



December 15, 2021

Alison Eyth
U.S. Environmental Protection Agency
Office of Air Quality Planning and Standards
109 TW Alexander Drive, MC C339-02
Durham NC 27711

Subject: EPA Draft 2016v2 Emissions Modeling Platform

Dear Ms. Eyth:

The Wisconsin Department of Natural Resources (WDNR) submits the following comments in response to the U.S. EPA's request for feedback on the draft 2016v2 Emissions Modeling Platform (released for public review on September 21, 2021).¹ Information reviewed by WDNR includes the 2016 base year information, as well as the growth and control data used by EPA for projecting 2023, 2026 and 2032 emissions.

Future Use of Draft 2016v2 Emissions Modeling Platform

1. The EPA has indicated the 2016v2 Platform will be utilized to support a future transport rule addressing the 2015 ozone National Ambient Air Quality Standards (NAAQS).² While EPA has acknowledged states' feedback on the draft 2016v2 Platform will not be incorporated in the agency's modeling for the proposed transport rule, EPA should at a minimum include a summary in the proposed rule acknowledging the comments received on the draft 2016v2 Platform. Additionally, EPA should explain in the proposed rule how the new information from those comments will be incorporated, including how they may impact the modeling results used to support the proposed rule and any proposed control requirements for emission sources. The EPA should utilize the updated 2016v2 Platform as soon as possible in developing this transport rule, while ensuring no further delay of final action to address ozone transport.

Modeling Assumptions for the Electric Power Sector (Electric Generating Units or EGUs)

2. The EPA should include the most recent information on utilities' publicly available retirement or fuel-switching plans for EGUs in the updated 2016v2 Platform. Wisconsin utilities have publicly announced shutdown dates by 2025 at three power plants (see **Table 1**), and EPA should ensure these shutdowns

¹ <https://www.epa.gov/air-emissions-modeling/2016v2-platform>

² Under the proposed consent decree in *Downwinders at Risk et al. v. Regan* (86 FR 57423), EPA would propose an ozone transport rule by February 28, 2022 and finalize the rule by December 15, 2022.

are reflected in the Power Sector Modeling Platform v6 forecasts (EPA currently forecasts these EGUs to operate through 2032).³ In addition, EPA should ensure its EGU model forecasts do not shut down EGUs that have not yet announced plans for retirement, including Wisconsin's Manitowoc Public Utilities (ORIS ID 4125). The WDNR is also providing this list of upcoming retirements, or continued operation, within the Clean Air Markets Power Sector Modeling Contact Form, as requested by EPA.⁴

3. The EPA should integrate the Eastern Region Technical Advisory Committee (ERTAC) EGU model forecasts into the updated 2016v2 Platform. The WDNR recognizes that EPA uses the Integrated Planning Model (IPM) to estimate future year EGU emissions, and that the IPM projection methodology differs from the ERTAC EGU model that is endorsed by the multi-jurisdictional organizations (MJOs) and the majority of the states in the eastern half of the country. States are using the ERTAC EGU model to consolidate and update technical information for the current State EGU fleets and to forecast the best understanding of how those fleets will change into the future in regard to planned retirements of specific units (e.g., the Wisconsin EGU retirements listed in **Table 1**), changes in fuels by specific units, responses to existing air emissions related regulations (State and Federal), and any planned new installations of retrofit emission control devices.

Table 1 – Wisconsin EGU Scheduled Retirements

Facility	Unit ID	ORIS	Retirement Date
South Oak Creek	5	4041	1/1/2024
South Oak Creek	6	4041	1/1/2024
South Oak Creek	7	4041	1/1/2025
South Oak Creek	8	4041	1/1/2025
Weston	2	4078	1/1/2024
Columbia	1	8023	1/1/2024
Columbia	2	8023	1/1/2025

Control and Growth Assumptions for Industrial Point Sources

4. There are several industrial point source retirements and committed controls in Wisconsin that are not included in EPA's projected 2023, 2026 and 2032 emissions (see **Table 2**). The EPA should integrate these retirements and controls into its projected emissions.

