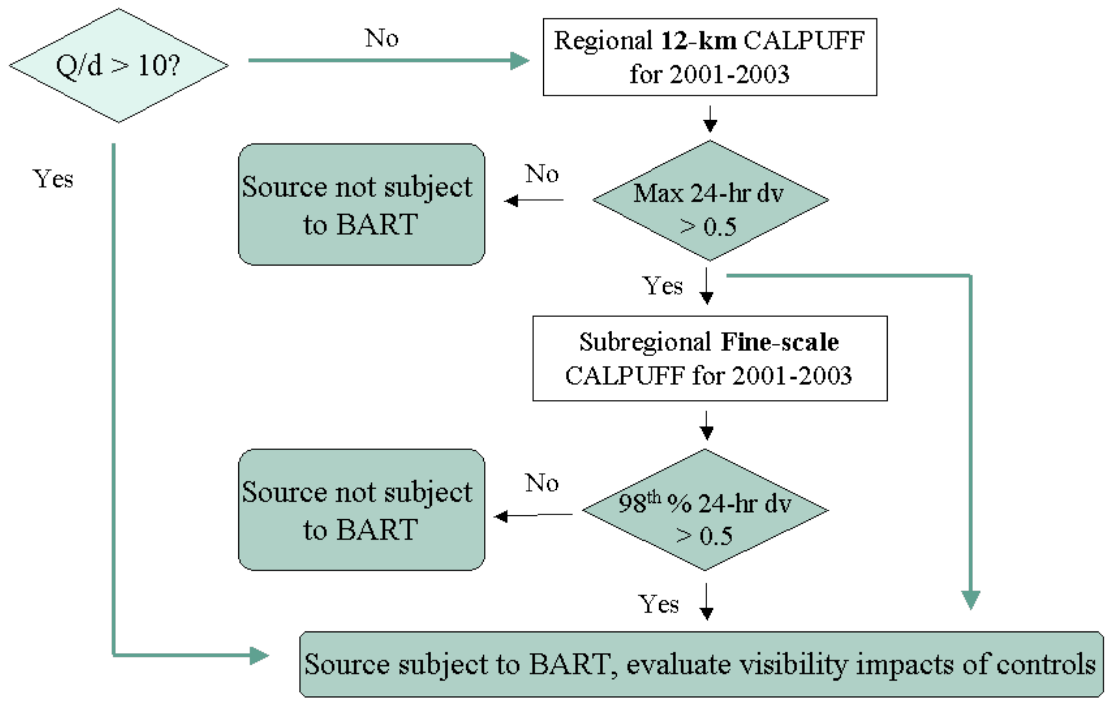

Figure 4-1. Flow chart showing the components of the VISTAS common modeling protocol. Assessment should be made for each Class I Area. (If a source agrees to install the most stringent controls then the modeling steps indicated above and engineering analyses and visibility impact modeling would not be required.)

2) An optional initial modeling assessment using the CALPUFF model with the coarse scale 12-km regional VISTAS domain can be used to answer questions whether (a) a particular source may be exempted from further BART analyses and (b) if finer grid CALPUFF analysis were to be undertaken, which Class I areas should be included. Assumptions for the initial modeling assessment are conservative so that a source that contributes to visibility impairment is not exempted in error. If a source is shown not to contribute to visibility impairment using the initial modeling assessment, the source would not be subject to BART and would be exempted from further BART analyses. If a source is shown to contribute to visibility impairment using the initial modeling assessment, the source has the option to undertake finer grid CALPUFF modeling to evaluate further whether it is subject to BART.

3) A finer grid CALPUFF modeling analysis using a subregional CALMET domain will be the definitive test as to whether a source is subject to BART.

For large sources that will clearly exceed the initial screening thresholds, this step can be skipped and the analysis may proceed directly to the finer grid modeling analysis, which is described in Section 4.4.

4.1.2 BART Control Evaluation

For sources that are determined to be subject to BART controls, part of the BART review process involves evaluating the visibility benefits of different BART control measures. These benefits will be determined by making additional CALPUFF simulations using the same CALMET and CALPUFF configuration as those used in the finer grid analysis of Step 2. The only exception is that the source and emissions data used in the CALPUFF control evaluation simulations will reflect the BART control measures being evaluated. Using the same model configuration will produce an "apples-to-apples" comparison, where differences in impacts are due to the effectiveness of the controls rather than model configuration differences. For example, a control scenario evaluation that uses more conservative assumptions than the base case simulation may produce results showing no or little improvement in visibility impacts. That control scenario run with the same model configuration as the base case may show significant visibility improvement. Therefore, in order to not obscure the response to predicted visibility improvements by differences in the modeling approach, the same model configuration should be used in the BART control evaluation simulation as in the base case simulation.

The base case to which the effectiveness of BART controls is to be compared is the "current emissions" scenario for which the finer grid Step 2 modeling was performed. The postprocessing steps and procedures are the same as in the BART eligibility simulation. Side-by-side comparison of the visibility impacts will be tabulated to quantify the effectiveness of each control scenario relative to the base case.

The modeling evaluation is a unit-by-unit evaluation and can be conducted on a pollutant specific basis. Modeling results are used with the other four statutory factors mentioned in Section 2.1 to decide which control technology, if any, is appropriate. Finally, if a source decides to use the most stringent control technology available, the BART control analysis, including modeling, is not necessary.

4.1.3 VISTAS' Treatment of VOC, NH_3, and PM

Volatile Organic Compounds

CALPUFF is currently not recommended for addressing visibility impacts from VOC because its capability to simulate secondary organic aerosol formation from VOC emissions is not adequately tested, especially for anthropogenic emissions. (Separately, condensable organic carbon can be calculated from PM_{10}.)

VISTAS has performed a weight of evidence analysis to demonstrate, using the CMAQ regional air quality model, that the combined VOC emissions from all point sources (BART-eligible and non-BART) in each State do not contribute to visibility impairment. Emissions sensitivity simulations run for VISTAS by Georgia Institute of Technology using VISTAS' 12 x 12 km grid and CMAQ v 4.3 for episodes in July 2001 and January 2002 demonstrated very low to no response of organic carbon levels and light extinction at Class I areas to changing VOC emissions from all anthropogenic sources in the VISTAS 12-km modeling domain (eastern US). Georgia Tech repeated the sensitivity analyses using the VISTAS 12-km domain and CMAQ v 4.4 with a refined SOA module for summer (Jun 1-Jul 10) and winter (Nov 19-Dec 19) periods in 2002. VOC emissions from all anthropogenic point sources in every VISTAS State were reduced by 100% (i.e., eliminated). The maximum 24-hr impact of all VOC emissions from all point sources throughout the VISTAS domain was thus determined to be less than 0.5 dv (compared to annual average natural background) at every Class I area in the VISTAS domain and in adjacent States. It follows that the impact of any one BART-eligible source would be much less than 0.5 dv. Based on these analyses, the VISTAS States have concluded that VOC emissions from BART sources do not cause or contribute to visibility impairment and do not need to be included in BART analyses.

Ammonia

EPA has given states the option to address ammonia (NH_3) emissions from BART-eligible sources. VISTAS also contracted with Georgia Tech to calculate NH_3 emissions sensitivities using CMAQ v 4.4 with a refined SOA module and the same Jun-Jul and Nov-Dec periods in 2002 that were used for the VOC sensitivity evaluation. The NH_3 emissions from all point sources (BART-eligible and not-BART) in every State were reduced by 100% for these analyses. This sensitivity evaluation showed that the collective impact of all VISTAS region point NH_3 emissions is greater than 0.5 dv (compared to annual average natural background) at several Class I areas. When the NH_3 emissions were scaled to represent 100% reduction from only the BART-eligible sources in each State, then the maximum impact of those sources was under 0.5 dv at most, but not all Class I areas. The high values appear to result primarily from emissions from 13 large NH_3 sources. In the absence of those 13 facilities, the scaled NH_3 emissions peak impacts at Class I areas were 0.3 dv or less. Based on these analyses, the VISTAS States recommended that, except for these 13 facilities, NH_3 emissions not be included in BART modeling. States will provide instructions to those 13 sources as to how to evaluate contributions of their NH_3 emissions to visibility impairment. For documentation purposes, in summer 2006 VISTAS is repeating the NH_3 emissions sensitivity calculations, using CMAQ v4.5 with Base F emissions and reducing 100% of NH_3 emissions from only the BART-eligible sources in the VISTAS states.

Primary Particulate Matter

Primary particulate matter is considered a visibility impairing pollutant. However, the extent to which primary PM from BART-eligible sources contributes to impairment at Class I areas in the southeastern US is not clear. For EGUs, the EPA has determined that emissions reductions of SO_2 and NO_x under the CAIR rule meet the BART requirements, but these EGUs may still be subject to BART for primary PM. To determine the potential impacts of PM from EGU and non-EGU sources in the VISTAS states, two CMAQ sensitivity runs for the first and third quarters of 2002 were carried out by VISTAS' CMAQ modeling team of ENVIRON, UCR, and Alpine

Geophysics In one run, all primary PM from EGUs was removed while in the other run all primary PM from non-EGU sources was removed. All other CMAQ modeling components were held constant. At almost all Class I areas in the VISTAS region, primary PM emissions contribute to regional haze, with the collective impact of all EGU and non-EGU point primary PM emissions being greater than 0.5 dv compared to annual average natural background. In fact, the impacts of EGU PM emissions alone or of non-EGU PM emissions alone were each mostly greater than 0.5 dv. Although the impacts of BART sources alone would be smaller, the VISTAS States have concluded that all BART-eligible sources need to consider the impacts of their PM emissions.

4.2 Optional Source-Specific Modeling

In some circumstances, a source may want to apply techniques designed to evaluate the impacts in a more detailed way than the standard VISTAS common protocol. A source may propose source-specific modeling procedures to address special issues to the State for State review. For example, sources very close to Class I areas may be better treated by a finer grid resolution that the generic Step 2 "fine" grid resolution meteorological fields provided by VISTAS. In some situations, higher resolution MM5 or other prognostic meteorological datasets may be available than the standard 12-km or 36-km MM5 datasets provided by VISTAS. Because it is not possible to anticipate all of the situations where there would be a benefit to conducting more detailed source-specific analyses, the option to pursue this option is left as an open issue, to be resolved and justified based on specific factors relevant for the source in question.

A source-specific modeling protocol is required for each source. This document should describe the data sources and model configuration, and provide rationale for any changes in the model approach from the common protocol. This source-specific protocol must be provided for review and approval by the State. The State will share the protocol with EPA and the Federal Land Managers for their review. Discussion of approaches to source-specific modeling and an outline of the typical contents of the source-specific protocol are presented in Chapter 5. Discussions with the regulatory authorities should be conducted prior to development of a source-specific protocol to ensure all of the relevant issues are included in the protocol.

4.3 Initial Procedure for BART Exemption

4.3.1 Overview of Initial Approach

The first step in the common protocol, the initial assessment in Figure 4-1, is a simple procedure to evaluate whether a source can be exempted from BART controls using a consistent set of meteorological and dispersion options. A pre-computed set of meteorological files and a pre-defined CALPUFF input option configuration, based on guidance in the final BART rule (70 FR 39104-39172) and other EPA and FLAG model guidance, will allow relatively simple initial simulations. The regional initial domain is designed to allow any Class I areas within the VISTAS area to be evaluated with a single meteorological database and consistent CALPUFF modeling options. The second important question that this first screening step will answer is, if initial modeling indicates a source may impact visibility significantly, what Class I areas should be included in a finer grid analysis? Due to the multitude of factors affecting the contribution of a source to visibility in a Class I area, simple screens or rules of thumb alone (such as that the closest Class I area will produce the controlling visibility impacts) are not likely to be universally reliable.

4.3.2 Discussion of 12-km Initial Exemption Modeling

Meteorological Fields

A regional initial domain and a set of pre-computed regional CALMET meteorological files will be prepared for VISTAS, to allow any Class I areas within the VISTAS area to be evaluated with a consistent meteorological database and consistent CALPUFF modeling options.

The following three years of MM5 meteorological data have been assembled by VISTAS for use in the regional CALPUFF modeling effort:

- 2001 MM5 dataset at 12 km and 36 km grid (developed for EPA)
- 2002 MM5 dataset at 12 km and 36 km grid (developed by VISTAS)
- 2003 MM5 dataset at 36 km grid (developed by the Midwest Regional Planning Organization).

These data sets have been provided to Earth Tech by VISTAS, and from them Earth Tech has produced annual CALMET meteorological files at 12-km grid resolution for the domain shown in Figure 4-2. The CALMET modeling output files in the form of CALPUFF-ready three-dimensional meteorological files will be available on external hard drives to the States and other parties.

The initial procedure to determine if a BART-eligible source is subject to BART uses the pre-computed CALMET meteorological fields for the years 2001-2003 on the 12-km CALMET domain in Figure 4-2 and simulates with CALPUFF any BART-eligible source to be screened. The CALMET simulations will be developed using the highest resolution MM5 data available for each year (i.e., 36-km MM5 data for 2003, 12-km MM5 data for 2001 and 2002).

The development of the regional CALMET meteorological fields from MM5 data will be conducted in No-Observations ("No-Obs") mode. The MM5 data already reflect assimilation of observational data and are likely to adequately characterize regional wind patterns that are consistent with the 12-km grid scale. Blending of MM5 data with local observations (which are mainly at the surface) could lead to wind structures that may not be realistic under some conditions and may result in poorer characterization of the regional winds. Thus, the effort required to prepare observational data sets for CALMET for the large regional domain involves considerable effort that may not provide corresponding improvement of the wind field.

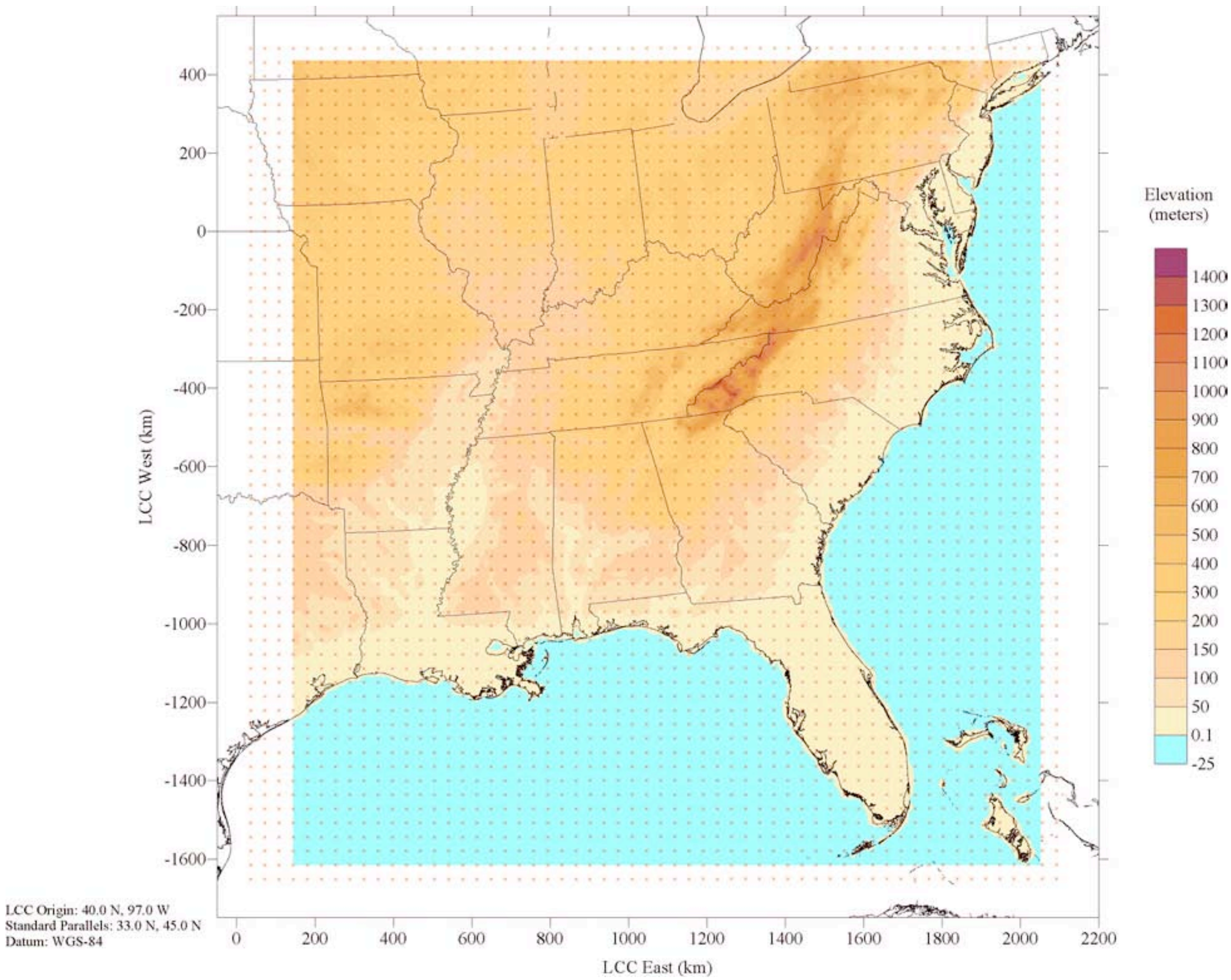

Figure 4-2. VISTAS Regional 12-km Resolution CALMET Modeling Domain (color area with terrain contours). The locations of the 36-km resolution MM5 grid points are shown on the plot.

For 2003, the 36-km MM5 data will be used as CALMET's initial guess field and then the CALMET diagnostic terrain adjustments (see Section 3.1.1) will be applied to reflect terrain on the scale of the CALMET grid (i.e., 12-km). When the 12-km MM5 (2001 and 2002) data are used, the diagnostic CALMET terrain adjustments will be turned off since the grid resolution of the MM5 data is the same as the CALMET grid and the terrain adjustments on the 12-km grid scale will already be reflected in the MM5 dataset. In this case, the MM5 winds will be interpolated by CALMET to the CALMET layers and CALMET's boundary layer modules will compute mixing heights, turbulence parameters and other meteorological parameters that are required by CALPUFF.

Impact Threshold

The final BART guidance recommends that the threshold value to define whether a source "contributes" to visibility impairment is 0.5 dv change from natural conditions[14] (although States may set a lower threshold). The 98th percentile (8th highest annual) 24-hr average predicted impact at the Class I area, as calculated using CALPOST Method 6 (monthly average relative humidity values), is to be compared to this contribution threshold value. For this comparison, the predicted impact at the Class I area on any day is taken to be the highest 24-hr average impact at any receptor in the Class I area on that day. (Note that the receptor where the highest impact occurs can change from day to day.) According to clarification of the BART guidance received from EPA, for a three-year simulation the modeling values to be compared with the threshold are the greatest of the three annual 8th highest values or the 22nd highest value over all three years combined, whichever is greater.

