October 15, 2021

To: Alison Eyth and emissionsmodeling@epa.gov

From: Marnie Stein, Supervisor – Operating Permits & Emissions Inventory

RE: EPA modeling platform 2016v2

Iowa staff have reviewed the non-EGU point source data (ptnoipm) in the draft 2016v2 modeling platform and our comments and observations are compiled in the summary below. Additional details can be found in the attached file (which is based on <https://gaftp.epa.gov/Air/emismod/2016/v2/reports/ptnonipm_facility_16_17_18_19_21_23_26_32_comp_29sep2021.xlsx).> We appreciate this opportunity for feedback - thank you!

1. Missing coal conversions:

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| **FIPS** | **Facility Name** | **EIS Facility ID** |
| 19135 | CARGILL, INC – EDDYVILLE | 12806011 |
| 19139 | MONSANTO COMPANY – MUSCATINE 6909 | 12807711 |

These two facilities converted from coal to natural gas in 2017. Their fuel switch isn't reflected in future year emissions estimates. They are prohibited from burning coal, so their future emissions are greatly overestimated; please base any projections off their 2019 emissions data.

1. Biofuel sector concerns:

Several corrections are needed in the biofuel sector (ethanol, biodiesel). First, the following three facilities added by EPA (having a facility ID starting with "OTAQ") should be removed. They are double counted - the DNR’s inventory already includes these sources. (Note, EPA’s emissions estimates for these facilities do not match the DNR’s data; the DNR questions the accuracy of the EPA estimates but did not investigate the differences.)

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| **FIPS** | **FACILITY NAME** | **FACILITY ID** |
| 19077 | MENLO | OTAQ70212 |
| 19093 | ARTHUR | OTAQ70214 |
| 19155 | SOUTHWEST IOWA RENEWABLE ENERGY | OTAQ70214 |

Second, the 2016 emissions estimates for other EPA added biofuel facilities ("OTAQ\*") are unreasonably large – DNR has added its own inventory data (columns J, L, N, P) to support this. (Note, at this time these differences are not likely an issue from a regional modeling perspective since emissions are relatively small, but improvements are suggested as a matter of accuracy.)

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| **FIPS** | **FACILITY NAME** | **FACILITY ID** |
| 19099 | REG NEWTON LLC | OTAQ80162 |
| 19045 | CLINTON BIODIESEL LLC | OTAQ82595 |
| 19161 | WESTERN IOWA ENERGY LLC | OTAQ82630 |
| 19061 | WESTERN DUBUQUE BIODIESEL LLC | OTAQ82855 |
| 19033 | REG MASON CITY | OTAQ82968 |

Third, emissions growth projections for most (all?) biodiesel facilities appear unreasonably large. For example, growth estimates appear to be 120% for 2021, 167% for 2023; and 155% for 2032. EPA should instead consider capping emissions for each facility to its maximum value within the 2016-2019 timeframe, or use smaller emissions growth rates, perhaps no greater than 25% - 50%.

**FIPS               Facility Name                                                                        Facility ID**

<Identified in the attached spreadsheet, see "Biodiesel facility...." comment in Column C>

1. Soybean Processing:

Emissions growth projections for the following two soybean processing facilities appear unreasonably large. EPA should instead consider capping emissions for each facility to its maximum value within the 2016-2019 time frame, or at least use smaller emissions growth rates, perhaps no greater than 25%.

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| **FIPS** | **Facility Name** | **EIS Facility ID** |
| 19083 | CARGILL, INC – IOWA FALLS | 5384011 |
| 19193 | AG PROCESSING, INC – SERGEANT BLUFF | 7789811 |

1. Iowa State University has not closed:

Neither of the following Iowa State University sources should be considered shutdown as of 2019. (The agency facility and EIS facility IDs for the main campus and power plant were merged by DNR at Iowa State's request, and now all emissions from both the main campus and the power plant are combined and reported under a new EIS Facility ID – 18936211. EPA should forecast emissions for that ID. Also of note, the ISU power plant is planning to convert from coal to natural gas in 2025; this is not yet enforceable.)

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| **FIPS** | **Facility Name** | **EIS Facility ID** |
| 19169 | IOWA STATE UNIVERSITY | 12806711 |
| 19169 | IOWA STATE UNIVERSITY – POWER PLANT | 12806811 |

1. Unexpected large emissions reductions

The following facilities were forecast to have unexpectedly large reductions for the listed pollutants. We suggest that growth/control factors not exceed 10% (plus or minus), unless other values can be

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| **FIPS** | **Facility Name** | **EIS Facility ID** | **Pollutant** |
| 19045 | ADM CORN PROCESSING / COGEN PLANT – CLINTON | 12805911 | NOX |
| 19045 | ADM CORN PROCESSING / COGEN PLANT - CLINTON | 12805911 | SO2 |
| 19033 | LEHIGH CEMENT COMPANY - MASON CITY | 7740911 | NOX |
| 19163 | CONTINENTAL CEMENT COMPANY - DAVENPORT PLANT | 8058711 | NOX |