



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

SEP 28 2016

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

MEMORANDUM

SUBJECT: Review of NOx Control Measure Information on non-EGU Point Sources

FROM: Erika Sasser, Director, Health and Environmental Impacts Division
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Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency

TO: State Emissions Inventory System Contacts

The purpose of this transmittal is to ask for your review and comment on NOx control measure data and related information for non-electric generating unit (non-EGU) point sources in the 2014 National Emissions Inventory, version 1 (2014 NEIv1). The remainder of this transmittal provides (i) background and context for this review, including a description of the information provided, (ii) the questions that should guide your review, and (iii) the format for submitting your suggested changes.

The EPA expects that your comments and updates will be important in implementing the 2015 ozone National Ambient Air Quality Standard (NAAQS). In particular, the EPA notes that "Good Neighbor" State Implementation Plans (SIPs) to address interstate transport are due in October 2018.¹ In light of the 2018 deadline, the Agency would like to work early toward improving the information it has on existing and future NOx control measures for non-EGU point sources. Your review of the information from the 2014 NEIv1 on existing NOx controls for non-EGU sources will help us ensure the NEI information is accurate and complete. The EPA greatly appreciates your time and attention and respectfully requests comments by October 28, 2016.

To begin the review, locate the zip file titled "2014_NEIv1_State_Review_Files.zip" at the following link: <ftp://ftp.epa.gov/EmisInventory/2014/doc/point/>. The zip file includes this memo and the Excel workbook, which is described in detail below, for review. To facilitate the review, please consolidate questions from each responding agency and send to Larry Sorrels, 919-541-5041, or sorrels.larry@epa.gov. In addition, please consolidate any suggested changes from each responding agency and send them to Larry Sorrels. After you consolidate changes, if the Excel file is too large to send via email, save the information related to your state only and send the file to Larry Sorrels.

¹ The plans for addressing interstate ozone transport are discussed in the October 1, 2015 memorandum from Janet G. McCabe to Regional Administrators for EPA Regions 1 through 10 and is located here: <https://www.epa.gov/ozone-pollution/implementing-2015-ozone-national-ambient-air-quality-standards-naaqs-memorandum>.

Background on NOx Control Measure Review

Information on whether an emissions source is controlled, by what control device, and control device efficiency, is to be reported by states under the Air Emissions Reporting Rule (AERR) used to collect NEI data. This information is only required to be provided when controls are present for the emissions sources. Because controls are not present on every emissions source, it is not possible to ensure systematically (i.e., through electronic reporting) the requirement to report information related to control devices. As a result, control-related information may not be complete in the NEI and would therefore not be available for use by states and the EPA to inform analyses. To ensure that future efforts related to transport analyses for the 2015 ozone NAAQS reflect robust information about non-EGU point source emissions controls, we are interested in your review of and comments on the non-EGU control information from the 2014 NEIv1. The changes and other data that you provide to us will be incorporated into the Emissions Inventory System.

The workbook, titled “2014 NEIv1 NOx Point Source Information by State.xlsx” includes the following worksheets: (i) Readme, (ii) NOx Summary Info – 2014 NEI, (iii) NOx Unit Level Info – 2014 NEI, and (iv) NEI Control IDs. In the NOx Summary Info and NOx Unit Level Info worksheets, we have inserted a filter on the first row so that the information for each state can be reviewed separately.

1. **Readme** – This worksheet includes the questions to help guide review, which are also provided below, as well as definitions for the column headings in the **NOx Summary Info** and **NOx Unit Level Info** worksheets.
2. **NOx Summary Info – 2014 NEI** – Organized by state and source categories/industry sectors, the worksheet includes information on the total number of emissions sources² in that category, the number of those sources that are reflected in the 2014 NEIv1 as being controlled, the total NOx emissions for that category, and the minimum and maximum percent NOx emissions reductions. This information is included to provide context for the more detailed information provided in the second worksheet. However, if in reviewing this summary-level information you identify information that does not seem accurate, please provide us with relevant updates or comments in the column titled “Additional Comments”.
3. **NOx Unit Level Info – 2014 NEI** – Also organized by state and source categories/industry sectors, the worksheet includes information at the emissions source, or emissions unit, level on control devices, control efficiencies (i.e., % Reduction), and design capacity for the emissions units. The questions that should guide the review of the information provided in this worksheet are presented below.
4. **NEI Control IDs** – This worksheet includes NEI control measure IDs and descriptions.