For the purposes of the initial analysis, however, the *highest value* over the three-year period (not the 98th percentile value) is to be compared to the contribution threshold. This ensures a significant measure of conservatism in the initial approach. VISTAS will evaluate the initial CALPUFF results to determine if using the single highest value provides too conservative a screen for exemption purposes. If so, VISTAS may increase the number of exceedances of the contribution threshold that would be allowed and still qualify to exempt a source.

4.3.3 Model Configuration and Settings for Initial Analysis

VISTAS will use CALPUFF Version 5.754 and CALMET Version 5.7. These versions contain enhancements funded by the Minerals Management Service (MMS) and VISTAS. They were developed by Earth Tech, Inc. and they are maintained on the CALPUFF website (www.src.com) for public access. This version includes CALMET, CALPUFF, CALPOST, CALSUM, and POSTUTIL as well as CALVIEW.

The initial analysis uses a CALPUFF computational domain that includes all Class I areas within 300 km of a source. These Class I areas are specified in the CALPUFF control file for analysis. States could decide to require a different value for the maximum distance threshold for the CALPUFF domain, depending on the locations of the Class I areas in their states and other factors such as meteorological conditions and the magnitudes of the emissions from BART-eligible sources. The regional CALMET domain will be unchanged by these adjustments.

Also, the initial approach is designed to significantly reduce the CALPUFF simulation time by restricting the CALPUFF computational domain size to include only areas where significant impacts are feasible rather than the entire regional domain. CALPUFF allows its computational domain to be specified as a subset of the CALMET meteorological domain by settings within the

[14] As described in Footnote 5 on page 6, States have the option of defining natural conditions as either the annual average default conditions or the average of the 20% best natural condition days.

CALPUFF input file. The advantage of selecting a smaller CALPUFF computational domain in the regional CALPUFF simulations is that CALPUFF run time is proportional to the number and residence time of the puffs on the domain (and other factors such as the number of receptors and the internal time step computed by the model). A CALPUFF domain covering an area 300 km from a source in all directions would involve only 50 x 50 12-km grid cells, which will require modest computational resources.

CALMET output files for the VISTAS regional domain shown in Figure 4-2 will be provided to VISTAS by Earth Tech. These files will be in CALPUFF-ready format, and as such, no CALMET user inputs will be required. An option in CALMET allows finer grid CALMET input files to be calculated from the 12-km CALMET files.

The basic characteristics of the CALMET, CALPUFF and CALPOST configurations for the initial analyses are listed below.

CALMET Modeling Configuration (12-km initial exemption modeling)

The CALMET model configuration for the regional CALMET simulations will be defined by Earth Tech in collaboration with the VISTAS States. The basic model configuration will follow the recommended IWAQM guidance (EPA, 1998; Pages A-1 through A-6), except as noted below.

The basic features of the modeling simulation are the following:

- Modeling period: 3 years (2001-2003)

- Meteorological inputs: MM5 data provide initial guess fields in CALMET

- CALMET grid resolution: 12-km (same Lambert Conformal coordinate system and grid cells as the 12-km 2001/2002 MM5 simulations)

- CALMET vertical layers: 10 layers. Cell face heights (meters): 0, 20, 40, 80, 160, 320, 640, 1200, 2000, 3000, 4000.

- CALMET mode: No-Observations mode including option to read overwater data directly from MM5.

- Diagnostic options: IWAQM default values, except as follows: diagnostic terrain blocking and slope flow algorithms used for 2003 simulations (using 36-km MM5 data), but no diagnostic terrain adjustments in 2001 and 2002 simulation (using 12-km MM5 data)

- CALMET options dealing with radius of influence parameters (R1, R2, RMAX1, RMAX2, RMAX3), BIAS, ICALM parameters are <u>not used</u> in No-Observations mode.

- TERRAD (terrain scale) is required for runs with diagnostic terrain adjustments (i.e., the 2003 simulations). Values of ~10-20 km will be tested, and an appropriate value determined.

- Land use defining water: JWAT1 = 55, JWAT2 = 55 (large bodies of water). This feature allows the temperature field over large bodies of water such as the Atlantic Ocean and the Great lakes to be properly characterized by buoy observations.

- Mixing height averaging parameter (MNMDAV) will be determined by Earth Tech for the regional simulations based on sensitivity tests. The purpose of the testing is to optimize the variable to allow spatial variability in the mixing height field, but without excessive noise.

- Geophysical data for regional runs: SRTM-GTOPO30 30-arcsec terrain data, Composite Theme Grid (CTG) USGS 200m land use dataset. References for these and other CALMET datasets can be found on the CALPUFF data page of the official CALPUFF site (www.src.com).

CALPUFF Modeling Configuration (Initial exemption modeling)

The CALPUFF model configuration for the regional CALPUFF initial simulations will follow the recommended IWAQM guidance (EPA, 1998; Pages B-1 through B-8), except as noted below:

- CALPUFF domain configured to include the source and all Class I areas within 300km of the source plus 50km buffer zone in each direction. CALPUFF is recommended for all source-receptor distances to be considered in the BART analyses.

- Chemical mechanism: MESOPUFF II module

- Species modeled: SO_2, SO_4, NO_x, HNO_3, NO_3 and particulate matter in size categories of <0.625 µm, 0.625-1.0 µm, 1.0-1.25 µm, 1.25-2.5 µm, 2.5-6.0 µm and 6-10 µm aerodynamic diameters. As noted below, the particulate matter emissions by size category will be combined into the appropriate species for the visibility analysis (i.e., elemental carbon (EC), fine PM or "soil" (< 2.5 µm in diameter), coarse PM (between 2.5-10 µm in diameter) and organics (called secondary organic aerosols (SOA) in the CALPOST postprocessor).

- Emission rates for modeling based on EPA BART guidance, i.e., maximum 24-hour actual emission rate with normal operations from the highest emitting day of the meteorological period modeled (excluding days where start-up, shutdown or malfunctions occurred sometime during the day.) Note that potential emissions are used to determine if a source is BART-eligible, but 24-hour average maximum emissions are used for modeling purposes (70 FR 39162). Pollutants considered include SO_2, H_2SO_4, NO_x and PM_{10}.

Condensable emissions are considered as primary fine particulate matter and allocated equally to the two submicrometer-particle size classes. If actual source emissions data are not available, the modeling should be based on permit limits. If source-specific size categories are not available, then AP-42 factors may be used for sources where AP-42 factors are available. For sources where AP-42 factors are not available, alternative approaches to speciation are given below.

Excluded from the modeling are pollutants with plant-wide emissions less than *de minimis* levels (40 tons per year for SO_2 and NO_x and 15 tons per year for PM_{10}). *De minimis* levels are plant wide for each visibility-impairing pollutant, so individual units may be modeled even if they have emissions below *de minimis* if the plant total is greater than *de minimis*.

- Particulate emissions speciation: Break down, as appropriate, filterable and condensable particulate matter into the following species categories: elemental carbon (soot), "soil" (fine PM < 2.5 µm diameter), coarse particulate matter (2.5-10 µm diameter) and organics. The process is illustrated in Figure 4-3. If source-specific speciated emissions factors are not available, AP-42 factors or speciation information developed by the National Park Service (http://www2.nature.nps.gov/air/permits/ect/index.cfm) can be used to estimate the PM speciation for many source sectors.

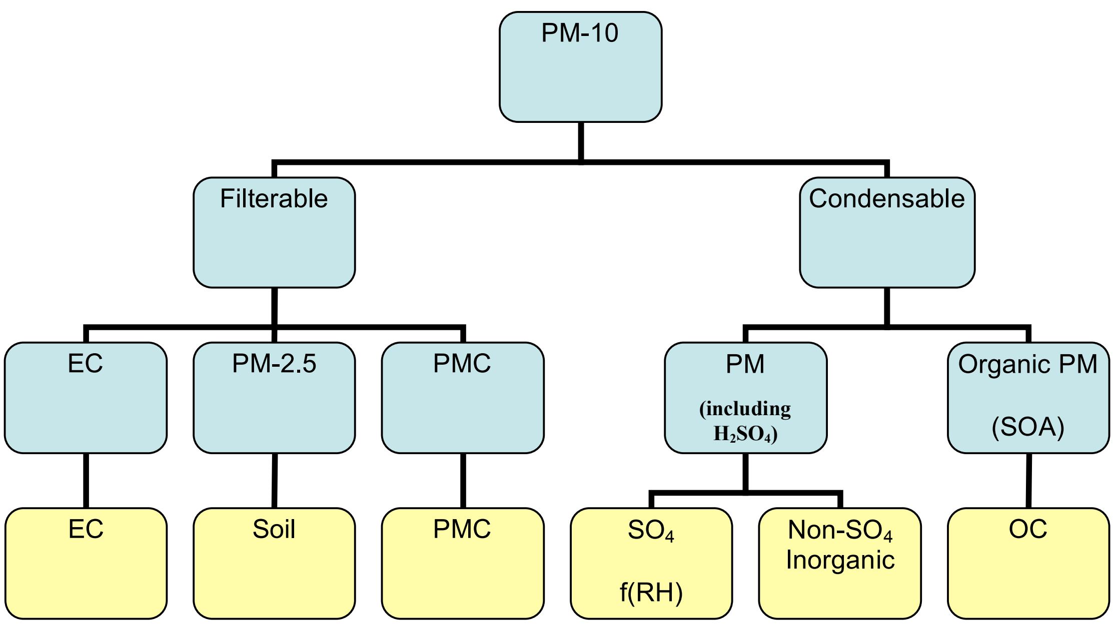

Figure 4-3. Speciation of PM-10 Emissions. (PMC is coarse particulate matter -- 2.5 to 10 µm diameter.)

Otherwise, assumptions will need to be proposed by the source, and reviewed and approved by the State. Possible acceptable alternative approaches to estimating speciation include the following:

- Speciation profiles developed by the SMOKE emissions model for use in VISTAS' CMAQ regional air quality modeling (available at http://www.vistas-sesarm.org/BART/calpuff.asp).

- The approach described in a memo available at http://www.vistas-sesarm.org/BART/calpuff.asp, which provides reasonably conservative estimates in situations where data are incomplete.

- Class I receptors: Use FLM Class I receptor list with receptor elevations provided (available from the NPS).

- CALPUFF model options: Use IWAQM (EPA, 1998) default guidance, including Pasquill-Gifford dispersion coefficients.

- Ozone dataset – use observed ozone data for 2001-2003 from CASTNet and AIRS stations. Only non-urban ozone stations should be used in the OZONE.DAT file. Monthly average ozone (backup) background values are to be computed based on daytime average ozone concentrations from the OZONE.DAT file (6am-6pm average ozone concentrations computed by month).

- Background ammonia concentration: In CALPUFF, use constant (0.5 ppb) value for ammonia.

- Puff representation: integrated puff sampling methodology.

- Building downwash: Ignore building downwash unless source is within 50-km of a Class I area and the State instructs the source to specifically consider building downwash.

CALPOST and POSTUTIL Configuration (Initial exemption modeling)

- Use Visibility Method 6 in CALPOST

- Species considered in visibility analysis: SO_4, NO_3, EC, SOA (i.e., condensable organic emissions), soil, coarse PM

- Natural background light extinction: Several options are acceptable at the discretion of the State: (1) A single annual average natural background extinction for each Class I area, as presented in Appendix B of EPA's natural conditions guidance (EPA, 2003b); (2) A single value that represents the average haze index on the 20% best natural conditions days, again as presented in the same Appendix B; or (3) A monthly average natural background as calculated by CALPOST under Method 6, based on annual average default natural conditions component concentrations and monthly average f(RH) values for the centroid of the Class I area, from Table A-3 in the natural conditions guidance document,.

A special procedure is needed for options 1 and 2, since CALPOST requires input of natural background concentrations of PM components while the backgrounds for options 1 and 2 are expressed in EPA's guidance document as extinction coefficients or haze indices (in deciviews). In order to produce the appropriate natural background in CALPOST for these options, use Equation 3-2 to calculate the extinction coefficient that corresponds to EPA's haze index value for the Class I area (if necessary), subtract the Rayleigh scattering value of 10 Mm^{-1}, and enter a soil concentration (in $\mu g/m^3$) into CALPOST that is numerically equal to this result. (Since the extinction efficiency of soil is 1 m^2/g, Equation 3-1 shows that this process produces a background extinction that equals the EPA's value.) Leave the concentrations of all other species blank, since the number that is entered represents extinction by all components.

- Light extinction efficiencies: Use EPA (2003a) values. If a source chooses, the new IMPROVE algorithm for calculating light extinction (see Section 3.2.3) may be used in addition to the default IMPROVE algorithm. (Calculations would need to be performed outside CALPOST or CALPOST would need to be modified to accommodate the new algorithm.)

- Nitrate repartitioning in POSTUTIL: Do not use for the initial modeling.

The initial run results will be based on the highest change in light extinction (deciviews) from natural conditions over the three-year modeling period for each Class I area considered. Predicted changes exceeding the "contribution" threshold (0.5 deciviews) will trigger a finer grid CALPUFF modeling analysis.

4.4 Finer Grid Modeling Procedures

4.4.1 Rationale for and Overview of Finer Grid Modeling Approach

There are two potential applications for finer grid CALPUFF modeling:

BART Exclusion Modeling. First, finer grid CALPUFF modeling can be used to demonstrate that a source does not cause or contribute to visibility impairment in any Class I areas, and thus can be excluded from BART controls. As shown in Figure 4-1, if the initial regional modeling results are not below the threshold for visibility impacts, the next step is to conduct modeling using a finer grid resolution for the meteorological fields and the treatment of terrain effects and land use variability. In the finer grid modeling the predicted visibility impairment that is compared to the threshold is based on the BART guidance of the 98^{th} percentile change in deciviews value rather than the more conservative highest value used in the initial analysis.

The BART guidance indicates that the emissions rate to be used for such modeling is the highest 24-hr rate during the modeling period. Depending on the availability of source data, the following emissions information (listed in order of priority) should be used with CALPUFF for BART exclusion modeling:

- 24 hr maximum value emissions for the period 2001-2003 (Continuous Emission Monitor, CEM data)
- 24 hr maximum value from continuous emissions monitoring data
- facility stack test emissions
- potential to emit
- permit allowable emissions, if available
- emissions factors from AP-42 source profiles

Quantify Benefits of BART. The second application of refined modeling is to quantify the visibility benefits from the BART control options. This is accomplished by running CALPUFF with the baseline emissions rates and again with emissions after BART controls. It is important that emission reductions be evaluated in the postprocessing step rather than by using "negative" emission rates in the CALPUFF model. The chemical scheme requires that emission rates always be positive.

For any of these applications, a source-specific modeling protocol that defines source properties and the specific model configuration is required. As discussed in Section 5, the source specific protocol should include source-specific emissions data and can refer to this document for all methods and assumptions that follow this common protocol.

4.4.2 Model Configuration and Settings for Finer Grid Modeling

Grid resolution substantially better than 12-km is needed for a finer grid CALPUFF assessment of visibility impacts in most cases involving Class I areas in complex terrain or coastal areas. Thus, the CALMET fine grid resolution in the subregional modeling domains used for finer grid modeling will depend on the terrain, land use (especially coastal boundaries), location of the source, distance of the source from Class I areas, and total size of the subregional modeling domain.

VISTAS States have 2001-2003 CALMET files for five 4-km sub-regional domains as illustrated in Figure 4-4. The subdomains are designed to address all BART eligible sources within each VISTAS states and all Class I areas within 300 km of the BART-eligible sources. For application for a single source, a smaller domain of roughly 200-300 km by 200-300 km is recommended. Requests to obtain the 4-km CALMET files should be made to the State BART representatives.

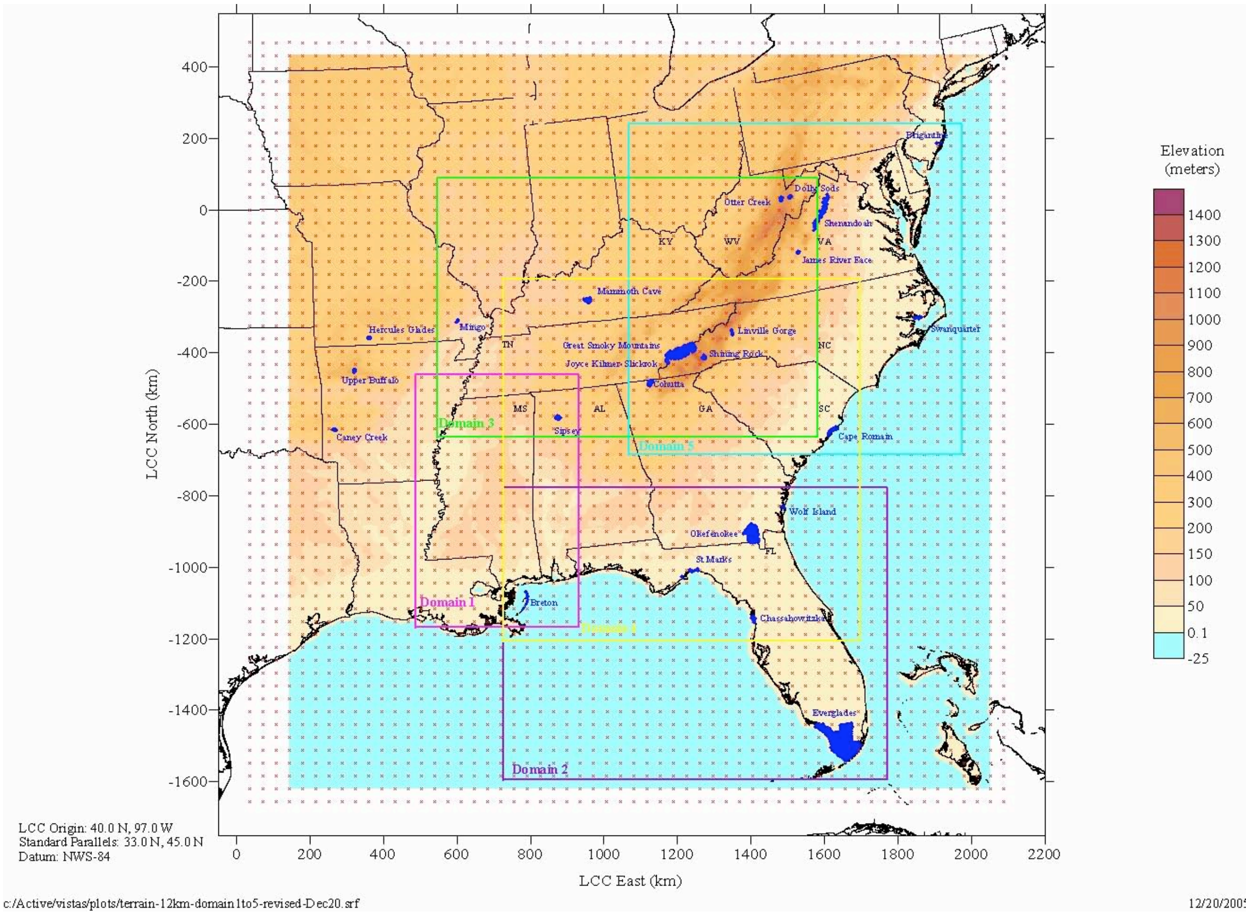

Figure 4-4. The five subregional domains for 4-km CALMET modeling.

