

**Responses to the 2007 Baseline Sub-Inventory Information and  
Significant Comments for the Final NO<sub>x</sub> SIP Call  
(63 FR 57356, October 27, 1998)**

Docket Number A-96-56  
X-C-01

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# Table of Contents

Introduction

I. EGU Comments

II. Non-EGU (Including Area and Mobile) Comments

III. Comments not Related to Emission Inventory Modification Requests

# **Responses to the 2007 Baseline Sub-Inventory Information and Significant Comments for the Final NO<sub>x</sub> SIP Call**

## **INTRODUCTION**

This document, together with the final rulemaking (NFR) for regional ozone transport (final nitrogen oxides (NO<sub>x</sub>) SIP Call, 63 FR 57356, October 27, 1998), present the responses of the Environmental Protection Agency (EPA) to the close to 300 public comments received on the 2007 baseline sub-inventory information requested in the final SIP Call and Correction and Clarification Notice, 63 FR 71220, December 24, 1998. Only those comments related to the emission inventory revisions are responded to in this document.

The purpose of the final SIP Call is to require certain States to submit State implementation plan (SIP) measures to ensure that emissions reductions are achieved as needed to mitigate transport of ozone (smog) pollution and one of its main precursors--emissions of oxides of nitrogen (NO<sub>x</sub>)--across State boundaries in the eastern half of the United States (U.S.). All significant issues raised in the public comments and related to the reopened topics have been addressed.

As reflected in the text for this document, responses are organized by docket number and relativity to the reopened comment periods, which correspond to a specific section (VIII-B) in the docket for this rulemaking (A-96-56).

This document refers, as appropriate, to various support documents, which are available in the docket, that have been prepared to assist in presenting the more technical aspects of the Agency's responses. A list of these support documents is presented in the "References" section of this document.

The responses presented in this document and in the separate documents referred to above are intended to augment the responses to comments that appear in the preamble to the final rule or to address comments not discussed in the preamble. Although portions of the preamble are paraphrased in this and other documents where useful to add clarity to responses, the preamble itself remains the definitive statement of the basic rationale for the final rule.

In many instances, particular responses presented in the above documents include cross references to responses on related issues, either in those documents or in the NFR. In view of the number of comments received, the cross references may not always reflect the extent to which information relevant to a particular comment is contained in responses to other comments. Accordingly, the above documents as a group, together with the NFR, should be considered collectively as EPA's response to all of the comments submitted.

In many cases, the NFR contains the full response to comments, and such responses are not restated here. In those cases, a reference is made to the appropriate section of the NFR containing relevant responses. This document does contain a restatement of the summary of comments received from the NFR on many issues with the addition of parenthetical references to the specific commenters submitting the comments for ease of identification. In many cases, EPA

has listed all of the commenters who made a specific comment. In other instances, the Agency may have identified one or a representative number of commenters.

## SECTION I

### **Part 1: General Response to Issues Related to the Correction of Data in the EGU Portion of the Inventory**

**SUMMARY:** The Agency received numerous comments with specific corrections to data in the EGU inventory. The comments specifically on the data in the inventory included units to add, units to delete, units to switch from the EGU to the non-EGU inventory (or vice versa), and changes to the individual data elements for individual units.

**LETTERS:** Docket A-96-56: Category V-H: 8, 16, 33, 44, 55, 57, 62, 80, 109, 115, 116, 123, 135, 141, 166, 184, 187, and 191; Category V-I-7; Category VIII-B: 8, 9, 11, 19, 20, 24, 25, 29, 30, 31, 32, 33, 34, 36, 37, 40, 41, 42, 43, 44, 46, 51, 52, 59, 60, 61, 62, 64, 68, 71, 74, 75, 84, 86, 87, 88, 92, 95, 96, 97, 99, 104, 114, 116, 118, 119, 122, 123, 127, 128, 130, 131, 132, 136, 138, 140, 142, 144, 145, 149, 153, 158, 159, 160, 163, 165, 168, 173, 176, 178, 180, 182, 183, 186, 187, 189, 190, 191, 198, 199, 200, 201, 204, 206, 208, 211, 216, 217, 218, 221, 222, 223, 225, 226, 227, 230, 231, 232, 233, 234, 241, 244, 250, 257, 258, 259, 260, 263, 266, 267, 269, 275, 276, 277, 278, 279, 282, 284, 290, and 291. Docket A-97-43: Category II-D-14; Category IV-D: 15, 26, 29, 31, 50, 53, 55, 65, 66, 74, 76, 88; Category IV-G-7; and Docket A-98-12-III-D-6 [Note: several commenters submitted these comments simultaneously to Dockets A-97-43 and/or A-98-12. See the crosswalk for commenters with multiple comments in these dockets that EPA has included in the docket (A-96-56).]

**RESPONSE:** This action finalizes the state budgets under the SIP Call. Thus, at this time, EPA has responded to all comments that have a direct bearing on finalizing the budgets. Comments affecting the budget include a number of general comment issue areas, such as the overall completeness of the inventories, classification of units as EGUs versus non-EGUs, methods used by EPA to compile the inventory, appropriateness of the rulemaking procedures used to finalize the budgets and growth rates, and certain other miscellaneous general issues. Comments affecting the budget also include the addition or deletion of units from the EGU inventory. For comments that affect individual data items, only certain items affect the calculation of the final budget. These items include:

(1) Unit or fuel type, to the extent it affects classification of a unit as an EGU or non-EGU. For unit type, the critical information is whether the unit is an internal combustion engine (ICE) or other form of unit (boiler, turbine or combined cycle). ICEs, even if used to generate electricity for sale, do not fall within the definition of an EGU for purposes of the SIP Call, section 126, or FIP rulemakings. Certain large ICEs are assumed controlled for purposes of calculating the budgets for the SIP Call and would be affected separately under the proposed FIP; ICEs also may be addressed as part of a State SIP revision in response to the SIP Call. For fuel type, the critical issue is whether a unit is a fossil fuel-fired unit (i.e., uses fossil fuel for more than 50 percent of its fuel usage). Only those units that qualify as fossil fuel units are considered EGUs for these rulemakings. Non-fossil fuel fired units are included in the non-EGU inventory (although they are not controlled units for purposes of calculating the budgets, or for purposes of the section 126 or FIP rulemakings).

(2) Nameplate capacity. The nameplate capacity of the largest generator a unit serves is used to determine whether an EGU is a large (i.e., controlled unit under the SIP Call, and section

126 and FIP proposals) or a small EGU (i.e., uncontrolled under the SIP Call and proposals). Thus, corrections to nameplate capacity data in the EGU inventory is essential for calculating the budgets. In all cases, the Agency accepted nameplate capacity corrections. Before accepting those nameplate capacity changes that affected the classification of a unit, EPA first corroborated the change through state agency comments or the "Inventory of Power Plants in the United States, As of January 1, 1998", U.S. Energy Information Administration (EIA), DOE/EIA-0095(98) (December 1998) (relevant excerpts from this inventory are included in the docket; this document is referred to throughout this document as the EIA inventory or EIA data).

(3) Seasonal heat input. The critical data to calculate the EGU portion of the state budgets is heat input data. For units affected by Title IV (referred to as Acid Rain units throughout this document) EPA used data submitted to the Agency for purposes of compliance with Title IV as the primary source of heat input data for these units. EPA is the primary agency responsible for assuring the quality of the data and maintaining the data. For these rulemakings, EPA had calculated ozone season (May 1 through September 30) heat inputs for all of the Acid Rain units based on the hourly data submitted by affected sources. Thus, EPA only revised heat input values for these units only in cases where the data in the inventory was a technical error (i.e., EPA had miscalculated the data in the inventory and it did not match the underlying data sources used to compile the inventory) or where the affected source provided a detailed explanation for the reasons why the source's calculated values (generally using the data underlying the reports submitted under the Acid Rain Program) should be accepted. Thus, the Agency accepted heat input changes for Acid Rain units in only limited circumstances. For non-Acid Rain units, EPA accepted heat input revisions where the revisions were corroborated by the state or the commenter provided an adequate justification for the change. In at least one instance, there was a conflict between the requested change received from a state agency and the change from the affected source; in any such cases, EPA used the data as provided by the state agency. EPA believes that the data supplied by the State is better because the State is charged with reviewing emissions data from its sources for other regulatory purposes and provides a better independent assessment of the data.

(4) NO<sub>x</sub> Emission Rate Information for Small Units. For large EGUs, EPA uses a 0.15 lb/mmBtu emission rate to calculate the budgets. However, for small units, the budgets are calculated based on the lowest of the actual 1995/1996 emission rates or any applicable RACT limit. Thus, any changes to emission rates for small EGUs could have some impact on the overall state budget. Only a limited number of commenters requested revisions to the rates for small EGUs, primarily state agency commenters. All of these requested revisions were made in the revised inventory. Changes to 1995/1996 NO<sub>x</sub> emission rate data for large EGUs will be reviewed and made as necessary to improve the overall quality of the inventory for future implementation activities and other regulatory activities. Because the data do not affect the calculation of the budgets, EPA has not reviewed all of the comments related to emission rates for large EGUs and is not responding to those comments at this time.

(5) All Other Data Fields. The Agency generally has not addressed comments requesting revisions to other data fields in the NO<sub>x</sub> emission inventory. Many of those fields provide data that are important for modeling purposes. There were comments received that requested changes to stack and similar unit-specific parameters. There were also comments on the daily and seasonal values in 1995 and 1996 (other than seasonal heat input) as well as the calculated baseline data for 2007. The Agency intends to consider any of these requests that affect

modeling prior to conducting any further modeling related to the applicable rulemakings or other EPA modeling activities. The Agency also notes that the 2007 baseline is not being recalculated for the EGU portion of the inventory at this time because it does not affect the calculation of the budget for EGU sources (see TSD for a more complete explanation).

In addition, certain other data fields are important for implementation purposes and may be useful in future cost and other analyses (such as unit bottom type or firing type). However, these data fields were not used for purposes of calculating the budgets, therefore EPA is not responding to comments regarding these data fields at this time. The EPA intends to consider these revisions prior to conducting any further analyses that would rely on these data, and will use the corrected information to update the inventory file for implementation purposes.

Comments were also received on heat rate. These values may be used if the Agency determines to use an output-based allocation method in the section 126 or section 110 FIP rulemakings, and the comments will be addressed in that context to the extent necessary based on EPA's determination as to whether an output-based allocation should be pursued.

Comments related to overall inventory topics, but not related to the correction of individual data elements are responded to in Part 4 of this document.

**SUMMARY:** One commenter requested clarification concerning the treatment of municipal diesel engines with a nameplate capacity less than 25 MWe. Commenter had understood that these engines, that produce electricity for sale, would be considered exempt from controls as small EGUs. Commenter noted further that it was not cost-effective to control these small units. Other commenters suggested in their comments that their IC engines should be treated as small EGUs or should be added as small EGUs to the inventory.

**LETTERS (Representative List):** American Public Power Association (VIII-B-252), Easton Utilities (VIII-B-), Illinois EPA (VIII-B-61), Missouri DNR (VIII-B-201)

**RESPONSE:** The definition of an EGU for purposes of the SIP Call, FIP and section 126 rulemakings includes only boilers, turbines, and combined cycle systems (boilers and turbines interconnected in one unit). Internal combustion engines, whether or not they produce electricity for sale, are all classified as "non-EGUs" for purposes of these rulemakings. In calculating the state budgets, EPA has assumed that certain large engines would be controlled and under the proposed FIP, EPA has proposed to require controls on these large engines. Based on the information available from the inventory, it appears that few, if any, municipal engines would be subject to the control requirements.

However, as a result of these comments, EPA analyzed all of the units listed in EPA's EGU inventory to determine if any of the units were in fact IC engines. In addition, EPA reviewed all requests to add units in order to avoid adding any IC engines to the EGU inventory. To conduct this analysis, EPA relied on the list of IC engines included with the APPA comment letter and the 1998 EIA inventory of power plants. As a result of this review, EPA reclassified a number of units formerly included in the EGU inventory under the revised non-EGU inventory (all were uncontrolled non-EGUs), and EPA did not accept a number of suggested IC engine additions to the EGU inventory that were requested in the comments.

**SUMMARY:** One commenter generally noted that the use of the higher of 1995 or 1996 utilization rates inflates the EGU portion of the budget.

**LETTERS:** New Hampshire Dept. of Environmental Services (III-D-42)-(IV-D-46)

**RESPONSE:** EPA is aware that the approach of using, on a state-by-state basis, the higher of 1995 or 1996 utilization rates slightly inflates the EGU portion of the budget. EPA believes that this overestimation helps further address concerns that the growth rates used by EPA were too low. Additionally, this approach allows for a more equitable treatment of each state's utilization by helping account for a potentially uncharacteristically low summer season.

**SUMMARY:** Some commenters disagreed with the January 1, 1996 cutoff for the determination of new sources, and one of these commenters noted that the use of this date introduces error in the State totals for the 1996 ozone season since EPA has included other units that became operational after this date. This commenter also noted that certain units (such as Clover 2) were included in the IPM projections used in estimating Virginia's growth but were not included in the baseline inventory. Some commenters specifically suggested that any source that is operational after January 1, 2000 should be defined as a new source for the purpose of allocations.

**LETTERS:** Empire Electric (VIII-B-140), General Electric (VIII-B-), Old Dominion Electric Cooperative (VIII-B-165), Midwest Ozone Group (VIII-B-125), Virginia Power (VIII-B-168), West Virginia Chamber of Commerce (VIII-B-195)

**RESPONSE:** EPA agrees with the commenters.

**SUMMARY:** Some commenters expressed opposition to the use of a single ozone season to determine the baseline for the NO<sub>x</sub> budget and recommended that 1998 be included in calculations of the State budgets.

**LETTERS:** Old Dominion Electric Cooperative (VIII-B-165), Virginia Power (VIII-B-168)

**RESPONSE:** EPA has not used a single ozone season to determine the State budgets. EPA determined the state budgets using the higher of the heat input from 1995 or 1996. EPA has not used the 1998 data because, for the purposes of generating a state-wide budget, EPA believes that it is important to use the most recent data that has been quality assured so as to assure that the overall State budget is as accurate as possible. The 1995 and 1996 heat input data has not only been quality assured by EPA, but commenters have also had two opportunities to comment on the data, this is not the case with the 1998 data.

**SUMMARY:** Commenters argued that EPA's definition for regulated sources is unclear and has been modified since the publication of the proposed NO<sub>x</sub> SIP call and subsequent to its final promulgation. Specifically, the commenters argued that EPA's definition of a regulated EGU has been expanded to include those units that are engaged in the sale of electricity and this expansion unnecessarily brings into the program units that do not otherwise meet the size cutoff and therefore do not emit the same volume of NO<sub>x</sub>. The commenters maintained that EPA has failed to justify these modifications to the scope of the regulation. Some commenters maintained that all industrial boilers should be treated alike regardless of whether or not they generate electric



power. One commenter argued that it makes more sense to segregate on boiler size as the first cut-point. The commenter maintained that the 250 mmBtu/hr for industrial boilers should be applied to both boilers that are used to generate electrical power and to boilers that do not generate electrical power, since emissions from a 250 mmBtu/hr coal-fired industrial boiler are the same whether it is used to generate electrical power or not. The commenter maintained that by defining EGUs in the manner proposed, industrial facilities will be discouraged from generating electrical power, causing greater amount of fossil fuel to be burned to accomplish the same end result.

**LETTERS:** Trinet (III-D-67), WV Chamber of Commerce (III-D-17), DP&L (III-D-3, IV-D-18), MOG (III-D-66), RJ Reynolds (IV-G-10), WPC (III-D-35), Georgia Coalition for Sound Environmental Policy (VIII-B-126)

**RESPONSE:** As EPA explained in a clarification notice published on December 24, 1998 (See 63 FR at 71223), EPA used two classification methods to determine whether a unit should be classified as an EGU or a non-EGU. One method (based on whether a unit served a generator from which electricity was sold under a firm contract) applied to units that were in existence in 1995 and were part of the base year emission inventory, and the other method (based on whether a unit serves a generator from which any electricity is sold) applies to units that came into existence on or after January 1, 1996. Both of these methodologies are explained in sections II.I.C1 and C.2 of final rule preamble. In addition, the methodology used to classify units in the base-year inventory was explained in the document, "Development of Modeling Inventory and Budgets for Regional NO<sub>x</sub> SIP call." A draft of this document was issued on March 23, 1998 and a final document was issued on September 24, 1998, and is available in the NO<sub>x</sub> SIP call docket.

The methodology used to classify existing units as EGUs or non-EGUs was based upon whether or not a unit was connected to a generator that sold electricity under firm contract to the grid. The EPA believes that the criteria of selling under firm contract to the grid classifies most industrial units that generate small amounts of electricity as non-EGUs rather than EGUs.

The EPA has explained throughout the NO<sub>x</sub> SIP call rulemaking that it is concerned that under a deregulated electricity market, it is important to consider all sources that generate electricity. For instance, in the supplemental notice of proposed rulemaking under the NO<sub>x</sub> SIP call, EPA explained that:

Additionally, with deregulation of electric utilities, it is not clear how ownership of the electricity generating facilities will evolve. Therefore, EPA proposes to include all large electricity generating sources, regardless of ownership, in the trading program. As there is no relevant physical or technological difference between utilities and other power generators, the same monitoring provisions and the size cut-off of greater than 25 MWe are applicable to all units which serve generators (63 FR at 25923).

For purposes of this rulemaking, EPA intends to continue to apply to existing units the definitions of EGU and non-EGU based on firm-contract sales, as clarified in the December 24, 1998 correction notice. These definitions do not classify either all existing units that generate electricity, or all existing units that generate electricity for sale, as EGUs. Specifically, industrial units that generate electricity only for internal use will be considered non-EGUs. Furthermore, most existing industrial units that sell small amounts of electricity will also not be considered EGUs, because most of these units do not sell electricity under firm contract. Even though EPA is not changing the EGU and non-EGU definitions as suggested by the commenters, EPA believes that the definitions for existing units classify the units owned or operated by the

commenters or commenter's members in a way that is consistent with how the commenters have suggested those units should be classified. As discussed in the preamble, use of these definitions also avoids reclassifying other existing units.

While EPA is not changing the definitions of EGU, based on firm-contract sales, and non-EGU, EPA is changing the time frame for which the definitions are applicable. The definitions based on firm-contract sales will be applicable for all units that commence commercial operation before January 1, 1999, rather than before January 1, 1996, as EPA proposed. EPA is selecting January 1, 1999 as the cutoff date for applying definitions based on firm-contract sales for several reasons. First, information is available to EPA on firm-contract sales of electricity on a calendar year basis only. Consequently, the classification of units based on whether the generators they serve are involved in firm-contract sales of electricity must be made on a calendar year basis and any cutoff must start at January 1st. Second, EPA maintains that it is reasonable to coordinate the cutoff date with the promulgation of the December 24, 1998 correction notice where EPA clarifies the EGU and non-EGU definitions that were used in determining state inventories. EPA also notes that the final state inventories include individual EGU and non-EGUs starting operation in 1996, and this also supports using a cutoff date later than January 1, 1995 for applying definitions based on firm-contract sales. Third, the January 1, 1999 cutoff date still prevents owners or operators of large, new units from obtaining small EGU classification by adding small (25 MWe or less) generators to the units and selling electricity under firm contract.

In applying the cutoff, EPA has divided the EGU and non-EGU definitions into three categories. For units commencing operation before January 1, 1999, the definitions are based on whether they serve generators involved in firm-contract sales during 1995 or 1996. As noted above, EGUs operating in 1995 or 1996 are individually listed and included in EGU portions of the state budgets. EPA is using the same period (1995-1996) to determine the status of these units as EGUs or non-EGUs as EPA used to calculate the EGU portion of the state budgets. If operations after 1996 could change whether such a unit was an EGU or a non-EGU, the State budget might have to be altered to account for the change, e.g., where a unit that is non-EGU for purposes of the state budget became an EGU based on the units operation after 1996.

For units commencing operation on or after January 1, 1997, and before January 1, 1999, the EGU and non-EGU definitions are based on whether they served generators involved in firm contract sales during 1997 or 1998. Although these units are not individually included in the state budgets, EPA's treatment of them is similar to the treatment of units operating before 1997. Once their status as EGUs or non-EGUs is determined based on 1997-1998, it does not change based on subsequent operations.

Finally, for units commencing operation on or after January 1, 1999, the definitions based on any sales of electricity (essentially as set forth in the December 24, 1998 correction notice) apply. Such a unit's status as an EGU or non-EGU can change in some circumstances based on future operations. For example, a unit whose generator is not initially involved in sales could become an EGU if such sales commence in the future. The definitions address situations where a large boiler serves a small generator: if the generator is involved in electricity sales and could use 50% or less of the potential electrical output of the boiler, the unit is a non-EGU. EPA maintains that it is reasonable to use the definitions based on any sale for units that just recently commenced operation or will commence operation in the future. This is consistent with EPA's approach that, in general, new units that generate electricity for sale should be treated as EGUs

**SUMMARY:** One commenter argued that small cogeneration units should not be treated as EGUs and EPA should continue to apply the exemption from treatment as utility units

established under new source performance standards (NSPS) and the Acid Rain Program for cogeneration units that produce an annual amount of electricity for sale less than one-third of their potential electrical output capacity or equal to or less than 25 MWe. (Note that the regulations implementing title IV converted the annual 25 MWe threshold to 129,000 MWe hrs of electricity which is equivalent to 25 MWe per hour times 8760 hours per year.) The commenter also noted that section 112 of the CAA defines “electricity steam generating unit” excluding cogeneration units using the same thresholds. The commenter made several assertions to support its argument. First, the commenter said the classification of small cogeneration units would be contrary to 20 years of Agency precedent under the NSPS and Acid Rain programs. The CAA encourages cogeneration by exempting small cogenerators below the one-third/25 MWe trigger from the Acid Rain program and from section 112. Deviating from this historical precedent was not a logical outgrowth of the proposed NOx SIP call since the proposed NOx SIP call did not discuss that EPA would treat small cogeneration units as EGUs or differently than under the NSPS and Acid Rain programs. The commenter's members have been operating under the assumption that they will be treated as non-electric generating units and this assumption is supported by their inclusion in the non-EGU inventory.

**LETTERS:** AF&PA (IV-D-21, III-D-70)

**RESPONSE:** As EPA explained in the correction notice published on December 24, 1998 (See 63 FR at 71223), EPA used two classification methods to determine whether a unit should be classified as an EGU or a non-EGU. One method applied to units that were in existence in 1995 and were part of the base year emission inventory and another method applies to units that came into existence on or after January 1, 1996. Both of these methodologies are explained in today's notice of final rulemaking (in sections II.I.C.1 and C.2 of the preamble). In addition, the methodology used to classify units in the base-year inventory was explained in the document, “Development of Modeling Inventory and Budgets for Regional NOx SIP call.” A draft of this document was issued on March 23, 1998 and a final document was issued on September 24, 1998, and is available in the NOx SIP call docket.

The methodology used to classify existing units as EGUs or non-EGUs was based upon whether or not a unit was connected to a generator that produced electricity for sale under firm contract to the grid. Since most industrial units are not currently involved in sales under firm contract to the grid, this leads to most industrial cogeneration units being classified as non-EGUs. The EPA has several concerns about changing from this methodology to a methodology based upon a one-third potential capacity/25 MWe threshold, as suggested by the commenter. The first is that EPA has not used that threshold in the rulemaking to date, and does not have information on all existing units necessary to apply that threshold to all the units. For example, EPA does not have information to identify all the units that actually cogenerate and the information on how much electricity is sold from these units. The commenter did not even identify the units owned by its members, much less provide that information for identified units.

Second, if EPA did have the information for each unit to determine if the unit's classification should be changed, EPA is concerned that the classification for a number of units would change, apparently none of which are owned or operated by the commenter's members. The commenter noted that changing the definition to be based upon a one-third potential capacity/25 MWe threshold “would not alter the Agency’s baseline emissions inventory.” Since the commenter never identified any existing units where classification is different in the inventory under the Agency's classification method than under the commenter's classification method, EPA concludes that changing the methodology would not change the inventory

classification of any units owned or operated by the commenter's members. The EPA believes that this is because using the criteria of selling under firm contract to the grid classifies most industrial units that generate small amounts of electricity as non-EGUs rather than EGUs.