Questions to Help Guide Review of the 2014 NEIv1 Data

In reviewing the NOx control measure and related information for non-EGU point sources in the attached workbook (the relevant column headings for review are indicated in blue in the worksheet titled “NOx Unit Level Info – 2014 NEI”), please answer the questions below. If you need to make changes and/or additions, please make those changes in the file in **red font**, save the file with the

² In this memo, the terms *emissions source* and *emissions unit* mean the same thing and are both used.

abbreviation of your state added to the end of the filename, and then email the file to Larry Sorrels at sorrels.larry@epa.gov.

1. **If there is a control measure or device indicated in the column titled “Control Description” (column I), please confirm that information is correct.** If it’s not correct, please update the information on control measures or devices for that emissions source in the accompanying file and indicate in red font. Also, if you have a specific reference for the updated information please provide it in the column titled “Additional Comments”.

Note that NEI control measure codes and descriptions are included in the worksheet titled “NEI Control IDs”. If you update the control measure information, please update column H (NEI Control IDs) using the information from this worksheet. Columns H and I are linked, so when you fill in Column H it will automatically fill in Column I. Lastly, Column I will indicate “Uncontrolled” if there is no NEI Control ID in Column H.

2. **If there is not a control measure or device indicated in the column titled “Control Description” (column I) but there should be, please indicate the control measures or devices for that emissions source** in the accompanying file and indicate in red font. If you update the control measure information, please update column H (NEI Control IDs) using the information from the worksheet titled “NEI Control IDs”.
3. **Are the control, or removal, efficiencies indicated in the column titled “% Reduction” (column G) for that emissions source and control measure accurate?** The EPA relies upon this information for its control strategy analyses. If there is no information in this field, the EPA assumes there is not a control device in place and that there is potential for the application of a control device on, and emissions reductions from, this emissions source. If this information is missing or if you have added a new control, please update the information on control efficiency (e.g., 90 for 90% reduction) for that emissions source and control measure in the accompanying file and indicate in red font. Also, if you have a specific reference for the updated information please provide it in the column titled “Additional Comments”.
4. **Is the information on the design capacity and design capacity units (e.g., E6BTU/HR) indicated in the columns titled “Design Capacity” and “Design Capacity Units” (columns J and K) for that emissions source correct?** If not, please update the design capacity information in the accompanying file and indicate in red font. Also, if you have a specific reference for the updated information please provide it in the column titled “Additional Comments”.

A significant amount of control measure information is not populated in the 2014 NEI v1. To help prioritize, we offer the following guidance for this review:

1. **High Priority** – emissions sources or units that emit 100 tons per year (tpy)³ or more of NO_x – there are approximately 3,000 units in this category in the **NO_x Unit Level Info – 2014 NEI** worksheet;
2. **Medium Priority** -- emissions sources or units that emit between 25 tpy and 100 tpy of NO_x – there are approximately 6,000 additional units in this category in the **NO_x Unit Level Info – 2014 NEI** worksheet; and
3. **Low Priority** – emissions sources or units that emit less than 25 tpy of NO_x.

³ Tons per year indicates annual tons and not ozone season-only tons.

These categories are intended to help prioritize your review of the 2014 NEIv1 data and are not intended to convey potential regulatory definitions or thresholds.

Information on the Potential for Future Controls

As stated at the outset of this memorandum, the Agency would also like to begin work to improve the information it has on potential NOx control measures for application to future year inventories. After updating the 2014 NEIv1, the EPA will begin work on future year emissions inventories and projections using the updated inventory as a starting point. Incorporating information on additional control measures, as well as on industry and technological trends and changes, into these inventories and projections will result in improvements. For example, information on other NOx control measures, devices or techniques that could be applied to specific sources categories or industry sectors would be helpful. The EPA looks forward to continuing the ongoing collaborative technical efforts and potentially discussing this additional information during future interactions.