In some instances, as part of the source-specific protocol, a source may propose to the State to use an even finer grid simulation to properly characterize the flow fields and land use changes that affect dispersion. An application for source-receptor distances within about 50 km may require a grid resolution less than 1 km if complex terrain effects are likely to be important. This determination should be made on a case-by-case basis. There is not a single distance at which a particular grid size is appropriate. It depends on factors such as the complexity of the terrain, the source-receptor distances involved, the location of the source relative to the terrain features, the physical stack parameters (e.g., a tall stack in complex terrain may be unaffected by the terrain-forced flow), proximity of the source and Class I area to a coastline, and other factors including availability of representative observational data.

The finer grid CALMET simulations were run in hybrid mode, using both MM5 data to define the initial guess fields and meteorological observational data in the Step 2 calculations. Overwater (buoy) data will be provided in addition to the hourly surface meteorological observations, precipitation observations and twice-daily upper air sounding data.

A domain-specific set of modeling parameters will be defined for each subregional domain. The proper selection of the CALMET diagnostic wind field parameters that are used to blend observations with the Step 1 wind field depends on factors such as the locations of the meteorological stations relative to terrain and coastal features (which affects the representativeness of the observational data), the terrain length scale, and the quality (resolution) of the MM5 data used to define the initial guess field and its ability to properly resolve wind flows on the fine-scale CALMET domain. The definition of the proper CALMET parameters is done as part of sensitivity testing where model performance is evaluated against available observations and expected terrain effects, such as channeling of flows within a valley.

In addition to the better grid resolution and the introduction of observational data in the finer grid simulations, several other modeling refinements can enhance the accuracy of the finer grid modeling. These include use of the higher resolution terrain DEM data (~3 arc sec USGS data) in defining the gridded terrain fields and application of the ammonia limiting method in the POSTUTIL post-processor. Otherwise, the source configuration, emissions, pollutant speciation, Class I receptors, ozone datasets and CALPUFF model options will be the same as in the initial runs. Similarly, CALPOST will be used in the same manner as for the initial analyses. However, POSTUTIL can be used to repartition nitrate in the finer grid modeling, using background ammonia concentrations according to the IWAQM Phase 2 report (IWAQM, 1998).

For the finer grid BART exclusion analysis, the test for evaluating whether a source is contributing to visibility impairment is based on the 98th percentile modeled value (rather than the highest predicted value used for the initial evaluation), which is consistent with EPA’s BART guidance.

4.5 Presentation of Modeling Results

The CALPOST processing computes the daily maximum change in deciviews. A sample of the summary table produced by CALPOST is shown in Table 4-1. For evaluating compliance with the VISTAS screening threshold, the highest change in extinction value, located at the bottom of the CALPOST list file is compared to the threshold value (e.g., 0.5 dv). For example, in the sample shown in Table 4-1, the summary at the bottom shows that the highest visibility impact is 1.219 dv, with 9 days over the year showing values greater than 0.5 dv. Therefore this source would not pass the initial analysis, and finer grid modeling would be required.

In addition to the highest change in deciview value on each day over all the receptors in a particular Class I area, the CALPOST summary table in Table 4-1 contains the coordinates of the receptor, receptor type (D indicates discrete receptors), the total haze level (background + source, in dv), the background haze in deciviews, the change in haziness (delta dv), the humidity term applied to hygroscopic aerosols (f(RH)), and the contribution of each species to light extinction (in percent of the total source contribution) for SO_4, NO_3, organics, elemental carbon, coarse and fine particulate matter.

Table 4-1. Example of CALPOST Output, Showing Maximum Daily Impacts of Source and Locations of Those Impacts.

YEAR	DAY	HR	RECEPTOR	COORDINATES (km)		TYPE	DV(Total)	DV(BKG)	DELTA DV	F(RH)	%_SO4	%_NO3	%_OC	%_EC	%_PMC	%_PMF
2001	2	0	3	20.540	79.782	D	5.397	5.358	0.039	4.314	44.33	47.22	3.07	1.07	0.00	4.30
2001	3	0	9	31.680	79.822	D	4.566	4.421	0.145	1.767	40.75	33.89	9.19	3.24	0.00	12.94
2001	4	0	1	24.723	77.951	D	4.540	4.540	0.000	2.076	0.00	0.00	0.00	0.00	0.00	0.00
2001	5	0	77	30.228	94.571	D	4.950	4.939	0.011	3.144	43.13	44.74	4.64	1.45	0.00	6.05
2001	6	0	1	24.723	77.951	D	5.181	5.166	0.015	3.772	38.58	56.05	1.90	0.70	0.00	2.76
2001	7	0	3	20.540	79.782	D	6.366	5.745	0.620	5.439	44.98	44.99	3.69	1.26	0.00	5.08
.																
.																
.																
2001	363	0	113	27.414	103.782	D	5.725	5.652	0.073	5.164	53.49	35.51	4.03	1.39	0.00	5.58
2001	364	0	113	27.414	103.782	D	6.554	6.521	0.033	7.826	48.12	47.09	1.67	0.64	0.00	2.48
2001	365	0	1	24.723	77.951	D	6.499	6.499	0.000	7.757	0.00	0.00	0.00	0.00	0.00	0.00

```
--- Number of days with Delta-Deciview  =>   0.50:         9
--- Number of days with Delta-Deciview  =>   1.00:         2
---             Largest Delta-Deciview  =             1.219
```

For the finer grid analysis, the data in the table can be imported into a spreadsheet and sorted on the delta dv column. Table 4-2 shows an example of the ranked visibility impacts (change in dv) for each of three years at six different Class I areas. The 98th percentile (8th highest value) in the sorted table would be compared to the contribution threshold (e.g., 0.5 dv). In the example shown in this table, the source passes the finer grid analysis because the highest 98th percentile visibility impact is below the contribution threshold of 0.5 dv.

The Results section of the CALPUFF modeling report should contain the following information:

1. Map of source location and Class I areas within 300 km of the source

2. For the VISTAS 12-km CALPUFF initial exemption modeling domain, a table listing all Class I areas in the VISTAS domain and those in neighboring states and impacts at those Class I areas within 300 km of the source, as illustrated in Table 4-3**.**

3. A discussion of the number of Class I areas with visibility impairment from the source on 98th percentile days in each year greater than 0.5 dv (total visibility impairment minus impairment on 20% best days for natural background visibility equals delta-dv, the visibility impact attributed to the source).

4. For the Class I area with the maximum impact, discussion of the number of days below the 98th percentile that the impact of the source exceeds 0.5 dv, the number of receptors in the Class I area where the impact exceeds 0.5 dv, and the maximum impact.

5. For finer grid CALPUFF exemption modeling, results for those Class I areas for which impacts of the source exceeded 0.5 dv in the 12-km initial exemption modeling. Report same results as provided for 12-km initial exemption modeling.

6. For control option modeling, each control option tested should be listed in tabular format. For each control option and for each Class I area where the impact of the source exceeded 0.5 dv, report the change in pollutant emissions and the change in visibility impact from the source as a result of the control option. The effectiveness of candidate control options are to be compared to each other, not to a specific target improvement.

   States will provide further guidance on graphic presentation of results to simplify evaluation of effectiveness of control measures. For example, a temporal plot of the change in deciviews between the controlled and uncontrolled cases could be developed for the receptor with the maximum modeled impact in each Class I area.

7. Copies of all input files and input data in electronic format for the CALMET, CALPUFF, CALPOST and POSTUTIL runs should be archived and provided to the State.

Table 4-2. Example of Visibility Impact Rankings at Six Class I Areas

Class I Area	2001	2002	2003
	Delta-Deciview Ranks 1-8	Delta-Deciview Ranks 1-8	Delta-Deciview Ranks 1-8
Great Smoky NP	0.99	0.95	1.20
	0.88	0.63	0.90
	0.62	0.51	0.73
	0.59	0.50	0.72
	0.55	0.46	0.59
	0.52	0.42	0.47
	0.48	0.37	0.45
	0.47	0.36	0.42
Linville Gorge	0.67	0.81	0.76
	0.45	0.69	0.47
	0.43	0.65	0.37
	0.33	0.50	0.35
	0.29	0.45	0.31
	0.27	0.33	0.30
	0.25	0.31	0.28
	0.23	0.29	0.28
Shining Rock	0.66	0.73	0.75
	0.43	0.69	0.45
	0.41	0.63	0.36
	0.35	0.52	0.34
	0.26	0.46	0.28
	0.24	0.34	0.27
	0.23	0.29	0.26
	0.22	0.26	0.25
Cohutta	0.26	0.54	0.61
	0.23	0.47	0.42
	0.22	0.43	0.30
	0.21	0.37	0.29
	0.20	0.37	0.28
	0.19	0.31	0.28
	0.18	0.31	0.25
	0.16	0.30	0.25
Joyce Kilmer-Slickrock	0.34	0.52	0.27
	0.33	0.43	0.24
	0.31	0.32	0.23
	0.26	0.31	0.20
	0.24	0.30	0.14
	0.20	0.28	0.13
	0.18	0.24	0.11
	0.17	0.24	0.10
Mammoth Cave NP	0.56	0.57	0.50
	0.44	0.56	0.37
	0.38	0.53	0.36
	0.29	0.35	0.35
	0.25	0.33	0.31
	0.24	0.33	0.24
	0.22	0.30	0.21
	0.21	0.29	0.19

Table 4-3. Format of Summary of Results for CALPUFF Modeling in VISTAS' 12-km Modeling Domain to Determine if a BART Eligible Source is Subject to BART.

Class I area	Distance (km) from source to Class I area boundary	# of days[1] and # of receptors with impact > 0.5 dv in Class I area: 2001		# of days[1] and # of receptors with impact > 0.5 dv in Class I area: 2002		# of days[1] and # of receptors with impact > 0.5 dv in Class I area: 2003		# of days[1] and # of receptors with impact > 1.0 dv in Class I area for 3-yr period		Max. 24-hr impact over 3-yr period
Dolly Sods, WV										
Shenandoah, VA										
James River Face, VA										
Mammoth Cave, KY										
Sipsey, AL										
Great Smoky Mtns, TN										
Cohutta, GA										
Shining Rock, NC										
Linville Gorge, NC										
Swanquarter, NC										
Cape Romain, SC										
Okefenokee, GA										
Saint Marks, FL										
Chassahowitzka, FL										
Everglades, FL										
Brigantine, NJ										
Breton Island, LA										
Caney Creek, AR										
Upper Buffalo, AR										
Mingo, MO										
Hercules Glade, MO										

[1]Days below the 98th percentile of days in each year or the three-year modeling period, as appropriate

4.6 VISTAS Contribution to CALPUFF Modeling of BART Eligible Sources

VISTAS will provide updates and supporting information concerning the Common Modeling Protocol (this document) on the VISTAS website. In addition, VISTAS will make publicly available the following data bases developed by Earth Tech:

- VISTAS version of the CALPUFF modeling system, maintained on the CALPUFF website. Version 5.754 includes CALMET, CALPUFF, CALPOST, and POSTUTIL files, updated in December 2005. The last update in this VISTAS version is a CALMET update that addresses over water dispersion, which was developed for the Minerals Management Service (MMS) in fall 2005. This VISTAS version of CALPUFF will not be updated further unless errors are found in the code, except that a new one-step POSTUTIL procedure will be incorporated. BART-eligible sources in the VISTAS states will be able to use this VISTAS version throughout the BART modeling exercise.

- 12-km CALMET output files for 2001, 2002, and 2003 produced as described in previous sections. Further detail on model configuration and settings will be provided with the output files and will be made available on the CALPUFF website.

- CALMET will include a software modification to allow the meteorological data inputs into CALMET to be used to generate finer grid CALMET files without having to go back to the original MM5 output files

- Five 4-km CALMET subdomains for 2001, 2002, and 2003, produced as described in previous sections. Further detail on model configuration and settings will be provided with the output files and will be made available on the website.

- File with CALPUFF model configuration and settings sufficient to replicate CALPUFF modeling done for VISTAS using 12 km CALMET, including

    - Ozone data used to run CALPUFF

    - Ammonia concentrations used to run CALPUFF.

    - All other set up files used in VISTAS 12-km CALPUFF run

Samples of these data files and examples of their application with CALPUFF for BART screening analyses can be found on the CALPUFF web site at (http://www.src.com/verio/download/sample_files.htm).

5. SOURCE-SPECIFIC MODELING PROTOCOL

Sources are required to submit a source-specific protocol to the State for review and approval prior to source-specific modeling. States will provide the documentation to EPA and FLM for their review. An outline of the typical contents of the site-specific protocol is provided in Table 5-1.

If a source-specific modeling approach is proposed that differs from the common approach in Chapter 4, a more-detailed modeling protocol than that required under the common procedures is required. This protocol must explain the data sources, model configuration, and rationale for changes in the model approach from the common protocol and must be approved by the State.

Unit-specific source data include the following parameters:

- Location (e.g., UTM coordinates, UTM zone and datum)
- Stack height above the ground
- Stack diameter
- Exit velocity
- Exit temperature
- Emission rates (SO_2, H_2SO_4, NO_x and PM_{10}).

Additional building dimension information (building width, length, height and corner locations) is needed for short stacks that are less than Good Engineering Practice (GEP) height. This information is used in providing effective structure dimensions for building downwash calculations. (The requirement to conduct building downwash modeling may be waived by individual States or if the transport distance is greater than 50 km.)

The source coordinates must be expressed in the coordinate system used to define the CALMET and CALPUFF modeling domains. For the regional screening simulations, a Lambert Conformal Conic (LCC) coordinate system will be used. The required parameters to define an LCC coordinate include two matching parallels, latitude/longitude of the projection origin, coordinate datum, and false Easting and Northing (if used) of the projection origin. Subregional and source-specific domains may be using either an LCC or UTM projection.

The CALPUFF Graphical User Interface (GUI) system provides software (called COORDS) to compute to/from latitude/longitude, LCC and UTM coordinates for a large number of datums. In addition, the CALVIEW graphics feature allows the use of georeferenced satellite or aerial photographs to be used as base maps to confirm source locations. Links to sources of suitable base maps can be found on the CALPUFF data site (www.src.com) in the section on "Aerial Photos".

Table 5-1. Sample Table of Contents of a Source-Specific Fine-Scale Modeling Protocol.

1. INTRODUCTION
   - 1.1 Objectives
   - 1.2 Location of Source vs. Relevant Class I Areas
   - 1.3 Source Impact Evaluation Criteria
2. SOURCE DESCRIPTION
   - 2.1 Unit-specific Source Data
   - 2.2 Boundary Conditions
3. GEOPHYSICAL AND METEOROLOGICAL DATA
   - 3.1 Modeling Domain and Terrain
   - 3.2 Land Use
   - 3.3 Meteorological Data Base
     - 3.3.1 MM5 Simulations
     - 3.3.2 Measurements and Observations
   - 3.4 Air Quality Data Base
     - 3.4.1 Ozone Concentrations – Measured or Modeled
     - 3.4.2 Ammonia Concentrations – Measured or Modeled
     - 3.4.3 Concentrations of Other Pollutants – Measured or Modeled
   - 3.5 Natural Conditions at Class I Areas
4. AIR QUALITY MODELING METHODOLOGY
   - 4.1 Plume Model Selection
     - 4.1.1 Major Relevant Features of CALMET
     - 4.2.2 Major Relevant Features of CALPUFF
   - 4.2 Modeling Domain Configuration
   - 4.3 CALMET Meteorological Modeling
   - 4.4 CALPUFF Computational Domain and Receptors
   - 4.5 CALPUFF Modeling Option Selections
   - 4.6 Light Extinction and Haze Impact Calculations
   - 4.7 Modeling Products
5. REVIEW PROCESS
   - 6.1 CALMET Fields
   - 6.2 CALPUFF, CALPOST, and POSTUTIL Results
6. REFERENCES

APPENDICES

A.1 VISTAS BART MODELING PROTOCOL

A.2 … other appendices as needed

An example of the data that need to be reported is provided in Table 5-2. More detail on the stack data, emissions species, and particulate size fractions to be reported will be made available on the CALPUFF website, www.src.com, Check with your State for the more detailed format of Table 5-2 that is to be used.

Discussions with the regulatory authorities should be conducted prior to development of a protocol to ensure all of the relevant issues are included in the protocol.

Table 5-2. Example of Source Documentation for BART Eligible Source.

Unit name and/or description	**Start-up dates**	**SO_2 potential emissions (tpy)**	**NO_x potential emissions (tpy)**	**Total PM potential emissions (tpy)**
Emissions source name				
…				
Total emissions				
Potential BART-eligible emissions				

6. QUALITY ASSURANCE

6.1 Scope and Purpose of the QA program

Air quality modeling covered under this protocol is an important tool for use in determining whether a BART-eligible source can be reasonable expected to cause or contribute to visibility impairment in a Class I area, and therefore whether this source should be subject to BART controls, and if so, to determine the relative benefits of various BART controls. The purpose of the quality assurance (QA) program is to establish procedures for ensuring that products produced by the application of the modeling techniques for BART studies satisfy the regulatory objectives of the BART program.

The scope of the QA program affects different users differently. Common features of most applications will be the setup and execution of the CALPUFF air quality model and processing of modeling results to determine if a source contributes to visibility impairment at a Class I area. In many cases, users will be provided meteorological datasets that have been developed with VISTAS funding under a suitable QA program for use in the BART modeling. Other users will be involved in site-specific or source-specific analyses that will use additional datasets and potentially different modeling options and/or tools. More extensive quality assurance will be required in these latter types of applications. It is the responsibility of the modeler to ensure that an adequate QA protocol is in place for a particular application.

The CALPUFF modeling system contains built-in features to facilitate quality assurance of the modeling results. These include the automatic production of "QA" files for various datasets, including geophysical fields, sources and receptors, and imbedded tracking of model options and switches within the output files from the major modeling units of the modeling system. The Graphical User Interface system (GUI) provided as part of the latest CALPUFF modeling system allows these QA files to be displayed graphically.

In addition, a detailed software management system is in place to track version and level numbers associated each program and utility within the CALPUFF modeling system. This information is carried forward in all of the output files to create an audit trail of software versions and major model options used that can be retrieved and displayed from the model output files.

Because the required QA procedures will depend heavily on the exact application, there will be differences among different users and different applications.

In addition, the BART modeling process involves multiple organizations. The States have overall responsibility for the process and may also execute some or all of the modeling. VISTAS is contributing general guidance via this protocol and is preparing meteorological fields and performing modeling under the guidance of the States. The sources that are BART-eligible need to provide process information and emissions data for use in the analyses. In addition, those sources that are involved in BART assessments will need to be actively involved in control technology decisions and assessments. Finally, some of the modeling steps may be carried out by contractors on behalf of VISTAS, a State, or a source.

Each of these organizations has a responsibility to ensure that it is providing correct information to others and to evaluate the quality of any analyses it is performing, whether with data of its own or from others. This chapter provides general guidance and information on those aspects of quality assurance that are specific to the CALPUFF modeling effort, irrespective of which organization is carrying out the effort. The focus is on the common protocol efforts described in Chapter 4. As described in Section 6.3, more comprehensive QA may be needed for the unique aspects of the source-specific modeling described in Chapter 5.