However, EPA maintains that there is the potential that a number of other units could be reclassified if EPA applied the one-third potential capacity/25 MWe threshold. This could change the classification of a large EGU to a large non-EGU, the classification of a large non-EGU to a large EGU or the classification of a small EGU to a large non-EGU. For example, a unit that is currently classified as a large EGU could become a large non-EGU if, even though the unit was selling electricity under a firm contract, it sold less than one third of its potential electrical output capacity. An independent power producer unit that is connected to a generator greater than 25 MWe and that cogenerates and provides both steam and electricity could fit into this category. A unit that is currently classified as a large non-EGU could become a large EGU if it did not sell power under a firm contract, but did sell more than one third of its potential electrical output capacity. An industrial boiler that cogenerates and is connected to a generator greater than 25 MWe could fit into this category. A unit that is currently classified as a small EGU and sells under firm contract, but less than one-third of its potential electrical output capacity, could become a large non-EGU if the unit was greater than 250 mmBtu, and the generator to which it was connected was less than 25 MWe. An independent power producer unit that cogenerates could fit into this category. In short, the adoption of the commenter's classification methodology could result in reclassification leading to more stringent, rather than less stringent, regulation of some cogeneration facilities

The EPA also does not agree with the commenter's arguments that deviating from the classification that EPA has used for cogeneration units in other contexts in the past was not a logical outgrowth of the proposed NO<sub>x</sub> SIP call and that no discussion was included in the proposal that small cogeneration units would be treated as EGUs or differently than under the NSPS and Acid Rain programs.

In prior regulatory programs, EPA has used the criteria of producing an annual amount of electricity for sale less than one-third of a unit's potential electrical output capacity or less than 25 MWe. However, these criteria were not applied in the same way in each of these prior programs and recent, ongoing changes in the electric power industry undermine the basis for the criteria, and justify using different criteria for the new units, in today's action. The Agency began using the one-third potential capacity/25MWe cutpoint in 1978, in 40 CFR part 60, subpart Da, setting forth new source performance standards for "electric utility steam generating units." In that case, the cutpoint was not used to exempt units entirely from NSPS. Rather, it was used to classify them as either "electric utility steam generating units" that would be subject to the new standards under subpart Da or to classify them as non-utility steam generating units that would continue to be subject to the requirements under subpart D and would subsequently become subject to more stringent standards for "Industrial-Commercial-Institutional Steam generating units" under subpart Db. This cutpoint applied to all steam generating units, not just cogeneration facilities. The cutpoint was used as a proxy for utility vs. non-utility ownership of the units, the assumption being that a unit involved in electricity sales at or below the cutpoint was owned by a company that was in a business other than electric generation and so was a utility. This reflected the fact that, since before the 1970s and into the 1980s, utilities (privately or publicly owned) produced almost all of the electricity generated or sold in the U.S. *See The Changing Structure of the Electric Power Industry: An Update*, Energy Information Administration, December 1996, at 111. As the commenter noted, a similar type of distinction between utility and non-utility units continued under the Clean Air Act Amendments of 1990, in both title IV and section 112, but the cutpoint was applied only to cogeneration facilities. Non-

cogeneration units involved in electricity sales could be treated as utility units regardless of whether they met one-third potential capacity/25 MWe criteria.

In recent years after 1990, there have been dramatic changes in the electric power industry associated with the emergence of competitive markets for electricity generation where non-utility generators compete to an increasingly significant extent with traditional utilities. The development of competitive electricity markets is on-going, and competition in electric generation is expected to become more pervasive in the future:

Propelled by events of the recent past, the [electric power] industry is currently in the midst of changing from a vertically integrated and regulated monopoly to a functionally unbundled industry with a competitive market for power generation. Advances in power generation technology, perceived inefficiencies in the industry, large variations in regional electricity prices, and the trend to competitive markets in other regulated industries have all contributed to the transition. Industry changes brought on by this movement are ongoing, and the industry will remain in a transitional state for the next few years or more. *The Changing Structure of the Electric Power Industry: Selected Issues, 1998*, Energy Information Administration, July 1998, at ix.

See also *The Changing Structure of the Electric Power Industry: An Update*, at 35-37. As these changes occur, it becomes less and less appropriate to differentiate between utilities and non-utilities that produce electricity.

The Energy Policy Act of 1992 reflected these types of changes in the electric power industry by recognizing a whole new category of non-utility generators, wholesale generators that directly compete with utility generators. The Energy Policy Act also amended the Federal Power Act to broaden the ability of generators to request that the Federal Energy Regulatory Commission (FERC) order a utility to provide transmission services. See *The Changing Structure of the Electric Power Industry: Selected Issues, 1998*, at 1. In response to the Energy Policy Act, FERC has encouraged competition for electricity at the wholesale level (i.e., in sales of electricity for resale) by removing obstacles to such competition. For example, starting in 1996, FERC issued orders requiring utilities to provide open access for electricity generators to transmission lines. Id.

In addition, a growing number of States have initiated retail pilot programs to test the feasibility of competition for electricity at the retail level (i.e., in sales of electricity to end-users) or taken other actions to promote retail competition and deregulate electricity generation. Id. at xi and 93. Consequently, "[o]ne of the expectations for the future is that end users of electricity will be allowed to participate in a unified whole/retail market." Id. at 3.

As a result of the opening of electricity generation to competition, "new entrants, generating and selling power, have made inroads in an industry previously closed to outside participants. Because of this array of changes, the industry is now more commonly called the *electric power industry* rather than the erstwhile *electric utility industry*." Id. at 5. See also *The Changing Structure of the Electric Power Industry: An Update*, at 13-14, 17 (Figure 7) and 111 (describing nonutility generators and showing increase in non-utility generation), at 57-63 (describing FERC order), and at 67-68 (describing State actions). In short, recent legislation of FERC promoting wholesale competition, and recent actions of the many States (currently at least 18 States) in the process of deregulating electricity generation have blurred the distinction between utilities and non-utilities.

Other federal agencies that deal with the power industry have realized that historical categorizations of the industry are no longer appropriate. For instance, the Energy Information Agency is in the process of streamlining its reporting requirements so that there will no longer be a distinction between reporting by utility generators and by non-utility generators.

In the NO<sub>x</sub> SIP call rulemaking, that EPA expressed concern that, under a deregulated electricity market, it is important to consider all NO<sub>x</sub> emissions sources that generate electricity. For instance, in the supplemental notice of proposed rulemaking under the NO<sub>x</sub> SIP call, EPA explained that:

Additionally, with deregulation of electric utilities, it is not clear how ownership of the electricity generating facilities will evolve. Therefore, EPA proposes to include all large electricity generating sources, regardless of ownership, in the trading program. As there is no relevant physical or technological difference between utilities and other power generators, the same monitoring provisions and the size cut-off of greater than 25 MWe are applicable to all units which serve generators. 63 FR at 25923.

For all of these reasons, EPA believes that it is appropriate to consider all units that generate electricity for sale as one source category, regardless of whether the owners and operators of the units are traditional utilities, independent power producers, or industrial companies. (Indeed, it may be appropriate at some time in the future to consider all units generating electricity, whether for sale or internal use, as a single category). However, for purposes of this rulemaking, EPA is continuing to apply to existing units the definition of EGU based on firm-contract sales, essentially as clarified in the December 24, 1998 correction notice. This definition does not classify either all existing or new units that generate electricity, or all existing or new units that generate electricity for sale, as EGUs. For example, industrial units that generate electricity only for internal use will be considered non-EGUs. Furthermore, most existing industrial units that sell small amounts of electricity will also not be considered EGUs, because most of these units do not sell electricity under firm contract. Even though EPA is not basing the EGU and non-EGU definitions on the one-third potential capacity/25 MWe threshold supported by the commenters, EPA believes that the definition for existing units classifies the units of the commenter's members in a way that is consistent with the way the commenters have suggested those units should be classified, i.e., as non-EGUs.

The EGU and non-EGU definitions based on any sales of electricity will apply to units that commence operation on or after January 1, 1999. These definitions will not apply to any of the units referenced by the commenter (e.g., the units referenced, but not identified in the commenter's April 7, 1999 comments for which the commenter provided information on actual, annual electricity sales). Thus, in general, any new units that serve generators involved in electricity sales will be EGUs. This reflects the restructuring of the electric power industry under which any unit serving a generator (regardless of whether the owner is a utility) can be involved in selling electricity and nonutility units are involved in an increasing portion of the electricity market. Instead, because of the ongoing restructuring, distinctions based in utility ownership are becoming increasingly artificial and irrelevant to determining whether units are involved in and should be classified as selling electricity.

EPA notes that the commenter has claimed there was not sufficient notice and opportunity to comment on the EGU and non-EGU definitions in the December 24, 1998 correction notice and that EPA did not explain sufficiently the basis for the definitions. However, prior to the December 24, 1998 correction notices, as discussed above, EPA discussed its approach to EGUs. Moreover, the December 24, 1998 correction notice requested further comment on the state inventories, including EGU and non-EGU portions, and the commenter provided extensive comments on that notice, and the definitions in particular. In response to these comments, EPA has fully addressed above the issues raised by the commenter.

While EPA is not including all sources that generate electricity for sale or internal use as EGUs at this time, EPA may for all of the reasons explained above, consider whether this would be appropriate in future rulemakings.

## **Part 2: Additional Responses on General Treatment of Acid Rain Unit Data Corrections**

**SUMMARY:** A number of commenters requested that EPA add certain Acid Rain units to the inventory. A few commenters noted specific Acid Rain units that were not listed on the allocations tables in the October 1998 FIP and 126 proposal. The units discussed specifically by these comments are: Edwardsport units (IN); Ghent 1 (KY); Endicott Unit 1 and Wyandotte Units 5 and 8 (MI); Walter C. Beckjord Unit 3 (OH); Clover Unit 2 and Possum Point Unit 5 (VA); and Bay Front Unit 4, Blount Street Unit 5, Stoneman Units B21 and B22, Pulliam Unit 3, South Fond Du Lac Unit CT4, Whitewater Cogeneration Unit 1, and Alma Unit CS2 (WI).

**LETTERS:** VIII-B-8, 74, 84, 114, 116, 127, 163, 165, 168, 232, and 269; also Docket A-98-12-III-D-6

**RESPONSE:** The Agency generally has added the units requested. Ghent 1 had already been added by EPA to the December 1998 inventory. Other units had been mistakenly omitted because they did not have heat input in the budget year for their state. Other units had not received allocations (although they were included in the overall State inventory) because their nameplate capacity was set at 25 MWe. Based on the comments received, EPA analyzed the MWe rating for all Acid Rain units to assure these units were properly classified as large EGUs subject to the SIP Call, FIP, and section 126 remedies, and also reviewed the overall list of Acid Rain units to assure that active units were included and properly identified as Acid Rain units. The impact of this review on an individual state basis is discussed in Part 3, below.

However, certain of the units mentioned in the comments were not included in the proposed inventory because they were considered new units (i.e., they commenced commercial operation on or after January 1, 1996). Based on the comments received, EPA has determined that for purposes of calculating the budget new units should only be those units that come on-line on or after January 1, 1997, given that the Agency used the higher heat input of 1995 or 1996 to establish the budget year for each state. Thus, several of these units are now counted for budget purposes. The affected units include Clover 2 in VA and South Fond Du Lac CT4 in WI; Whitewater Cogeneration in WI remains off the inventory because it did not commence commercial operation until 1997. As a result of this modification in the treatment of units that came on-line in 1996, EPA has also added certain Acid Rain units not specifically mentioned in the comments (Brooklyn Navy Yard plant (NY), Michigan Power (MI), and Panda Brandywine (MD)).

EPA also notes that the Alma CS2 designation cited in one comment is not a unit ID for the Alma plant; all Acid Rain units at the Alma plant are included in the WI inventory.

While EPA has responded to these comments with regard to their impact on the overall State budgets, EPA is not responding to comments related to allocations at this time. EPA will respond to comments regarding allocations as part of the finalization of a trading program under either the 126 or FIP actions.

**SUMMARY:** A number of commenters requested nameplate capacity changes for Acid Rain units.

**LETTERS:** [See the applicable comments listed under each State by State summary below]

**RESPONSE:** As noted above, EPA analyzed all of the Acid Rain units to assure that the nameplate capacity data was sufficiently accurate to assure that the units were properly classified as large EGUs. Where a commenter requested a change to the nameplate capacity that did not affect the unit's classification, EPA made the change as requested. Where an Acid Rain unit appeared to have a small EGU classification and a comment specific to that unit was not received, EPA used the 1998 EIA inventory of powerplants to check and revise as appropriate the nameplate capacity rating for the unit. As a result of this analysis, all of the Acid Rain units in the inventory are now classified as large EGUs.

**SUMMARY:** A number of commenters requested specific heat input changes for Acid Rain units.

**LETTERS:** [See the applicable comments listed under each State by State summary below]

**RESPONSE:** In most of these instances, the requested changes were relatively minor and appear to represent rounding issues or slight variations in the methodology used to sum hourly data. The Agency believes that is important to be as consistent as possible in the methodologies used to determine the information used in this inventory.. The Agency developed the heat input for each unit in a consistent manner and relied on the hourly data included in the quarterly reports submitted by the affected sources. There is no reason for the Agency to accept relatively minor changes for some units, without any indication on the part of the commenters as to how the values were calculated and why the values that EPA calculated using the data that the sources themselves had submitted was not accurate..

In several instances, however, significant discrepancies occurred for which the commenter provided a justification for an adjustment or for which it was apparent from the underlying Acid Rain data that an entry error had been made in the inventory. The Agency's response to each of these situations is discussed in the individual responses included in Part 3, below. Also, based on some of these comments related to 1997 ozone season heat input, EPA analyzed all of the Acid Rain units to assure that the 1997 data had been added to the inventory. As a result of this review, EPA added the 1997 ozone season heat input for a number of Acid Rain units.

**SUMMARY:** One commenter notes that in cases where EPA's inventory data come from an EDR representing the emissions of two or more units that share a common stack, the heat input data for these units can be significantly underestimated.

**LETTERS:** Utility Air Regulatory Group (VIII-B-197) (III-G-150)

**RESPONSE:** In calculating NO<sub>x</sub> mass at the unit level for units that monitor heat input at the common stack level and NO<sub>x</sub> emission rate at the unit level, EPA used the heat input reported by the owner or operator of the affected source based on specific comments received, EPA understands that some owners and operators have had errors in their reporting software that has led to reporting of heat input values at the unit level that do not agree with the value monitored and reported at the common stack. In cases where commenters explained that this was the situation, EPA has modified the heat input to agree with the actual heat input reported at the common stack.



## Part 3. State Summaries

### I. ALABAMA

#### A. Alabama Department of Environmental Management (VIII-B-52)

##### (1) Requested Changes:

! Commenter notes the following units that are not EGUs:

- Following units do not sell electricity (other pertinent data identified): Union Camp, Scotch Lumber Co. (unit in inventory is a 98.5 mmBtu wood-fired boiler), Shell Western EP Yellowhammer Offshore (5,000 hp gas turbine with emissions <1 tpd), and Unocal (2 1200 HP gas turbines)
- Vintage Petroleum (3 1,000 HP compressor turbines) does not generate electricity.
- Charles R. Lowman unit \*\*4 does not exist.

! Commenter notes that three (3) Mobile Bay Onshore units are each 3755 KW turbine EGUs.

! Commenter requests addition of EC Gaston Unit Z006.

**(2) Action Taken:** Non-EGU units moved from the EGU inventory to the non-EGU inventory as requested by AL DEM. Charles R. Lowman unit deleted from inventory as requested. Mobile Bay Onshore units retained without change because AL DEM provided insufficient data to segment into three separate units, and comment did not affect status of these units as a small EGUs which are not part of the controlled inventory. EC Gaston unit not added because insufficient data provided and an independent check of an inventory by the Energy Information Administration (EIA) did not identify this unit.

#### B. General Electric (VIII-B-61 and VIII-B-123)

**(1) Requested Changes:** Commenter requests that EPA add a new cogeneration plant at GE's Burkville Facility (85 MW gas turbine, 225 mmBtu/hr natural gas burner & heat recovery boiler) to the inventory, which will be online in July 1999 and should receive an allocation. Commenter clarified that GE is requesting a NOx budget allocation of 116 tons of NOx per ozone season for this unit.

**(2) Action Taken:** Unit was not added because it commenced operation after 1/1/97. See discussion of general inventory issues for further discussion of the rationale for this cut-off date. Also note that EPA is not addressing questions related to allocations under either a section 126 action or a FIP action as part of this rulemaking. EPA will address comments related to allocations as part of the rulemakings addressing the trading programs.

#### C. Southern Company (VIII-B-64 and VIII-B-119)

**(1) Requested Changes:** Commenter notes that the following units should be added to the inventory: Alabama Power Company Greene County (units 2 through 10). Commenter also notes that Greene County units 2, 8, 9, and 10 were permitted and under construction during

1995, were online by 1996 and should be allocated allowances and included in the final budget calculations.

**(2) Action Taken:** These units had been included in the overall AL inventory, but had an error in the MWe nameplate capacity and were thus inadvertently treated as small units. The MWe capacity was corrected and these units have been added to the inventory. Also note that EPA is not addressing questions related to allocations under either a section 126 action or a FIP action as part of this rulemaking. EPA will address comments related to allocations as part of the rulemakings addressing the trading programs.

#### **D. Tennessee Valley Authority (VIII-B-104)**

**(1) Requested Changes:** Commenter requests that Colbert (units 1 through 8) be added to the inventory and provides the necessary information on heat input and other parameters.

**(2) Action Taken:** These units have been added to the EGU inventory as requested.

#### **E. Other Changes to AL Inventory**

As a result of certain comments that documented that certain Acid Rain units had failed to be identified, EPA reanalyzed the entire regionwide database to confirm that all Acid Rain units were properly identified. As a result, McWilliams unit \*\*4 was identified as an Acid Rain unit in AL and the heat input values for the unit were adjusted based on reported Acid Rain data.

## **II. CONNECTICUT**

#### **A. Connecticut Department of Environmental Protection (V-H-80, VIII-B-95, VIII-B-128)**

**(1) Requested Changes:** The primary changes requested by CT DEP was to increase the nameplate capacity of several units so that they would be reclassified from the uncontrolled to controlled EGU inventory. CT DEP also noted that certain units were actually had two segments, but CT provided separate heat input data for the segments for only one of these units. CT DEP also requested the addition of several segments for South Norwalk facility. Other changes included heat input changes and the deletion of one unit that had retired in 1995 and another that burns primarily tires as fuel. Finally, CT DEP requested the addition of certain small EGUs.

**(2) Action Taken:** EPA revised the CT inventory as requested by the state with certain limited exceptions. First, by reviewing EIA data, EPA determined that the South Norwalk facility is in fact comprised of six internal combustion (IC) engines. The EGU inventory includes only boilers, turbines, and combined cycle systems. These units have been moved to the IC engine portion of the non-EGU inventory. In addition, one unit was not segmented as requested because there was no heat input data provided with which to segment the units. Based on the information provided, EPA does not believe that this request would have any affect on the classification of the unit as large.

#### **B. American Ref-Fuel (VIII-B-234)**

**(1) Requested Changes:** Commenter requests the addition of two municipal waste combustor units.

**(2) Action Taken:** Units were not added to the EGU inventory, which includes only fossil fuel units. All MWC units are included as part of the unaffected non-EGU inventory (even if the MWCs may generate electricity for sale). EPA does agree that in light of the restructuring of the electrical generation industry, it may make sense to consider the emissions impact of such units in future rulemakings.

### **III. Delaware**

#### **A. State of Delaware (VIII-B-51)**

**(1) Requested Changes:** Commenter requests specific revisions to the inventory, which are summarized in electronic files which note on a unit-by-unit basis which units should be changed and what the changes are. There are also comments associated with each unit that describes the source of the change. The State requests that the 1995 and 1996 heat input be changed for Seaford 6. This appears to correspond to "Seaford -- 7" on EPA's inventory. Also, the State requests that the following units be added: First State Cogen 127 (unit added to replace two units that have been requested to be deleted from the inventory, Kraft Foods Cogen and General Foods Nug), General Chemical Cogen 7, Christiana Sub 11, Christiana Sub 14, Delaware City 10, Edge Moor 10, Madison Street 10, West Substation 10, and Dupont Seaford 1 through 3, Indian River 10, and Seaford 1 through 5. Several of these units are added because the state is reclassifying the units as EGUs, and thus they would be removed from the non-EGU inventory. The state also identified one unit that is not operational and should be removed from the inventory.

**(2) Action Taken:** The changes requested by the state have been made as requested, except that certain units were identified as IC engines. As noted above, IC engines are treated separately from EGUs and thus are not included on this EGU inventory.

#### **B. Conectiv (VIII-B-199)**

**(1) Requested Changes:** Commenter requested various changes to units included in the EPA inventory as well as units to add to the inventory. Generally, these requests were consistent with the comments submitted by the State of DE, although there were some discrepancies in the heat input values submitted by the utility and the state.

**(2) Action Taken:** Because these comments overlapped with the comments submitted by the state, no action was necessary. Where the industry and state data for non-Acid Rain units conflicted, EPA used the data as supplied by the state agency. EPA believes that the data supplied by the State is better because the State is charged with reviewing emissions data from its sources for other regulatory purposes and provides a better independent assessment of the data.

#### **C. Other Corrections to DE EGU Inventory**

Based on a review of all Acid Rain units, EPA modified the point ID for the Van Sant Station and added 1997 heat input data for that unit. In addition, based on general comments received about the treatment of IC engines that may produce electricity, EPA evaluated the unit type data

for all of the units in the EPA inventory and identified through EIA databases and comments certain units that EPA had failed previously to identify as IC engines. In Delaware, this resulted in the shifting of three IC engine units from the EGU inventory to the non-EGU inventory-..

#### **IV. District of Columbia**

##### **A. Potomac Electric Power Company (VIII-B-204)**

**(1) Requested Changes:** Commenter requests that the HI data for two Acid Rain units be modified in 1995 (reduced HI) and 1996 (increased HI).

**(2) Action Taken:** No changes to the inventory were made as a result of this comment. The EPA developed the HI values for all Acid Rain units based on the hourly data the utilities are required to submit under 40 CFR Part 75. The commenter provided no support for the requested changes or an explanation of why the hourly values as reported should not be used. After follow-up with the utility, no additional support was provided. Absent supporting documentation, the Agency believes that data supplied for purposes of compliance with the Acid Rain Program is the best available data.

#### **V. Georgia**

##### **A. Georgia Power Company (V-H-62) and Southern Company (VIII-B-64 and VIII-B-119)**

**(1) Requested Changes:** In each of these letters, the commenters request that Atkinson (5A, 5B), Bowen (6A), McDonough (3A, 3B), McManus (3A, 3B, 3C, 4A, 4B, 4C, 4D, 4E, 4F), and Mitchell (4A, 4B, 4C) be added to the inventory. Commenter provided a spreadsheet with the necessary data for these units, and provided follow-up data on HI values. In earliest comments, commenter requested the addition of McManus 4 and Wansley 5, but did not request that these units be added as part of the subsequent comments.

Commenter also notes that the following units should receive allocations: Georgia Power Company McIntosh (units CT1 and CT2). Commenter notes that 1997 heat input should be added to the inventory for Georgia Power and Savanna Electric and Power Company McIntosh (units CT3 through CT8), but does not provide this data in their letter.

Commenter requests that Mitchell units 1 and 2 and Riverside units 4 and 5, which are smaller than 25 MW and less than 250 mmBtu/hr, not be included in the budget or in any calculations.

**(2) Action Taken:** The requested units to add have all been added based on the information provided, except for the McManus and Wansley units identified in the earliest comments. Based on a review of the EIA inventory and the fact that the commenter did not request the addition of these units in their second letter, EPA believes that all existing units at the McManus and Wansley plants have been included in the inventory. The request to delete units under 25 MWe was not acted upon because the inventory is intended to be a complete inventory of all fossil fuel boilers and turbines that produce electricity for sale in each state. Additional controls were not applied to units that are 25 MWe or less. Also note that EPA is not addressing questions related

to allocations under either a 126 action or a FIP action as part of this rulemaking. EPA will address comments related to allocations as part of the rulemakings establishing the trading programs.

## **B. South Georgia Facilities (VIII-B-145)**

**(1) Requested Changes:** Commenter requests that EPA delete from the Georgia inventory those emissions attributable to facilities in Georgia south of latitude 32.67, since they are located in the "coarse grid" area and do not make a significant contribution to non-attainment in any downwind state.

**(2) Action Taken:** This comment is beyond the scope of this rulemaking. EPA made significance determinations as part of the final SIP Call rulemaking. Therefore no change has been made to the inventory.

## **C. Additional Corrections to GA EGU Inventory**

Based on general comments received about the treatment of IC engines that may produce electricity, EPA evaluated the unit type data for all of the units in the EPA inventory and identified through EIA databases and comments provided certain units that EPA had failed previously to identify as IC engines. In Georgia, this resulted in the shifting of one IC engine unit from the EGU inventory to the non-EGU inventory.