5. The petroleum coke growth factor of 1.98 for A-M Kaukauna paper mill (Agency FID 445031180) unit B11 process #5 and unit B09 process #3 is inappropriate. The EPA should instead use a growth factor equivalent to the growth factor of coal of 0.88 for this facility. Petroleum coke throughput at this facility is expected to be proportional to coal throughput or less.

³ The EPA's Power Sector Modeling Platform v6 – Summer 2021 Reference Case was released in association with the draft 2016v2 Platform and is located at <https://www.epa.gov/airmarkets/epas-power-sector-modeling-platform-v6-using-ipm-summer-2021-reference-case>.

⁴ <https://www.epa.gov/airmarkets/forms/power-sector-modeling-contact-form>

Table 2 – Wisconsin Industrial Point Source Post-2016 Retirements and Controls

Facility	Agency FID	Unit ID	Control/ Retirement Description	Control/ Retirement Year	2016 Emissions		Control Factor for 2023/2026/2032*	
					NOx	SO2	NOx	SO2
Retirements								
Green Bay Packaging Inc. – Mill Division	405032100	B26	Retired	2019	100	185	100.00	100.00
Georgia- Pacific – Green Bay	405032870	B26	Retired	2019	371	513		
		B28	Retired	2019	185	415		
		B29	Retired	2018	235	454		
Controls								
Cardinal FG – Portage	111071180	P10	Selective Catalytic Reduction	2019	1,426	62	85.54	0.00
Cardinal FG – Menominee	617049840	P01	Selective Catalytic Reduction	2020	1,573	58	85.54	0.00
ND Paper Inc – Biron Division	772009480	B23	Fuel switch from coal to natural gas	2017	648	1,823	65.90	99.96

*Control factors are expressed as a percent reduction (0 = no reduction, 100 = full reduction). Control factors are based on 2020 actual emissions compared to 2016 actual emissions except for Cardinal FG – Menominee unit P01, which assumes the same NOx control factor as Cardinal FG – Portage unit P10.

Control and Growth Assumptions for Mobile Sources

6. Commercial Marine Vessels. The EPA’s Technical Support Document⁵ for the draft 2016v2 Platform (dated September 2021) states that the commercial marine emissions in 2016v2 are the same as those in 2016v1 (see pages 57 and 61). However, the draft 2016v1 Platform provides two sets of commercial marine emissions:

- One nationwide, with the files dated during January and February 2020. The data for these emissions can be accessed at the following links:
<https://gaftp.epa.gov/Air/emismod/2016/v1/2016emissions/>
<https://gaftp.epa.gov/Air/emismod/2016/v1/2023emissions/>
<https://gaftp.epa.gov/Air/emismod/2016/v1/2028emissions/>
- A second focused on the Great Lakes area, with the files dated later, during May 2020. These files cover two modeling domains:

⁵ https://www.epa.gov/system/files/documents/2021-09/2016v2_emismod_tsd_september2021.pdf.

- DO3: Parts of four states⁶ surrounding Lake Michigan
- DO2: A larger domain surrounding the Great Lakes, including all or parts of 16 states⁷ and part of Canada

The data for these emissions can be accessed at the following link:

https://gaftp.epa.gov/Air/emismod/2016/v1/2016emissions/cmv_other_grids/

The commercial marine emissions in the draft 2016v2 Platform match those in the first (nationwide) set cited above. The emissions within the states covered in the second (Great Lakes) set are not updated to match the emissions in that set. The EPA should either update the commercial marine emissions within the DO2 and DO3 modeling domains to match the May 2020 data or document why the earlier nationwide emissions estimates are preferable.

If you have any questions about these comments, please contact Jonathan Loftus (Jonathan.Loftus@wisconsin.gov; 608-264-8868).

Thank you for the opportunity to review and comment.

Sincerely,

Jason Treutel

Jason Treutel
Chief, Air Quality Planning and Standards Section
Bureau of Air Management

⁶ These four states are: Illinois, Indiana, Michigan, and Wisconsin.

⁷ These 16 states are: Arkansas, Illinois, Indiana, Iowa, Kansas, Kentucky, Michigan, Minnesota, Missouri, New York, Ohio, Oklahoma, Pennsylvania, Tennessee, West Virginia, and Wisconsin.