6.2 QA Procedures for Common Protocol Modeling

The VISTAS common protocol (Section 4) describes the methods and procedures for use in conducting regional scale screening modeling to determine the whether a particular source or group of sources is subject to BART controls. In the initial application, the regional CALPUFF-ready meteorological data files will be provided by VISTAS. The amount of effort for end-users performing QA of these pre-defined meteorological fields will be reduced from what is required in developing source-specific meteorological fields, as described below. Also, VISTAS is planning to provide five subregional CALMET meteorological datasets in a CALPUFF-ready format. The development of these CALMET datasets will be subject to a QA program as part of their development, so the necessary quality assurance activity of end-users is again reduced from what would be required in the development of the dataset. It is not expected that the quality assurance steps in the development will be repeated in each application. The VISTAS-provided regional and subregional meteorological fields will include a test case simulation for demonstrating that expected modeling results are obtained on the user's computer platform. This test should be repeated by every user.

Although the CALPUFF modeling system is recommended by the U.S. Environmental Protection Agency for application to BART analyses, a considerable amount of expertise and modeling judgment is needed at certain stages of the analysis. The modeling is not a "cookbook" exercise, a fact that was recognized by the U.S. EPA in describing the expertise needed for CALMET modeling (EPA, 1998; pp. 9-10,). Current methods for performing refined chemistry calculation also require an understanding of the chemical and meteorological processing affecting ammonium nitrate formation. VISTAS has committed to provide appropriate CALPUFF training to assist States in obtaining the necessary expertise with the latest CALPUFF modeling tools and techniques. An appropriate level of knowledge of the model formulation, technical approach and assumptions is essential for successful BART modeling.

6.2.1 Quality Control of Input Data

The input data required by the model depends on the application. At a minimum, source data is required by CALPUFF (see Section 6.2.3) along with a list of choices made about model options and switches. Most of the modeling option choices are specified or recommended by regulatory guidance and default values (see references in Section 4.3.3). However, remodeling of the boundary conditions is not required for VISTAS-provided finer grid domains so the expertise level is not as high as it would be for development of the boundary conditions files from scratch.

To the extent that modeling applications are using pre-defined CALMET files and CALPUFF templates, the quality assurance will be straightforward. More detailed steps are needed for the setup of modeling files for source-specific applications of subregional domains finer than 4 km.

The basic procedures that will apply to all CALPUFF model applications will include a confirmation of the source data, including units, verification of the correct source and receptor locations, including datum and projection, confirmation of the switch selections relative to modeling guidance, checks of the program switches and file names for the various processing steps, and confirmation of the use of the proper version and level of each model program. It is a common and recommended procedure for an independent modeler not involved in the setup of the modeling files to independently confirm the model switches and data entry in the actual model input files and to conduct an independent run of the worst case event as a confirmation check.

In addition, common practice requires that a model project CD (or DVD or set of DVDs) be created that contains all of the data and program files needed to reproduce the model results presented in a report. The model list files from each step are included on the project CD. This information allows independent checking and confirmation of the modeling process.

6.2.2 Quality Control of Application of CALMET

For users of the VISTAS CALPUFF-ready CALMET meteorological files, a number of large datafiles will be provided by VISTAS on external USB2 or Firewire hard drives in a format ready for use with the CALPUFF model. The QA steps associated with the development of the VISTAS common datasets will be provided separately as part of the modeling documentation. It is not expected that the QA steps conducted in the development of the meteorological datasets will be repeated in each application, although tests to confirm that the dataset is suitable for the application for which it is being used should be performed as part of the QA. This is discussed in more detail below.

The regional screening CALMET grid is defined in Chapter 4 on a 12-km Lambert Conformal Conic (LCC) grid system. The subregional and source-specific domains may be defined in either LCC or Universal Transverse Mercator (UTM) coordinates. In the case of the LCC projection, two matching parallels, latitude/longitude of the projection origin, coordinate datum, and false Easting and Northing (if used) of the projection origin must also be defined. For any domains in UTM coordinates, the UTM zone (see Appendix D of the CALMET User's Guide) and datum must be defined. The appropriate projection and map factors are provided as part of the definition of the VISTAS regional grid system. For a source-specific domain, the grid parameters will be provided as part of the source-specific protocol.

Appendix A of the IWAQM report (EPA, 1998) contains a list of recommended CALMET switch settings. Except as modified in Chapter 4 of this protocol or in a source-specific protocol, the IWAQM guidance should be used in setting up the CALMET simulations. The CALMET model obtains the switch settings from an ASCII "control file" with a default name of CALMET.INP. Whether the model is run using a GUI or from the control line in a DOS, Linux, or Unix window, it is essential that the control file be reviewed as part of the CALMET QA analysis. The CALMET GUI retains all of the input descriptive information that is part of the standard CALPUFF.INP file structure. This includes the default value for each variable, a text description of the variable, the meaning of each variable option, the units of the variable and inter-relationships among variables indicating if/when the variable is used. Some third-party commercial GUIs strip out this descriptive information, which makes the QA step more difficult, although it is essential for perform nonetheless using the variable names as references for the variables in the file.

Part of the CALPUFF modeling system's built-in QA capabilities is a variable tracking system that retains the control file inputs for CALMET and CALPUFF in the output files create by the models. This information includes the Version and Level numbers of the processor codes and main model codes used in the simulations as well as the control files from the main models (CALMET and CALPUFF). The information from the preprocessing steps and the CALMET and CALPUFF model simulations is all carried forward and saved in the CALPUFF/postprocessor output files so that the final concentration/flux files contain a history of the model options and switch settings. This allows a user or reviewing agency to confirm the switch settings provided in a control file with that actually used in the model simulations. An optional switch in the CALPOST processor creates a complete listing of the QA data. This step requires access to the output CALPUFF concentration and/or flux files, which are normally practical to store on CDs or DVDs and to provide a part of the Project CD/DVD set.

6.2.3 Quality Control of Application of CALPUFF

The quality assurance of the source and emissions data is a major component of the CALPUFF modeling. Also, many errors are found in source coordinates and related projection/datum parameters, so confirmation of the source location is an important part of the modeling QA.

The locations of the Class I area receptors are another important CALPUFF input. The use of pre-defined receptors as provided by the National Park Service (NPS) receptor dataset is recommended in the VISTAS common protocol. However, although the latitude and longitude of each receptor point is provided, it is necessary to ensure that the proper UTM or LCC coordinates have been computed for computational domain selected. In particular, the datum of the NPS conversion software is not specified, so it is recommended that coordinates be checked using the CALPUFF GUI's COORDS software or another comparable coordinate translation software package that recognizes various datums.

Most of the CALPUFF input variables contain default values. Appendix B of the IWAQM report contains a list of recommended CALPUFF switch settings. Except as modified in Chapter 4 of this protocol or in a source-specific protocol, the IWAQM guidance should be used in setting up the CALPUFF simulations. The CALPUFF model obtains the switch settings from an ASCII "control file" with a default name called the CALPUFF.INP file. As is the case with the comparable CALMET file, it is essential that the control file be reviewed manually as part of the CALPUFF QA analysis. To facilitate this process, as was the case with the CALMET GUI, the CALPUFF GUI retains all of the input descriptive information that is part of the standard CALPUFF.INP file structure. Some third-party commercial GUIs strip out this descriptive information, which makes the QA step more difficult, although it is essential for perform nonetheless using the variable names as references for the variables in the file.

6.2.4 Quality Control of Application of CALPOST and POSTUTIL

CALPOST is run separately for each Class I area in order to obtain the necessary visibility statistics for evaluating compliance with the BART screening and finer grid modeling thresholds. The inputs to CALPOST involve selection of the visibility method (Method 6 in the standard EPA BART guidance), entry of Class I area-specific data for computing background extinction (either average or best 20% natural conditions, as prescribed by the State) and monthly relative humidity factors for hygroscopic aerosols. CALPOST contains a receptor screening that allow subsets of a receptor network modeling in CALPUFF to be selected for processing in a given CALPOST run. This is how receptors within a single Class I area are selected for processing from a CALPUFF output file that may contain receptors from several Class I areas. CALPOST contains options for creating plot files that will help in the confirmation that the proper receptor subset is extracted.

The CALPOST output file contains a listing of the highest visibility impact each day of the model simulation over all receptors included in CALPOST analysis. Receptors will normally be selected in each CALPOST run so that each CALPOST run represents the impacts at a single Class I area. The table includes the data shown in the example in Table 4-1. For a screening assessment, the peak value of the change in extinction is shown at the bottom of the visibility table (see Table 4-1). For a finer grid simulation, the 98th percentile value (8th highest day) is used for comparison against the BART threshold of 0.5 deciviews. It is necessary to import the results of the CALPOST table into a sorting program such as a spreadsheet to rank the daily change in extinction values such as is presented in Table 4-2.

The CALPOST inputs that need to be carefully checked as part of the CALPOST quality assurance are:

- Visibility technique (Method 6 in the common VISTAS protocol)

- Monthly Class I-specific relative humidity factors for Method 6

- Background light extinction values

- Inclusion of all appropriate species from modeled sources (e.g., sulfate, nitrate, organics, (as SOA), coarse and fine particulate matter and elemental carbon.

- Appropriate species names for coarse PM used

- Extinction efficiencies for each species

- Appropriate Rayleigh scattering term (10 Mm^{-1} for screening modeling but Class I area specific value for finer grid modeling)

- Screen to select appropriate Class I receptors for each CALPOST simulation.

The CALPOST program produces plot files compatible with CALVIEW that allow confirmation of receptor locations that is useful in evaluating the receptor screening step.

POSTUTIL allows the user to sum the contributions of sources from different CALPUFF simulations into a total concentration file. In addition, it contains options to scale the concentrations from different modeled species (e.g., different particle sizes) into species-dependent size distributions for the particulate matter. For example, PM is often simulated with unit emission rates for each particle size category and, in the POSTUTIL stage, the contributions of each size category based on the species being considered (e.g., elemental carbon, coarse particulate matter, etc.) are combined to form the species concentrations for input into CALPOST. This process, although simple, requires a careful review of the weighting factors for each source. POSTUTIL also allows a repartitioning of nitric acid and nitrate to account for the effects of ammonia limiting conditions.

If source-specific modeling is performed using different sources of data or different techniques, the source-specific modeling protocol should provide justification for deviations from the VISTAS common protocol, and a QA plan specific for the application provided to address the quality assurance of the data used.

6.3 Additional QA Issues for Alternative Source-Specific Modeling

The level of QA required for application of source-specific protocols will be substantially higher than for the use of datasets that have already been subject to a QA procedure. For example, source-specific protocols may include the use of on-site meteorological datasets, the use of higher resolution prognostic meteorological (e.g., MM5) datasets, alternative visibility calculations, different extinction coefficients, or other changes to the common protocol. In addition to providing a source-specific modeling protocol describing and justifying the changes to the modeling approach from the VISTAS common protocol, the site-specific applications should include the development of a QA plan to properly evaluate the data used in the site-specific modeling.

The critical CALMET input parameters depend on the mode in which the model is run (observations mode, hybrid mode or no-observations mode), and the location and spatial representativeness of any observational data. In a site specific protocol involving the development of a meteorological dataset, the elements of the QA process include preparation of wind rose (using observed, MM5 and CALMET-derived data), including examination of the data as a function of season and time of day (e.g., 4am, 10am, 4pm wind roses), time series analyses, and presentation of 2-D vector plots illustrating terrain effects/sea breeze circulation or other features of the flow expected to occur within the domain. For example, 2-D vector plots produced during light wind speed stable conditions (e.g., early morning such as 4 am) are good for assessing the performance of the CALMET model configuration and switches in reproducing terrain effects because these conditions are likely to maximize the terrain impacts in the model. Season wind roses at 4 am, 10 am and 4 pm would be expected to show the development of sea breeze circulations that may be important for certain applications. Customization of the QA process for the individual site-specific domain based on the availability of data and the physical processes expected to be important at that location should be conducted as part of the site-specific QA plan development.

If site-specific CALPUFF simulations involving the Ammonia Limiting Method are conducted, performance of the model in reproducing observed CASTNet or IMPROVE sulfate and nitrate concentrations at measurement sites within the site-specific modeling domain should be evaluated. The use of alternative ammonia concentration data (e.g., CMAQ output rather than derived ammonia based on aerosol measurements) will require an evaluation of the model performance relative to the techniques in the VISTAS common protocol.

In any site-specific protocol a site-specific QA plan should be prepared.

6.4 Assessment of Uncertainty in Modeling Results

Chapter 3 discussed the uncertainties and known limitations in CALPUFF. The source specific modeling report does not need to repeat the uncertainties listed in Chapter 3, but the reviewer should interpret results in light of these limitations. It is expected that the performance of the model will be better in predicting changes in visibility impacts due to BART controls than in predicting absolute visibility values. This is because uncertainties in meteorological conditions transport and dispersion are expected to be less important in evaluating a change in impact, since a comparable effect will be included in both the base and sensitivity simulations.

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COPY OF SINGLE SOURCE MODELING TO SUPPORT REGIONAL HAZE BART MODELING PROTOCOL

Single Source Modeling to Support Regional Haze BART
Modeling Protocol

March 21, 2006
Lake Michigan Air Directors Consortium
Des Plaines, IL

Modeling may be necessary to support a decision by the States about which BART eligible sources "cause or contribute" to visibility impairment and are subject to BART. The threshold used to determine whether a source "contributes" to visibility impairment is 0.5 deciviews, or lower, which is suggested in U.S. Environmental Protection Agency (EPA) guidance (EPA, 2005). For the purposes of this analysis, the threshold used to determine whether a source "contributes" to visibility impairment is 0.5 deciviews. EPA guidance recommends CALPUFF for modeling single source visibility impacts at Class I areas (EPA, 2005).

POLLUTANTS

EPA guidance lists SO2, NOX, and primary particulate matter (PM) as visibility impairing pollutants (EPA, 2005). Emissions of SO2, NOX, and PM must be examined for source contribution to visibility impairment. EPA recommends using the CALPUFF modeling system. EPA guidance recommends the use of judgment to determine whether VOC, ammonia, or primary PM emissions contribute to visibility impairment (EPA, 2005). An additional modeling analysis will be performed to determine whether VOC, ammonia, and primary PM emissions need to be considered.

VISIBILITY IMPAIRMENT MODELING: SUBJECT TO BART

The list of BART-eligible sources in each state will include all 26 applicable source categories (i.e., both EGUs and non-EGUs). For EGUs, EPA states the CAIR rule will result in controls for electric generating units (EGUs) better than those achievable by the BART provision of the Regional Haze rule. Each State will need to make a policy decision to either accept this position or to impose BART controls on their EGUs. Since the CAIR rule regulates SOX and NOX emissions, some consideration for other EGU emissions including primary PM, VOC, and ammonia is necessary. An additional modeling analysis will be performed to determine whether VOC, ammonia, and primary PM emissions from all elevated point sources in the Midwest RPO States contribute to visibility impairment at Class I areas.

For non-EGUs, the options in the BART guideline for determining which sources need not be subject to BART will be considered. The three options are individual source attribution approach (i.e., CALPUFF modeling), use of model plants to exempt individual sources, and cumulative modeling to show that certain elevated point source emissions species do not contribute to visibility degradation at nearby Class I areas. All three options will be used here. Specifically, the following approach will be taken:

(1) Calculate the Q/d value for all sources based on actual emissions and minimum distance to a Class I area. (Note, the Q/d metric was

identified in EPA's proposed rule and is similar to the emissions-distance criteria suggested in the final rule.)

(2) Conduct individual source CALPUFF modeling for those sources with a Q/d value $\geq$ 5. (Note, the CALPUFF modeling conducted in response to EPA's proposed BART rule showed that the emissions-distance criteria associated with less than 0.5 dv visibility impacts on nearby Class I areas was consistent with a Q/d value of < 5.)

(3) Review the results of the new CALPUFF modeling to determine which sources have less than a 0.5 dv impact on nearby Class I areas and which can, therefore, be assumed to be exempt from the BART process.

(4) Also review the results of the new CALPUFF modeling for sources with a Q/d value between 5 and 20 to determine if 5 is an appropriate cut-off for exempting sources from the BART process.

(5) Cumulative modeling will also be performed with CAMx to determine if ammonia, VOC, and direct PM (fine and coarse mass) emissions can be exempt from the BART process.

CUMULATIVE VISBILITY IMPAIRMENT MODELING

A photochemical model (CAMx4) will be applied with the VOC, ammonia, and PM fine and coarse mass emissions "zeroed-out" from all point sources in the Midwest RPO States, both BART-eligible and non-BART-eligible. The "zero-out" run will include EGU and non-EGU point sources. The results of this run will be compared to a base run with these emissions included to determine if these emissions species impair visibility. This type of cumulative modeling is consistent with option 3 under the section on determining which sources are subject to BART (EPA, 2005). The CAMx4 modeling system is applied with the same inputs and parameters as used for the PM2.5 and regional haze SIP. CAMx4 will be applied for the 2002 calendar year at 36 km grid resolution.

SINGLE SOURCE VISIBILITY IMPAIRMENT MODELING: SUBJECT TO BART

The CALPUFF modeling system is used to estimate visibility impairment from single sources. CALPUFF consists of the plume transport model (CALPUFF), meteorological data pre-processors (CALMM5, CALMET), inorganic chemistry parameterization module (POSTUTIL), and post-processor (CALPOST) (Scire et al, 2000a; Scire et al, 2000b). The versions of the CALPUFF modeling system code used for this analysis are shown in Table 1.

Table 1. CALPUFF Modeling System Versions

	Version	Level
CALPUFF	5.771a	040716
CALPOST	5.51	030709
CALMET	5.53a	040716
CALMM5	2.0	021111
POSTUTIL	1.4	040818

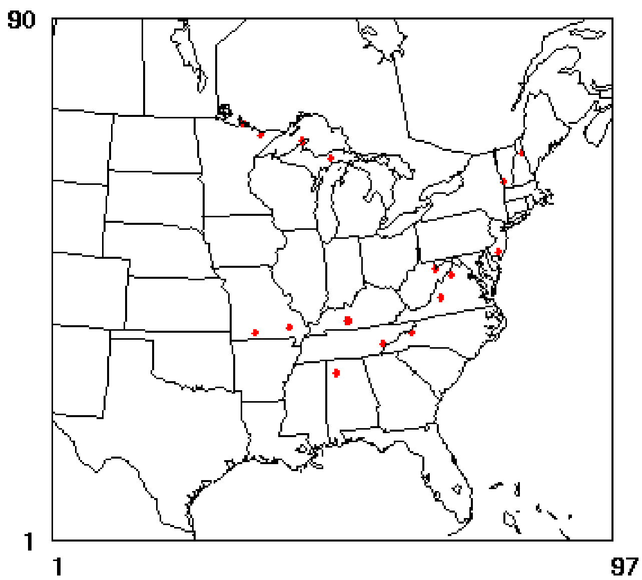
The modeling system is applied consistently with the EPA guidance recommendation of following the guidelines set forth in EPA's Interagency Workgroup on Air Quality Modeling (IWAQM) Phase 2 Summary Report and Recommendations for Modeling Long Range Transport Impacts (EPA, 2005; EPA, 1998). None of the BART eligible sources in the Midwest Regional Planning Organization are less than 50 km from a

Class I area so modeling analysis in addition to CALPUFF is not applicable. The IWAQM guidance states that less than 5 years of meteorological data may be used if a meteorological model using FDDA is used to supply data.

