



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

MEMORANDUM

SUBJECT: Concurrence Request for Approval of Alternative Model AERCOARE in Conjunction with AERMOD, in Support of Clean Air Act Permitting Effort

FROM: Ashley Mohr, Regional Air Permit Modeler
Air Permits Section
Air and Radiation Division
EPA Region 6, Dallas, Texas

THRU: Jeffrey Robinson, Manager
Air Monitoring and Grants Branch
Air and Radiation Division
EPA Region 6, Dallas, Texas

TO: George Bridgers, Director of Model Clearinghouse
Air Quality Modeling Group
Office of Air Quality Planning and Standards

(via email at bridgers.george@epa.gov)

The U.S. Environmental Protection Agency Region 6 seeks concurrence from the Model Clearinghouse regarding the prospective EPA Region 6 approval of an alternative model for a Clean Air Act Prevention of Significant Deterioration permitting effort. Specifically, the AERCOARE meteorological data preprocessor program will be used in conjunction with AERMOD (AERCOARE/AERMOD) to conduct an air quality modeling analysis as part of the Prevention of Significant Deterioration permit application for the proposed New Fortress Energy Louisiana FLNG LLC's Deepwater Port project to be located in the Gulf of Mexico. New Fortress Energy Louisiana FLNG LLC has sought approval to allow the use of the AERCOARE/AERMOD model for their air quality modeling analysis, under 40 CFR Part 51, Appendix W §3.2.2(b), Condition (3), for the project's Prevention of Significant Deterioration permit application. Under Condition (3), an alternative model may be used if the Regional Office finds the conditions specified in Appendix W §3.2.2(e) are satisfied.

New Fortress Energy Louisiana FLNG LLC submitted their alternative model request on July 26, 2022, that provided justification satisfying the requirements of §3.2.2(e).

EPA Region 6 has conducted a thorough review of the request and currently intends to approve the use of AERCOARE/AERMOD as an alternative model to conduct the air quality modeling analysis as part of the New Fortress Energy Louisiana FLNG LLC Prevention of Significant Deterioration permit application. We have found the proposed application of the model is

satisfactory under the requirements of §3.2.2(e). A technical analysis summarizing our review is attached to this memo for your consideration, and includes the July 26, 2022, alternative model request submitted by New Fortress Energy Louisiana FLNG LLC. Please feel free to contact Ashley Mohr of my staff at (214) 665-7289 if you have any questions regarding the request.

Attachment