## **VI. Illinois**

### **A. Illinois Environmental Protection Agency (VIII-B-62, 118, and 275)**

**(1) Requested Changes:** Illinois EPA submitted a complete revised EGU inventory as well as supporting materials provided by several companies in Illinois. These comments requested the addition of several large CT units operated by Commonwealth Edison, as well as the addition of a number of small EGUs. In addition, certain units were requested to be deleted, some of which were to appear on the non-EGU list and others that were unidentified units that should be removed entirely. There were also several units for which heat input and MW corrections were submitted, including Acid Rain units at four Illinois Power facilities (Baldwin, Hennepin, Vermilion, and Wood River). Illinois also forwarded a request by Illinois Power to substitute representative year heat input for several Havana and Wood River units that did not operate between 1995 and 1997.

**(2) Action Taken:** Most of the corrections submitted by Illinois EPA were accepted and included in the revised inventory. However, Illinois EPA had requested the addition of several small IC engines. As discussed above, this EGU inventory does not include IC engines, these units are being added to the non-EGU inventory. As a result of Illinois's comments, EPA reviewed the existing units in the Illinois inventory and moved other IC engines to the non-EGU inventory as well. In addition, with the exception of Hennepin unit 1, EPA did not make the requested changes to the heat input values for the Acid Rain units. The two major discrepancies noted included Baldwin Unit 1 and Hennepin Unit 1. Because the utility was unable to provide any justification as to why the values submitted for Baldwin 1, EPA did not make the requested changes. EPA had additional discussions regarding Hennepin Unit 1 with both Illinois EPA and

Illinois Power (the owner and operator of Hennepin 1). Illinois Power explained that because Hennepin 1 shares a common stack with another unit (Hennepin 2) and because Hennepin 1 is a phase 1 Acid Rain unit and Phase 2 is a phase 1 substitution unit, Illinois Power has installed their monitors in a unique configuration that does not accurately account for unit level heat input. EPA agrees that the monitoring configuration that Illinois Power is using may not provide accurate heat input data, therefore EPA has accepted Illinois Power alternative value. EPA notes that the monitoring methodology that Illinois Power is using for the Hennepin unit would not be allowed under 40 CFR 75.71 and that if Illinois Power is required to make reductions at this unit for purposes of the SIP Call, Illinois Power would be required to ensure that the monitoring configuration they choose to use is allowable under Part 75 for purposes of quantifying NO<sub>x</sub> mass. All of the other units had only minor differences, and the commenter provided no explanation or support which would indicate that the existing value calculated by EPA is incorrect. Finally, IL EPA requested that a number of small EGUs be added to the inventory. In order to calculate a budget element for these small units, EPA needs to have a NO<sub>x</sub> emission rate. However, IL EPA failed to provide a NO<sub>x</sub> rate for these units. In comments on ComEd units, ComEd supplied NO<sub>x</sub> emission rate data for many of these small EGUs, and those units were therefore added as requested. The remaining units were not included. EPA is also not including the “representative heat input” values supplied for units that did not operate in 1995-1997. The inventory is supposed to represent actual emissions and heat input in 1995 and 1996. Also note that EPA is not addressing questions related to allocations under either a 126 action or a FIP action as part of this rulemaking. EPA will address comments related to allocations as part of the rulemakings establishing the trading programs.

#### **B. Ameren Corporation (VIII-B-24)**

**(1) Requested Changes:** Commenter requests addition of a CT unit at the Venice plant.

**(2) Action Taken:** The unit was added as requested. This comment was corroborated by the Illinois EPA comments, and the unit is listed in the EIA inventory.

#### **C. Commonwealth Edison (VIII-B-59)**

**(1) Requested Changes:** Commenter requests that EPA recalculate the allowance allocation for the Powerton facility because they were not updated after EPA had updated the heat input utilization for these units. Commenter also requests the addition of several large and small CT units.

**(2) Action Taken:** The CT units were added as requested. These comments were corroborated by Illinois EPA and the units are listed in the EIA inventory. Also note that EPA is not addressing questions related to allocations under either a 126 action or a FIP action as part of this rulemaking. EPA will address comments related to allocations as part of the rulemakings establishing the trading programs.

### **VII. Indiana**

#### **A. Commenter: Aluminum Company of America (ALCOA) (V-H-109 and VIII-B- 97)**

**(1) Requested Changes:** Commenter requests that Warrick units 1 through 3 be reclassified as non-EGUs and that the heat input be adjusted for these units. The units are Acid Rain opt-in units, and did not begin monitoring heat input under 40 CFR Part 75 until July 1, 1996. Commenter also provided 1997 heat input data for Warrick units 1, 2, and 3, and lists these values as 7,092,671 mmBtu, 6,123,542 mmBtu, and 8,111,546 mmBtu, respectively.

**(2) Action Taken:** Units have been reclassified as non-EGUs. EPA verified that the heat input requested agreed with the heat input reported to EPA for compliance with the Acid Rain Program and added it.

**B. Commenter: Indianapolis Power & Light (VIII-B-31, VIII-B-122, and A-97-43, IV-D-15)**

**(1) Requested Changes:** Commenter notes that IPL Perry K (11,12, 14) should be treated as small EGUs, based on EPA's clarification of EGUs versus non-EGUs. Total combined generator capacity is 20 MW (two generators) and IP&L filed EIA 860 forms for these units based on capability to generate electricity for sale. Commenter also provided information that should be incorporated into the EGU inventory -- information on operating parameters, heat input, emission rates, and other general information for the E.W. Stout, HT Pritchard, and Petersburg EGUs. Also provided updated operating and stack parameter data for modeling purposes.

**(2) Action Taken:** The Perry K units have been reclassified based on the information provided and as corroborated by the state. The MW changes for the other units did not affect their classification as controlled EGUs and were all accepted. EPA compared the 1995 HI data as provided by the commenter to the data calculated by EPA from the Part 75 monitoring reports. Based on these comments, EPA reviewed its calculation of heat input from the reports submitted for compliance with the Acid Rain Program and found only minor discrepancies, except for Petersburg 2, in which the commenter's data was much closer to that recalculated by EPA. Based on this comparison, EPA changed the Petersburg 2 data to be consistent with the data previously calculated by EPA. For the other requested HI changes, EPA had no basis on which to use the data calculated by the utility as opposed to the data calculated by EPA.

**C. Commenter: Cinergy (VIII-B-114)**

**(1) Requested Changes:** Commenter notes that the information for several of its PSI Energy facilities in Indiana is incorrect, and requests revisions to the nameplate capacity for several units; none of these requests reclassifies a unit except as follows:

- ! Connersville units 1 and 2 should each have a nameplate capacity of 50 MW (instead of 2 MW)
- ! Edwardsport units 1, 2, 3, and 4 should each have a nameplate capacity of 44 MW each (instead of 25 MW)

The commenter also notes that Cayuga unit 5 should be deleted from the inventory since it does not exist. Finally, commenter requests that the 1996 heat input data for Cayuga unit 1 be revised.

**(2) Action Taken:** All of the MW changes were made as requested because they were corroborated by the state and a review of EIA data for the units that are reclassified as controlled units. Cayuga 5 was deleted because this request was also corroborated by the state and EIA information. The HI revision for Cayuga 1 was not accepted. This is an Acid rain unit, and the data in the inventory is the same as calculated by EPA for this unit. The commenter provides no explanation for why the Agency should accept the change to the HI for this unit.

#### **D. Northern Indiana Public Service Company (VIII-B-211)**

**(1) Requested Changes:** Commenter requests addition of a combustion turbine to add to the controlled EGU inventory.

**(2) Action Taken:** Unit added based on the information provided and corroboration from EIA inventory.

#### **E. Indiana Department of Environmental Management (VIII-B-223 and 269) and SIGECO (VIII-B-244)**

**(1) Requested Changes:** Commenter corroborated requested changes by various IN utilities (discussed above). Also submitted changes for FB Culley Units 2 and 3, AB Brown Unit 4 and Broadway Unit 2, and requested the addition of Broadway Unit 1 and Northeast facility. Finally, the state asked that a unit be deleted from the inventory because based on the information in the inventory, Indiana has no information supporting the existence of this unit..

**(2) Action Taken:** For the action taken with respect to ALCOA, Cinergy, and IP&L, see summaries above. All other requested additions, deletions, MW changes and HI changes were made except for HI changes to Acid Rain units and the addition of the Northeast facility. For the Acid Rain units, the data in the inventory are the same as calculated by EPA for the applicable units. The commenter provides no explanation for why the Agency should accept the change to the HI for the units. For the Northeast facility, insufficient data were provided to add the units (no NOx rate data were provided, so EPA would be unable to calculate projected NOx mass emissions from these units.). These small units had a total Budget Year HI of approximately 2,000 mmBtu, so the addition of these units would have little or no impact on Indiana's budget.

#### **F. Additional Corrections to IN EGU Inventory**

Based on general comments received about the treatment of IC engines that may produce electricity, EPA evaluated the unit type data for all of the units in the EPA inventory and identified through EIA databases and comments provided certain units that EPA had failed previously to identify as IC engines. In Indiana, this resulted in the shifting of two IC engine units from the EGU inventory to the non-EGU inventory.

### **VIII. Kentucky**



## **A. Kentucky Natural Resources and Environmental Protection Cabinet (VIII-B-158)**

**Requested Changes:** Commenter requested the addition of several units, primarily combustion turbines, but also Ghent 1. Commenter also incorporated comments from various Kentucky utilities for corrections to heat input and MW capacity.

**Action Taken:** For the requested additions, all of the units were added except for the J.K. Smith units which are units that are not yet operational. In addition, EPA notes that the inventory released in December 1998 already included Ghent 1. All of the requested revisions to MW capacity values were made, and none of those changes affected the classification of a unit as a small or large unit. None of the requested heat input corrections were made. All of the affected units are Acid Rain units, and for most of these units, the requested heat input changes were extremely minor (all were less than 10,000 mmBtu). Because no supporting documentation or explanation was provided as to why the values submitted by the utilities varied from the values calculated by EPA for these units, no changes were made.

## **B. Kentucky Utilities (VIII-B-8, 74, and 176)**

**Requested Changes:** Commenter requested that Ghent 1 be added to the inventory. Commenter provided 1995 heat input value of more than 16 million mmBtu, as well as an explanation of complex reporting history for this unit. Commenter also provided corrections for four CT units at its EW Brown plant and the addition of three CT units at its Haefling plant.

**Action Taken:** As noted above, EPA already had added Ghent 1 in the December 1998 inventory. However, EPA used a 1995 heat input value of over 14 million mmBtu for this unit. This value was based on the Acid Rain Program data used by EPA to calculate heat input for Acid Rain units. Nothing in the explanation provided by the utility provided a reason for modifying this prior calculation. For the EW Brown units, EPA made the changes consistent with the comments. These Acid Rain units had misidentified unit numbers and thus the Acid Rain data for these units was not used in the existing inventory. Based on the comments, EPA added 1995-97 ozone season heat inputs for all of these units, and added the fourth. The fourth unit, Unit 11, is a 1996 new unit, but has been added based on the approach discussed above for including units that came on line in 1996 in the inventory. The Haefling units were added as requested, and as corroborated in the state's comments.

## **C. Tennessee Valley Authority (VIII-B-104)**

**Requested Changes:** Commenter requested the addition of several CT units. Commenter also provided corrections to the heat input values for three Shawnee units.

**Action Taken:** The requested additions were included based on the data and supporting materials provided by the commenter. The three Shawnee units are Acid Rain units, therefore EPA rechecked its heat input calculations for these units. Based on this check, EPA agrees with the commenter that these values were incorrect. EPA has replaced these values with values based on its recalculation of the Acid Rain Data. The corrected values are generally consistent with the comments submitted.

## **D. Western Kentucky Energy (VIII-B-183)**

**(1) Requested Changes:** Commenter requested revised nameplate capacity, heat input and other values for several Acid Rain units.

**(2) Action Taken:** These comments were incorporated into the state comments discussed above. As noted, the MW revisions were accepted but the heat input revisions were not accepted for the reasons explained above.

#### **E. Louisville Gas and Electric Co. (VIII-B-216)**

**(1) Requested Changes:** Commenter requests the addition of six CT units and submits some corrections to miscellaneous data for certain other units (no HI or MW changes for these other units).

**(2) Action Taken:** EPA has added the units requested by the commenter, and as corroborated in the state comments.

### **IX. Massachusetts**

#### **A. General Electric Company (VIII-B-61 and 123)**

**(1) Requested Changes:** Commenter requests that EPA clarify the status of a series of interconnected units at commenter's Lynn, MA facility. Notes that units currently listed inappropriately in EGU and non-EGU inventories. Commenter provides detailed explanation and supporting documentation.

**(2) Action Taken:** Based on the data provided, EPA has reclassified one existing large EGU and two large non-EGUs as two small EGUs. The facility has five boilers, only one of which is over 250 mmBtu/hr. The steam from these units is combined and then used to provide steam both to the facility and to three separate steam turbine generators. The three generators provide a combined 35 MWe electricity capacity to the facility and the grid. In addition, a combustion turbine generator (21 MWe and 252 mmBtu/hr) also provides electricity to the facility and the grid, as well as waste heat used to fire one of the five boilers mentioned above. None of the generators is over 25 MWe, although in combination the facility generates more than 25 MWe.

Because no generator is over 25 MWe and all of the boilers provide steam to a generator, all of the units should be classified as small EGUs. However, the commenter provided heat input and other relevant data for only two of the units. EPA is not including units that do not operate in 1995 or 1996 in the inventory and since the commenter did not provide heat input data, EPA assumes that these units did not operate. Thus, the revised inventory represents this facility as two small EGU units.

#### **B. American Ref-Fuel Company (VIII-B-234)**

**(1) Requested Changes:** Commenter requests the addition of certain municipal waste combustors (MWCs) to the EGU inventory.

(2) **Action Taken:** These units were not added to the EGU inventory. The EGU inventory includes only fossil fuel-fired boiler and turbine EGUs. These MWC units, because they do have NOx emissions, are included as part of the overall non-EGU inventory.

### **C. Additional Corrections to MA EGU Inventory**

Based on general comments received about the treatment of IC engines that may produce electricity, EPA evaluated the unit type data for all of the units in the EPA inventory and identified through EIA databases and comments provided certain units that EPA had failed previously to identify as IC engines. In Massachusetts, this resulted in the shifting of ten IC engine units from the EGU inventory to the non-EGU inventory.

## **X. Maryland**

### **A. Maryland Department of Environment (VIII-B-46 and 99) and Easton Utilities (VIII-B-131)**

(1) **Requested Changes:** Commenters request that all of the units at Easton Utilities be considered small because they are less than 25 MW.

(2) **Action Taken:** As noted by the commenters, all of the units at Easton Utilities are IC engines. Thus, none of these units are EGUs for purposes of the NOx SIP Call; these units will be classified non-EGUs and will be classified as large or small based on the criteria used for the IC engines (horsepower and/or tons per day basis).

### **B. Bethlehem Steel (Sparrows Point) (VIII-B-11, 19, 20, 25, 29, 36 and 37)**

(1) **Requested Changes:** Commenter noted that the EGU inventory contains reference to an EGU at this facility. However, the unit information appears to match a unit in Bethlehem, PA operated by Bethlehem Steel. The unit at Sparrows Point is not a fossil fuel unit and the facility is a net purchaser of electricity.

(2) **Action Taken:** The unit has been moved from the EGU inventory to the non-EGU inventory because it is a non-fossil fuel unit.

### **C. Baltimore Gas and Electric Company (VIII-B-75 and 180)**

(1) **Requested Changes:** Commenter requested correction to HA Wagner 1995 heat input. The commenter stated that the Part 75 EDR for that year was in error and that the heat input should instead be calculated from fuel usage records as supplied in the comments. In a subsequent letter, this commenter requested the addition of several small CT units.

(2) **Action Taken:** The small CT units have been added as requested in the comments and confirmed through EIA data. The Agency has not made the change requested by the commenter for the HA Wagner unit because the commenter supplied no documentation or explanation as to why they believe that the value EPA calculated using data submitted to EPA for compliance purposes was incorrect.

### **C. Conectiv (VIII-B-199)**

(1) **Requested Changes:** Commenter requests the addition of a CT unit at its Vienna facility.

(2) **Action Taken:** The unit was added as requested and as confirmed through EIA data.

### **D. Potomac Electric Power Company (VIII-B-204)**

(1) **Requested Changes:** Commenter requested the addition of a CT unit at its Chalk Point facility as well as heat input changes for several Acid rain units at the Chalk Point, Dickerson, and Morgantown plants.

(2) **Action Taken:** The CT unit at Chalk Point was added based on the data supplied by the commenter and ozone season heat input data calculated by EPA from Part 75 monitoring reports. For one unit, Dickerson 3, the commenter did provide an explanation of the reporting problem that had occurred. In response, the Agency checked the EDR file data and observed that the reporting problem did in fact lead to exclusion of certain heat input values for two months in the 1995 ozone season. thus, the Agency has accepted the 1995 heat input changes for this unit. The Agency has not made the change requested by the commenter for the other units because the commenter supplied no documentation or explanation as to why they believe that the value EPA calculated using data submitted to EPA for compliance purposes was incorrect.

## **XI. Michigan**

### **A. Michigan Department of Environmental Quality (VIII-B-230 and 279), Detroit Edison (VIII-B-231), T.E.S. Filer City Station (VIII-B-44), and Midland Cogeneration Venture (VIII-B-278)**

(1) **Requested Changes:** State agency commenter submitted requested changes and supporting documentation for large EGUs operated by Midland Cogeneration Venture, Detroit Edison, T.E.S. Filer City Station, and the Wolverine Power Advance Plant. Midland Cogeneration Venture changes significantly affect heat input and other parameters by segmenting this plant into multiple units. For Detroit Edison, the major changes involve 1995 and 1996 heat input for the Monroe plant (Acid Rain units), the addition of two CT units, and heat input and other parameters for certain other units. The comments also request that certain units <25 MWe be removed from the inventory. For the T.E.S. Filer City Station, the comments request a significant increase for heat input. For the Wolverine Power facility, Michigan requests that the units be deleted because the plant has been shut down. The other commenters submitted comments with the same data requests as included in the state agency comments.

(2) **Action Taken:** All of the requested changes for Midland, T.E.S. Filer, and Wolverine Power have been made as requested based on the comments and supporting documentation received. For the Detroit Edison units <25 MWe, EPA notes that they remain in the overall EGU inventory, but are not considered controlled for purposes of determining the budget. EPA has added the Detroit Edison CT units as requested, and modified the heat input values for the Beacon Heating Plant as requested. For the Monroe plant, the commenter requested significant increase in 95 and 96 HI for Units 3 and 4 as a result of an EDR error for allocating HI input to these common stack units. The requested revisions are consistent with the 1997 data for these

units and are supported by the total HI reported for the stack. The commenter's recommendation to split the HI equally for the two units (and the reference to other units owned by the commenter at which EPA had already taken this approach) further support this requested change. Thus, EPA has made the change as requested. Finally, EPA also revised the MWe capacity for the Marysville units consistent with the comments received.

#### **B. City of Wyandotte (VIII-B-116)**

**(1) Requested Changes:** Commenter described the unit configuration (small boilers connected to common header feeding a 32 MWe generator). If all units feeding the generator are to be affected units, then the inventory needs to be corrected to include Wyandotte units 5 and 8, and both units should receive allocations.

**(2) Action Taken:** The three units at Wyandotte (Units 5, 7 and 8) are all Acid Rain units. Unit 8 was in the overall inventory, but not in the allocation table because of an erroneous MW value. Unit 5 had been left off the inventory because it did not have heat input in the budget year for Michigan. Based on the data provided with the comments and the available Acid Rain data, the information for Wyandotte has been corrected for all three units. Commenter also requested an increased allowance allocation because of reduced utilization between 1995-1997. As noted in Part 1, above, EPA will respond to these allocation issues when Part 97 is finalized. The Agency disagrees with those commenters that argue that the inventory should be modified to reflect increased heat input based on more "typical" operations that did not occur in the 1995-1997 years. The inventory is intended to reflect an estimate of statewide actual heat input in these years to calculate an overall state budget. On a statewide or regionwide basis, the reduced utilization of one unit is presumably met by increased utilization at another unit. For these reasons, EPA will address these concerns solely as an allowance allocation issue, not a statewide inventory issue.

#### **C. Michigan South Central Power Agency (VIII-B-163)**

**(1) Requested Changes:** Commenter request the addition of the Endicott Station to the EGU inventory. Commenter also requests an adjusted utilization baseline because of atypical plant operations between 1995-1997.

**(2) Action Taken:** The unit has been added as requested by the commenter based on the data and supporting documentation provided. Commenter also requested an increased allowance allocation because of reduced utilization between 1995-1997. As noted in Part 1, above, EPA will respond to these allocation issues when Part 97 is finalized. The Agency disagrees with those commenters that argue that the inventory should be modified to reflect increased heat input based on more "typical" operations that did not occur in the 1995-1997 years. The inventory is intended to reflect an estimate of statewide actual heat input in these years to calculate an overall state budget. On a statewide or regionwide basis, the reduced utilization of one unit is presumably met by increased utilization at another unit. For these reasons, EPA will address these concerns solely as an allowance allocation issue, not a statewide inventory issue.

#### **D. Lansing Board of Water and Light (VIII-B-189), Holland Board of Public Works (VIII-B-198), City of Detroit Public Lighting Department (VIII-B-206), Marquette Board of Light and Power (VIII-B-290)**

**(1) Requested Changes:** Each of these commenters requested adjusted baseline utilization rates to account for atypical operations in the 1995-1997 period. In addition, City of Detroit provided revised heat input and fuel type data for the Mistersky plant.

**(2) Action Taken:** Commenters requested an increased allowance allocation because of reduced utilization between 1995-1997. As noted in Part 1, above, EPA will respond to these allocation issues when Part 97 is finalized. The Agency disagrees with those commenters that argue that the inventory should be modified to reflect increased heat input based on more "typical" operations that did not occur in the 1995-1997 years. The inventory is intended to reflect an estimate of statewide actual heat input in these years to calculate an overall state budget. On a statewide or regionwide basis, the reduced utilization of one unit is presumably met by increased utilization at another unit. For these reasons, EPA will address these concerns solely as an allowance allocation issue, not a statewide inventory issue.

For the Mistersky plant, the revised heat input values included in the commenter's letter are not supported by the Acid Rain data submitted for this unit, and EPA has not made the changes requested.

#### **E. CMS Generation (VIII-B-34) and Genesee Power Station (VIII-B-136)**

**(1) Requested Changes:** Commenters request that their units be included in the EGU inventory.

**(2) Action Taken:** These are wood waste boilers and thus are not fossil fuel units. These units are included in the uncontrolled portion of the non-EGU inventory.

## **XII. Missouri**

#### **A. Missouri Department of Natural Resources (VIII-B-201) and Empire District Electric (VIII-B-140)**

**(1) Requested Changes:** Commenter provided a complete EGU inventory with a number of requested heat input and MW changes as well as a number of large and small units to add. For large EGUs, the commenter noted specifically that the U. of Missouri-Columbia power plant units should be reclassified as small EGUs, and all three boilers at the Columbia Municipal Power Plant should be classified as large EGUs. Most of the heat input corrections were for non-Acid Rain units but there were five Acid Rain units with requested heat input corrections. Missouri also corroborated and incorporated changes submitted separately by Empire District Electric.

**(2) Action Taken:** The changes requested by the state were generally accepted. The requests to change heat input values for Acid Rain units were not accepted. Because no supporting documentation or explanation was provided as to why the values submitted by the state varied from the values calculated by EPA for these units, no changes were made. In addition, many of the units that the State requested be added to the EGU inventory were in fact IC engines, and thus were not added as requested. Finally, the inventory list provided by Missouri included certain units for Union Electric, KCI Energy Center, and Chillicothe Municipal Utilities that were not

added to the inventory. Based on a review of the EIA inventory information, all of the units operated by Union Electric Company are accounted for in the inventory and thus these units appeared to be duplicate entries. Moreover, the data provided for these units and the KCI Energy Center units were insufficient to determine their size, heat input values, or NO<sub>x</sub> rates. The Chillicothe units also appeared to be duplicates and also were lacking certain data elements. The state had identified these as large EGUs, but the heat input values were extremely small. In addition, the EIA inventory data showed no such large EGUs for Chillicothe, and none of these units are identified as part of the Acid Rain Program. Based on those considerations, these units were not added.