CALPUFF will be applied to each source for a 3 annual simulations, covering calendar years 2002 to 2004. CALPUFF will be applied using discrete receptor points covering the Class I areas with an approximate resolution of 1 km. POSTUTIL is used to re-partition nitrate into the gas or particulate phase depending on the estimated ammonia availability. This option has been shown to improve model performance (Scire et al, 2001). CALPOST is then applied to the POSTUTIL output for each group of Class I area receptors (shown in Figure 1 and in Table 3). CALPUFF, POSUTIL, and CALPOST are also run for 3 consecutive years for each source for gridded receptors that match the CALMET/CALPUFF domain shown in Figure 1. These runs allow for quality assurance and quality control by plotting the results for visual inspection. The results are checked for reasonableness of stack location, stack parameters, and emission rates. Each source is applied in CALPUFF for 3 years in a discrete receptor mode to meet regulatory requirements and for 3 years in a gridded receptor mode as a quality assurance and control measure.

The CALPUFF/CALMET modeling domain is a Lambert conformal grid projection centered at (97 W, 40 N) with true latitudes at 33 N and 45 N and origin at (-900 km, -1620 km). The horizontal domain consists of 97 36 km cells in the east-west direction and 90 36 km cells in the north-south direction (see Figure 1). The vertical atmosphere up to approximately 15 km is resolved with 16 vertical layers, most of which are in the boundary layer to appropriately resolve the diurnal fluctuations in boundary layer mixing depths.

Figure 1. Model Domain



Landuse and terrain data are extracted from the global datasets, USGS Composite Theme Grid landuse and USGS Digital Elevation Model terrain height, distributed with CALPUFF and match the horizontal grid specifications. Meteorological inputs to CALPUFF are output from a prognostic meteorological model using four-dimensional data assimilation. MM5v3.6 output is used to supply hourly meteorological data to CALPUFF.

Observation data is included in the ETA analysis fields used to initialize MM5 so additional assimilation of observational data in CALMET is redundant to the specific purpose of a prognostic meteorological model, which is to appropriately fill in the data around the surface monitoring network and sparse upper air monitoring network. The MM5 output used to support the BART CALPUFF modeling has extensive model performance evaluation and is used to support regional photochemical modeling applications for the ozone, PM2.5, and regional haze State Implementation Plans (Baker, 2004; Baker, 2005; Johnson, 2003).

Modeling options are set to be consistent with the IWAQM guidance. A few modifications to the suggested parameter settings are discussed in this section. For CALMET, several options were selected to use the MM5 output as input to CALMET rather than observation data; ICLOUD=3, IPROG=14, ITPROG=2, and IEXTRP=-1. Several options are selected in CALPUFF that differ from the IWAQM recommendations: the IDRY and IWET variables are set to 0 since dry and wet deposition flux output is not applicable for this analysis. The IPRTU variable is set to 3 to output specie concentrations in units of ug/m^3 to be consistent with measured regional concentrations.

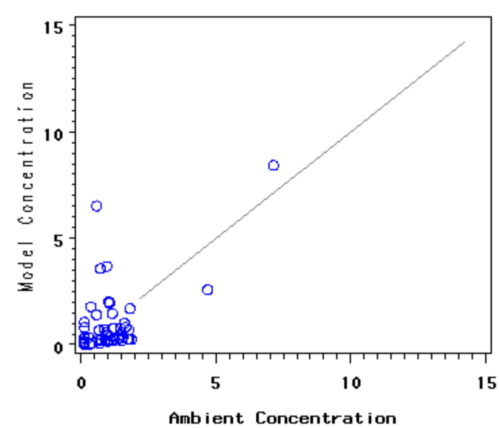
CALPUFF requires the input of ozone (O3) and ammonia (NH3) concentrations as a monthly background value applicable for the entire modeling domain. Seasonal domain averaged concentrations of each will be obtained from an annual 2002 calendar year CAMx4 simulation. These values are shown in Table 2.

Table 2. Domain Seasonal Average Concentrations (ppb)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
O3 (ppb)	31	31	31	37	37	37	33	33	33	27	27	27
NH3 (ppb)	.3	.3	.3	.5	.5	.5	.5	.5	.5	.5	.5	.5

CAMx4 prediction of ammonia at the rural Illinois site in Bondville shows good agreement between model predictions and ambient observations. A scatter plot showing the prediction-observation pairs over the entire calendar year of 2004 is shown in Figure 2.

Figure 2. CAMx4 model and ambient ammonia Predictions at Bondville, Illinois



SOURCE SPECIFIC INPUTS: EMISSIONS and STACK PARAMETERS

States will use the 24-hr maximum emissions rate between 2002 and 2004. If this data is not available, then a short term "allowable" or "potential" emission rate of emissions between 2002-2004 will be used. If neither of these types of emission rates is available, then the highest actual annual emissions divided by hours of operation of NOX, SOX, and primary PM between 2002 and 2004 will be applied in CALPUFF.

EPA recommends the States should determine the specific stacks that BART process emissions will exit and use stack information specific to those stacks (EPA, 2005b).

CLASS I AREA RECEPTORS

The receptors used to determine visibility impacts are taken from the National Park Service's Class I area receptor index (NPS, 2005). The receptors "should be located in the nearest Class I area with sufficient density to identify likely visibility effects" according to the BART modeling guidance (EPA, 2005). The spatial resolution of the discrete receptors is not changed in any way from the NPS files. Table 3 shows the list of Class I areas and the total number of discrete receptors covering the Class I area used as the receptor field in CALPUFF.

Table 3. Class I Receptor areas and total discrete rectors

Boundary Waters Canoe Area	MN	856
Brigantine National Wildlife Refuge	NJ	16
Dolly Sods /Otter Creek Wilderness	WV	187
Great Gulf Wilderness	NH	38
Great Smoky Mountains National Park	TN	736
Hercules-Glades	MO	80
Isle Royale National Park	MI	966
James River Face	VA	52
Linville Gorge	NC	66
Lye Brook Wilderness	VT	103
Mammoth Cave National Park	KY	302
Mingo	MO	47
Seney	MI	173
Shenandoah National Park	VA	298
Sipsy Wilderness	AL	148
Voyageurs National Park	MN	366

CALPUFF OUTPUT: POST PROCESSING and INTERPRETATION

The light extinction equation will use the monthly average relative humidity (RH) rather than the daily average humidity as detailed in the BART modeling guidance (EPA, 1998; FLAG, 2000). This necessitates using the CALPOST background light extinction option 6, which computes light extinction from speciated PM measurements with a monthly RH adjustment factor. These Class I area centroid specific monthly RH adjustment factors are taken from Table A-3 of the EPA's "Regional Haze: Estimating Natural Visibility Conditions under the Regional Haze Rule: Guidance Document." (EPA, 2003).

The daily visibility metric for each receptor is expressed as the change in deciviews compared to natural visibility conditions as outlined in the IWAQM guidance (EPA, 1998). Natural visibility conditions, the 20% best days, for Class I areas used in this analysis are found in Appendix B of EPA's Guidance for Estimating Natural Visibility Conditions under the Regional Haze Rule (EPA, 2003). The 20% best days for each Class I area are listed in Appendix B in deciviews and not as chemically speciated constituents of the light extinction equation, which are needed for CALPOST option 6. Annual background concentrations for the eastern United States are given in the Guidance for Estimating Natural Visibility Conditions in Table 2-1 (EPA, 2003). These values are scaled back to lower concentrations until the Class I area specific natural visibility metric is produced (North Dakota Department of Health, 2005). This scaling procedure is done for each Class I area and uses an annual average fRH calculated from the 12 monthly site specific fRH values mentioned in the first paragraph of this section (EPA, 2003).

The annual average Class I area specific natural conditions are given in deciviews, so they must be converted to light extinction.

Natural conditions (1/Mm) = 10*exp(natural conditions in deciviews/10)

Second, the chemically speciated natural background concentrations for the eastern United States are scaled to equal the site specific natural background light extinction value.

Natural conditions in 1/Mm = 3*fRH*[ammonium sulfate]*X + 3*fRH*[ammonium nitrate]*X + 4*[OC]*X + 10*[EC]*X + 1*[SOIL]*X + 0.6*[CM]*X + [$\beta_{(Raleigh)}$]

The bracketed concentrations are expressed as ug/m3. The fRH values represent annual average fRH calculated from the 12 monthly site specific fRH values mentioned in the first paragraph of this section (EPA, 2003). Solving for X gives the dimensionless scaling factor which is applied to each of the chemically speciated natural background concentrations given for the eastern United States. The natural background values and scaling factors used for each Class I area are shown in Table 4.

Table 4. Scaled natural background values by Class I area

Class I Area	Nat. Back. deciview	Nat. Back. 1/Mm	Scaling Factor	Annual average fRH	Amm. Sulfate	Amm. Nitrate	Organic Carbon	Elemental Carbon	Soil	Coarse Mass
BOWA	3.53	14.233	0.39	2.93	0.089	0.038	0.539	0.008	0.192	1.155
BRIG	3.60	14.333	0.39	3.05	0.090	0.039	0.546	0.008	0.195	1.169
DOSO	3.64	14.391	0.39	3.20	0.090	0.039	0.546	0.008	0.195	1.169
GRGU	3.63	14.376	0.39	3.13	0.090	0.039	0.547	0.008	0.195	1.172
GRSM	3.76	14.564	0.40	3.46	0.091	0.040	0.555	0.008	0.198	1.188
HEGL	3.59	14.319	0.39	3.13	0.089	0.039	0.540	0.008	0.193	1.157
ISLE	3.54	14.248	0.39	2.90	0.089	0.039	0.542	0.008	0.194	1.161
JARI	3.56	14.276	0.39	3.04	0.089	0.038	0.539	0.008	0.192	1.155
LIGO	3.75	14.550	0.39	3.54	0.090	0.039	0.549	0.008	0.196	1.176
LYBR	3.57	14.290	0.39	2.99	0.089	0.039	0.543	0.008	0.194	1.164
MACA	3.85	14.696	0.41	3.36	0.095	0.041	0.575	0.008	0.206	1.233
MING	3.59	14.319	0.39	3.14	0.089	0.039	0.539	0.008	0.193	1.156
SENE	3.69	14.463	0.39	3.30	0.090	0.039	0.550	0.008	0.196	1.178
SHEN	3.57	14.290	0.38	3.19	0.088	0.038	0.533	0.008	0.191	1.143
SIPS	3.71	14.492	0.39	3.43	0.090	0.039	0.547	0.008	0.195	1.172
VOYA	3.41	14.064	0.38	2.71	0.087	0.038	0.528	0.008	0.188	1.131

The visibility degradation beyond natural conditions expressed in deciviews is kept for each Class I area and ranked over the length of the modeling simulation. The criteria used to determine if a source is "contributing" to visibility impairment is the 98^{th} percentile that is equal to .5 deciviews for MRPO States using a maximum 24-hour emission rate and the peak value that is equal to .5 deciviews for MRPO States using an actual 24-hour emission rate. The 98^{th} percentile is interpreted as any source with more than 21 days of visibility impairment over the 3 year modeling period or 7 days of visibility impairment in any one of the 3 years modeled is "contributing" to visibility impairment. The peak value is interpreted as any source with more than 1 day of visibility impairment over the 3 year modeling period is "contributing" to visibility impairment.

The gridded receptor run will be post processed through CALPOST for plotting purposes. The plots show the number of days at each receptor that have 24-hr average 1% degradation in light extinction (1/Mm) over background conditions. This is approximate, but not equal, to 0.5 deciview degradation over background conditions. These plots allow for a qualitative visual inspection of the extent impact over the region.

VISIBILITY IMPROVEMENT DETERMINATION

Once a source is considered subject to BART the visibility improvement determination requires additional single source modeling. CALPUFF will be used to determine the visibility improvement at Class I area receptors from the potential BART control technology applied to the source. Post-control emission rates are calculated as a percentage of the pre-control emission rates (EPA, 2005).

The post-control CALPUFF simulation will be compared to the pre-control CALPUFF simulation by the change in the value of the highest degradation in visibility over natural conditions between the pre-control and post-control simulations (EPA, 2005). Further information on the sources and control levels to be used in this additional modeling will be provided later.

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APPENDIX D

MODELING FILE NAMING CONVENTIONS AND SAMPLE CALPUFF, POSTUTIL, AND CALPOST MODELING FILES

Electronic media enclosed with this report contain the input and output files from all CALPUFF, POSUTIL, and CALPOST processing for ESSROC's BART Applicability modeling analyses. A consistent file naming convention is used throughout, with the following general structure. All filenames contain the SPEEDIN root to denote ESSROC – Speed Indiana Plant. Note that meteorological data files are not provided due to file size. Note also that path names in input files will need to be modified to represent the user's directory structure when replicating these analyses.

4 KM MODELING FILES

CALPUFF Runstream Files

SPEEDIN*yy.fff*
yy = **01**, **02**, and **03** denotes data analysis years 2001, 2002, and 2003, respectively
fff = **inp** denotes input files
fff = **lst** denotes CALPUFF output summary files

POSTUTIL Processing Files

SPEEDINUT*yybb.fff*
yy = **01**, **02**, and **03** denotes data analysis years 2001, 2002, and 2003, respectively
bb = **A1**, **B1**, and **C1** denoting 4-month blocks January-April, May-August, September-December, respectively
fff = **inp** denotes input files
fff = **lst** denotes POSTUTIL output summary files

APPEND*yy.fff*
yy = **01**, **02**, and **03** denotes data analysis years 2001, 2002, and 2003, respectively
fff = **inp** denotes input files
fff = **lst** denotes POSTUTIL output summary files

SPEEDINUT*yy.fff*
yy = **01**, **02**, and **03** denotes data analysis years 2001, 2002, and 2003, respectively
fff = **inp** denotes input files
fff = **lst** denotes POSTUTIL output summary files

CALPOST Runstream Files

SPEEDIN*mmmaayy.fff*
yy = **01**, **02**, and **03** denotes data analysis years 2001, 2002, and 2003, respectively
fff = **inp** denotes input files
fff = **lst** denotes CALPOST output summary files
mmm denotes the following natural background conditions:
M20 = 20% Best Days following the MRPO method for representing background light extinction
aa denotes the Class I area considered in the analyses:

MC = Mammoth Cave (Receptors 1-302)

36 KM MODELING FILES

CALPUFF Runstream Files

SPEEDIN*yy.fff*
yy = **02**, **03**, and **04** denotes data analysis years 2002, 2003, and 2004, respectively
fff = **inp** denotes input files
fff = **lst** denotes CALPUFF output summary files

POSTUTIL Processing Files

SPEEDINUT*yy.fff*
yy = **02**, **03**, and **04** denotes data analysis years 2002, 2003, and 2004, respectively
fff = **inp** denotes input files
fff = **lst** denotes POSTUTIL output summary files

CALPOST Runstream Files

SPEEDIN*aayy.fff*
yy = **02**, **03**, and **04** denotes data analysis years 2002, 2003, and 2004, respectively
fff = **inp** denotes input files
fff = **lst** denotes CALPOST output summary files
aa denotes the Class I area considered in the analyses:

BOWA = Boundary Waters (1-856)
BRIG = Brigantine (857-872)
DOSO = Dolly Sods (873-937)
GRGU = Great Gulf (938-975)
GRSM = Great Smoky (976-1711)
HEGL = Hercules-Glades (1712-1791)
ISLE = Isle Royale (1792-2757)
JARI = James River Face (2758-2809)
LIGO = Linville Gorge (2810-2875)
LYBR = Lye Brook (2876-2978)
MACA = Mammoth Cave (2979-3280)
MING = Mingo (3281-3327)
OTCR = Otter Creek (3328-3449)
SENE = Seney (3450-3622)
SHEN = Shenandoah (3623-3920)
SIPS = Sipsey (3920-4068)
VOYA = Voyageurs (4069-4434)

APPENDIX E

QA/QC CHECKLISTS FOR CALPUFF AND CALPOST

TABLE E-1. CALPUFF CONTROL FILE CHECKLIST

Order	Primary Categories in CALPUFF Input File	Default Value (Trinity)	Checked?	Notes
1	Header	Update header record for the year modeled (XX) ESSROC SPEED INDIANA BART APPLICABILITY ANALYSIS 20XX MAMMOTH CAVE	☑ JHC	
2	Input and Output File Names	Update all files in INPUT GROUP: 0 and save CALPUFF control file as SPEEDINXX.inp file name CALPUFF.LST output ! PUFLST =SPEEDINXX.LST ! CONC.DAT output ! CONDAT =SPEEDINXX.CON ! DFLX.DAT output * DFDAT = * WFLX.DAT output * WFDAT = * VISB.DAT output ! VISDAT =SPEEDINXX.VIS ! RESTARTE.DAT output * RSTARTE= *	☑ JHC	
3	Model Settings: Compare to IDEM sample files for all modeling settings.			
4	Met Data	Update Subgroup (0a) for the year modeled (XX) specifically: ! METDAT=E:\2001-dom3\MET20XX-DOM3-01A.DAT through MET20XX-DOM3-12B.DAT ! (4-km) ! METDAT=D:\20XX\CALMET.XX0102.DAT ! (36-km)	☑ JHC	
6	Run period	Update ! IBYR = ! in INPUT GROUP: 1 -- General run control parameters	☑ JHC	
7	NSPEC (Number of Species)	Check ! NSPEC = 6 ! in INPUT GROUP: 1 -- General run control parameters	☑ JHC	
8	NSE (Number of species emitted)	Check ! NSE = 3 ! in INPUT GROUP: 1 -- General run control parameters	☑ JHC	
9	MDISP (Dispersion parameters)	Check ! MDISP = 3 ! in INPUT GROUP: 2 -- Technical options	☑ JHC	
10	MPDF (Convective Dispersion)	Check ! MPDF = 0 ! in INPUT GROUP: 2 -- Technical options	☑ JHC	
11	Modeled Species	Check Subgroup (3a) ! CSPEC = SO2 ! !END! ! CSPEC = SO4 ! !END! ! CSPEC = NOX ! !END! ! CSPEC = HNO3 ! !END! ! CSPEC = NO3 ! !END! ! CSPEC = PM25 ! !END!	☑ JHC	
12	Deposited Species	Check Subgroup (3a) SPECIES NAME (Limit: 12 Characters in length) — MODELED (0=NO, 1=YES) — EMITTED (0=NO, 1=YES) — DEPOSITED (0=NO, 1=COMPUTED-GAS 2=COMPUTED-PARTICLE 3=USER-SPECIFIED) — NUMBER (0=NONE, 1=1st CGRUP, 2=2nd CGRUP, 3= etc.) ! SO2 = 1, 1, 1, 0 ! ! SO4 = 1, 0, 2, 0 ! ! NOX = 1, 1, 1, 0 ! ! HNO3 = 1, 0, 1, 0 ! ! NO3 = 1, 0, 2, 0 ! ! PM25 = 1, 1, 2, 0 !	☑ JHC	
13	Meteorological Grid Setup:	Check INPUT GROUP: 4 -- Map Projection and Grid control parameters VISTAS 4-km CALMET ! NX = 263 !, ! NY = 185 !, ! NZ = 10 !, ! DGRIDKM = 4. ! ! XORIGKM = 538.004 !, ! YORIGKM = -637.997 ! ! ZFACE = 0., 20., 40., 80., 160., 320., 640., 1200., 2000., 3000., 4000. ! IDEM 36-km CALMET ! NX = 97 !, ! NY = 90 !, ! NZ = 16 !, ! DGRIDKM = 36. ! ! XORIGKM = -900 !, ! YORIGKM = -1620 ! ! ZFACE = 0., 20., 73., 109., 146., 294., 445., 598., 753., 1071., 1400., 1828., 2462., 3984., 6517., 10127., 14662. !	 ☑ JHC ☑ JHC ☑ JHC ☑ JHC ☑ JHC ☑ JHC	

TABLE E-1. CALPUFF CONTROL FILE CHECKLIST (CONT.)

Order	Primary Categories in CALPUFF Input File	Default Value (Trinity)	Checked?	Notes
14	Computational grid	Check INPUT GROUP: 4 -- Map Projection and Grid control parameters VISTAS 4-km CALMET Check SW corner of grid in ! IBCOMP = 80 ! and ! JBCOMP = 74 ! Check NE corner of grid in ! IECOMP = 128 ! and ! JECOMP = 152 ! IDEM 36-km CALMET Check SW corner of grid in ! IBCOMP = 48 ! and ! JBCOMP = 35 ! Check NE corner of grid in ! IECOMP = 55 ! and ! JECOMP = 44 !	☑ JHC ☑ JHC ☑ JHC ☑ JHC	
16	Dry Deposition Parameters	Check INPUT GROUP: 7 -- Chemical parameters for dry deposition of gases SPECIES DIFFUSIVITY ALPHA STAR REACTIVITY MESOPHYLL RESIST. HENRY'S LAW COEF. NAME = (cm**2/s) (dimensionless) (dimensionless) (s/cm) (dimensionless) ! SO2 = 0.1509, 1000., 8., 0., 0.04 ! ! NOX = 0.1656, 1., 8., 5., 3.5 ! ! HNO3 = 0.1628, 1., 18., 0., 0.00000008 !	☑ JHC	
15	Size Parameters	Check INPUT GROUP: 8 -- Size parameters for dry deposition of particles SPECIES GEOMETRIC MASS MEAN GEOMETRIC STANDARD NAME DIAMETER DEVIATION Name = (microns) (microns) ! SO4 = 0.48, 2. ! ! NO3 = 0.48, 2. ! ! PM25 = 0.48, 2. !	☑ JHC	
16	Wet Deposition Parameters	Check INPUT GROUP: 9 -- Miscellaneous dry deposition parameters Pollutant Liquid Precip. Frozen Precip. NAME = (sec**-1) (sec**-1) ! SO2 = 3.0E-05, 0.0E00 ! ! SO4 = 1.0E-04, 3.0E-05 ! ! NOX = 0.0E00, 0.0E00 ! ! HNO3 = 6.0E-05, 0.0E00 ! ! NO3 = 1.0E-04, 3.0E-05 ! ! PM25 = 1.0E-04, 3.0E-05 !	☑ JHC	
17	BCKO3 (Monthly Background Ozone Values	Check INPUT GROUP: 11 -- Chemistry Parameters to ensure that the correct set of BCKO3 values are selected based on the MRPO BART Modeling Protocol ! BCKO3 = 31.00, 31.00, 31.00, 37.00, 37.00, 37.00, 33.00, 33.00, 33.00, 27.00, 27.00, 27.00 !	☑ JHC	
18	Receptors	Check INPUT GROUPS: 17a & 17b -- Non-gridded (discrete) receptor information and compare with qarecd.dat and grid and receptor setup spreadsheet	☑ JHC	
19	Stack/Emissions Parameters	Check INPUT GROUP: Subgroup (13b) Source X Y Stack Base Stack Exit Exit Bldg. Emission No., X Coordinate, Y Coordinate, Height, Elevation, Diameter, Vel., Temp., Dwash, No., ! (km), (km), (m), (m), (m), (m/s), (deg. K), Emission rates, (g/s) SO2, SO4, NOx, HNO3, NO3, PM25 1 ! SRCNAM = EU20 ! 1 ! X = 972.493, -114.574, 36.58, 137.2, 2.44, 22.16, 513.7, .0, 5.95E+01, 0.00E+00, 4.49E+01, 0.00E+00, 0.00E+00, 3.84E+00 ! 1 ! ZPLTFM = .0 ! 1 ! FMFAC = 1.0 ! !END! 2 ! SRCNAM = EU27 ! 2 ! X = 972.438, -114.621, 64.92, 138.1, 2.97, 16.31, 422.0, .0, 3.35E+01, 0.00E+00, 4.57E+01, 0.00E+00, 0.00E+00, 5.34E+00 ! 2 ! ZPLTFM = .0 ! 2 ! FMFAC = 1.0 ! !END!	☑ JHC ☑ JHC	

TABLE E-2. POSTUTIL CONTROL FILE CHECKLIST

Order	Primary Categories in POSTUTIL Input File	Default Value (Trinity)	Checked?	Notes
1	Header	Update header record for the year modeled (XX) ESSROC SPEED INDIANA BART APPLICABILITY ANALYSIS 20XX MAMMOTH CAVE	☑ JHC	
2	Output File Names	Update all files in OUTPUT GROUP: 0a and save POSTUTIL control file as SPEEDINUTXX.* file name POSTUTIL.LST ! UTLLST = SPEEDINUTXX.lst! MODEL.DAT ! UTLDAT = SPEEDINUTXX.con!	☑ JHC ☑ JHC	
3	Number of CALMET Files used in ALM	VISTAS 4-km ! NFILES = 24 ! IDEM 36-km ! NFILES = 364 ('02 and '03), 366 ('04) !	☑ JHC	
4	Met Data	Update Subgroup (0d) with model year (XX) specifically ! UTLMET=E:\20XX-dom3\MET20XX-DOM3-01A.DAT ! (4-km) ! UTLMET=D:\20XX\CALMET.020102.DAT ! (36-km)	☑ JHC	
5	Input File Name	CALPUFF.DAT ! MODDAT = SPEEDINXX.con !	☑ JHC	
6	Run period	Update ! IBYR = 20XX ! in INPUT GROUP: 1 -- General run control parameters	☑ JHC	
7	NSPECINP (Number of Species)	Check ! NSPECINP = 6 ! in INPUT GROUP: 1 -- General run control parameters	☑ JHC	
8	NSPECOUT (Number of species output)	Check ! NSPECOUT = 6 ! in INPUT GROUP: 1	☑ JHC	
9	NSPECOUT (Number of species to compute from those species)	Check ! NSPECCMP = 0 ! in INPUT GROUP: 1	☑ JHC	
10	NH3TYP (Input source of Ammonia)	Check ! NH3TYP = 3 ! in INPUT GROUP: 1, where 3 = NH3 Monthly averaged background (BCKNH3) listed below will be used alone.	☑ JHC	
11	BCKNH3 (Monthly Background Concentration of Ammonia)	Check ! BCKNH3 = 3 ! in INPUT GROUP: 1 follows MRPO 12 i.e. ! BCKNH3 = 0.30, 0.30, 0.30, 0.50, 0.50, 0.50, 0.50, 0.50, 0.50, 0.50, 0.50, 0.50 !	☑ JHC	
12	Processed Species	Check Subgroup (2a) ! ASPECI = SO2 ! !END! ! ASPECI = SO4 ! !END! ! ASPECI = NOX ! !END! ! ASPECI = HNO3 ! !END! ! ASPECI = NO3 ! !END! ! ASPECI = PM25 ! !END!	☑ JHC	
11	Species to be written	Check Subgroup (2b) ! ASPECO = SO2 ! !END! ! ASPECO = SO4 ! !END! ! ASPECO = NOX ! !END! ! ASPECO = HNO3 ! !END! ! ASPECO = NO3 ! !END! ! ASPECO = PM25 ! !END!	☑ JHC	

TABLE E-3. CALPOST CONTROL FILE CHECKLIST

Order	Primary Categories in CALPOST Input File	Default Value (Trinity)	20% Best Days	Checked
1	Header	Update header record with the year modeled (XX) ESSROC SPEED INDIANA BART APPLICABILITY ANALYSIS - 20XX MAMMOTH CAVE MRPO 20% NATURAL BACKGROUND		☑ JHC
2	File Names	Update all files in OUTPUT GROUP: 0a and save POSTUTIL control file as SPEEDINBBBAAXX.* for 4 km (where BBB= type of background, M20 (for MRPO 20% best days) , AA= Class I area, MC (for Mammoth Cave), and XX= year) and as SPEEDINAAAAXX.* for 36 km (where AAAA= Class I area and XX= year)		
		INPUT ==> MODEL.DAT ! MODDAT = SPEEDINUTXX.con!		☑ JHC
		VISTAS 4-km CALMET		
		OUTPUT ==>CALPOST.LST ! PSTLST = SPEEDINM20MCXX.lst! OUTPUT ==>DELVIS.DAT ! DVISDAT = SPEEDINM20MCXX.del!		☑ JHC
		IDEM 36-km CALMET		
		OUTPUT ==>CALPOST.LST ! PSTLST = SPEEDINAAAAXX.lst! (where AAAA = Class I area)		☑ JHC
3	Run period	Update ! ISYR = 20XX ! in INPUT GROUP: 1 -- General run control parameters		☑ JHC
4	ASPEC (species)	Check ! ASPEC = VISIB ! in INPUT GROUP: 1 -- General run control parameters		☑ JHC
5	ILAYER (Layer/deposition code)	Check ! ILAYER = 1 ! in INPUT GROUP: 1 -- General run control parameters		☑ JHC
6	NDRECP (receptors to include)	Check INPUT GROUP: 1 -- General run control parameters VISTAS 4-km CALMET MC ! NDRECP = 302*1! IDEM 36-km CALMET BOWA ! NDRECP = 856*1, 3578*0 ! BRIG ! NDRECP = 856*0, 16*1, 3562*0 ! DOSO ! NDRECP = 872*0, 65*1, 3497*0 ! GRGU ! NDRECP = 937*0, 38*1, 3459*0 ! GRSM ! NDRECP = 975*0, 736*1, 2723*0 ! HEGL ! NDRECP = 1711*0, 80*1, 2643*0 ! ISLE ! NDRECP = 1791*0, 966*1, 1677*0 ! JARI ! NDRECP = 2757*0, 52*1, 1625*0 ! LIGO ! NDRECP = 2809*0, 66*1, 1559*0 ! LYBR ! NDRECP = 2875*0, 103*1, 1456*0 ! MACA ! NDRECP = 2978*0, 302*1, 1154*0 ! MING ! NDRECP = 3280*0, 47*1, 1107*0 ! OTCR ! NDRECP = 3327*0, 122*1, 985*0 ! SENE ! NDRECP = 3449*0, 173*1, 812*0 ! SHEN ! NDRECP = 3622*0, 298*1, 514*0 ! SIPS ! NDRECP = 3920*0, 148*1, 366*0 ! VOYA ! NDRECP = 4068*0, 366*1 !		☑ JHC

TABLE E-3. CALPOST CONTROL FILE CHECKLIST

Order	Primary Categories in CALPOST Input File	Default Value (Trinity)	20% Best Days	Checked
7	BTZONE (time zone)	Check ! BTZONE = 5.0 ! in INPUT GROUP: 2 -- Visibility Parameters (ASPEC = VISIB)		☑ JHC
8	Modeled Species to be included in computing the light extinction	Include SULFATE? (LVSO4) -- Default: T ! LVSO4 = T !		☑ JHC
		Include NITRATE? (LVNO3) -- Default: T ! LVNO3 = T !		☑ JHC
		Include ORGANIC CARBON? (LVOC) -- Default: T ! LVOC = F !		☑ JHC
		Include COARSE PARTICLES? (LVPMC) -- Default: T ! LVPMC = F !		☑ JHC
		Include FINE PARTICLES? (LVPMF) -- Default: T ! LVPMF = T !		☑ JHC
9	SPECPMF (species name for PM fine)	Check ! SPECPMF = PM25 ! in INPUT GROUP: 2 -- Visibility Parameters (ASPEC = VISIB)		☑ JHC
10	Extinction Efficiency ($Mm^{-1}/\mu g/m^3$)	Check Subgroup (2)		
		MODELED particulate species:		
		PM COARSE (EEPMC) -- Default: 0.6 ! EEPMC = 0.6 !		☑ JHC
		PM FINE (EEPMF) -- Default: 1.0 ! EEPMF = 1.0 !		☑ JHC
		BACKGROUND particulate species:		
		PM COARSE (EEPMCBK) -- Default: 0.6 ! EEPMCBK = 0.6 !		☑ JHC
		Other species:		
		AMMONIUM SULFATE (EESO4) -- Default: 3.0 ! EESO4 = 3.0 !		☑ JHC
		AMMONIUM NITRATE (EENO3) -- Default: 3.0 ! EENO3 = 3.0 !		☑ JHC
		ORGANIC CARBON (EEOC) -- Default: 4.0 ! EEOC = 4.0 !		☑ JHC
		SOIL (EESOIL)-- Default: 1.0 ! EESOIL = 1.0 !		☑ JHC
		ELEMENTAL CARBON (EEEC) -- Default: 10. ! EEEC = 10.0 !		☑ JHC
11	MVISBK (visibility calculation method)	Check ! MVISBK = 6 ! in INPUT GROUP: 2 -- Visibility Parameters (ASPEC = VISIB)		☑ JHC
12	RHFAC (f(RH) values by month)	Update ! RHFAC = ! in INPUT GROUP: 2 -- Visibility Parameters (ASPEC = VISIB) and compare against *Guidance for Estimating Natural Visibility Conditions Under the Regional Haze Program/ EPA-454/B-03-05 September 2003, Table A-3*.		
		!RHFAC = 3.4, 3.1, 2.9, 2.6, 3.2, 3.5, 3.7, 3.9, 3.9, 3.4, 3.2, 3.5 !(for Mammoth Cave)		☑ JHC
13	Natural Conditions	Background species concentrations (µg/m3) specific to Mammoth Cave computed following the MRPO protocol [ammonium sulfate (BKSO4), ammonium nitrate (BKNO3), coarse particulates (BKPMC), organic carbon (BKOC), soil (BKSOIL), and elemental carbon (BKEC)].		
		BKSO4 =	0.095	☑ JHC
		BKNO3 =	0.041	☑ JHC
		BKPMC =	1.233	☑ JHC
		BKOC =	0.575	☑ JHC
		BKSOIL =	0.206	☑ JHC
		BKEC =	0.008	☑ JHC
		BEXTRAY (Rayleigh Extinction) =	10	☑ JHC

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

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February 25, 2008

IDEM's response to ESSROC – Speed BART analysis

IDEM has reviewed the information provided by ESSROC-Speed for our subject to BART analysis of your facility. A lack of information concerning the SO2 emissions calculations for ESSROC-Speed's subject to BART determination has been found. Therefore, IDEM requests additional emission information from ESSROC-Speed's Kilns #1 and #2.

IDEM does not find the SO2 emissions estimates as listed in the ESSROC-Speed BART analysis report and subsequent email correspondence with its consultants adequate. The SO2 estimates for the BART analysis are based on less than 3 years of CEM data and a permit application that has since been withdrawn. This information would have been gathered from the BART survey forms, which were submitted to all BART eligible sources, including ESSROC in the fall of 2005. However, IDEM did not receive a completed BART survey form from the ESSROC facilities located in Speed. Requests for additional SO2 CEM data were made to ESSROC, or its consultants, on July 31, 2007, September 22, 2007, January 16, 2008 and January 17, 2008. ESSROC's consultants submitted information on September 4, 2007 and January 24, 2008.

The BART emissions information submitted by ESSROC was reviewed by IDEM permit reviewers who reviewed ESSROC's Plantwide Applicability Limits (PAL) permit application, which has since been withdrawn by ESSROC. Problems with the data involve discrepancies in the SO2 and NOx emission estimates and lack of SO2 CEMS information to calculate representative 24 hour average actual emissions rate from the highest emitting day over a 3 year period.

Previously, U.S. EPA commented on the ESSROC's proposed PAL, focusing their attention on the SO2 emissions and the need for further CEM data, which are necessary for the PAL calculations. U.S. EPA and Federal Land Managers will be reviewing all subject to BART determinations. This further emphasizes the need for the additional information.

The table below shows the potential SO2 and NOx emissions for Kilns #1 and #2 and the various emissions estimates based on historical data, continuous monitoring and the plantwide applicability limits from a now withdrawn permit application.

Unit	Pollutant	Potential	PAL – ESSROC	CEM – ESSROC	PAL Development-IDEM
		(lb/hr)	**(lb/hr)**	**(lb/hr)**	**(lb/hr)**
Kiln #1	SO2	1104.0	472.5	92.4	630.4
Kiln #2	SO2	1812.0	266.3	334.2	456.5
TOTAL		**2916.0**	**738.8**	**426.6**	**1096.9**
Kiln #1	NOx	360.0	362.8		267.7
Kiln #2	NOx	462.0	356.7		462.0
TOTAL		**822.0**	**719.5**		**719.7**

A conservative approach is necessary to ensure the visibility impacts from any subject to BART source, such as ESSROC, do not significantly affect nearby Class 1 areas. The BART rule recommends modeling the “24 hour average actual emissions rate from the highest emitting day of the meteorological period modeled” (70 FR 39162). If the emission estimates proposed in the BART analysis are consistent over a 3 year period (the three year period can be more recent than the modeled period), IDEM will review those estimates and determine the visibility impacts on nearby Class 1 areas.

IDEM requests that 3 years of SO2 and NOx emission data summaries be submitted for Kilns #1 and #2 and representative 24 hour average actual emissions rates from the highest emitting day be calculated. While the conservative emissions approach that ESSROC previously submitted shows Kilns #1 and #2 are not subject to BART, the potential emissions show that ESSROC is subject to BART. ESSROC based their modeled emissions on a proposed permit application that the company withdrew during the comment period. SO2 and NOx emissions calculations over a 3-year period, consistent with the BART rule and ESSROC modeling protocol will help in the decision for ESSROC-Speed’s subject to BART determination. Pending IDEM's receipt of the 3 years of emissions data and subsequent determination of visibility impact, ESSROC-Speed is considered subject to BART.

Contact me if you have questions.