The State and a utility had also requested the addition of a Staeline unit that commenced commercial operation in 1997. Since this unit did not operate in either 1995 or 1996, the years covered by this inventory this unit has not been added to the baseline EGU inventory.

Because the state had requested the addition of several IC engines, EPA reanalyzed the existing EGU inventory for Missouri and located several other IC engines that had been erroneously included in the EGU portion of Missouri's inventory. These IC engines were removed from the EGU inventory and included in the non-EGU inventory.

#### **B. Kansas City Power & Light (VIII-B-33)**

**(1) Requested Changes:** Commenter requested addition of units at Northeast Generating Facility.

**(2) Action Taken:** These units were also in the state of Missouri's list of units to be added, and EPA has added the units as requested.

#### **C. Ameren (VIII-B-24)**

**(1) Requested Changes:** Commenter requested addition of six CT units, and also requested heat input and other changes to three other units.

**(2) Action Taken:** All of these changes were also included in the state of Missouri's suggested inventory corrections, and the additions and changes have been incorporated as requested.

#### **D. Associated Electric Cooperative (VIII-B-153)**

**(1) Requested Changes:** Commenter requested heat input correction for Chamois Unit 1 and segmenting Unionville Power Station into 2 units with revised heat input values.

**(2) Action Taken:** These changes were also included in the state of Missouri's comments, and the changes have been made as requested.

### **XIII. New Jersey**

#### **A. New Jersey DEP (VIII-B-258)**

**(1) Requested Changes:** Commenter resubmitted comments submitted in response to the SIP Call SNPR. These comments requested that EPA clarify the information for several units, one of which had no plant name, and the others of which were identified with plant names of SMECO, PCLP NUG, Mobil NUG, L&D Landfill NUG, and KCS NUG. Commenter also requested the addition of certain PSE&G units at the Linden and Hudson plants. The agency also provided a list of units that were not included in Appendix A of the inventory as of March 1998. The commenter noted certain units in the non-EGU inventory that appeared to be EGUs. Finally, the commenter identified certain IPP units that should be added to the EGU inventory. In follow-up comments, the agency again noted that it could not confirm the existence of the unnamed plant and the KCS NUG plant in the NJ inventory, as well as a plant identified as NA 2 -7140. The state also pointed to other plants which, although a prior comment had indicated may not be accurately represented, the state believed were accounted for in the non-EGU and EGU inventories.

**(2) Action Taken:** Based on the comments from the State of New Jersey, EPA carefully reviewed the overall NJ EGU inventory and matched the inventory with the OTC NOx Budget Program inventory for New Jersey (a list of OTC NBP units in New Jersey is included in the docket). Based on that review, and the comments from New Jersey utility and non-utility generators (discussed below), EPA has updated several aspects of the New Jersey inventory. First, EPA has removed the unidentified plant and the plants identified as "KCS NUG" and "NA2 -7140." No match in the New Jersey inventory could be made for those units. The plant identified as CCLP NUG appears to be the Carney's Point facility in New Jersey and has been renamed based on this review. The Mobil NUG corresponds to the Paulsboro plant in New Jersey. No match between the NJ OTC inventory and the EPA inventory could be made for either the SMECO or the PCLP NUG units. Therefore these units were removed from the EPA inventory. The L&D Landfill NUG is a small 2 MWe unit and thus no potential match with the OTC inventory is possible (since the OTC inventory only includes units down to 15 MWe). Therefore, this small unit was retained.

Second, EPA looked at the units which the commenter suggested should be added or moved from the non-EGU inventory. Some of these units were added at the request of the applicable operators (see below), and many of them were already in the small EGU portion of the inventory. In addition, EPA moved the Kamine Milford and Prime Energy plants from the non-EGU inventory to the EGU inventory based on the data provided by New Jersey and follow-up data obtained from one of the plants (note that as a result of the additional information provided, there is not a one to one correspondance between the units that were listed in the non-EGU inventory and which are now listed in the EGU inventory).

Third, in the process of matching the units in the EPA inventory and the units in the OTC inventory, EPA carefully reviewed the nameplate capacity of all of the units, especially several units for which nameplate capacity information was missing. Based on the comments received, monitoring plan information available through implementation of the OTC NOx Budget Program (a copy of the relevant information reviewed is in the docket), and the EIA inventory of power plants, EPA revised or added the nameplate capacity data for several units, especially PSE&G units (see below).

## **B. Public Service Electric and Gas Company (V-H-123 and VIII-B-138 and 233)**



**(1) Requested Changes:** Commenter requests that certain CT units be added and clarifies the status of certain units at the Bergen and Burlington facilities. In earlier comments on the SIP Call SNPR, commenter had noted that certain units appeared to be missing from the inventory while other units had identifying information that did not match the NJ OTC inventory.

**(2) Action Taken:** The CT units which the commenter requested to be added were added based on the information provided and a check against the OTC inventory data for the plants operated by this commenter. Because the commenter did not provide nameplate capacity data for some of these units, EPA verified all of the nameplate capacity data for the PSE&G units in New Jersey against comparable data submitted by the commenter as part of its monitoring plan submissions in the OTC NOx Budget Program (a copy of the relevant information reviewed is in the docket). Based on that data, EPA updated all of the nameplate capacity data for the PSE&G units, which resulted in some units being reclassified as large units and some being reclassified as small units. For any small PSE&G units that were added to the inventory, EPA used the unit-specific default NOx rate to be used for OTC reporting purposes as the NOx rate for the unit. In conducting this review, EPA noted that certain other NJ units were also missing nameplate capacity data. For these units, EPA reviewed the available monitoring plan data and EIA inventory data to add a nameplate capacity value and assure proper classification of the units as large or small EGUs. None of the units analyzed by EPA were reclassified as a result of this additional analysis.

For the SNPR comments suggesting that certain units may need to be added or deleted, EPA first notes that the commenter did not reiterate or incorporate those comments into the most recent round of comments submitted. However, as discussed above under the NJ DEP comments, EPA reviewed the EPA inventory against the NJ OTC program inventory. Based on NJ DEP's comments, EPA removed any large units for which no match could be determined. However, for small units that may not be included in the NJ OTC inventory, EPA left the units in the overall NJ inventory as small units.

#### **C. East Cast Power, L.L.C. (VIII-B-142)**

**Requested Changes:** Commenter notes that the Cogen Technologies units identified in the inventory had several inaccurate data elements. Commenter provided revised data for the Bayonne, Linden and Camden facilities operated until recently by Cogen Technologies (East Coast Power recently acquired these facilities).

**Action Taken:** Based on the comments, and accompanying data and supporting references, EPA has adjusted the data for these units as requested.

#### **D. Conectiv (VIII-B-199)**

**(1) Requested Changes:** Commenter requests heat input corrections for several units. In addition, commenter suggests combining two segments of one unit into a single unit and adding two CT units.

**(2) Action Taken:** Based on the comments, and accompanying data and supporting references, these changes have been incorporated in the NJ inventory.

#### **E. American Ref-Fuel (VIII-B-234)**

**(1) Requested Changes:** Commenter requests that certain MWC units be added.

**(2) Action Taken:** MWCs are treated as non-EGUs for purpose of these rulemakings because they are not fossil-fuel fired units.

#### **F. GPU Genco (VIII-B-257 and 284)**

**(1) Requested Changes:** First, commenter requests that EPA verify the last entry for NJ EGU Budget in the allocation table included with the section 126 proposal. Second, commenter notes that several allocations appear to be incorrect based on the heat input data. These include minor and major discrepancies. Third, the commenter identifies a number of units that were omitted from the inventory. Fourth, the commenter identifies apparent duplicate units in the inventory. Finally, the spreadsheet provided by the commenter included heat input and MW information for several units that varied from EPA's inventory.

**(2) Action Taken:** The last entry (the unidentified unit discussed above) has been deleted based on these comments and confirmation from the state agency. For the allocation issues raised by the commenter, EPA will address these comments as part of finalizing Part 97 later this year. For the omissions and apparent duplicates identified in the comments, EPA has revised the inventory based on the information and supporting references provided in the comments. The MW corrections were added as requested. For the heat input revisions, EPA corrected the information for the non-Acid Rain units based on the information provided, but generally did not change the Acid Rain data. For one unit, Gilbert 7, the Agency did modify the 1995 heat input data based on a comparison of the inventory data with a calculated value prepared by the Agency from hourly Acid Rain data.

### **XIV. New York**

#### **A. New York DEC (VIII-B-222)**

**(1) Requested Changes:** The state agency provided a complete revised EGU inventory with numerous changes, including units to delete, units to add and MW and heat input changes for a number of units. The revised state inventory incorporated changes requested in the following letters: Orange & Rockland (V-H-11), NYSEG (VIII-B-30), Colonie Cogeneration (VIII-B-41), Project Orange Associates (VIII-B-42), TBG Cogen Partners (VIII-B-92), Kamine Development Corporation (VIII-B-96), Fulton Cogeneration Associates (VIII-B-132), Central Hudson Gas & Electric (VIII-B-182), Niagara Mohawk Power (VIII-B-225), Selkirk Cogen (VIII-B-226 and 227), American Ref-Fuel (VIII-B-234), Saranac Energy (VIII-B-263), LG&E Westmoreland (VIII-B-266), MarketSpan Corporation (VIII-B-267), and Nissequoque Cogen Partners (VIII-B-276). The revised state inventory also contained revisions consistent with those requested by Consolidated Edison (VIII-B-30). ConEd also supplied detailed comments with a significant amount of supporting information.

**(2) Action Taken:** All of the changes requested by the state were included in EPA's revised inventory, except that EPA did not accept any addition of IC units or MWCs to the EGU inventory, and generally did not accept changes to the heat input values for Acid Rain units. The IC engines and MWC units (even if they converted after 1996 to a fossil fuel) are considered

non-EGUs for purpose of these rulemakings. For one Acid Rain unit, Astoria 30, the utility commenter provided a detailed explanation for the cause of a discrepancy between the Acid Rain calculated value and the actual heat input for the 1995 ozone season heat input. The commenter provided an updated calculation using the original EDR data together with substitute CO<sub>2</sub> values consistent with Part 75 procedures. Based on these comments, EPA agrees with the commenter's revised calculation for this unit. However, for Acid Rain units at the Bowline, CR Huntley, Danskammer, Greenidge, Jennison, Kintigh, Lovett and Milliken plants, NY DEC and NY utilities requested revisions to the heat input values for these units, some of which increased and some of which decreased heat input values for the plants involved. However no explanation or supporting documentation was provided to explain why the values determined for compliance with the Acid Rain Program were not accurate, thus, none of these changes were made.

**B. Jamestown Board Of Utilities (VIII-B-43, A-97-43, IV-G-7, and A-98-12, III-G-3)**

**(1) Requested Changes:** Commenter requested that EPA determine whether the S.A. Carlson units should be considered controlled for purposes of determining the 2007 budget, and noted that the proposed allocation table did not list any of the units at this plant. Commenter also provided a full set of data for this unit that included suggested revisions to many of the data elements in the existing inventory. These comments were also incorporated into the NY DEC comments.

**(2) Action Taken:** Based on the comments and a review of Acid Rain data, EPA has revised the nameplate capacity for these units. This change results in all of the units being classified as large. EPA did not accept the heat input revisions suggested by the commenter for these Acid Rain units. The values suggested by the commenter were generally within a few hundred mmBtu of the values calculated by EPA, which suggests that the commenter may have calculated the values with a slight difference in rounding conventions and methodology. EPA believes that it is important to use a consistent rounding convention to treat all units that are submitting data in the same way equitably.

**C. Steelcase (A-97-43, IV-D-53)**

**Requested Changes:** Commenter noted that Steelcase units should not be included in the NY EGU inventory.

**Action Taken:** These units do not appear in the NY EGU inventory and thus no further response is necessary.

**XV. North Carolina**

**A. North Carolina DENR (VIII-B-159) and Cogentrix (VIII-B-191)**

**(1) Requested Changes:** The state agency provided suggested corrections for several aspects of the EGU inventory. First, the commenter requested that units less than 25 MW and/or emission rates less than 0.15 be removed from the controlled inventory. Second, the state agency also requested significant changes for Cogentrix and LG&E Power plants, and the Panda Rosemary plant. The Cogentrix comment letter also requested the same changes for the Cogentrix plants. Third, the commenter noted one unit that is a non-fossil fuel unit that also does not involve

electricity generation. Fourth, the commenter requested that a unit which in 1995 and 1996 did provide electricity for sale but now uses all electricity on-site not be considered an EGU. Fifth, the commenter included corrected data for a R.J. Reynolds facility as well as a request to remove another Reynolds facility. Finally, the commenter requested changes to the 2007 base case NOx rates for certain facilities.

**(2) Action Taken:** The units identified by the commenter that are less than 25 MWe remain on the overall NC EGU inventory, but are not included as controlled sources. Large EGUs that may have emission rates below 0.15 lb/mmBtu are included on the controlled inventory. The changes requested for the Cogentrix, LG&E Power and Panda Rosemary plants have been made as requested. The non-fossil fuel unit has been moved from the EGU inventory to the non-EGU inventory as an unaffected source. IF a unit provided electricity for sale in 1995 and 1996, the unit remains classified as an EGU even if the unit subsequently ceases such sales. For the R.J. Reynolds facilities, the corrections requested for the one facility have been incorporated, and the other unit remains on the overall inventory, but is not treated as a controlled source. Finally, as noted in Part 1, above, EPA has not changed any 2007 data in response to comments. These data are calculated values based on other data elements in the inventory. Moreover, the request for most of these changes relates to units in a Title IV averaging plan. The Agency is not making these types of changes on an ad hoc basis, as explained in Part 1, above.

## **B. Carolina Power and Light (VIII-B-186)**

**(1) Requested Changes:** Commenter requested that certain CT units be added, and that two CT unit segments at the Cape fear plant be deleted. Commenter provided other data corrections as well, including revised 2007 base case emission rates. Commenter also requested that heat input for common stack units be apportioned equally to each of the two units (all heat input in 1995 is currently attributed to one of the units).

**(2) Action Taken:** The additions and deletions for CT units were made as requested. As noted in Part 1, other data elements that do not affect the budget calculation have not been made at this time. See also the response to the NC DENR letter, above, on the 2007 base case data. For the Mayo plant, the commenter requested that 1995 HI data be split between two unit segments, consistent with treatment of 1996 and 1997 data. The requested change does not affect the total heat input for this two-segment unit, and thus was adopted.

## **XVI. Ohio**

### **A. Cinergy (VIII-B-84)**

**(1) Requested Changes:** Commenter request that W.C. Beckjord Unit 3 be added to the inventory.

**(2) Action Taken:** This Acid Rain unit has been added as requested based on the data provided and corroborating Acid Rain data.

### **B. City of Orrville (VIII-B-86)**

**(1) Requested Changes:** Reclassify all units as small EGUs and make other data element corrections.

**(2) Action Taken:** The nameplate capacity for the four units was revised as requested (and corroborated through a review of EIA data). These changes result in all units being classified as small EGUs. The heat input corrections and NOx emission rate changes for these units were also made based on the information provided.

#### **C. City of Hamilton (VIII-B-217, A-97-43, IV-D-74, and A-98-12, III-D-65)**

**(1) Requested Changes:** Commenter requested heat input changes for certain units, and one minor nameplate capacity revision. Commenter also requested revisions to other data elements. Commenter also states that it should receive an adjusted baseline because of unusual circumstances involving its facility.

**(2) Action Taken:** EPA revised the nameplate capacity as requested. For heat input changes, EPA revised the data for the non-Acid Rain units, and the 1995 data for Unit 9. The 1995 data for this municipal utility was missing because of a problem encountered with monitor certification in 1995. The use of Part 75 missing data would result in extremely high assumptions of heat input. The utility provided fuel usage records to document heat input for this one year at this unit. Because contemporaneous Part 75 data are not available, the Agency has determined to accept fuel usage data in this limited circumstance. For the 1996 and 1997 data, no such justification for modifying the values as calculated by EPA exists. For other data elements, EPA has not yet taken action as noted in Part 1, above.

Finally, the Agency disagrees with those commenters that argue that the inventory should be modified to reflect increased heat input based on more "typical" operations that did not occur in the 1995-1997 years. The inventory is intended to reflect an estimate of statewide actual heat input in these years to calculate an overall state budget. On a statewide or regionwide basis, the reduced utilization of one unit is presumably met by increased utilization at another unit. For these reasons, EPA will address these concerns solely as an allowance allocation issue, not a statewide inventory issue.

#### **D. First Energy (VIII-B-250)**

**(1) Requested Changes:** Commenter requested the addition of several CT peaking units.

**(2) Action Taken:** These units have been added based on the data and supporting materials provided.

#### **E. Dayton Power and Light Company (VIII-B-277)**

**(1) Requested Changes:** Commenter requested that EPA replace F.M. Tait CT3 with CT2, and revise the applicable data for this unit. Unit CT3 did not begin commercial operation until December 1998.

**(2) Action Taken:** EPA has revised the inventory consistent with these comments and supporting data from Acid Rain records.

## **XVII. Pennsylvania**

### **A. Pennsylvania DEP (VIII-B-187) and AES Beaver Valley, Inc. (VIII-B-291)**

**(1) Requested Changes:** State agency commenter requested that three units be removed from the EGU inventory and that the data for three plants be segmented into multiple units. One of these plants included the AES Beaver facility, which the second commenter also noted in late comments submitted dated April 22, 1999. State agency commenter also noted support for comments submitted on several other facilities. Finally, the agency asked that the FIPS county codes be added for several units.

**(2) Action Taken:** The three units have been removed from the EGU inventory as requested and the other units have been segmented as requested by the state agency. See the discussion below on comments received from other affected sources whose comments the agency corroborated and supported. For the FIPS county codes, EPA has not yet acted on this request because it does not effect the budget calculation. EPA will address these comments prior to use of the data for modeling purposes or implementation.

### **B. Gilberton Power (VIII-B-87, and A-97-43, IV-D-66), US Generating (VIII-B-88, and A-97-43, IV-D-76), Foster Wheeler Mt. Carmel (VIII-B-32, and A-97-43, IV-D-50), Panther Creek Partners (VIII-B-68, and A-97-43, IV-D-26), Northampton Generating Company (A-97-43, IV-D-65), and ARIPPA (A-97-43, IV-D-88)**

**(1) Requested Changes:** Each of these commenters requested that the heat input data for their non-Acid Rain units be corrected. ARIPPA (a member organization comprised of these and other companies) provided comments on these same units, although in certain situations the data differed.

**(2) Action Taken:** These changes were accepted based on the data and supporting information provided, as well as corroboration by the state agency. For the Gilberton and Northeastern plants, the ARIPPA data was slightly less than the values included directly by the source (differences ranged from 500 mmBtu (out of a total heat input of over 2 million mmBtu) to 120,000 mmBtu (out of a total heat input of over 3 million mmBtu). In addition, the ARIPPA data for the Foster Wheeler facility appeared to have a typographical error (it differed from the source data by only 20 mmBtu). For each of these cases, EPA accepted the data as submitted by the source. In general, EPA believes that data supplied by the source is better than data supplied by a member organization because the owners and operators of a facility are much more familiar with the operation of that facility than a member organization is. Each of the values reported by these sources is supportable based on the design heat input capacity of the applicable units.

In another case (Piney Creek), however, EPA used the data provided by ARIPPA instead of the data provided by the source. For this unit, the ARIPPA data suggested a seasonal heat input of approximately 1.3 million mmBtu per ozone season for 1995-1997. In contrast, the Piney Creek comment letter indicated that the heat input in each year was approximately 3.2 million mmBtu. Given the design heat input capacity of the boiler at this facility, the values provided by Piney Creek appear to be annual, not seasonal, values. At full capacity operation, the heat input values suggested by Piney Creek would take over 7,000 operating hours (the ozone season has less than 3,700 available operating hours). This interpretation of the Piney Creek data is supported by the

text of their letter which states that no changes to the existing data are required, but rather blank data fields need to be filled in with the data provided in the comment letter . Thus, for this unit, EPA used the ARIPPA data.

Finally, EPA added the data for Ebensburg and Wheelabrator as requested by ARIPPA and corroborated by the state agency.

ARIPPA and other of these commenters also suggested values for 1997 ozone season heat input. Since these values are not used for purposes of calculating the State budget, EPA is not responding to these comments at this time.

### **C. GPU Genco (VIII-B-257 and 284)**

**(1) Requested Changes:** First, commenter notes that several allocations appear to be incorrect based on the heat input data. These include minor and major discrepancies. Second, the commenter identifies a number of units that were omitted from the inventory (including units over 25 MW and units between 15 and 25 MW). Third, the commenter identifies a unit that should be removed from the inventory because it was retired in March 1995. Finally, the spreadsheet provided by the commenter includes heat input and MW information for several units that varies from EPA's inventory.

**(2) Action Taken:** For the allocation issues raised by the commenter, EPA will address these comments as part of finalizing Part 97 later this year. For the omissions identified in the comments, EPA has revised the inventory based on the information and supporting references provided in the comments. The MW corrections were added as requested. For the heat input revisions, EPA corrected the information for the non-Acid Rain units based on the information provided, but did not change the Acid Rain data. The differences noted by the commenter for these units were generally minor differences, and the commenter provided no explanation or supporting documentation to suggest that the values calculated by EPA for these units from hourly Acid Rain data are incorrect. The one retired unit was deleted as requested.

### **D. Inter-Power/AhlCon Partners (VIII-B-9, 40, and 200, and A-97-43, IV-D-55, and A-98-12, III-D-47) and ARIPPA (A-97-43-IV-D-88)**

**(1) Requested Changes:** Commenters request that the Colver Power project be added to the inventory and provides the applicable data elements. The final follow-up letter from the affected generator provided supporting information, but also used annual heat input values as suggested values to include in the inventory.

**(2) Action Taken:** EPA had already added this unit in the December 1998 inventory, but adjusted the heat input values based on the seasonal heat input values included in the generator's November 1998 letter and the supporting information provided in the generator's February 1999 letter. The Agency notes that the state agency corroborated these comments as well.

### **E. Air Products (VIII-B-71), Cambria CoGen (A-97-43, IV-D-29), and ARIPPA (A-97-43, IV-D-88)**

**(1) Requested Changes:** Commenters provide updated data for the Cambria Cogen facility, including revised MW and heat input data.

**(2) Action Taken:** The MW and heat input data for this facility have been revised based on the data and supporting information provided, and the corroboration by the state agency.

#### **F. Tractebel (VIII-B-60) and ARIPPA (A-97-43, IV-D-88)**

**(1) Requested Changes:** Commenter provides miscellaneous revisions to the data for Northeastern Power facility, including 1997 ozone season heat input data.

**(2) Action Taken:** None of these changes affect the calculation of the budget and thus no response is necessary at this time.

#### **G. PP&L, Inc. (VIII-B-241)**

**(1) Requested Changes:** Commenter notes that the Sunbury units do not appear to be included as controlled units in the inventory.

**(2) Action Taken:** EPA revised the nameplate capacity for these units based on the comments received, and these units are now classified as large (controlled) EGUs.

#### **H. City of Philadelphia (VIII-B-218) and Trigen (VIII-B-208)**

**(1) Requested Changes:** Commenter requested the addition of a CT unit at the Delaware and PECO Schuylkill facilities but provided no nameplate capacity, heat input or other critical data. Commenter also requested that the Grays Ferry project be removed because it did not become operational until 1998. Commenter also requested that the entry for "PECO Energy, Unit 1--2" be deleted because it appears to represent two units that no longer exist, and the existing units at this plant are accounted for elsewhere in the inventory. Commenter also requests that the nameplate capacity for the PECO Southwark units be included as 13 MW and that thus these units should be exempt. Finally, the commenter notes that the Trigen Energy Sansom plant is also referred to as the Edison plant (but that no changes are required) and that the Trigen Schuylkill plant is comprised of three boiler segments. However, the agency does not provide any of the critical data for segmenting the entry for this plant. Trigen also notes that the data for Trigen Sansom and Schuylkill appears to be incorrect and unsegmented. However, the commenter provided no data to correct the information for these plants and no further details about these facilities.

**(2) Action Taken:** The requests to add certain CT units and segment other units were not accepted as the commenters provided none of the necessary nameplate capacity, heat input or NOx emission rate data for these actions and also provided no supporting documentation for the changes. Based on the data in the EIA inventory of powerplants, both of the CT units would be small units and would not affect the controlled EGU inventory for Pennsylvania. For the plants at which the non-utility generator requested generally that the information be revised, the plants are represented in the inventory and do have heat input and nameplate capacity data. Thus, it is not clear from the comments whether the data used to calculate the budget for these facilities is in error. At least for one of the facilities, the local agency noted that the heat input data was



appropriate; for the other facility the local agency suggested that the facility is comprised of three units but did not indicate that the total heat input value for the plant was in error. Finally, EPA removed the units and clarified the nameplate capacity for the Southwark units as requested by the local agency.

#### **I. Duquesne Light (VIII-B-144 and 259)**

**(1) Requested Changes:** Commenter requests that the heat input values for Acid Rain units at Cheswick and Elrama be revised and that the 2007 budget tons be adjusted accordingly. Commenter states generally that these requests are based on 1995 and 1996 Part 75 CEMS data. Commenter also requests that units at Brunot Island and Phillips Power Stations be added to the inventory. These units are in cold reserve currently. Commenter suggests using full capacity operating rates as adjusted baseline values for heat input during 1995 through 1997.

**(2) Action Taken:** None of the suggested heat input revisions for the Acid Rain units were made. The commenter provided no supporting information to document why the numbers calculated by the source may differ from the values calculated by EPA based on the hourly data submitted under Part 75 for these units. For the cold reserve units, EPA has added these units to the inventory, but has set the heat input at zero for 1995 through 1997. The Agency disagrees with those commenters that argue that the inventory should be modified to reflect increased heat input based on more "typical" operations that did not occur in the 1995-1997 years. The inventory is intended to reflect an estimate of statewide actual heat input in these years to calculate an overall state budget. On a statewide or regionwide basis, the reduced utilization of one unit is presumably met by increased utilization at another unit. For these reasons, EPA will address these concerns solely as an allowance allocation issue, not a statewide inventory issue.

#### **J. American Ref-Fuel (VIII-B-234)**

**(1) Requested Changes:** Commenter requests the addition of MWCs to the EGU inventory.

**(2) Action Taken:** These units have not been added because they are non-fossil fuel units. These units are included in the non-EGU inventory.

#### **K. Piney Creek (VIII-B-282) and ARIPPA (A-97-43, IV-D-88)**

**(1) Requested Changes:** Both commenters provide additional data for the Piney Creek facility, including 1995 and 1997 heat input data. ARIPPA also provided revised data for several member companies. However, in some instances the data conflicted with the data submitted by the individual member company.

**(2) Action Taken:** EPA has added the 1995 data as requested and corroborated by the state agency. Generally, for facilities owned by ARIPPA member companies, EPA used the data provided directly by the member companies. Most of the remaining data affects only 1997 heat input data. EPA will evaluate that information as part of finalizing allocations under Part 97. In one other instance, EPA received a request from ARIPPA to modify the 1996 heat input for a unit by less than three percent. Because of the small discrepancy and the lack of any corroboration from the owner of the unit, EPA did not make this minor change. For the specific unit, this correction would not affect potential heat input based allocations because the 1995 and

1997 values remain the highest two years. For the Pennsylvania budget, this correction would change the overall budget by less than five tons.

## **XVIII. Rhode Island**

### **A. Rhode Island Department of Environmental Management (VIII-B-221)**

**(1) Requested Changes:** Commenter requested that several units be added, all but one of which is an IC engine. Commenter also requested that the heat input values for a number of units be changes, including certain Acid Rain units.

**(2) Action Taken:** None of the requested units were added, generally because they were IC engines. One auxiliary boiler was not added because insufficient data were provided. However, the unit had only 1,314 mmBtu heat input, so the effect of this unit is minimal. The requested heat input corrections were made for non-Acid Rain units, but not for the Acid Rain units. No explanation or supporting documentation of these requested 1995 heat input changes was made to explain why the data submitted for compliance with the Acid Rain Program was inaccurate.

### **B. Other Changes to the RI EGU Inventory**

Based on general comments received about the treatment of IC engines that may produce electricity, EPA evaluated the unit type data for all of the units in the EPA inventory and identified through EIA databases and comments provided certain units that EPA had failed previously to identify as IC engines. In Rhode Island, this resulted in the removal of 10 IC engine units from the EGU inventory.

## **XIX. South Carolina**

### **A. South Carolina DHEC (VIII-B-190) and Carolina Power & Light (VIII-B-186)**

**(1) Requested Changes:** State agency commenter provided revised heat input for two non-acid Rain units and several Acid Rain units, all based on fuel usage supporting data. This commenter also noted several units to add, including four units that should be switched from the non-EGU inventory to the EGU inventory. Utility commenter provided similar comments on one of the units to add.

**(2) Action Taken:** The heat input revisions for the non-Acid Rain units were accepted based on the supporting data provided. The requested heat input changes were not made for the Acid Rain units because no explanation or supporting documentation of these requested 1995 heat input changes was made to explain why the data submitted for compliance with the Acid Rain Program was inaccurate. Finally, all of the requested additions have been incorporated as requested.

### **B. Other Changes to the SC EGU Inventory**

Based on general comments received about the treatment of IC engines that may produce electricity, EPA evaluated the unit type data for all of the units in the EPA inventory and identified through EIA databases and comments provided certain units that EPA had failed

previously to identify as IC engines. In South Carolina, this resulted in the removal of two IC engine units from the EGU inventory.

## **XX. Tennessee**

### **A. Tennessee Valley Authority (VIII-B-104)**

**(1) Requested Changes:** Commenter requested the addition of a number of CT units.

**(2) Action Taken:** Units were added as requested based on the data and supporting documentation provided and as confirmed in the EIA inventory.

## **XXI. Virginia**

### **A. Virginia Department of Environmental Quality (VIII-B-127)**

**(1) Requested Changes:** Commenter requests the addition of SEI Birchwood and supports the comments submitted by Virginia Power.

**(2) Action Taken:** The SEI Birchwood facility was added as requested. See the summary for action on Virginia Power's comments below.

### **B. LG&E Power (VIII-B-149)**

**(1) Requested Changes:** Commenter requests corrections to a number of data items related to its Southhampton, Altavista, and Hopewell plants.

**(2) Action Taken:** Based on these comments and the supporting materials and references provided, the requested revisions have been made. For each plant, the original one unit entry was replaced with a two segment entry that incorporates the data submitted. The overall impact of these changes is to reduce the heat input (and budget-related NO<sub>x</sub> emissions) for each of these facilities.

### **C. Old Dominion Electric Cooperative (VIII-B-165) and Virginia Power (VIII-B-168)**

**(1) Requested Changes:** Both commenters request that Clover Unit 2 (online in 1996) be added to the inventory. In addition, Virginia Power requested changes to the heat input values for certain Acid Rain and non-Acid Rain units. Virginia Power also requested that two other large units be added to the inventory, as well as a number of small CT units.

**(2) Action Taken:** Based on the comments received, EPA has decided to include units that came on line in 1996 in the inventory for each state, including Clover Unit 2. Based on the corroborating information submitted by the state, EPA has also added the other units requested by Virginia Power and all heat input changes to the non-Acid Rain units. For the Acid Rain units, EPA did not make the changes requested, except for Chesterfield Unit 8. EPA reverified the NO<sub>x</sub> mass emissions calculated from the data submitted for compliance with the Acid Rain Program for all of the units and agrees that the values submitted for Chesterfield Unit 8 are correct. Thus, these revisions were accepted. For the other units, the comments provided no

explanation or supporting data to document that the values calculated by EPA from the Acid Rain data were incorrect. The values included in the inventory are consistent with the data EPA has calculated for these units.

#### **D. Cogentrix (VIII-B-191)**

(1) **Requested Changes:** Commenter provides revisions to heat input and other parameters for its Hopewell, Portsmouth, Richmond 1 and Richmond 2 plants.

(2) **Action Taken:** Based on the data and supporting references provided, EPA has made the heat input and MW changes requested.

#### **E. Conectiv (VIII-B-199)**

(1) **Requested Changes:** Commenter requests addition of a large CT unit.

(2) **Action Taken:** The unit was added based on the data provided, the supporting materials, and confirmation through EIA data.

#### **F. Potomac Electric Power Company (VIII-B-204)**

(1) **Requested Changes:** Commenter requests significant reduction in heat input for 1995 at its Potomac River plant.

(2) **Action Taken:** After reviewing the data for this plant and discussing the suggested changes with the utility, EPA has made the changes as requested. The Agency and the utility had previously discussed this issue as the Agency was finalizing the 1995 data included on the Acid Rain website. At the time, it was acknowledged that the data overstated the HI at these units significantly, but the data were retained at the high value to maintain consistency with treatment of all data on the website. However, in the current context, the use of the overcalculated values would significantly overestimate the overall VA budget as well as any allocations to the utility. Therefore, in this limited instance, EPA has determined to accept the revised values provided by the utility.

#### **B. Other Changes to the VA EGU Inventory**

Based on general comments received about the treatment of IC engines that may produce electricity, EPA evaluated the unit type data for all of the units in the EPA inventory and identified through EIA databases and comments provided certain units that EPA had failed previously to identify as IC engines. In Virginia, this resulted in the removal of 40 IC engine units from the EGU inventory.

## **XXII. West Virginia**

### **A. West Virginia department of Environmental Protection (VIII-B-173) and Virginia Power (VIII-B-168)**

**(1) Requested Changes:** State agency requested heat input changes to certain Acid rain units, deletion of one non-EGU, and the addition of Morgantown Energy Associates units. The utility commenter also included the same changes for the applicable Acid Rain units.

**(2) Action Taken:** The changes to the Mt. Storm heat input values were not made because the commenter did not supply justification as to why the data submitted for purposes of compliance with the Acid Rain Program was not accurate. For the North Branch units, EPA concurs with the error in the 1996 heat input values (these units did not operate in 1996 and the 1995 values had been erroneously copied into the 1996 fields). Thus, EPA has corrected the data consistent with the comment from the state and the affected utility. For the non-EGU source, that unit is not in the current EGU inventory and thus no change was necessary. For the Morgantown Energy units, the commenter provided no data on these units and thus this addition was not possible.

### **XXIII. Wisconsin**

#### **A. Wisconsin Department of Natural Resources (VIII-B-232)**

**(1) Requested Changes:** Commenter submitted a complete, revised inventory with numerous changes to the existing data, deletions for certain units, and several units to be added.

**(2) Action Taken:** The changes and other modifications requested by the state were incorporated with certain exceptions. First, the State included heat input changes for a number of Acid rain units. These changes were not made because the commenter did not supply justification as to why the data submitted for purposes of compliance with the Acid Rain Program was not accurate. For the Stoneman plant, the units were not in operation during the 1995-97 period. The commenter requested that the units be added to the inventory and provided heat input values for the units based on representative operation. As noted above, the Agency will add these units to the inventory, but will not include representative data as part of the inventory. The Agency will address this issue when it finalizes allocations for Part 97.

Also, for units that the state requested to be added that are also Acid Rain units, the Agency used Acid Rain data to calculate ozone season heat input, which in certain instances is at slight variance from the heat input values provided in the comments.

#### **B. Other Changes to the WI EGU Inventory**

Based on general comments received about the treatment of IC engines that may produce electricity, EPA evaluated the unit type data for all of the units in the EPA inventory and identified through EIA databases and comments provided certain units that EPA had failed previously to identify as IC engines. In Wisconsin, this resulted in the removal of 58 IC engine units from the EGU inventory.

### **Part 4 General Inventory Comments Unrelated to Unit Specific Data Elements Used to Calculate the Budget**

#### **I. Allowance Allocations**

**SUMMARY:** One commenter expressed concern regarding the differences between the SIP Call and the section 126 emissions inventories, and specifically mentioned the differences between the use of 1995-97 versus 1995-96 heat input data and the inclusion of units from 15-25 MWe in the petitions.

**LETTERS:** Indiana Dept. of Environmental Management (IV-D-72)

**RESPONSE:** The commenter has noted a difference between the SIP call inventory and the proposed section 126 allocation methodology. As described in the section 126 NPR (proposed in the Federal Register on October 21, 1998), the applicable parts of the SIP call inventories will be used in the section 126 rulemaking for the purposes of determining the list of covered sources and total emissions from each source category by State, but the methodology for determining the individual unit allocations for purposes of the Federal NO<sub>x</sub> Budget Trading Program may be different from the methodology used to develop the SIP call inventory. Therefore, the EPA believes that the “Section 126 inventory” the commenter is referring to is not the inventory used to calculate total emissions from source categories in each State in the section 126 proposal, but rather the individual unit allocations proposed in the section 126 rulemaking. The total allocations issued to all sources included in the section 126 remedy in a State will be based on the State budget numbers finalized with this inventory revisions notice. However, the unit specific allocations themselves will be determined in a separate notice that includes the final regulations setting forth the NO<sub>x</sub> Budget Trading Program under section 126.

As explained in both the SIP Call rulemaking and the section 126 rulemaking, EPA has not found it to be highly cost effective to control small EGUs (boilers and turbines less than 25 MWe). Therefore, in determining the final State budgets, EPA did not assume additional controls on such units. However, because the inventory is supposed to be a complete inventory of all NO<sub>x</sub> emissions in a State, the units were included in the inventories.

**SUMMARY:** A number of commenters addressed the allocations proposed under the section 126 rulemaking. One commenter requests that EPA adequately explain the differences between the Acid Rain data on the web page and the EGU allocation tables, and correct any errors if necessary. A number of commenters noted that due to exceptional circumstances (generally in 1995 and 1996), the heat input data for certain units are low and as a result the affected utilities would be denied an adequate amount of allocations for these units. Other commenters noted generally that EPA should consider atypical baseline year comments in developing a final inventory.

**LETTERS:** Arch Coal (III-D-6), Detroit PLD (VIII-B-206), Duquesne Light (VIII-B-144), Hamilton, City of (VIII-B-217), Holland Board of Public Works (VIII-B-198), Illinois EPA (VIII-B-62), Lansing Board of Water & Light (VIII-B-189), Michigan South Central Power Agency (VIII-B-163), Midwest Ozone Group (VIII-B-125), Niagara Mohawk Power Corp. (VIII-B-225), Utility Air Regulatory Group (VIII-B-197) (III-G-150), Virginia Power (VIII-B-168), West Virginia Chamber of Commerce (VIII-B-195), Wisconsin, State of (VIII-B- ), Wyandotte, City of (VIII-B-116)

**RESPONSE:** Comments related to the development of unit allocations for purposes of the Federal NO<sub>x</sub> Budget Trading Program are not being addressed in the SIP call inventory technical amendment. The Agency will respond to the commenters’ concerns when the Agency

promulgates the Federal NO<sub>x</sub> Budget Trading Program regulations and associated unit allocations. In the section 126 rulemaking, the Agency committed to promulgating these regulations by July 15, 1999. As of the issuance of today's notice, the Agency has not had sufficient time to properly evaluate comments related to the trading program which were dependent on consideration of the inventory revisions, or to incorporate those inventory revisions into the final trading program. When these Federal NO<sub>x</sub> Budget Trading Program regulations and allocations are promulgated, the Agency will respond to trading program (and allocation) related comments.

**SUMMARY:** One commenter noted that EPA incorrectly calculates the NO<sub>x</sub> budget by utilizing 0.17 lb/mmBtu as the non-EGU emission rate given that the SIP call, FIP, and section 126 petitions require a 60% reduction from 1995 actuals. This commenter added that their units operate at 0.7 lb/mmBtu and therefore, a 60% reduction would equate to a 0.28 lb/mmBtu emission rate.

**LETTERS:** ALCOA (VIII-B-97)

**RESPONSE:** See preamble section III.B.3.c.v. of the proposed section 126 rulemaking (published in the Federal Register on October 21, 1998). The Agency calculated the State NO<sub>x</sub> budgets by utilizing a 60% reduction from uncontrolled 1995 emission levels as described in the Technical Amendment to the NO<sub>x</sub> SIP call. However, in the section 126 rulemaking proposal, the Agency proposed that the State budgets be allocated to individual units utilizing 0.17 lb/mmBtu multiplied by the units' 1995 heat input. In the proposal, the individual unit allocations would then be adjusted so that the total allocations issued in each State would be equivalent to 95% of the portion of the State budgets attributed to large non-EGUs. Therefore, EPA disagrees with the commenter that the budgets were incorrectly calculated.

## II. Growth

**SUMMARY:** A number of commenters expressed concern regarding the accuracy and appropriateness of the growth factors used to develop the EGU portion of the state budgets. Several of the commenters noted that the use of the Integrated Planning Model (IPM) to determine growth of projected electricity generation is inappropriate.

**LETTERS:** Allegheny Power (VIII-B-209), Ameren (VIII-B-24) (VIII-B-130), American Electric Power (VIII-B-161), Associated Electric Cooperative, Inc. (VIII-B-153), Carolina Power & Light Company (III-D-79) (IV-D-81) (VIII-B-186), ComEd (VIII-B-274), Connecticut Dept. of Environmental Protection (II-D-39) (IV-D-19), Hamilton, City of (VIII-B-217207), Illinois EPA (III-D-9) (IV-D-5), Illinois Power (VIII-B-172), Indianapolis Power and Light (VIII-B-31), KY Natural Resources and Environmental Protection Cabinet (VIII-B-158), Midwest Ozone Group (VIII-B-125), New Hampshire Dept. of Environmental Services (III-D-42) (IV-D-36), Niagara Mohawk Power (VIII-B-225), North Carolina DENR (VIII-B-159), Northeast States for Coordinated Air Use Management (III-D-26), Orville, City of (VIII-B-86), Pennsylvania Dept. of Environmental Protection (II-D-26), South Carolina Department of Health and Environmental Control (VIII-B-190), Southern Company (VIII-B-119), Tri-State Industrial Network (III-D-67), Utility Air Regulatory Group (VII-B-197), Virginia Power (III-D-63) (III-D-64) (IV-D-80) (VIII-B-168), West Virginia Chamber of Commerce (III-D-17) (VIII-B-195), WV DEP (VIII-B-173)

**RESPONSE:** Comments related to the use of growth factors in determination of State budgets are not being addressed in the SIP call inventory technical amendment. The Agency has responded to the commenters' growth concerns in the context of the final NO<sub>x</sub> SIP call (see section III.B. of the preamble to the final NO<sub>x</sub> SIP call) and in the section 126 rulemaking notice issued on April 30, 1999.



## SECTION II

### RESPONSE TO NON-EGU (INCLUDING AREA AND MOBILE) COMMENTS

**Item Number:** VIII-B-01  
**Origin:** AK Steel Corporation, Steve Felton  
**Category:** Non-EGU Point  
**States Affected:** OH

**Requested Modification:**  
Requests modification to Middletown Works and Hamilton Plants. Supporting documentation will follow.

**EPA Final Decision:**  
No action necessary as no data provided. See VIII-B-02 for additional action.

**Item Number:** VIII-B-02  
**Origin:** AK Steel Corporation, Steve Felton  
**Category:** Non-EGU  
**States Affected:** OH

**Requested Modification:**  
Requests modification to Middletown Works and Hamilton Plants.

1995 Middletown Works Emission Inventory: Annual emissions from each source are based on a 365 day, calendar year instead of the 153 day ozone season year. The boiler emissions (B007-B010) and (P009-P012) are lumped together and not broken out individually.

Hamilton Plant Shutdown: Attached documentation shows that Hamilton Plant had been shut down prior to 1995.

**EPA Final Decision:**  
Remove Hamilton Plant from inventory.  
Modify Middletown Works facility as requested. EPA calculated typical ozone season daily emissions.

**Item Number:** VIII-B-03  
**Origin:** Westvaco, Kenneth Wendell  
**Category:** Non-EGU Point  
**States Affected:** MD

**Requested Modification:**  
Requests modification to two industrial boilers FIPSST 24, FIPSCNTY 001, PLANTID 0011, POINTIDs 001, 002.

**EPA Final Decision:**  
Modify boilers per request.  
Note that stackid changed to value 001, not pointid to 001 as requested.

**Item Number:** VIII-B-05  
**Origin:** AlliedSignal Inc., James Cooper  
**Category:** Non-EGU Point  
**States Affected:** VA

**Requested Modification:**  
Requests modification to Hopewell, VA facilities; FIPSST 51, FIPSCNTY 670, PLANTID 0026, POINTID 016 is the primary reformer in a "Kellogg" ammonia manufacturing facility.

This unit is a small unit with a maximum rated heat capacity of 92 mmBtu/hr and significantly less than 1 ton/day NOx.

Requests modification to stack data for these two units.

**EPA Final Decision:**  
Modify data based on request.  
POINTID 016 capacity data converted from NG heat input value to MMBtu/hr.

**Item Number:** VIII-B-06  
**Origin:** AK Steel Corporation, Steve Felton  
**Category:** Non-EGU Point  
**States Affected:** KY

**Requested Modification:**  
Requests modification to Ashland Works (Steel and Coke Plants) to reflect the 1995 actual source emissions for NO<sub>x</sub>, CO, and VOC as reported to the Kentucky Division for Air Quality.

Requests removal of Sinter plant from inventory as this plant was shut down between 1990 and 1995.

**EPA Final Decision:**  
Remove Sinter facility from inventory.  
Review VIII-B-18 for Ashland Works revisions. Data not provided in subsequent comments. Comment addressed in VIII-B-158.

**Item Number:** VIII-B-07  
**Origin:** Bear Island Paper Company, L.P., Robert Ellis  
**Category:** Non-EGU Point  
**States Affected:** VA

**Requested Modification:**  
Requests modification of boiler capacity to Babcock and Wilcox (B&W) boiler.

B&W boiler, Point ID1 is presently rated at 243 mmBtu/hr and is permitted by the Virginia Department of Environmental Quality at 243 mmBtu/hr.

Requests that EPA modify its database to show that the BIPCO facility is not a large non-utility NO<sub>x</sub> point source.

**EPA Final Decision:**  
Modify inventory based on comments.

**Item Number:** VIII-B-10  
**Origin:** Naval Surface Warfare Center, Indian Head Division; Michael Dunn  
**Category:** Non-EGU Point  
**States Affected:** MD

**Requested Modification:**  
Requests unit modification to Indian Head Division facility.

Boiler 004                      Modify boiler capacity to 206 MMBtu/hr  
                                  Modify 1995 typical ozone season daily emissions to 1.1335 tons NO<sub>x</sub>  
                                  Modify other 1995 pollutant information  
                                  Modify stack and operating parameter information

Boiler 005                      Modify boiler capacity to 206 MMBtu/hr  
                                  Modify 1995 typical ozone season daily emissions to 1.1335 tons NO<sub>x</sub>  
                                  Modify other 1995 pollutant information  
                                  Modify stack and operating parameter information

Boiler 003 (assumed)             Modify boiler capacity to 206 MMBtu/hr  
                                  Modify 1995 typical ozone season daily emissions to 0 tons NO<sub>x</sub>  
                                  Modify other 1995 pollutant information  
                                  Modify stack and operating parameter information

**EPA Final Decision:**  
Modify sources as requested.

**Item Number:** VIII-B-11  
**Origin:** Bethlehem Steel (Sparrows Point), Erroll Hay  
**Category:** Non-EGU Point & EGU  
**States Affected:** MD

Requested Modification:

Requests removal of multiple sources from inventories and additional of EGU and non-EGU sources.

The Maryland inventory of Non-Utility power generators contained one source from the Division. The source was listed under the Plant ID 10483, which corresponds to the Bethlehem, PA facility. The correct Plant ID for the Division is 10485. It is the division's contention that this point refers to the NO. 2 powerhouse located in Bethlehem, PA. The division request the removal of this source from the NOx SIP call inventory.

The Maryland inventory of other NOx sources contained two sources from the Division, which were listed as Point ID 8 and 9. These point ID numbers correspond to the B Street Boilers that were removed from operation in 1991. The Division requests the removal of these sources from the NOx SIP call Inventory for the Division.

EPA Final Decision:

Addressed in VIII-B-29.

**Item Number:** VIII-B-12

Origin: Chattanooga-Hamilton County Air Pollution Control Bureau, Errol Reksten

Category: Non-EGU Point

States Affected: TN

Requested Modification:

Requests removal of source from inventories and additional non-EGU source corrections to facilities in Hamilton County, TN.

\* Commenter states that their data shows zero boilers > 250 MMBtu/hr.

DuPont	Largest boiler 159 MMBtu/hr
Central Soya	Shut down in 1991
Veliscol	Boiler capacity change to 65 MMBtu/hr

EPA Final Decision:

Modify inventory as requested.

**Item Number:** VIII-B-13

Origin: Williams Gas Pipeline, Stuart Latham

Category: Non-EGU Point

States Affected: IN, KY

Requested Modification:

Requests non-EGU source corrections.

None of Texas Gas' emission units exceeded 1 ton/day of NOx emissions. Additionally, no units have a rated heat input capacity of 250 mmBtu/hr or greater.

EPA Final Decision:

Modify inventory as requested.