Mark Derf
Office of Air Quality
Indiana Department of Environmental Management
Indianapolis, IN 46206

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May 5, 2008

Mark Derf
Office of Air Quality
Indiana Department of Environmental Management
Indianapolis, IN 46206

RE: Response to IDEM Comments on BART Exemption Analysis
ESSROC Speed, IN

Dear Mr. Derf:

In response to your memorandum dated February 25, 2008, ESSROC has compiled CEMS data for our Speed Plant that furthers supports our facility's exemption from BART. Specifically, we have compiled the readily available Continuous Emissions Monitoring System (CEMS) data for NO_x and SO_2 for our two BART eligible cement kilns (Kilns 1 and Kiln 2) for most of 2006, 2007 and the first quarter of 2008 (1Q2008) and have summarized the resulting emission rates and modeled visibility impacts against the applicable thresholds. These data continue to indicate that this facility is not subject to BART. After you review this information, we believe that IDEM will concur with our conclusion.

NO_x and SO_2 CEMS Monitoring

As IDEM is aware, the Speed Plant is subject to significant reporting of NO_x emissions and as a result the facility operates certified NO_x CEMS on Kilns 1 and 2. In addition, ESSROC does operate CEMS on Kilns 1 and 2 for SO_2. However, ESSROC is not required to monitor SO_2 via a CEMS and the SO_2 monitors are not certified and are used exclusively for process monitoring purposes. The daily data collected from these monitors for calendar years 2006 and 2007 and 1Q2008 are summarized in Attachment 1. Note, as calendar year 2005 and early 2006 data is not readily available in electronic format, and we do not believe addition to the analysis would alter our conclusions here, we have not included them in our analysis.

Evaluation of Highest Emitting Day Emission Rates from CEM Data

The BART exemption process seeks to identify the highest emitting day's actual emission rates representative of modeled calendar years 2002 through 2004.[1,2] Although the BART rule and guidance allows many different methods to quantify these emissions, CEMS data can typically be considered to be credible for this purpose. Even though the attached assessment evaluates data from a different time period (i.e., 2006, 2007, and 1Q2008) than that used for BART exemption modeling, we have utilized these emission rate data in our updated exemption analysis as discussed below.

[1] Comment letter from IDEM to ESSROC dated January 29, 2007.
[2] MRPO, *Single Source Modeling to Support Regional Haze BART Modeling Protocol*, March 21, 2006.

In our analysis, ESSROC reviewed the highest daily emissions value for each day during 2006, 2007, and 1Q2008 from the CEMS data set for both NO_x and SO_2, independently. During this time period, data collection from the CEMS was very good and the quality of data was reviewed to confirm that these data appeared reasonable given the normal variability of emissions from the cement kiln process. The resulting highest emitting days for the ESSROC for NO_x and SO_2 are summarized below.

Table 1. NO_x and SO_2 Highest Emitting Day Summary 2006-1Q2008 (CEMS Data)*

Pollutant	Highest Emission Rate (lb/day)	Date of Occurrence	Kiln 1 Emission Rate (lb/hr)	Kiln 2 Emission Rate (lb/hr)
NO_x	17,928	12/4/2006	302.6	444.4
SO_2	10,706	5/20/2006	37.8	408.3

* Average hourly emission rate for corresponding day.

Assessment of BART Exemption Status

Based on these data, we reanalyzed the visibility impacts at Mammoth Cave National Park from the Speed Plant with these emissions rates according to the modeling methodology previously accepted by IDEM. Our results, as summarized in Attachment 2, indicate that the 98th percentile visibility impact level was 0.44 dVs which is safely below the 0.5 dV exemption level. Accordingly, the ESSROC Speed Plant is considered exempt from BART requirements.

We hope that this information resolves any remaining concerns that IDEM may have regarding the Speed Plant's BART exempt status. If you have any questions, do not hesitate to contact us or Mike Remsberg, Trinity Consultants, at 240-379-7490 x101.

Sincerely,

ESSROC CEMENT CORP

Paul Stewart
Plant Manager

ATTACHMENTS

cc: David Hitt, ESSROC
Gary Molchan, ESSROC
Mike Cawthray, ESSROC
Mike Remsberg, Trinity
Jim Hauck, Hatchett & Hauck

ATTACHMENT 1
NOx and SO2 CEM Data - 2006 to 1Q2008

Date	Total SO_2 (lb/day)	Kiln 1 (lb/hr)	Kiln 2 (lb/hr)	Total NO_x (lb/day)
4/26/2006	4,272.0			11,268.0
4/27/2006	7,250.4			10,924.8
4/28/2006	6,840.0			12,564.0
4/29/2006	6,580.8			10,142.4
4/30/2006	7,303.2			11,457.6
5/1/2006	6,792.0			10,464.0
5/2/2006	5,652.0			10,761.6
5/3/2006	5,260.8			11,611.2
5/4/2006	7,024.8			11,553.6
5/5/2006	5,961.6			11,121.6
5/6/2006	6,708.0			11,616.0
5/7/2006	7,008.0			12,616.8
5/8/2006	3,780.5			9,287.2
5/9/2006	5,382.4			11,246.2
5/10/2006	5,649.2			9,936.4
5/11/2006	7,504.8			11,719.2
5/12/2006	5,829.6			12,374.4
5/13/2006	6,460.8			12,537.6
5/14/2006	7,219.2			13,788.0
5/15/2006	7,747.2			12,280.8
5/16/2006	7,627.2			13,051.2
5/17/2006	8,440.2			10,056.0
5/18/2006	8,325.6			13,867.2
5/19/2006	9,444.0			13,396.8
5/20/2006	**10,706.4**	**37.8**	**408.3**	12,472.8
5/21/2006	8,047.2			11,592.0
5/22/2006	3,911.2			10,088.0
5/23/2006	948.0			6,784.8
5/24/2006	1,070.4			6,064.8
5/25/2006	6,837.6			14,085.6
5/26/2006	7,948.8			12,244.8
5/27/2006	6,688.8			14,359.2
5/28/2006	8,223.8			13,474.2
5/29/2006	6,789.6			15,062.4
5/30/2006	3,091.0			8,365.0
5/31/2006	3,378.0			9,374.7
6/1/2006	5,286.3			12,997.3
6/2/2006	5,983.2			6,835.2
6/3/2006	7,702.6			13,962.8
6/4/2006	7,010.4			13,581.6
6/5/2006	6,657.6			15,180.0
6/6/2006	5,944.8			15,072.0
6/7/2006	6,343.2			13,747.2
6/8/2006	3,935.5			3,374.5
6/9/2006	6,710.4			13,248.0
6/10/2006	7,706.4			14,368.8
6/11/2006	7,012.8			12,960.0
6/12/2006	7,737.6			14,680.8

ATTACHMENT 1
NOx and SO2 CEM Data - 2006 to 1Q2008

Date	Total SO_2 (lb/day)	Total NO_x (lb/day)
6/13/2006	8,697.6	13,389.6
6/14/2006	7,096.8	14,325.6
6/15/2006	7,689.6	16,545.6
6/16/2006	6,139.2	7,600.8
6/17/2006	6,448.8	7,041.6
6/18/2006	8,097.6	13,783.2
6/19/2006	6,744.0	11,983.2
6/20/2006	6,256.8	14,104.8
6/21/2006	5,971.2	14,563.2
6/22/2006	1,368.0	7,814.4
6/23/2006	1,420.8	7,915.2
6/24/2006	1,437.6	7,764.0
6/25/2006	1,437.6	7,248.0
6/26/2006	1,447.2	6,194.4
6/27/2006	1,303.2	6,972.0
6/28/2006	1,365.6	7,183.2
6/29/2006	4,836.3	12,393.9
6/30/2006	6,452.7	13,281.0
7/1/2006	7,569.6	14,738.4
7/2/2006	6,595.2	14,083.2
7/3/2006	6,614.4	13,478.4
7/4/2006	6,038.4	13,116.0
7/5/2006	5,534.4	15,184.8
7/6/2006	3,384.0	11,961.6
7/7/2006	4,860.0	13,044.0
7/8/2006	4,689.6	12,436.8
7/9/2006	5,222.4	14,961.6
7/10/2006	5,728.8	13,288.8
7/11/2006	5,157.6	13,236.0
7/12/2006	5,916.0	13,188.0
7/13/2006	5,596.8	12,187.2
7/14/2006	4,396.8	10,959.6
7/15/2006	1,367.1	7,157.5
7/16/2006	1,409.0	3,425.9
7/17/2006	2,988.9	12,580.5
7/18/2006	4,113.2	10,278.6
7/19/2006	3,352.8	12,518.4
7/20/2006	3,651.6	10,707.6
7/21/2006	5,385.6	14,409.6
7/22/2006	5,688.0	15,038.4
7/23/2006	6,837.6	15,583.2
7/24/2006	5,666.4	15,264.0
7/25/2006	6,964.8	15,722.4
7/26/2006	6,578.0	14,095.2
7/27/2006	3,471.5	12,039.4
7/28/2006	4,660.8	13,053.6
7/29/2006	4,768.8	14,544.0
7/30/2006	5,357.2	11,506.0
7/31/2006	5,068.8	11,983.2
8/1/2006	7,143.3	12,800.5

ATTACHMENT 1
NOx and SO2 CEM Data - 2006 to 1Q2008

Date	Total SO_2 (lb/day)	Total NO_x (lb/day)
8/2/2006	6,780.0	11,983.2
8/3/2006	6,792.0	11,800.8
8/4/2006	6,612.0	11,961.6
8/5/2006	6,624.0	12,904.8
8/6/2006	6,950.4	13,296.0
8/7/2006	7,080.0	13,356.0
8/8/2006	8,515.2	13,360.8
8/9/2006	6,112.8	11,740.8
8/10/2006	6,242.4	11,078.4
8/11/2006	4,852.8	14,524.8
8/12/2006	5,906.4	16,927.2
8/13/2006	5,658.0	15,306.8
8/14/2006	1,694.4	7,101.6
8/15/2006	1,276.8	5,073.0
8/16/2006	0.0	0.0
8/17/2006	0.0	0.0
8/18/2006	0.0	0.0
8/19/2006	0.0	0.0
8/20/2006	0.0	0.0
8/21/2006	0.0	0.0
8/22/2006	0.0	0.0
8/23/2006	0.0	0.0
8/24/2006	0.0	0.0
8/25/2006	0.0	0.0
8/26/2006	0.0	0.0
8/27/2006	2,401.2	849.6
8/28/2006	937.7	8,049.8
8/29/2006	5,554.2	5,547.0
8/30/2006	4,340.2	9,856.5
8/31/2006	4,372.8	13,027.2
9/1/2006	4,694.4	13,394.4
9/2/2006	2,875.2	12,652.8
9/3/2006	3,660.0	13,689.6
9/4/2006	5,037.6	14,661.6
9/5/2006	3,278.4	15,952.8
9/6/2006	4,709.3	11,123.6
9/7/2006	2,071.0	15,920.8
9/8/2006	842.4	13,783.2
9/9/2006	2,760.0	13,024.8
9/10/2006	3,650.8	10,306.6
9/11/2006	3,734.4	11,608.8
9/12/2006	3,204.0	13,056.0
9/13/2006	4,430.4	12,888.0
9/14/2006	2,611.2	15,559.2
9/15/2006	60.0	7,243.2
9/16/2006	300.0	6,086.4
9/17/2006	180.0	6,115.2
9/18/2006	177.6	6,196.8
9/19/2006	2,981.1	12,300.9
9/20/2006	4,524.0	13,994.4

ATTACHMENT 1
NOx and SO2 CEM Data - 2006 to 1Q2008

Date	Total SO_2 (lb/day)	Total NO_x (lb/day)
9/21/2006	3,720.0	15,024.0
9/22/2006	2,292.0	12,189.6
9/23/2006	2,523.6	12,163.8
9/24/2006	3,849.6	4,783.2
9/25/2006	4,118.4	6,981.6
9/26/2006	4,653.6	6,775.2
9/27/2006	4,111.2	7,488.0
9/28/2006	5,748.0	7,540.8
9/29/2006	3,049.3	6,238.4
9/30/2006	4,406.4	4,310.4
10/1/2006	5,335.2	5,236.8
10/2/2006	2,971.2	3,866.4
10/3/2006	3,504.0	3,266.4
10/4/2006	4,853.0	4,100.9
10/5/2006	2,252.8	3,873.6
10/6/2006	5,208.0	8,100.0
10/7/2006	3,016.8	5,402.4
10/8/2006	2,302.3	5,131.3
10/9/2006	1,632.8	3,532.1
10/10/2006	3,026.4	4,748.1
10/11/2006	2,929.8	8,833.4
10/12/2006	2,634.8	12,790.4
10/13/2006	3,060.0	12,849.6
10/14/2006	3,938.4	12,225.6
10/15/2006	4,262.4	12,009.6
10/16/2006	4,346.4	11,052.0
10/17/2006	2,148.0	5,647.2
10/18/2006	1,594.5	3,501.0
10/19/2006	4,093.4	14,648.0
10/20/2006	5,119.2	13,725.6
10/21/2006	5,064.0	14,114.4
10/22/2006	4,303.2	14,680.8
10/23/2006	4,720.8	14,822.4
10/24/2006	4,308.0	14,294.4
10/25/2006	5,064.0	16,221.6
10/26/2006	3,636.0	13,111.8
10/27/2006	3,979.2	17,212.8
10/28/2006	3,784.8	15,460.8
10/29/2006	3,745.2	12,646.6
10/30/2006	3,338.4	9,410.4
10/31/2006	3,295.2	11,227.2
11/1/2006	5,186.4	12,420.0
11/2/2006	2,947.2	9,732.0
11/3/2006	5,117.1	10,194.2
11/4/2006	3,859.2	10,411.2
11/5/2006	3,820.8	14,390.4
11/6/2006	4,192.8	11,536.8
11/7/2006	3,571.2	13,555.2
11/8/2006	3,977.2	13,236.4
11/9/2006	1,010.7	2,014.2

ATTACHMENT 1
NOx and SO2 CEM Data - 2006 to 1Q2008

Date	Total SO_2 (lb/day)	Total NO_x (lb/day)
11/10/2006	1,501.2	10,526.4
11/11/2006	3,040.8	12,271.2
11/12/2006	4,063.2	12,208.8
11/13/2006	3,830.4	13,147.2
11/14/2006	4,614.8	12,805.6
11/15/2006	55.2	6,597.6
11/16/2006	19.2	6,993.6
11/17/2006	3,496.8	15,631.2
11/18/2006	3,736.8	13,142.4
11/19/2006	5,632.8	12,357.6
11/20/2006	3,221.4	12,398.4
11/21/2006	12.0	6,986.4
11/22/2006	40.8	4,821.6
11/23/2006	60.0	5,851.2
11/24/2006	4,038.0	12,133.2
11/25/2006	4,017.3	15,775.5
11/26/2006	4,490.4	11,263.2
11/27/2006	6,290.4	13,838.4
11/28/2006	4,259.0	12,869.8
11/29/2006	4,135.2	14,810.4
11/30/2006	5,510.4	13,195.2
12/1/2006	3,849.6	14,572.8
12/2/2006	2,351.7	7,690.8
12/3/2006	2,923.2	16,375.8
12/4/2006	4,449.6	**17,928.0**
12/5/2006	4,478.4	13,533.6
12/6/2006	4,970.4	12,019.2
12/7/2006	2,544.0	13,188.0
12/8/2006	5,841.6	15,592.8
12/9/2006	3,688.8	10,939.2
12/10/2006	3,842.1	12,019.9
12/11/2006	810.0	3,614.8
12/12/2006	3,242.0	13,996.5
12/13/2006	3,393.6	12,799.2
12/14/2006	3,403.2	12,837.6
12/15/2006	2,416.8	14,817.6
12/16/2006	2,162.4	15,441.6
12/17/2006	1,884.0	12,456.0
12/18/2006	1,320.0	11,875.2
12/19/2006	4,490.4	16,029.6
12/20/2006	2,464.8	15,194.4
12/21/2006	2,626.4	12,985.6
12/22/2006	2,311.2	15,592.8
12/23/2006	3,072.0	13,953.6
12/24/2006	2,827.2	14,892.0
12/25/2006	3,686.4	14,510.4
12/26/2006	3,108.0	11,126.4
12/27/2006	2,966.4	13,776.0
12/28/2006	1,814.4	13,651.2
12/29/2006	2,822.4	11,839.2

Kiln 1 (lb/hr)	Kiln 2 (lb/hr)
302.6	**444.4**

ATTACHMENT 1
NOx and SO2 CEM Data - 2006 to 1Q2008

Date	Total SO_2 (lb/day)	Total NO_x (lb/day)
12/30/2006	2,227.2	12,734.4
12/31/2006	3,276.0	11,284.8
1/1/2007	3,124.8	12,304.8
1/2/2007	3,187.6	10,120.8
1/3/2007	3,532.8	5,589.6
1/4/2007	3,530.8	9,795.3
1/5/2007	4,725.6	13,161.6
1/6/2007	3,093.6	14,251.2
1/7/2007	3,655.2	10,860.0
1/8/2007	2,796.0	11,788.8
1/9/2007	1,826.4	10,562.4
1/10/2007	1,806.4	8,529.2
1/11/2007	1,569.9	8,469.6
1/12/2007	2,165.6	9,287.6
1/13/2007	2,904.0	11,834.4
1/14/2007	2,088.0	12,643.2
1/15/2007	2,577.6	5,916.0
1/16/2007	1,317.6	6,729.6
1/17/2007	2,124.0	13,188.0
1/18/2007	3,660.0	13,072.8
1/19/2007	3,892.8	12,770.4
1/20/2007	1,512.0	14,704.8
1/21/2007	2,539.2	8,278.8
1/22/2007	3,844.8	5,095.2
1/23/2007	6,141.6	5,186.4
1/24/2007	5,721.9	7,885.8
1/25/2007	3,276.0	12,460.8
1/26/2007	5,220.0	12,153.6
1/27/2007	4,953.6	12,720.0
1/28/2007	3,016.8	10,197.6
1/29/2007	3,184.8	12,391.2
1/30/2007	2,849.4	9,700.8
1/31/2007	4,888.8	14,796.0
2/1/2007	4,346.4	13,106.4
2/2/2007	4,284.0	13,137.6
2/3/2007	4,003.2	13,442.4
2/4/2007	3,957.6	14,248.8
2/5/2007	6,330.2	12,044.8
2/6/2007	6,715.2	13,089.6
2/7/2007	3,981.6	12,381.6
2/8/2007	1,458.2	5,073.5
2/9/2007	4,031.7	5,923.5
2/10/2007	3,177.6	14,018.4
2/11/2007	4,598.4	13,382.4
2/12/2007	4,915.2	13,766.4
2/13/2007	4,369.2	11,960.0
2/14/2007	4,705.2	11,459.9
2/15/2007	4,262.4	13,908.0
2/16/2007	1,648.8	9,659.6
2/17/2007	4,084.8	13,440.0