**Item Number:** VIII-B-18

Origin: AK Steel Corporation, Stephen Felton

Category: Non-EGU Point

States Affected: KY

Requested Modification:

Requests modification to the SIP call emission inventory for Ashland Works facility.

EPA Final Decision:

Assumed to be FIPSSST=21, FIPSCNTY=019, PLANTID=0005.

Addressed in VIII-B-158.

**Item Number:** VIII-B-19

Origin: Bethlehem Steel (Sparrows Point), Brandon Bonanno

Category: Non-EGU Point & EGU

States Affected: MD

Requested Modification:

Requests removal of multiple sources from inventories and additional of EGU and non-EGU sources for Bethlehem Steel. Inaccurate data in the inventory was the result of the growth of 1990 state emissions inventory data to represent 1995 emissions. Some of the point sources listed in the inventory were in operation in 1990 but removed from operation prior to 1995.

EPA Final Decision:  
Addressed in VIII-B-29.

**Item Number:** VIII-B-20  
**Origin:** Bethlehem Steel (Sparrows Point), Erroll Hay  
**Category:** Non-EGU Point & EGU  
**States Affected:** MD

**Requested Modification:**  
Correction to A-96-56; VIII-B-11  
Requests removal of multiple sources from inventories and additional of EGU and non-EGU sources. The correction addresses incorrect information for the operating days per week for Plant ID #29 ("L" Blast Furnace). The original submittal incorrectly listed the operating schedule as 5 days/week, the correct operating schedule is 7 days/week.

EPA Final Decision:  
Addressed in VIII-B-29.

**Item Number:** VIII-B-21  
**Origin:** The Doe Run Company, Walter Nowotny, Jr.  
**Category:** Non-EGU Point  
**States Affected:** MO

**Requested Modification:**  
Requests removal of multiple sources for the Doe Run Company from inventories as they are not fossil-fired facilities.

EPA Final Decision:  
Source not removed as all positive emitting units, regardless of fuel, are components of the inventory.

**Item Number:** VIII-B-23  
**Origin:** Kodak Environmental Services, Roy Wood  
**Category:** Non-EGU Point  
**States Affected:** NY

**Requested Modification:**  
Requests corrections to Kodak Park Div. facility; large sources only. There are more large Kodak Park sources in the EPA database than exist at Kodak Park.

EPA Final Decision:  
Modify inventory as requested.

**Item Number:** VIII-B-25  
**Origin:** Bethlehem Steel (Sparrows Point), Brandon Bonanno  
**Category:** Non-EGU Point & EGU  
**States Affected:** MD

**Requested Modification:**  
Correction to A-96-56; VIII-B-11; VIII-B-19  
Requests removal of multiple sources from inventories and additional of EGU and non-EGU sources. Inaccurate data in the inventory was the result of the growth of 1990 state emissions inventory data to represent 1995 emissions. Some of the point sources listed in the inventory were in operation in 1990 but removed from operation prior to 1995.  
The Maryland inventory of Non-Utility power generators contained one source from the Division. The source was listed under the Plant ID 10483, which corresponds to the Bethlehem, PA facility. The correct Plant ID for the Division is 10485. It is the division's contention that this is point refers to the NO<sub>x</sub> 2 powerhouse located in Bethlehem, PA. The division request the removal of this source from the NO<sub>x</sub> SIP call inventory.  
The Maryland inventory of other NO<sub>x</sub> sources contained two sources from the Division, which were listed as Point ID 8 and 9. These point ID numbers correspond to the B Street Boilers that were removed from operation in 1991. The Division requests the removal of these sources from the NO<sub>x</sub> SIP call Inventory for the Division.

EPA Final Decision:  
Addressed under VIII-B-29.

**Item Number:** VIII-B-26  
Origin: Ohio Paperboard Corp., Jeffrey Peters  
Category: Non-EGU Point  
States Affected: OH

Requested Modification:  
Requests modification of boiler capacity for unit B003 for Ohio Paperboard Company.  
Unit B003 108.2 mmBtu/hr

EPA Final Decision:  
Modify unit as requested.  
Comment addressed by OH EPA comment VIII-B-133.

**Item Number:** VIII-B-28  
Origin: AK Steel Corporation, Steve Felton  
Category: Non-EGU Point  
States Affected: OH

Requested Modification:  
Requests modification to Middletown Works facility 1995 and projected 2007 daily NOx emissions for selected sources.

EPA Final Decision:  
Boiler capacity data and emissions for base year modified per request.  
No change to growth factor information as this topic was not open for comment during this period.  
Unit X005 already removed in a prior comment.  
No removal of sources which were operational until Dec. 1995. These remain in the base year inventory.

**Item Number:** VIII-B-29  
Origin: Bethlehem Steel (Sparrows Point), Erroll Hay  
Category: Non-EGU Point & EGU  
States Affected: MD

Requested Modification:  
Correction to previous submittal. Requests modification to incorrect information for the emissions for Plant ID #38 (Cold Sheet Mill). An audit of the 1995 Emissions Certification Report revealed an error in the emission factor representing NOx emissions from the coating lines of the Cold Sheet Mill.

Correct Emissions	Listed Emissions
2.3118 tons/day	4.557 tons/day

EPA Final Decision:  
Modify inventory as requested.

**Item Number:** VIII-B-31  
Origin: Indianapolis Power & Light Company, Terry M. Hogan  
Category: Non-EGU Point  
States Affected: IN

Requested Modification:  
Non-EGU Point-Related Revisions:  
Perry K Boilers 11-16 should be considered large non-EGUs

EPA Final Decision:  
Perry K units 11, 12, and 14 moved to non-EGU inventory.

**Item Number:** VIII-B-35  
Origin: Timken Company, Jamie Milobar  
Category: Non-EGU Point  
States Affected: OH

Requested Modification:

Requests revision of boiler capacity data for one point in inventory (from 0 to 116.6 mmBtu/hr) and modifications to 1995 NOx emissions for nine points in inventory.

EPA Final Decision:

Modify inventory as requested.

**Item Number:**

**VIII-B-38**

Origin: Champion International; Charles Ayer

Category: Non-EGU Point

States Affected: NC, AL, NY, OH, MI

Requested Modification:

Requests modification of inventories at several facilities for Champion International.

EPA Final Decision:

Modify inventories as requested.

**Item Number:**

**VIII-B-39**

Origin: Clark Lima Refinery, Gary Watson

Category: Non-EGU Point

States Affected: OH

Requested Modification:

Requests modification of inventories and additions to data for Clark Lima Refinery (formerly BP Lima Refinery).

Several units were omitted from the database even though they exceeded the 250 mmBtu/hr threshold.

The emissions that are listed (with the exception of B026) are based on fuel usage, unit feed rates, and AP42 factors. B026 emissions are based on actual stack testing.

EPA Final Decision:

Modify inventory as requested.

Modifications and additions completed under VIII-B-133.

**Item Number:**

**VIII-B-45**

Origin: BP Oil Company; Linda Wilson

Category: Non-EGU

States Affected: OH

Requested Modification:

Requests modification of source data for BP Oil Company, Toledo Refinery.

The inventory does not include all of the non-EGUs in operation on or before 1995 with a capacity greater than 250 mmBtu.

Additionally, the inventory currently includes a unit identified as P004, which is a hydrocarbon flare. The purpose of this source is to safely combust refinery upset gases prior to release to the atmosphere. It does not meet the definition of an EGU or non-EGU.

EPA Final Decision:

Modify inventory based on comments.

Units not deleted as all sources are part of budget at baseline levels.

**Item Number:**

**VIII-B-47**

Origin: Wheeling-Pittsburgh Steel Corporation; Ronna Topf

Category: Non-EGU

States Affected: OH

Requested Modification:

Requests modification of source data for Wheeling Pittsburgh Steel Corporation. Requests addition of unit B010 at Martins Ferry facility.

EPA Final Decision:

Comment addressed by VIII-B-83.

**Item Number:** VIII-B-48  
**Origin:** Franklin Boxboard Corporation; Gregory Keefer  
**Category:** Non-EGU  
**States Affected:** OH

**Requested Modification:**  
Requests modification of source data for Franklin Boxboard Corporation.

**Facility ID** 14830400  
**Stack ID** 74330  
74331  
74332  
**DVID** B001 rated as 116 mmBtu/hr has been derated to 78 mmBtu/hr

Included in the response is the present boiler operating permit issued by the Ohio EPA which clearly states that the boiler B001 has been derated to 78 mmBtu/hr.

Franklin Boxboard Corporation does not have the potential to emit more than 1 ton/day of NOx.

**EPA Final Decision:**  
Modify inventory based on comments.

**Item Number:** VIII-B-51  
**Origin:** State of Delaware; Darryl Tyler  
**Category:** Non-EGU  
**States Affected:** DE

**Requested Modification:**  
Requests modification to non-EGU point source inventories.

**EPA Final Decision:**  
Modify inventory as requested.

**Item Number:** VIII-B-52  
**Origin:** State of Alabama; Ronald Gore  
**Category:** Non-EGU  
**States Affected:** AL

**Requested Modification:**  
Requests modification to non-EGU point source inventories.

Boiler capacity modifications to multiple sources.  
Inclusion of engines to large source category based on HP rating.  
Removal of non-EGU sources to EGU inventory as misclassified sources. TVA Colbert units data from non-EGU to EGU supplemented with unit IDs and SCC data.

Clarification that provided file did request capacity (size) modification only and did not request modifications to emissions at existing non-EGU sources. Modify boiler capacities as requested.

**EPA Final Decision:**  
Modify inventory as requested.

**Item Number:** VIII-B-53  
**Origin:** Aristech Chemical Corp.; J. E. Fain  
**Category:** Non-EGU  
**States Affected:** OH

**Requested Modification:**  
Requests modification to non-EGU point source inventories. The boiler capacities are all under 250 mmBtu/hr.

Requests addition of sources.

N001 is a thermal oxidizer, which was installed in 1992.

B014 is a natural gas fired boiler, which is scheduled to start up sometime in January 1999.

The boiler is rated at 281 mmBtu/hr and is equipped with low NOx burners with flue gas recirculation. The permitted NOx limit is 98.5 ton/yr and 539 lbs/day.

EPA Final Decision:

Modify existing units as requested with the following exceptions.

Add unit N001 as provided.

Do not add unit B014 as it was not in operation in 1995.

**Item Number:** VIII-B-54  
**Origin:** State of Ohio; Robert Hodenbosi  
**Category:** Non-EGU  
**States Affected:** OH

Requested Modification:

Requests modification to multiple non-EGU point source inventories.

Requests addition of sources to base year inventory.

EPA Final Decision:

Base 1995 inventory modified as requested with the exceptions / assumptions indicated below.

NOXINV1

39-017-140901006-P908	No emission changes made as 1996/1997 emissions data provided
39-017-140901006-P925	No emission changes made as 1996/1997 emissions data provided
39-017-1409040212-B022	No change as boiler capacity revision information not provided
39-017-1431010054-P010	No change as emissions already reported as zero
39-061-1431390903-B001	No change as provided data conflicts with requested change
39-113-0857041124-B006	No change as unit not found in existing inventory
	Not enough information provided to add as new unit
39-151-1576000614-P013	No change as unit not found in existing inventory
39-151-1576000614-P014	No change as unit not found in existing inventory
39-151-1576000614-X001, B003	No change as boiler capacity revision information not provided Assumed to be facility 1576050614
39-165-1483060110-X001	No change as supporting information for requested change not provided

**Item Number:** VIII-B-55  
**Origin:** Columbia Gas Transmission; P. Michael Hoffman  
**Category:** Non-EGU  
**States Affected:** OH

Requested Modification:

Requests modification to non-EGU point source inventories.

Based on Columbia's 1995 production records and 1995 emission inventories for the Crawford Compressor Station, all of the sources listed emitted less than 1 ton of NOx per day during the ozone season.

The 2007 growth factor of 1.34 assigned to the Columbia sources should be changed to 1.0 since no growth is expected for the year 2007 regarding the operational capabilities of the stationary internal combustion engines existing at Crawford station in 1995.

EPA Final Decision:

No action taken as EPA could not match to any facility found in EPA data.

No change to growth factors as not open for comment during this period.

**Item Number:** VIII-B-56  
**Origin:** Marathon Ashland Petroleum LLC; Brent McNeese  
**Category:** Non-EGU  
**States Affected:** OH

Requested Modification:

Requests modification to non-EGU point source inventories for Canton Refinery.



B029 process unit heater with design capacity of 234 mmBtu/hr

P002 is a FCC Regenerator Unit which does not have the potential to emit greater than 1 ton/day NOx  
MAP Canton has no other heaters with a design duty over 250 mmBtu/hr and the most recent 1997 emissions  
inventory for the facility indicates no other NOx emission sources that approach the 1 ton/day cutoff number.

EPA Final Decision:  
Modify inventory as requested.

**Item Number:** VIII-B-57  
**Origin:** United States Enrichment Corporation (USEC); Robert Blythe  
**Category:** Non-EGU  
**States Affected:** OH

Requested Modification:

Facility ID 0666000000, Source IDs B001, B002, and B003, SCC 10200204

Requests that these points be removed from the inventory, as they are each rated at a heat input of 158 mmBtu/hr.

EPA Final Decision:  
Modify boiler capacity of each boiler to 158 MMBtu/hr.

**Item Number:** VIII-B-58  
**Origin:** Jackson & Kelly PLLC (for Consolidation Coal Co.); Kathy Beckett  
**Category:** Non-EGU  
**States Affected:** IL, PA, VA, WV

Requested Modification:  
Requests modification of inventory for multiple sources.

EPA Final Decision:  
Modify base inventory as requested.

**Item Number:** VIII-B-61  
**Origin:** General Electric Corporation; Robert Schenker  
**Category:** EGU & Non-EGU  
**States Affected:** AL, IN, IL, KY, MA, NY, OH, PA

Requested Modification:  
Requests modification of inventory for multiple sources and removal of sources from tables allocating emissions.

EPA Final Decision:  
Non-EGU: Modify non-EGU capacity inventory as requested with following exceptions.  
Remove sources from inventory where shown to not be in operation in 1995.  
No modifications made to 2007 heat input values as this topic not open during this comment period.

AL: Cannot match data to comment. Point ID's and SCCs do not match EPA data.  
State comment addresses the large unit.  
IN: Cannot match EPA data to comment. No such FIPS county.  
KY: Comment addressed by Jefferson Co., KY data submitted.  
MA: Large units deleted from non-egu inventory.  
NY: Comment addressed by NY state comment.  
OH: B01 deleted from non-egu inventory.  
PA: Pointids begin at 031. Matched EPA point # 032 to boiler 2 in supplied comment using other  
parameters.  
Emissions for boiler 2 changed to 0 to indicate seasonal shutdown.  
Modified other boiler capacities as requested.

**Item Number:** VIII-B-62  
**Origin:** Illinois Environmental Protection Agency; Bharat Mathur  
**Category:** EGU, Non-EGU, Area, Nonroad, Mobile  
**States Affected:** IL

Requested Modification:  
Requests modification of inventory for multiple sources and sectors.

Non-EGU source list has been revised to remove sources listed in EGU inventory and vice-versa.  
Emission units subject to control programs have been identified and the uncontrolled emission rates and control efficiencies are supplied.  
Emission units have been separated where units were combined in EPA's data.  
Providing 'average' daily ozone season emissions for each source.  
Resubmitting growth and controls factors submitted during SNPR are submitted again.

Area and nonroad mobile source 'average' daily emissions provided for each category.  
Requests calculating seasonal emissions using typical ozone season daily value \* 153 days in season.  
Resubmitting growth and control as submitted during SNPR.

EPA Final Decision:

Non-EGU: Replace EPA inventory with new IL EPA unit data.  
Replace growth as requested.  
No modification to future year control factors as not open to comment during this period.

Area: Replace inventory with IL EPA provided data.  
Replace growth as requested.  
Calculated budgets using typical seasonal emissions \* 153 days.  
No change made to controls applied to calculate 2007 nonroad emissions as not open to comment during this period.

Nonroad: Revise 1995 nonroad activity levels and emissions as requested.  
Apply growth rates as requested.  
No change made to federal engine standards applied to calculate 2007 nonroad emissions.

Mobile: Revise speeds by roadway type and vehicle class as requested.  
Revise VMT and VMT growth as requested.

**Item Number:** VIII-B-63  
**Origin:** Champion International; Charles Ayer  
**Category:** Non-EGU Point  
**States Affected:** NC, AL, NY, OH, MI

Requested Modification:  
Requests modification of inventories at several facilities for Champion International.

EPA Final Decision:  
Modify inventory as requested.

**Item Number:** VIII-B-65  
**Origin:** Atlas Roofing Corporation; Phillip Price  
**Category:** Non-EGU  
**States Affected:** OH

Requested Modification:  
Requests modification of capacity data and facility name to Atlas.

EPA Final Decision:  
Modify inventory as requested.

**Item Number:** VIII-B-66  
**Origin:** Tenneco Packaging; Richard Holland  
**Category:** Non-EGU  
**States Affected:** TN

Requested Modification:  
Requests redefining as non-fossil unit.

EPA Final Decision:  
No action necessary as not enough data provided to make revision request.

**Item Number:** VIII-B-67  
Origin: Bayer Addyston; Terry A. Harris  
Category: Non-EGU  
States Affected: OH

Requested Modification:  
Requests boiler capacity (units not provided) and emissions changes for 10 units.

Requests the addition of three units to the inventory. Boiler capacities and emissions are provided for these units.

EPA Final Decision:  
Modify inventory as requested.  
Assume plant id=1431010054.  
Override data modified under VIII-B-133 with these data.

**Item Number:** VIII-B-69  
Origin: Appleton Papers; Nancy McDonnell  
Category: Non-EGU  
States Affected: OH

Requested Modification:  
Requests revision to facility information for Appleton Papers.  
No boilers are rated at greater than 250 mmBtu/hr heat input.

Original heat input capacities:  
B003 Normal: 216 Max: 271 Rated: 255  
Actual Values:  
B003 Normal: 213 Max: 245 Rated: 235

Boiler output and therefore heat input varies throughout the year.

The actual 1995 average NOx emissions from May 1 through September 30 were:

B002	0.557 tons/day
B003	0.603 tons/day
Total	1.160 tons/day

Based on the growth factors and actual 1995 NOx emissions, the values for DNOX07 should not exceed:

B002	0.602
B004	0.663

EPA Final Decision:  
Modify base year data as requested. Use provided rated heat capacity for unit modification.

**Item Number:** VIII-B-70  
Origin: BP Chemicals; James Walpole  
Category: Non-EGU  
States Affected: OH

Requested Modification:  
Requests revision to facility information for BP Chemicals.  
The Absorber OffGas Incinerator (AOGI) is the only source with is subject to the NOx SIP rulemaking. The AOGI has less than 250 mmBtu/hr rated heat input, but has the potential to emit (PTE) of greater than 1 ton/day NOx (3.31 tons NOx per day).

It should be noted that in the data sent by the OEPA, the data shows that BP Chemicals Inc., and BP Oil emission numbers are summed together. They should be separated. Also, PCS, Nitrogen, LP emissions (B001, B002, B003, and P030) were included in the BP Chemicals, Inc. emissions inventory. PCS Nitrogen, LP will submit an emissions inventory separate from this letter.

EPA Final Decision:  
Modify capacity/stack data as requested. No modification to emissions as potential to emit data provided.

**Item Number:** VIII-B-72

Origin: Anheuser-Busch Companies; Dean Pusch  
Category: Non-EGU  
States Affected: OH, NJ, NY

Requested Modification:  
Requests revision to facility information for Anheuser Busch Companies.

The original inventories identified the industrial boilers at Columbus and Baldwinsville as having maximum heat inputs of over 250 mmBtu/hr, when, in fact, the Columbus units are 113 mmBtu/hr and the Baldwinsville units are 120 mmBtu/hr.

Referenced industrial boilers at Newark that have been permanently shut down.

EPA Final Decision:  
Modify inventory based on comments.  
Remove New Jersey units as requested.

**Item Number: VIII-B-73**  
Origin: Maryland Department of the Environment; Duane King  
Category: Non-EGU Point  
States Affected: MD

Requested Modification:  
Requests modification of inventory for Chesapeake Paperboard facility.

Boiler 001                                Modify SCC to 10200601  
Modify boiler capacity to 160 MMBtu/hr  
Modify 1995 ozone season daily emissions to 0.0745 tons  
Modify operating and control percent information

Boiler 002                                Modify SCC to 10200601  
Modify boiler capacity to 200 MMBtu/hr  
Modify 1995 ozone season daily emissions to 0.0955 tons  
Modify operating and control percent information

EPA Final Decision:  
Modify inventory as requested.

**Item Number: VIII-B-76**  
Origin: Eastman Chemical Company; Stephen Gossett  
Category: Non-EGU  
States Affected: TN

Requested Modification:  
Requests revision to multiple unit information for Eastman Chemical Company. Several units with maximum rated heat capacities less than 250 mmBtu/hr were incorrectly included in the NOx emission inventory.

EPA Final Decision:  
Change requests made by commenter in separate attached Word and Excel documents are inconsistent.  
Modifications made as part of VIII-B-121.

**Item Number: VIII-B-77**  
Origin: PCS Nitrogen Ohio, L.P.; James Walpole  
Category: Non-EGU  
States Affected: OH

Requested Modification:  
Requests revision to unit information for PCS Nitrogen Ohio, LP. The primary reformer in the Ammonia Unit B003 is the only source which is subject to the NOx SIP call.

B003                631 mmBtu/hr maximum rated heat capacity

Three sources listed in the information submitted to PCS Nitrogen, LP by the EPA do not fall into the rulemaking.

B001                227 mmBtu/hr

B002 227 mmBtu/hr

In addition, each boiler does not have the Potential to Emit (PTE) greater than 1 ton/day of NOx during the ozone season (0.83 ton/day NOx).

P030 #1 Nitric Acid Plant was taken out of service and replaced by #2 Nitric Acid Plant, P070.  
P070 does not have the PTE greater than 1 ton/day NOx

EPA Final Decision:  
Modify inventory based on comment.  
Also addressed under VIII-B-133.

**Item Number:** VIII-B-78  
**Origin:** LTV Steel; R. M. Zavoda  
**Category:** Non-EGU  
**States Affected:** OH

**Requested Modification:**  
Requests revision to unit information for several sources for LTV Steel. The inventory provided to EPA by Ohio EPA was actually based on 1990 data. Requests correction to the inventory based on actual NOx emissions, previously submitted to the Ohio EPA to fulfill the 1995 annual emissions fee report.

EPA Final Decision:  
Modify inventory as requested.  
Also addressed under VIII-B-133.

**Item Number:** VIII-B-79  
**Origin:** Jefferson Smurfit Corporation; Kevin McMunn  
**Category:** Non-EGU  
**States Affected:** OH

**Requested Modification:**  
Requests revision to unit information for Jefferson Smurfit Corporation.  
Plant ID 01650100  
Unit ID B004 231 mmBtu/hr  
SIC 2631

EPA Final Decision:  
Modify inventory as requested. Assumed to be plantid 0165010009.

**Item Number:** VIII-B-80  
**Origin:** Pilkington Libbey-Owens-Ford; John Keil  
**Category:** Non-EGU  
**States Affected:** OH

**Requested Modification:**  
Requests revision to Rossford Plant 6 unit information. As of 1991, Pilkington LOF no longer operates the emission unit identified as Stack ID 74501, DVID B003.

P001 1.724 tons/day corrected  
P003 2.404 tons/day corrected

EPA Final Decision:  
Modify inventory as requested.  
Also addressed in VIII-B-133.

**Item Number:** VIII-B-81  
**Origin:** Goodyear Tire & Rubber Company; Martin Trembly  
**Category:** Non-EGU  
**States Affected:** OH

**Requested Modification:**  
Requests revision to Akron facility unit information for Goodyear Tire & Rubber Company.  
B001 requests revision to several parameters

B002 requests revision to several parameters

1995-2007 growth factor: 1.21 Goodyear expects a considerable reduction in steam and power generation over the next several years

EPA Final Decision:

Modify inventory as requested.

Do not modify growth assumptions as this topic not open to comment during this period.

**Item Number:** VIII-B-82

Origin: Procter & Gamble Company; P. C. Edward Burcham

Category: Non-EGU

States Affected: OH

Requested Modification:

Requests revision to unit information for Procter & Gamble Company.

B021 277 mmBtu/hr

B022 450 mmBtu/hr

Revisions to data are based on the emissions submission to the Ohio EPA in 1996.

EPA Final Decision:

Modify inventory as requested.