ATTACHMENT 1
NOx and SO2 CEM Data - 2006 to 1Q2008

Date	Total SO_2 (lb/day)	Total NO_x (lb/day)
2/18/2007	5,100.0	11,400.0
2/19/2007	5,916.0	12,700.8
2/20/2007	4,531.2	10,615.2
2/21/2007	1,870.4	6,636.8
2/22/2007	3,537.6	11,426.4
2/23/2007	2,527.2	10,394.4
2/24/2007	2,930.4	4,899.4
2/25/2007	1,812.0	3,655.2
2/26/2007	2,628.0	9,144.0
2/27/2007	4,285.4	10,984.2
2/28/2007	5,839.2	10,202.4
3/1/2007	0.0	0.0
3/2/2007	0.0	0.0
3/3/2007	379.9	5,734.5
3/4/2007	2,800.8	12,309.6
3/5/2007	4,130.4	13,694.4
3/6/2007	3,112.8	12,273.6
3/7/2007	5,270.4	12,122.4
3/8/2007	4,641.6	12,957.6
3/9/2007	5,126.4	11,301.6
3/10/2007	6,230.4	11,551.2
3/11/2007	5,186.4	11,604.0
3/12/2007	6,040.8	11,340.0
3/13/2007	6,448.8	13,857.6
3/14/2007	7,012.8	11,056.8
3/15/2007	7,699.2	10,672.8
3/16/2007	7,024.8	10,377.6
3/17/2007	7,015.2	11,985.6
3/18/2007	6,782.4	11,260.8
3/19/2007	2,089.6	3,713.2
3/20/2007	3,179.4	4,657.6
3/21/2007	7,135.2	4,514.4
3/22/2007	6,018.0	7,588.8
3/23/2007	5,776.8	10,312.8
3/24/2007	4,623.9	9,849.8
3/25/2007	6,110.4	11,604.0
3/26/2007	6,271.2	10,788.0
3/27/2007	6,741.6	10,197.6
3/28/2007	7,101.6	9,204.0
3/29/2007	7,084.8	9,333.6
3/30/2007	7,041.6	10,128.0
3/31/2007	6,172.8	8,913.6
4/1/2007	4,790.4	9,873.6
4/2/2007	4,549.0	9,734.8
4/3/2007	28.8	5,940.0
4/4/2007	62.4	6,672.0
4/5/2007	4,617.0	8,089.6
4/6/2007	4,033.2	10,210.0
4/7/2007	5,186.4	11,342.4
4/8/2007	4,817.1	9,249.6

ATTACHMENT 1
NOx and SO2 CEM Data - 2006 to 1Q2008

Date	Total SO_2 (lb/day)	Total NO_x (lb/day)
4/9/2007	6,626.4	10,173.6
4/10/2007	4,442.4	10,471.2
4/11/2007	3,813.6	10,274.4
4/12/2007	3,668.0	10,260.8
4/13/2007	2,560.8	9,120.4
4/14/2007	6,374.4	9,458.4
4/15/2007	8,431.2	7,776.0
4/16/2007	7,766.4	11,695.2
4/17/2007	5,037.6	10,072.8
4/18/2007	2,979.7	8,505.7
4/19/2007	5,191.3	8,246.5
4/20/2007	5,037.6	10,864.8
4/21/2007	4,584.6	8,845.1
4/22/2007	5,767.2	11,894.4
4/23/2007	2,602.8	10,417.8
4/24/2007	2,884.8	9,004.8
4/25/2007	4,521.6	8,264.0
4/26/2007	5,277.6	6,933.6
4/27/2007	6,048.0	6,144.0
4/28/2007	6,708.0	6,103.2
4/29/2007	2,560.8	6,411.9
4/30/2007	60.0	6,132.0
5/1/2007	60.0	7,790.4
5/2/2007	153.6	6,885.6
5/3/2007	117.0	6,512.4
5/4/2007	0.0	0.0
5/5/2007	0.0	0.0
5/6/2007	0.0	0.0
5/7/2007	0.0	0.0
5/8/2007	0.0	0.0
5/9/2007	0.0	0.0
5/10/2007	0.0	0.0
5/11/2007	0.0	0.0
5/12/2007	0.0	0.0
5/13/2007	0.0	0.0
5/14/2007	0.0	0.0
5/15/2007	0.0	0.0
5/16/2007	0.0	0.0
5/17/2007	0.0	0.0
5/18/2007	0.0	0.0
5/19/2007	0.0	0.0
5/20/2007	0.0	0.0
5/21/2007	1,805.5	2,768.0
5/22/2007	2,358.3	9,556.8
5/23/2007	4,737.6	11,152.8
5/24/2007	2,979.6	9,918.8
5/25/2007	1,261.7	8,640.5
5/26/2007	1,599.6	11,283.6
5/27/2007	2,576.4	9,685.2
5/28/2007	1,793.7	9,430.6

ATTACHMENT 1
NOx and SO2 CEM Data - 2006 to 1Q2008

Date	Total SO_2 (lb/day)	Total NO_x (lb/day)
5/29/2007	2,629.5	9,224.7
5/30/2007	2,577.6	10,624.8
5/31/2007	1,422.9	10,223.4
6/1/2007	4,216.8	13,123.2
6/2/2007	5,532.0	11,779.2
6/3/2007	3,604.8	9,590.4
6/4/2007	3,756.0	3,864.0
6/5/2007	3,631.2	3,849.6
6/6/2007	7,610.4	11,992.8
6/7/2007	2,788.8	2,893.2
6/8/2007	6,777.6	16,920.0
6/9/2007	3,411.0	14,665.4
6/10/2007	3,561.6	14,628.0
6/11/2007	4,600.8	14,745.6
6/12/2007	4,348.8	14,299.2
6/13/2007	5,412.0	13,555.2
6/14/2007	4,581.6	14,008.8
6/15/2007	3,590.4	15,852.0
6/16/2007	4,680.0	11,556.0
6/17/2007	4,144.8	13,468.8
6/18/2007	2,966.4	10,848.0
6/19/2007	4,029.6	13,111.2
6/20/2007	5,282.8	10,419.2
6/21/2007	879.6	9,638.4
6/22/2007	3,710.4	13,209.6
6/23/2007	3,519.0	11,165.4
6/24/2007	5,246.7	13,961.7
6/25/2007	6,765.6	15,470.4
6/26/2007	5,059.2	13,132.8
6/27/2007	5,145.6	13,322.4
6/28/2007	5,056.8	12,532.8
6/29/2007	5,512.8	11,066.4
6/30/2007	3,933.6	13,881.6
7/1/2007	4,939.2	12,381.6
7/2/2007	4,418.4	13,744.8
7/3/2007	6,206.4	14,551.2
7/4/2007	57.6	6,225.6
7/5/2007	64.8	5,762.4
7/6/2007	55.2	4,852.8
7/7/2007	67.2	4,987.2
7/8/2007	4,320.7	14,153.1
7/9/2007	3,703.2	12,876.0
7/10/2007	5,073.6	14,260.8
7/11/2007	3,264.0	14,858.4
7/12/2007	3,784.8	14,239.2
7/13/2007	3,256.8	13,310.4
7/14/2007	3,246.0	14,551.5
7/15/2007	5,530.8	10,556.4
7/16/2007	5,479.2	7,689.6
7/17/2007	6,866.4	8,052.0

ATTACHMENT 1
NOx and SO2 CEM Data - 2006 to 1Q2008

Date	Total SO_2 (lb/day)	Total NO_x (lb/day)
7/18/2007	4,363.2	11,157.6
7/19/2007	3,866.4	12,828.0
7/20/2007	3,614.4	14,728.8
7/21/2007	4,077.6	16,202.4
7/22/2007	902.8	7,413.6
7/23/2007	775.1	6,908.5
7/24/2007	3,988.8	11,632.8
7/25/2007	6,004.8	13,320.0
7/26/2007	5,592.0	14,140.8
7/27/2007	4,303.8	11,963.7
7/28/2007	5,460.0	13,334.4
7/29/2007	4,946.4	11,529.6
7/30/2007	5,834.4	12,790.8
7/31/2007	5,852.7	11,917.8
8/1/2007	5,059.2	13,401.8
8/2/2007	4,987.2	14,124.0
8/3/2007	5,534.4	13,785.6
8/4/2007	5,289.6	12,607.2
8/5/2007	4,598.4	11,673.0
8/6/2007	5,661.6	13,344.0
8/7/2007	5,880.0	12,523.2
8/8/2007	6,672.0	12,542.4
8/9/2007	3,515.2	12,714.4
8/10/2007	6,329.6	15,291.4
8/11/2007	8,438.4	14,865.6
8/12/2007	5,368.8	12,391.2
8/13/2007	5,856.0	13,188.0
8/14/2007	5,060.4	11,376.6
8/15/2007	5,581.8	13,038.6
8/16/2007	4,101.6	13,022.4
8/17/2007	3,218.4	13,336.8
8/18/2007	4,142.4	14,810.4
8/19/2007	4,555.2	13,543.2
8/20/2007	3,955.8	13,125.0
8/21/2007	108.0	5,954.4
8/22/2007	57.6	5,781.6
8/23/2007	4,320.7	8,755.0
8/24/2007	6,105.6	14,479.2
8/25/2007	6,091.2	15,165.6
8/26/2007	6,052.8	15,864.0
8/27/2007	4,963.2	14,044.8
8/28/2007	424.8	7,457.4
8/29/2007	865.6	9,531.2
8/30/2007	4,711.2	13,934.4
8/31/2007	7,584.0	15,328.8
9/1/2007	3,312.0	13,838.4
9/2/2007	4,579.2	14,460.0
9/3/2007	4,843.2	16,804.8
9/4/2007	6,909.6	15,525.6
9/5/2007	3,052.8	15,391.2

ATTACHMENT 1
NOx and SO2 CEM Data - 2006 to 1Q2008

Date	Total SO_2 (lb/day)	Total NO_x (lb/day)
9/6/2007	2,743.2	14,016.0
9/7/2007	4,653.5	15,526.4
9/8/2007	4,269.6	14,280.0
9/9/2007	3,972.0	15,828.0
9/10/2007	3,929.3	13,981.4
9/11/2007	6,727.2	14,541.6
9/12/2007	223.6	609.5
9/13/2007	6,719.4	14,814.6
9/14/2007	8,196.0	15,415.2
9/15/2007	4,886.3	14,224.1
9/16/2007	4,860.0	15,590.4
9/17/2007	6,955.2	14,625.6
9/18/2007	6,420.0	15,038.4
9/19/2007	7,075.2	16,929.6
9/20/2007	7,735.2	17,248.8
9/21/2007	3,804.4	11,535.6
9/22/2007	7,027.2	15,319.2
9/23/2007	7,814.4	14,676.0
9/24/2007	4,920.0	13,317.6
9/25/2007	3,703.2	13,454.4
9/26/2007	5,992.8	14,438.4
9/27/2007	7,946.4	15,067.2
9/28/2007	6,501.6	14,100.0
9/29/2007	4,564.8	13,039.2
9/30/2007	4,939.2	15,290.4
10/1/2007	4,586.4	15,237.6
10/2/2007	4,543.2	13,905.6
10/3/2007	5,155.5	14,667.7
10/4/2007	4,677.6	12,708.0
10/5/2007	1,175.2	8,344.8
10/6/2007	3,331.2	11,520.0
10/7/2007	2,614.4	10,203.6
10/8/2007	4,310.4	13,828.8
10/9/2007	4,243.2	13,416.0
10/10/2007	8,493.6	14,128.8
10/11/2007	7,824.0	11,536.8
10/12/2007	9,844.8	13,680.0
10/13/2007	8,258.4	14,680.8
10/14/2007	5,743.2	13,963.2
10/15/2007	4,428.0	13,334.4
10/16/2007	2,560.8	11,096.3
10/17/2007	3,415.2	13,804.8
10/18/2007	4,298.4	13,068.0
10/19/2007	5,726.4	14,016.0
10/20/2007	337.9	6,833.2
10/21/2007	2,817.5	14,549.0
10/22/2007	1,947.9	10,229.0
10/23/2007	2,854.4	11,459.8
10/24/2007	5,860.8	13,672.8
10/25/2007	6,084.0	13,742.4

ATTACHMENT 1
NOx and SO2 CEM Data - 2006 to 1Q2008

Date	Total SO_2 (lb/day)	Total NO_x (lb/day)
10/26/2007	6,199.2	13,591.2
10/27/2007	4,106.4	14,078.4
10/28/2007	3,302.4	12,688.8
10/29/2007	4,456.8	13,478.4
10/30/2007	6,765.6	12,501.6
10/31/2007	7,636.8	12,592.8
11/1/2007	8,512.8	15,528.0
11/2/2007	4,348.8	12,196.8
11/3/2007	3,811.2	14,320.8
11/4/2007	5,436.0	13,977.6
11/5/2007	7,218.0	11,294.4
11/6/2007	5,085.6	14,227.2
11/7/2007	6,765.6	15,492.0
11/8/2007	4,872.0	16,010.4
11/9/2007	7,156.8	15,177.6
11/10/2007	10,502.9	10,119.5
11/11/2007	6,425.6	8,810.2
11/12/2007	5,049.9	9,290.4
11/13/2007	2,944.2	5,892.6
11/14/2007	2,576.4	13,826.4
11/15/2007	5,426.4	14,469.6
11/16/2007	6,880.8	16,161.6
11/17/2007	5,721.6	14,496.0
11/18/2007	4,159.2	13,471.2
11/19/2007	3,554.4	13,161.6
11/20/2007	585.1	7,154.3
11/21/2007	4,915.2	13,447.2
11/22/2007	5,308.8	15,300.0
11/23/2007	3,732.0	12,640.8
11/24/2007	2,208.9	12,637.6
11/25/2007	4,207.2	14,426.4
11/26/2007	6,703.2	12,576.0
11/27/2007	6,506.4	13,680.0
11/28/2007	3,458.4	12,672.0
11/29/2007	4,584.0	14,174.4
11/30/2007	6,223.2	13,773.6
12/1/2007	3,681.6	13,418.4
12/2/2007	5,695.2	12,295.2
12/3/2007	5,868.0	14,155.2
12/4/2007	6,429.6	14,311.2
12/5/2007	2,318.6	9,781.0
12/6/2007	220.8	5,140.8
12/7/2007	6,213.0	11,676.9
12/8/2007	5,736.0	12,189.6
12/9/2007	7,034.4	11,769.6
12/10/2007	8,568.0	12,868.8
12/11/2007	9,076.8	13,780.8
12/12/2007	9,033.6	14,824.8
12/13/2007	4,312.8	14,702.4
12/14/2007	2,347.8	10,652.0

ATTACHMENT 1
NOx and SO2 CEM Data - 2006 to 1Q2008

Date	Total SO_2 (lb/day)	Total NO_x (lb/day)
12/15/2007	6,542.4	12,597.6
12/16/2007	4,056.0	12,652.8
12/17/2007	5,524.8	12,861.6
12/18/2007	4,089.6	8,592.2
12/19/2007	6,396.0	6,261.6
12/20/2007	6,703.2	6,108.0
12/21/2007	5,931.6	10,595.2
12/22/2007	4,035.6	10,039.8
12/23/2007	6,212.0	11,802.8
12/24/2007	7,696.8	12,240.0
12/25/2007	6,352.8	11,462.4
12/26/2007	6,237.6	12,264.0
12/27/2007	3,660.0	11,412.0
12/28/2007	4,891.2	12,045.6
12/29/2007	5,313.6	13,977.6
12/30/2007	4,556.6	11,367.6
1/1/2008	5,685.6	13,185.6
1/2/2008	4,780.8	12,674.4
1/3/2008	60.0	5,616.0
1/4/2008	1,746.0	4,512.3
1/5/2008	72.0	5,467.2
1/6/2008	1,010.4	5,877.6
1/7/2008	2,908.8	8,804.4
1/8/2008	2,835.9	10,285.2
1/9/2008	4,785.0	10,900.2
1/10/2008	2,787.0	5,324.6
1/11/2008	4,221.1	11,442.6
1/12/2008	4,269.6	11,227.2
1/13/2008	3,842.4	10,353.6
1/14/2008	5,174.4	11,510.4
1/15/2008	5,205.6	11,080.8
1/16/2008	2,721.6	11,632.8
1/17/2008	4,080.0	11,210.4
1/18/2008	5,042.4	12,189.6
1/19/2008	5,136.0	12,924.0
1/20/2008	1,549.0	8,495.9
1/21/2008	21.6	3,303.6
1/22/2008	0.0	0.0
1/23/2008	0.0	0.0
1/24/2008	0.0	0.0
1/25/2008	0.0	0.0
1/26/2008	0.0	0.0
1/27/2008	0.0	0.0
1/28/2008	0.0	0.0
1/29/2008	0.0	0.0
1/30/2008	0.0	0.0
1/31/2008	0.0	0.0
2/1/2008	0.0	0.0
2/2/2008	0.0	0.0
2/3/2008	0.0	0.0

ATTACHMENT 1
NOx and SO2 CEM Data - 2006 to 1Q2008

Date	Total SO_2 (lb/day)	Total NO_x (lb/day)
2/4/2008	0.0	0.0
2/5/2008	0.0	0.0
2/6/2008	0.0	0.0
2/7/2008	0.0	0.0
2/8/2008	0.0	0.0
2/9/2008	0.0	0.0
2/10/2008	0.0	0.0
2/11/2008	0.0	0.0
2/12/2008	0.0	0.0
2/13/2008	0.0	0.0
2/14/2008	0.0	0.0
2/15/2008	0.0	0.0
2/16/2008	0.0	0.0
2/17/2008	729.0	297.6
2/18/2008	3,885.6	3,753.6
2/19/2008	6,924.4	8,500.5
2/20/2008	2,968.2	10,074.6
2/21/2008	3,681.6	9,283.2
2/22/2008	2,935.2	11,407.2
2/23/2008	1,944.0	10,188.0
2/24/2008	2,163.0	12,325.0
2/25/2008	2,851.2	11,776.8
2/26/2008	3,076.8	9,496.8
2/27/2008	2,954.4	9,660.0
2/28/2008	4,341.6	11,155.2
2/29/2008	3,859.2	10,982.4
3/1/2008	4,821.6	5,758.4

Attachment 2
Updated Visibility Impacts

Updated Table 4-2. Highest Eight 24-hour Average Visibility Impacts at Mammoth Cave for Each Year Modeled (Using the 36-km IDEM CALMET Data)

Rank	2002 CALMET Highest 24-hr Average Visibility Impacts (Δdv)	2002 CALMET (Days >0.5 dv, Receptors> 0.5 dv)	2003 CALMET Highest 24-hr Average Visibility Impacts (Δdv)	2003 CALMET (Days >0.5 dv, Receptors> 0.5 dv)	2004 CALMET Highest 24-hr Average Visibility Impacts (Δdv)	2004 CALMET (Days >0.5 dv, Receptors> 0.5 dv)	Highest 8th-High Δdv (Total Days > 1.0 dv, > 0.5 dv)
1	0.698		0.977		1.038		
2	0.591		0.697		1.014		
3	0.552		0.687		0.614		
4	0.505		0.636		0.552		**0.440**
5	0.495	(4,3)	0.490	(4,3)	0.529	(5,5)	(2,13)
6	0.480		0.486		0.426		
7	0.442		0.485		0.386		
8	**0.440**		0.428		0.372		

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