**Item Number:** VIII-B-83

Origin: Wheeling Pittsburgh Steel Corporation; Harold Strohmeyer

Category: Non-EGU

States Affected: OH

Requested Modification:

Requests revision to Wheeling Pittsburgh Steel facility information. Requests correction to the reporting of boiler capacity, consolidating the facility identification number for the Steubenville and Mingo Junction facility, correcting the boiler identification numbers at the Steubenville plant, and adding an additional small boiler at the Martins Ferry Facility. Several SCC codes were also revised for some sources.

EPA Final Decision:

Modify inventory as requested.

**Item Number:** VIII-B-85

Origin: Sunoco MidAmerica Marketing & Refining; Elaine Moore

Category: Non-EGU

States Affected: OH

Requested Modification:

Requests addition units and unit modification at Sun Refining, Toledo Refinery.

Revised data:

Plant ID 0448010246

SCC 30600201

Unit ID P011

1995 Actual Daily NOx emissions 1.764 ton/day

Additional Sources to be added:

Plant ID 0448010246

Unit ID B025

SCC 30600104

Max rated heat capacity 482 mmBtu/hr

1995 Actual Daily NOx emissions 0.485 ton/day

Plant ID 0448010246

Unit ID B044

SCC 10200401, 10200701

Max rated heat capacity 296 mmBtu/hr

1995 Actual Daily NOx emissions 0.483 ton/day

The last two sources are rated at 340 mmBtu/hr and would not operate above 250 mmBtu/hr. However, when the FCC unit is in start up mode after a turnaround (every 5 to 6 years), it is possible that the boilers would be fired above 250 mmBtu/hr for a brief period until the FCC unit is up and running.

Plant ID 0448010246  
Unit ID B046  
SCC 10200404, 10200701  
Max rated heat capacity 340 mmBtu/hr  
1995 Actual Daily NOx emissions 0.263 ton/day

Plant ID 0448010246  
Unit ID B047  
SCC 10200404, 10200701  
Max rated heat capacity 340 mmBtu/hr  
1995 Actual Daily NOx emissions 0.258 ton/day

EPA Final Decision:

Modify inventory as requested.

Note that new units requested by facility are in existing data set and modified as requested.

Use primary SCC when single segment data provided.

**Item Number:** VIII-B-89  
**Origin:** Nucor Steel; David Sulc  
**Category:** EGU & Non-EGU  
**States Affected:** IN

Requested Modification:

Requests unit additions to Nucor Steel. The inventory for Nucor Steel - Indiana is missing the pickle line boiler, the cold mill boiler, the hydrogen plant boiler, and four emergency generators.

Data to add:

Pickle Line #2 Boiler  
FIPS State Code: 18  
FIPS County Code: 107  
Plant name: Nucor Steel  
SIC: 1312  
Plant ID number: 0038 (Indiana - STEPS database)  
Unit ID number: 20 (Indiana STEPS) pickle line #2 boiler

Cold Mill Boiler  
FIPS State Code: 18  
FIPS County Code: 107  
Plant name: Nucor Steel  
SIC: 1312  
Plant ID number: 0038 (Indiana - STEPS database)  
Unit ID number: 23 (Indiana STEPS) cold mill boiler

Hydrogen Plant Boiler  
FIPS State Code: 18  
FIPS County Code: 107  
Plant name: Nucor Steel  
SIC: 1312  
Plant ID number: 0038 (Indiana - STEPS database)  
Unit ID number: 24 (Indiana STEPS) hydrogen plant boiler

Emergency Generators  
FIPS State Code: 18  
FIPS County Code: 107  
Plant name: Nucor Steel  
SIC: 1312  
Plant ID number: 0038 (Indiana - STEPS database)  
Unit ID number: 15, 14, not assigned, not assigned

MISSING EXISTING CONTROL EFFICIENCIES  
FIPS State Code: 18

FIPS County Code: 107  
Plant name: Nucor Steel  
Plant ID number: 0038  
Unit/Stack ID number: 002/002; 002/003; 002/004; 003/007; 004/005; 005/008; 007/009  
007/009; 007/010; 007/011; 012/017; 012/018  
1995 existing NOx control: 30%

EPA Final Decision:  
Modify inventory as requested with the exception of emergency generators as not enough information provided to include in the inventory.

**Item Number:** VIII-B-90  
**Origin:** Procter & Gamble Paper Products Company; J. Andrew Hadley  
**Category:** Non-EGU  
**States Affected:** PA

Requested Modification:  
Requests unit modification to Mehoopany facility for Procter & Gamble Paper Products Company.  
Source 035 listed= 575 mmBtu/hr, actual rated heat input = 644 mmBtu/hr  
During the 1995 ozone season RACT NOx control was installed on this source.

Source 932 listed 1300 mmBtu/hr, actual rated heat input = 233 mmBtu/hr  
The ozone season NOx emission rate 2.8122 ton/day is incorrect. Typical ozone season emissions for this source are 0.86 ton/day

EPA Final Decision:  
Modify inventory as requested.  
RACT control efficiency not modified as uncontrolled emissions were provided.

**Item Number:** VIII-B-91  
**Origin:** Naval Surface Warfare Center, Indian Head Division; Michael Dunn  
**Category:** Non-EGU  
**States Affected:** MD

Requested Modification:  
Requests unit modification to Indian Head Division facility.

Boiler 004 Modify boiler capacity to 206 MMBtu/hr  
Modify 1995 typical ozone season daily emissions to 1.1335 tons NOx  
Modify other 1995 pollutant information  
Modify stack and operating parameter information

Boiler 005 Modify boiler capacity to 206 MMBtu/hr  
Modify 1995 typical ozone season daily emissions to 1.1335 tons NOx  
Modify other 1995 pollutant information  
Modify stack and operating parameter information

Boiler 003 (assumed) Modify boiler capacity to 206 MMBtu/hr  
Modify 1995 typical ozone season daily emissions to 0 tons NOx  
Modify other 1995 pollutant information  
Modify stack and operating parameter information

EPA Final Decision:  
Modify inventory as requested.

**Item Number:** VIII-B-93  
**Origin:** Mead Containerboard; Barry Eller  
**Category:** Non-EGU  
**States Affected:** AL

Requested Modification:  
Requests unit modification to Stevenson Mill facility for Mead Containerboard.  
Point ID 001 223 mmBtu/hr



Point ID 002 NA  
Point ID 003 430 mmBtu/hr  
Point ID 004 223 mmBtu/hr  
Point ID 005 NA

SIC codes were inserted to reflect the correct SIC code for Mead Containerboard  
07 Budget NOx Cont. Efficiency was revised to 0.00 for Point ID 001  
Point ID 001 07 Ozone Season Budget NOx was revised to 80.6851 tons  
Point ID 001 07 Typical Ozone Season Daily Budget NOx was revised to 0.52735 tons

EPA Final Decision:  
Modify inventory as requested.  
Replace NA boilcaps with 0.

**Item Number:** VIII-B-94  
**Origin:** Bear Island Paper Company; Robert Ellis  
**Category:** Non-EGU  
**States Affected:** VA

Requested Modification:  
Requests unit modifications (removal) to Bear Island Paper Company L.L.C. (BIPCO) facility.  
Point ID 001 243 mmBtu/hr  
0.8 ton/day average daily NOx emissions

Requests addition of planned units to data set.  
Combustion Gas Turbine 474 mmBtu/hr (natural gas)  
468 mmBtu/hr (No. 2 fuel oil)  
Combustion boiler 690.3 mmBtu/hr (burning sludge, bark, and coal)  
580.9 mmBtu/hr (burning sludge, bark)  
633.4 mmBtu/hr (burning coal)  
621.2 mmBtu/hr (burning bark)

BIPCO also operates a package boiler with an original design rating of 255 mmBtu/hr when burning natural gas, however, the boiler was actually built for a maximum capacity of 247 mmBtu/hr.

EPA Final Decision:  
Modify inventory as requested.  
Planned units not included in inventory as not online in 1995 base year. Future year data not open to comment during this period.

**Item Number:** VIII-B-95  
**Origin:** State of Connecticut; Christopher Nelson  
**Category:** EGU & Non-EGU  
**States Affected:** CT

Requested Modification:  
Requests unit modifications to multiple EGU facilities.  
Requests redesignation of Exeter Energy as non-EGU base on fuel status.

Commenter provided a list of large industrial units that should be included for CT.  
This spreadsheet includes units found in CT DEP's inventory for the same 1990 baseline year. Matches with EPA's list are indicated.

Units included in EPA's February 1998 budget which don't meet the applicability criteria are noted.

1. "Federal Paper Board Co" has changed name to International Paper Company. Its 1990 NOx TPD value should be 0.92 rather than 0.75.
2. Five marine boilers at Pratt & Whitney Willgoos Lab should be added to the budget. Stack info, etc. needed for modeling purposes are included for these sources.
3. Dexter Nonwovens Div - this unit is an EGU and is included in the EGU budget.
4. Pfizer Inc (points 9 and 10) - these units are smaller than 250 mmBTU/hr.
5. EPA's proposed budget includes numerous test cells (these are identified on the spreadsheet). These units are not traditional pieces of fuel-burning equipment and for that reason were not included in the OTC NOx Budget. They should be left off EPA's budget as well.

6. Detailed info regarding MWCs and tire burning facilities in CT. Spreadsheet contains stack info, etc needed for modeling.

EPA Final Decision:  
EGU - ARD decision.

Non-EGU

1. Change name of facility, add capacity, calculate 1995 emissions from 1990 data provided.
2. Add sources to inventory with calculated 1995 emissions from 1990 data provided.
3. Remove source from non-EGU inventory.
4. Modify inventory as requested.
5. No removal of sources from inventory as budget comprised of all NOx emitting sources.
6. Modify non-EGU unit information as provided. Note some sources are in EGU inventory.

**Item Number:** VIII-B-97  
**Origin:** Alcoa (Aluminum Company of America, Warrick); Scott Darling  
**Category:** EGU, Non-EGU  
**States Affected:** IN

Requested Modification:

Requests redesignation of data from EGU to non-EGU sources.

Alcoa Warrick Power Plant Units 1, 2, and 3 supply electricity solely for consumption by Alcoa Warrick Smelting and Fabricating Operations.

EPA has incorrectly estimated the seasonal heat inputs for Warrick Power Plant Units 1, 2, and 3.

EPA incorrectly calculates the NOx budget by utilizing 0.17 lb/mmBtu as the non-EGU emission rate given that the SIP call, FIP call, and 126 petitions require a 60% reduction from 1995 actuals.

EPA Final Decision:  
Modify units as requested.

**Item Number:** VIII-B-98  
**Origin:** Celanese Acetate; Phillip Lockard  
**Category:** Non-EGU  
**States Affected:** VA

Requested Modification:

Requests modification of data for multiple units at Narrow's Virginia facility.

Point ID 002 184 mmBtu/hr  
Point ID 003 246 mmBtu/hr  
Point ID 004 91 mmBtu/hr SCC 10200202  
Point ID 005 184 mmBtu/hr  
Point ID 006 246 mmBtu/hr  
Point ID 007 322 mmBtu/hr SCC 10200202

1995 ozone season daily NOx emissions rates need to be corrected for Point ID 002, 003, 004, 006, and 007.

Updated stack parameter information is supplied for all point sources.

Updated operating parameter information is supplied for all point sources.

EPA Final Decision:  
Modify inventory as requested.

**Item Number:** VIII-B-100  
**Origin:** Maryland Department of the Environment; Duane King  
**Category:** Non-EGU  
**States Affected:** MD

Requested Modification:

Requests modification of inventory for Chesapeake Paperboard facility.

Identical request to VIII-B-73.

Boiler 001  
Modify SCC to 10200601  
Modify boiler capacity to 160 MMBtu/hr  
Modify 1995 ozone season daily emissions to 0.0745 tons  
Modify operating and control percent information

Boiler 002

Modify SCC to 10200601  
Modify boiler capacity to 200 MMBtu/hr  
Modify 1995 ozone season daily emissions to 0.0955 tons  
Modify operating and control percent information

EPA Final Decision:  
Modify inventory as requested.

**Item Number:** VIII-B-101  
**Origin:** D.K. Berry, Clean Air Act Program Director, and J. Carroll, Project Engineer, Environmental Quality Management, Inc., Durham, NC for Roanoke Cement Company  
**Category:** point  
**State(s) Affected:** VA

Requested Modification :  
Requests revision to five kilns operated at Roanoke Cement Facility

- Kilns 1-4 Boiler capacity change to 90 mmBtu/hr each  
Were shut down in 1996  
Total ANNUAL 1995 NOx emissions revised to 1,897.39 tons/year  
Daily 1995 NOx emissions revised to 5.92 tons/day  
Stack/operating schedule parameter changes
- Kiln 5 Boiler capacity change to 350 mmBtu/hr (increased to 393 in 1996 and in 1998 capacity is 500 mmBtu/hr)  
Total ANNUAL 1995 NOx emissions revised to 1,250.94 tons/yr  
Daily 1995 NOx emissions revised to 4.11 tons/day  
Stack/operating schedule parameter changes

Requests emission reduction change to 33% (post-1995 application, control level is permitted)  
Requests increase in growth factor to 46.9% (1995-2007)

EPA Final Decision:  
Modify inventory as requested.  
No change in growth or control as these topics not open for comment during this period.

**Item Number:** VIII-B-102  
**Origin:** Mead Paper Company, Sonja Olendorf  
**Category:** Non-EGU Point  
**States Affected:** MI

Requested Modification:  
Requests revision to three boilers operated at Mead Paper Co.:

- #7 boiler Point ID 0310, Stack ID 310, SCC 10200601  
Boiler capacity change to 240 mmBtu/hr  
2007 NOx control efficiency of 0%
- #8 boiler Point ID 0320, Stack 320, SCC 10200601  
Boiler capacity change to 595 mmBtu/hr
- #11 boiler Point 0340, Stack 340, SCC 10200212  
Reclassify under primary SCC (10200212) only  
Boiler capacity change to 1,040 mmBtu/hr  
NOx emissions change to 4.8970 tons/season day based on CEM data

EPA Final Decision:  
Modify base inventory as requested.  
No change to projection year as these topics were not open for comment during this period.

**Item Number:** VIII-B-103  
**Origin:** Metropolitan Nashville and Davidson County Air Pollution Control Division, Rob Raney  
**Category:** Non-EGU point  
**States Affected:** TN

Requested Modification:  
Revise NOx control efficiencies; eliminate sources that did not exist in 1995

EPA Final Decision:  
Addressed under VIII-B-215.

**Item Number:** VIII-B-104  
**Origin:** J.K. Watts, Manager of Advanced Production Technology and Regulatory Integration,  
Tennessee Valley Authority (TVA), Chattanooga, TN  
**Category:** Non-EGU, EGU  
**States Affected:** AL, KY, TN

Requested Modification:  
Add-in inventory data for combustion turbines in AL and TN; correct heat inputs for 3 KY coal-fired units

EPA Final Decision:  
Modify inventory as requested.

**Item Number:** VIII-B-105  
**Origin:** Shell Chemical Company  
**Category:** Non-EGU Point  
**States Affected:** OH

Requested Modification:  
Requests modification of capacity for boiler units B005 and B007 for Shell Chemical Company.  
B005 243 mmBtu/hr  
B007 243 mmBtu/hr  
Point ID P003 has been replaced by P010.  
Requests addition of several sources to the inventory.

EPA Final Decision:  
Modify inventory as requested.

**Item Number:** VIII-B-106  
**Origin:** E.J. Wilusz, Director, Government Relations, Wisconsin Paper Council, Neenah, WI  
**Category:** Non-EGU  
**States Affected:** WI

Requested Modification:  
Requests modification of NOx emissions for two companies.

International Paper Co./Thilmany.  
unit B11 504.1 tons

Georgia Pacific Corp./Nekoosa (Nekoosa Papers, Inc.) emissions should be based on AP-42  
unit B24 239 tons

Requests modification of boiler capacity for several companies.

Fort James Corp./East (James River - Green Bay) information is incorrect  
unit B01a 103.8 mmBtu/hr  
unit B01b 103.8 mmBtu/hr  
unit B01c 138.4 mmBtu/hr  
unit B01d 186.9 mmBtu/hr

CityForest Corp. has a permit condition specifying natural gas use  
unit B11 81.2 mmBtu/hr

Frasier Papers, Inc. is a fluidized bed combustor  
unit 150 maximum firing capacity 16.6 mmBtu/hr

Requests correction of point identification for several Point IDs.  
Consolidated Papers/Biron

Consolidated Papers/Kraft  
Georgia-Pacific/Nekoosa

Requests removal of boiler unit for Inter Lake Papers.  
unit B24 was replaced by B28 in 1996

Requests addition of boiler units for several companies.

Inter Lake Papers unit was added in 1996  
unit B28 274.4 mmBtu/hr

Wausau-Mosinee Paper Corp./Stevens Point  
unit B28 280.0 mmBtu/hr

Consolidated Papers Inc./Stevens Point unit came on line in 1997  
unit B25 249.0 mmBtu

Kerwin Papers came online in 1995  
unit B02 110.0 mmBtu/hr

Georgia-Pacific Corp./Nekoosa lime kiln came online in 1996  
unit P27 7.5 ton/hr

Green Bay Packaging/Mill came online in 1997 and used as a back-up  
unit B33 182.0 mmBtu/hr

Requests modification of boiler units for several companies as the baseline inventory for these units were based on controlled emissions, rather than uncontrolled as specified in the SIP Call.

Appleton Papers/Locks	unit B23, B05
Consolidated Papers/Kraft	unit B20, B21, B24
Consolidated Papers/Biron	unit B24
Consolidated Papers/WI River	unit B24
Consolidated Papers/Niagara	unit B24
Consolidated Papers/Inter Lake	unit B21, B22
Consolidated Papers/Stevens Point	unit B23
Fort James/West	unit B26
Georgia-Pacific/Nekoosa	unit B24
Green Bay Packaging/Mill	unit B26
Plainwell Tissue	unit B25
Proctor & Gamble	unit B07
Tenneco Packaging	unit B30
Wausau-Mosinee/Brokaw	unit B25

Requests modification of boiler classification for Proctor & Gamble Paper Products Co. units B05 and B06 to reflect the capability to burn both coal and natural gas.

EPA Final Decision:  
Addressed under VIII-B-260.

**Item Number:** VIII-B-107  
**Origin:** Transcontinental Gas Pipeline Corporation (Transco), Mary Beth Whitfield  
**Category:** Non-EGU Point  
**States Affected:** AL, GA, SC, NC, VA, MD, PA, NJ

**Requested Modification:**  
Requests modification to heat rate capacity for natural gas fired internal combustion engines and natural gas fired turbines for Transco. Requests removal of incorrect cumulative records and addition of individual point source records for Transco. Requests revision of the inventory to include the revised May-September 1995 ozone season NOx emissions for Transco.

EPA Final Decision:

Modify inventory as requested.

**Item Number:** VIII-B-108  
**Origin:** Duke Energy Corporation, David Felcman  
**Category:** Non-EGU Point  
**States Affected:** AL, CT, IL, IN, KY, MD, MI, MO, NJ, NY, OH, PA, RI, TN

**Requested Modification:**  
Requests addition of sources for Duke Energy to the inventory. Requests correction of one plant name for Duke Energy. Requests corrections to SCCs and PODs. Requests correction to budget sizes. Requests modification of maximum heat input capacities. Requests modification of stack parameters. Requests modification of operating schedules. Requests modification of SIC codes. Requests modification of 1995 emissions. Requests modification of 1995 control efficiencies, 2007 control efficiencies, and 2007 emissions. Requests modification of 2007 budget NOx control efficiencies and 2007 ozone season budget NOx emissions.

**EPA Final Decision:**  
Modify inventory as requested.  
No change in growth or control as these topics not open for comment during this period.

TN: county-plantid 189-0093 TX Eastern Gas Pipeline emissions replace those supplied by TN-DEC comment. Other Duke Energy data applied.

**Item Number:** VIII-B-109  
**Origin:** D.D. Tyler, Administrator, Delaware Department of Natural Resources and Environmental Control, Division of Air & Waste Management, Air Quality Management Section, Dover, DE  
**Category:** Nonroad  
**States Affected:** DE

**Requested Modification:**  
Requests replacement of nonroad emissions data with State supplied data.

**EPA Final Decision:**  
Modify inventory as requested.

**Item Number:** VIII-B-110  
**Origin:** Maryland Department of the Environment; Duane King  
**Category:** Non-EGU  
**States Affected:** MD

**Requested Modification:**  
Requests modification of inventory for Chesapeake Paperboard facility.  
Identical request to VIII-B-73, VIII-B-100.

Boiler 001  
Modify SCC to 10200601  
Modify boiler capacity to 160 MMBtu/hr  
Modify 1995 ozone season daily emissions to 0.0745 tons  
Modify operating and control percent information

Boiler 002  
Modify SCC to 10200601  
Modify boiler capacity to 200 MMBtu/hr  
Modify 1995 ozone season daily emissions to 0.0955 tons  
Modify operating and control percent information

**EPA Final Decision:**  
Modify inventory as requested.

**Item Number:** VIII-B-111  
**Origin:** GA Department of Natural Resources, H. F. Reheis  
**Category:** Non-EGU Point  
**States Affected:** GA

**Requested Modification:**

Revision requests to multiple non-EGU point sources.  
Reviews of all 'large' sources as indicated in EPA's inventory.

EPA Final Decision:  
Modify inventory as requested.

**Item Number:** VIII-B-112  
**Origin:** Maryland Department of the Environment, Duane King  
**Category:** Non-EGU Point  
**States Affected:** MD

**Requested Modification:**  
Requests revision of hours, days, weeks to multiple non-EGU facilities.

EPA Final Decision:  
Modify non-EGU operating data as requested.

**Item Number:** VIII-B-113, VIII-B-154, VIII-B-158  
**Origin:** Commonwealth of Kentucky Transportation Cabinet (James Codell, III), Federal Highway Administration, Kentucky Division Office (Jesse Story), Commonwealth of Kentucky Department for Environmental Protection, Division for Air Quality (John Hornback)  
**Category:** Highway Mobile Sources  
**States Affected:** KY

**Requested Modification:**

Requests that Kentucky daily VMT for 1995 and 2007 be replaced by that provided in the attached data. The primary issues are allocation of VMT by county and roadway type and growth factors by county. The Kentucky Transportation Cabinet methodology is based on a combination of historical VMT growth for the interstate portion of VMT and historical VMT growth as well as population growth by county for non-interstate VMT.

EPA Final Decision:  
Modify inventory as requested.

**Item Number:** VIII-B-117  
**Origin:** International Paper, Howard D. Lienert  
**Category:** Non-EGU Point  
**States Affected:** PA, CT, NC, AL, SC, WI, GA, NY

**Requested Modification:**  
Requests numerous changes to stack parameters, plant operating parameters, SCC, SIC, coordinates, 1995 NOx control efficiency, 1995 NOx ozone season emissions, and boiler design capacities for several facilities.

EPA Final Decision:  
Modify inventory as requested.

**Item Number:** VIII-B-118  
**Origin:** B. Mathur, Chief, Bureau of Air, Illinois Environmental Protection Agency (EPA), Springfield, IL  
**Category:** EGU, Non-EGU Point  
**States Affected:** IL

**Requested Modification:** Revise specific data fields for one EGU, add new non-EGU units, revise specific data fields for non-EGU point units, delete specific non-EGU point units

EPA Final Decision:  
Addressed under VIII-B-62.

**Item Number:** VIII-B-120  
**Origin:** Coastal Corporation/ANR Pipeline Company, Wilbert L. Lee  
**Category:** Non-EGU Point  
**States Affected:** IL, IN, KY, MI, MO, OH, TN, WI

**Requested Modification:**

Does not specify revisions. Submitting a complete new inventory for 205 IC engines and turbines because of "numerous errors in existing inventory."

EPA Final Decision:  
Modify inventory as requested.

**Item Number:** VIII-B-121  
**Origin:** Department of Environment and Conservation, Tracy Carter  
**Category:** Non-EGU Point, EGU  
**States Affected:** TN

**Requested Modification:**  
Requests revision of emissions, capacities, operating parameters, growth, and control for multiple facilities.

**EPA Final Decision:**  
Non-EGU:  
No revisions made to comments requesting revision to growth or future base or budget level control assumptions. These parameters were not open for comment during the comment period.  
Modifications to inventory as requested, with the following exceptions:

AIRS-AFS ID	Action
011-0014	Removed reported base year control efficiency of 100% as unit is not controlled to 0 tons.
031-0010	No classification change made as unit SCC indicates boiler
037-0002	** See VIII-B-103 for additional comment review **
157-****	No change as new data not submitted for any of these facilities
163-0003	No sources removed as all units are included in total State budget
163-1007	No change as no data submitted for this facility
163-1009	No change as no data submitted for this facility
165-0014	Do not add units 003, 004 as no information provided for their addition

**Item Number:** VIII-B-123  
**Origin:** R.W. Schenker, Manager-Air Pollution Control, General Electric Company, Fairfield, CT  
**Category:** Non-EGU  
**States Affected:** AL, MA

**Requested Modification:**  
Clarifies previous comment that GE seeks a NOx budget allocation of 116 tons of NOx per ozone season for Burkville, AL cogeneration facility.

Asks EPA to consider previous comment and make a determination on how the NOx SIP call will/will not apply to GE's Lynn, MA cogeneration facility.

**EPA Final Decision:**  
Modify as requested.

**Item Number:** VIII-B-124  
**Origin:** J.C. Colman, Assistant Commissioner, Massachusetts Department of Environmental Protection (MADEP), Boston, MA  
**Category:** Mobile  
**States Affected:** MA

**Requested Modification:**  
Request modification to MOBILE input parameters.

**EPA Final Decision:**  
Modified I/M program inputs as requested, changed from maximum LEV credits to minimum LEV credits.

**Item Number:** VIII-B-127  
**Origin:** J.M. Daniel, Director of Air Program Coordination, Virginia Department of Environmental Quality, Richmond, VA  
**Category:** Non-EGU  
**States Affected:** VA



Requested Modification:  
Modification to multiple facilities in the State.

EPA Final Decision:  
Modify boiler capacities as requested in va\_negu.xls  
Modified inventories as requested with the following exceptions:

Roanoke: do not add unit 052 as on-line in 1996  
Bear: do not add new units as on-line after 1995  
Union Camp: see comment VIII-B-210 for response

**Item Number:** VIII-B-128  
**Origin:** State of Connecticut; Christopher Nelson  
**Category:** EGU & Non-EGU  
**States Affected:** CT

Requested Modification:  
Any additions made to Connecticut's EGU budget as a result of the January 29 comments will need to be apportioned to each of the three states' revised MOU budgets. A copy of the MOU is enclosed.

Several corrections to the non-EGU portion of the budget have been made by EPA as a result of comments, but the need for some additional corrections still remains. The remaining corrections pertain to the need to remove certain sources from EPA's current inventory of large non-EGU sources for Connecticut. Attached is a list of the large non-EGU sources currently contained in EPA's NOx SIP Call budget for Connecticut and an explanation of which sources should be removed from this portion of the inventory.

In comments submitted to the docket on January 29, 1999 regarding the EGU portion of Connecticut's inventory, CT DEP noted that Exeter Energy (Oxford) was not an EGU source and should thus be moved to the non-EGU point source portion of the budget. This source should be classified as a small non-EGU source since it does not meet the criteria for being a large source (it does not combust fossil fuel).

Also missing from the small non-EGU portion of Connecticut's inventory are American Ref-Fuel Co. of SE CT (ARD ORISPL #10646, points 105 & 106) and Riley Energy Systems of Lisbon (ARD ORISPL # 54758, Boilers 1 & 2). Both of these facilities are municipal waste combustors.

The CTDEP encourages EPA to be diligent when reviewing any requested inventory changes submitted during this comment period and the SIP revisions submitted by states pursuant to the NOx SIP Call. In addition, EPA must ensure that the reductions projected by each state's SIP are actually achieved in the required time frame so that the anticipated ozone reduction benefits of the NOx SIP Call are fully realized.

EPA Final Decision:  
Remove sources CAPITOL DISTRICT ENERGY CENTER (P64) and DEXTER NONWOVENS DIV (P29) from non-EGU inventory.

No modification made to PRATT & WHITNEY (039) facility. All source types are included in State budget.

No modification made to SIMKINS INDUSTRIES INC (673) and PFIZER INC-CHEMICALS (009 and 010) facilities. No supporting information or data to support claim that these units do not meet the criteria for being large non-EGU sources and should be removed from the large non-EGU portion of Connecticut's inventory.

Exeter Energy (Oxford) handled under comment VIII-B-95

Unit parameters taken from American Ref-Fuel Co. of SE CT and Riley Energy Systems of Lisbon as requested.

**Item Number:** VIII-B-129  
**Origin:** Columbia Gas Transmission Corporation, P.M. Hoffman  
**Category:** EGU, non-EGU point  
**States Affected:** KY, TN, WV

Requested Modification:  
Does not list specific revisions. Provides corrected emission inventories for Columbia Gas Transmission in KY, TN, WV based on 1995 actual production records (except for KY, which is based on 1997 data).

EPA Final Decision:  
Modify capacities, emissions, SCCs, operating parameter information as provided.

**Item Number:** VIII-B-132  
**Origin:** Fulton Cogeneration Associates as submitted by Galson Consulting, David Ostaszewski  
**Category:** EGU, non-EGU point  
**States Affected:** NY

**Requested Modification:**  
Wholesale revisions to inventory for one EGU (combustion gas turbine with duct burner) and two non-EGUs (auxiliary boilers).

**EPA Final Decision:**  
Modify inventory as requested.

**Item Number:** VIII-B-133  
**Origin:** State of Ohio; Robert Hodenbosi  
**Category:** Non-EGU  
**States Affected:** OH

**Requested Modification:**  
Requests modification to multiple non-EGU point source inventories.  
Requests addition of sources to base year inventory.

**EPA Final Decision:**  
Base 1995 inventory modified as requested with the exceptions / assumptions indicated below.

NOXINV3  
39-003-0302020308-B003 Assume record to revise was 39-003-0302020015-B003  
39-035-1318001613-P046 No change as unit not found in existing inventory  
39-035-1318001613-P047 No change as unit not found in existing inventory  
39-035-1318001613-P048 No change as unit not found in existing inventory  
39-035-1318001613-P904 No change as unit not found in existing inventory  
39-049-0125040554-X001 Used stack and operating parameter information from unit X001 to generate  
units B001-B004  
39-113-0857190001-B002 Change SCC to 10200202  
39-125-0363000002-P014 Change SCC to 30500706  
39-125-0363000002-P015 Change SCC to 30500706

NOXINV4  
39-003-0302020308-B003 Replace unit 39-003-0302020015-B003 with this record  
39-061-1431010054-B001 Apply default operating schedule to this unit  
39-061-1431010054-B005 Apply default operating schedule to this unit  
39-061-1431010054-TOX Apply default operating schedule to this unit

**Item Number:** VIII-B-135  
**Origin:** W.S. Kubiak, Environmental Affairs, U.S. Steel, Pittsburgh, PA  
**Category:** Non-EGU  
**States Affected:** AL, IL, IN, PA

**Requested Modification:**  
Requests that additional boilers be included for plants in NOx SIP call inventory (plants are located in AL and PA).

**Modifications to information for three plants:**  
South Works (IL)  
Plant ID 031600ALZ, Point ID 82010044014, Stack ID 0008:  
Change design capacity from 876 to 1,210 mmBtu/hr  
Plant ID 031600ALZ, Point ID 82010044013, Stack ID 0013:  
Change design capacity from 575 to 533 mmBtu/hr

Fairless Works (PA)  
Plant ID 0055, Point IDs 043, 045, and 046:  
Not owned by U.S. Steel, owned by PECO.

Gary Works (IN)  
"Detailed corrections submitted through IDEM."

Also notes that U.S. Steel has other non-boiler sources with heat input capacities greater than 250 mmBtu/hr and that they can provide information for these sources at EPA's request.

Recommends that use of byproduct fuels such as blast furnace gas and coke-oven gas should be considered as a NOx control technology for purpose of NOx budget program.

EPA Final Decision:

Modify Smith Works boiler capacity.

Modify Fairless name to PECO.

No other change as emissions data not provided and additional topics were not open for comment during this period.

**Item Number:** VIII-B-137  
**Origin:** Goodyear Tire & Rubber Company, M.G. Trembly  
**Category:** Non-EGU point  
**States Affected:** AL, IL, OH, SC, TN, VA

Requested Modification:

AL Correction of SIC code for Gadsden plant.

IL Add four sources (gas-boilers at tire manufacturing facility in Freeport) to inventory.

OH Numerous changes to St. Marys plant; Logan Plant - Point ID #K001 shut-down in 1997; Jackson Plant-now owned/operated by Cambridge Industries, Inc.; numerous changes to Akron complex, including closure of point ID #B004 and plant C may have been shut-down (now owned/operated by Lockheed Martin); numerous changes to Marysville plant. Also notes that only two boilers should be subject to NOx SIP call at Akron plant because remaining boilers are non-EGUs with maximum design capacities of less than 250 MMBtu/hr.

SC Corrected error in design capacity of boiler at Spartanburg facility.

TN For Union City Plant—Are four boilers, not two—delete two rows of inventory data and replace with eight new rows of data; also notes letter submitted to Docket No. A-97-43, dated 11/25/98, which requests that one boiler (Goodyear 004 boiler) at the Union City facility be deleted from Table A.2 of Appendix A of EPA's "Proposed Rulemaking: Findings of Significant Contribution on Section 126 Petitions for Purposes of Reducing Interstate Ozone Transport," 62 FR 56292.

VA Corrected numerous data elements for Danville plant; notes that although stack flow data are higher than shown, could not locate accurate info. and request that EPA contact Goodyear before using the data that are currently in inventory.

Notes that some sources in inventory are not significant sources of CO or VOC emissions, while other more significant sources that they are aware of are not included in the inventory. Note that CO and VOC emissions data for 1995 are wrong for several other sources and that some sources only emit particulates. Goodyear invites EPA to contact them to discuss whether some CO and/or VOC sources should be added/deleted/corrected.

Disagree with growth factors—believe that EPA may not be able to calculate correct emissions projections for 2007.

EPA Final Decision:

Modify inventory based on comments.

No change to growth as this topic was not open for comment during this period.

**Item Number:** VIII-B-139  
**Origin:** Marathon Ashland, L.J. Nordhausen  
**Category:** Non-EGU  
**States Affected:** MI

Requested Modification:

Provides detailed inventory data to revise Plant ID #A9831, Unit ID#1 (CO boiler), #7 (FCCU), and #8 (IC engines).

EPA Final Decision:

Modify inventory as requested.

**Item Number:** VIII-B-141  
**Origin:** Zinc Corporation of America, Makram Jaber, Counsel  
**Category:** Non-EGU Point

States Affected: PA

Requested Modification:

Requests modification of the NOx emissions inventory for Zinc Corporation of America.

The non-EGU emissions inventory has four entries listed as "large" non-EGU units under ZCA's ownership. These entries in fact correspond to two 600 mmBtu/hr boilers. A small amount of natural gas is used for startup and to supplement the coal on occasions. Although the heat input is reported separately for the coal and gas used in each boiler, NOx emission monitoring data are collected for each boiler as one unit.

Plant ID	32	
Point ID	34	
Segment	1 & 2	
Boilcap	600 mmBtu/hr	modified from 251 mmBtu/hr

Plant ID	32	
Point ID	35	
Segment	1 & 2	
Boilcap	600 mmBtu/hr	modified from 251 mmBtu/hr

Requests modification of the ozone season emissions. EPA apparently assumed that 1995 emissions are approximately 95 percent of 1990 emissions (this conclusion is based on a comparison of actual 1990 emissions from the boilers and the 1995 emissions listed in EPA's emission inventory). EPA's estimates are incorrect and underestimate 1995 uncontrolled emissions.

Control efficiency	0.5	reflects the implementation of RACT controls for units
Seasonal throughput		based on actual 1995 throughput data
Times of Operation		Boiler 034 operates 7 days/week

Requests modification of 1995-2007 growth factor. ZCA expects an average yearly growth factor of 1 percent to continue through the next decade.

1995-2007 growth factor	modify to 1.12
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EPA Final Decision:

Modify inventory as requested.

No change to growth factors as this topic was not open for comment during this period.

**Item Number: VIII-B-143**

Origin: Westvaco Corporation, Thomas G. Botkins, Jr.

Category: Non-EGU Point

States Affected: VA

Requested Modification:

This commenter submits that a total of 8 points at this facility are subject to this rule.

Requests that the following two boilers, which are both >250 mm/Btu and were operational in 1995, be included in the budget:

Plant ID 0006, Point 005, Segment 1, SCC 10200601

Plant ID 0006, Point 011, Segment 1, SCC 10200601

Requests several changes to stack parameters and emissions for the other 6 points subject to this rule.

Also requests that the SCC for the following point be changed to the one listed (i.e., 10200212).

Plant ID 0006, Point ID 004, Segment 1, SCC 10200212

Requests that the growth factor for wood combustion be equivalent to that of coal.

EPA Final Decision:

Modify base year inventory as requested.

Add sources as requested.

No change to growth factor information as this topic was not open for comment during this period.

**Item Number:** VIII-B-146  
**Origin:** R.W. Wood, Kodak Environmental Services, Eastman Kodak Company, Rochester, NY  
**Category:** Non-EGU  
**States Affected:** NY

**Requested Modification:**  
Modification to heat input for ozone season. Does not specify emission revisions; submits "correct" 1995 data for Kodak Park facility in Rochester, NY. Also notes that the 2007 emissions data that they provide do not account for growth.

**EPA Final Decision:**  
Assume as facility 36-055-0258.  
See VIII-B-23 for modification.

**Item Number:** VIII-B-147  
**Origin:** J.G. McCabe, Assistant Commissioner, Office of Air Management, Indiana Department of Environmental Management (IDEM), Indianapolis, IN  
**Category:** Mobile  
**States Affected:** IN

**Requested Modification:**  
Requests modification to VMT and MOBILE input parameters.

**EPA Final Decision:**  
Modify as requested.

**Item Number:** VIII-B-148  
**Origin:** R.W. Gore, Chief, Air Division, Alabama Department of Environmental Management (ADEM), Montgomery, AL  
**Category:** Mobile  
**States Affected:** AL

**Requested Modification:**  
The Alabama comments simply state that practically all of the mobile source inputs used in the SIP Call are invalid and so therefore, the emission budgets are not valid. What Alabama believes to be correct data is not provided in most cases.

RVP values of 7.8 psi were modeled in Jefferson and Shelby Counties, while 8.7 psi was modeled in the remainder of the State. The 9.0 psi RVP limit has been historically modeled as 8.7, assuming a 0.3 psi margin of error.

AL states that HDGVs and hydrocarbons should not be modeled with new engine standards. OMS specifically decided to include the HDGV and hydrocarbon new engine standards in the SIP Call budget to mirror the work done in OTAG (at which time the new engine standards were not yet finalized).

AL states that the NOx HDDV standards take effect for AL in 2004 and the use of years 1991 and 1997 is not correct. The MOBILE5 Information Sheet #5 is cited as the source supporting this argument. In fact, the HDDV NOx standards included in all of the MOBILE input files for calculating the NOx SIP Call budgets match exactly with those listed in Information Sheet #5.

AL states that the use of both January and July month flags for the ozone season invalidates the results. The January flag was used in all cases for modeling May and June emission factors while the July flag was used for modeling July, August, and September emission factors. In fact, the May and June emission factors will be slightly overestimated since fleet turnover will be slightly underestimated. However, using the July flag to model emission factors for these months would cause the emission factors to be slightly underestimated. Either way, the difference is small, but EPA should decide whether it is better to model all emission factors using the July flag.

AL states that the NLEV implementation schedule file used in the SIP Call for AL artificially lowers the emission factors. Presumably, AL makes this assertion because the NLEV file used includes LEVs prior to 2001. However, the AL MOBILE input files specify a LEV program start date of 2001. Therefore, data for the years prior to 2001 in the NLEV implementation schedule file are ignored, and the emission factors are correctly calculated.

AL states that correct speed data was not used, but does not say what the correct speed data should be.

AL states that the growth rate for the State averages 3.78%, but does not provide any supporting data.

EPA Final Decision:

Nonroad: Revise 1995 nonroad activity levels and emissions as per the commenter's direction. Apply growth rates as per the commenter's direction.

Mobile: Do not accept commenter's suggestion to revise gasoline Reid Vapor Pressure levels. While the RVP limit in Alabama (outside Jefferson and Shelby Counties) is 9.0 psi, EPA data indicates that actual gasoline RVP levels average 8.7 psi.

Revise application of the 2004 heavy-duty highway NOx standard to limit its application to heavy-duty diesel vehicles, as per the commenter's suggestion, since commenter's description of the 2004 heavy-duty highway standard is accurate.

Revise the emission factors for heavy-duty highway diesel engines in 1991-2003 model year engines to reflect the standards that will apply to those engines. Do not apply the 2004 NOx standard prior to the 2004 model year (consistent with the commenter's suggestion).

Revise the mileage accumulation and other MOBILE inputs (other than temperature) for all months of the ozone season to be based on a July profile, as per the commenter's suggestion.

Revise the LEV input file to match the non-OTR LEV phase-in, as per the commenter's suggestion, since the commenter's information is accurate.

Revise the speed data as per the commenter's suggestion, since the commenter has more recent and more accurate data.

No change in VMT growth as only Statewide factor provided.

**Item Number:** VIII-B-150  
**Origin:** Great Lakes Gas Transmission Company, Douglas Andrews  
**Category:** Non-EGU Point  
**States Affected:** MN, WI, MI

**Requested Modification:**  
Requests modification of the NOx emissions inventory for Great Lakes Gas Transmission Company.

Eight Great Lake sources were improperly classified as "large" Non-EGU sources. The maximum rated heat capacity of each source was incorrect. The stack diameter and/or height were incorrectly identified for nine sources. Average exhaust gas temperature, flowrate, and velocity were incorrect for virtually every one of the Great Lake sources subject to the proposed rule. The SIC code was incorrect in three cases. The corrected daily average of uncontrolled NOx emissions during the 1995 ozone season was incorrect in all 21 cases.

EPA Final Decision:  
Modify inventory as requested.

**Item Number:** VIII-B-151  
**Origin:** Blue Circle Cement, Lorraine Roberts  
**Category:** Non-EGU Point  
**States Affected:** NY

**Requested Modification:**  
Requests modification of inventory data for Blue Circle Cement.

Plant ID 0040  
Point ID 00A  
Stack ID 1  
Segment ID 1  
SCC 39000201

Requests that corrections are made for stack temperature Data from 1997 stack test

stack flow	Max flow was measured
stack velocity	Corrected based on flow
1995 NOx Control Efficiency	As reported in 1994 NOx RACT
1995 Typical Ozone Season Daily NOx emissions	As reported in 1994 NOx RACT
2007 Ozone Season Weekday NOx emissions	Adjusted from corrected baseline
2007 Ozone Season Saturday NOx emissions	Adjusted from corrected baseline

EPA Final Decision:

Modify inventory based on comments.

No change to growth factor information as this topic was not open for comment during this period.

**Item Number:** VIII-B-152  
**Origin:** Continental Cement Company, Gregory Haug, PE  
**Category:** Non-EGU Point  
**States Affected:** MO

Requested Modification:

Requests modification of NOx baseline emissions for Continental Cement Company to 11.38 tons NOx/day during the ozone season.

The agency's use of 1995 EIQ data is not representative of baseline NOx emissions for Continental Cement Company as alternate control technologies were in place. CCC had previously installed an alternate control technology using a substitute fuel firing system.

Baseline Coal only	11.38 tons NOx/day
NOx emissions with alternative control technology 1995	5.97 tons NOx/day
NOx emissions with alternative control technology 1996	6.69 tons NOx/day
NOx emissions with alternative control technology 1997	6.69 tons NOx/day

EPA Final Decision:

Revise emissions/stack data as requested. Use modified 30% controlled emissions for 1995 base, add 30% control efficiency.

**Item Number:** VIII-B-154  
**Origin:** J.A. Story, Division Administrator, Federal Highway Administration, U.S. Department of Transportation, Frankfort, KY  
**Category:** Mobile  
**States Affected:** KY

Addressed under VIII-B-113.

**Item Number:** VIII-B-155  
**Origin:** Union Camp Corporation, James R. Baker  
**Category:** Non-EGU point  
**States Affected:** GA

Requested Modification:

Lists following information for Union Camp Corporation's pulp and paper mill in Savannah:

Power Boiler 10	852 MMBtu/hr; 1995 NOx emissions - 59.3 tons
Power Boiler 11	890 MMBtu/hr; 1995 NOx emissions - 131 tons
Power Boiler 12	1,120 MMBtu/hr; 1995 NOx emissions - 173 tons
Power Boiler 13	1,390.6 MMBtu/hr; 1995 NOx emissions - 1,104 tons

EPA Final Decision:

Modify inventory as requested.

**Item Number:** VIII-B-156  
**Origin:** J. Stathyelich, Site Environmental Manager, Procter & Gamble Paper Products Company, Cape Girardeau, MO  
**Category:** Non-EGU

States Affected: MO

Requested Modification:  
Unit revision request for facility at Cape Girardeau, MO.

EPA Final Decision:  
Modify inventory as requested.  
Do not add units 25-40 to 1995 base inventory as on-line after 1995.  
No change to growth factor information as this topic was not open for comment during this period.

**Item Number:** VIII-B-157  
Origin: Lafarge Corporation, Michael Pelan  
Category: Non-EGU Point  
States Affected: MI, IL, OH, MO, PA

Requested Modification:  
Requests modifications to the NOX SIP call inventory for several sources located in Alpena, Michigan; Grand Chain (Joppa), Illinois; Paulding, Ohio; Sugar Creek, Missouri; and Whitehall, Pennsylvania.

EPA Final Decision:  
Modify inventory based on comments.  
No change to growth factor information as this topic was not open for comment during this period.  
See state data submittals and item VIII-B-248 for additional action.

**Item Number:** VIII-B-158  
Origin: J.E. Hornback, Director, Kentucky Natural Resources and Environmental Protection Cabinet, Frankfort, KY  
States Affected: KY

Addressed under VIII-B-113.

**Item Number:** VIII-B-159  
Origin: A.W. Klimek, Director, North Carolina Department of Environment and Natural Resources, Division of Air Quality, Raleigh, NC  
Category: Non-EGU  
States Affected: NC

Requested Modification:  
Revision requests to multiple facilities in the State. Revision request for 2007 VMT.

EPA Final Decision:  
Modify inventory and VMT as requested.

**Item Number:** VIII-B-160  
Origin: Consolidated Edison Company of New York, Inc., Alan Homyk  
Category: Non-EGU Point  
States Affected: NY

Requested Modification:  
Requests modification of the NOx emissions inventory for non-EGU point sources for Con Edison Company. Most notable is a complete absence of generator nameplate ratings and modeling parameters for the company's 96 combustion-turbine powered electric generators.

Changes for several units in the inventory are requested.

EPA Final Decision:  
Modify inventory as requested.

**Item Number:** VIII-B-162  
Origin: Lehigh Portland Cement Company, Timothy Matz  
Category: Non-EGU Point  
States Affected: AL, MD, PA, IN, NY



Requested Modification:

Requests modification of the source specific data used in each of Lehigh Portland Cement Company's relevant state budgets.

Requests modification of the growth factor used for the cement industry, particularly as outlined for Lehigh's facilities in the baseline budget. The Portland Cement Association predicts a much higher growth in our industry than what is currently in the budget.

EPA Final Decision:

Modify inventory as requested.

No change to growth factor information as this topic was not open for comment during this period.

**Item Number:** VIII-B-164

Origin: B.H. Brothers, Transportation Manager II, Tennessee Department of Transportation, Nashville, TN

Category: Mobile

States Affected: TN

Requested Modification:

Expresses concerns with EPA VMT allocation and projection methodologies.

EPA Final Decision:

No inventory modification made as no modification request made.

**Item Number:** VIII-B-166

Origin: Trigen-Boston Energy Corporation, Thomas J. Gorham

Category: Non-EGU point

States Affected: MA

Requested Modification:

Notes that they have four units, not the three units listed by EPA. States that they can not identify the units EPA has listed because the EPA numbers do not correspond to their numbers. Suggests contacting the commenter for questions/additional information.

EPA Final Decision:

No action taken as no data provided.

**Item Number:** VIII-B-169

Origin: J. Merrill, Principal Engineer/President, Air/ Compliance Consultants, Inc. (ACCI), Pittsburgh, PA

Category: Non-EGU

States Affected: PA

Requested Modification:

Requests revisions to heat input data for Shenango Neville Island Facility (Plant ID 0050, Point ID 06 & 09, Stack ID 033 & 034).

Boiler 9 699,641 mmBtu, should be 4.5 times higher than the EPA value

Boiler 10 162,682mmBtu, should be 1.3 times higher than the EPA value

The heat input data is based on fuel records at the facility.

EPA Final Decision:

Modify inventory as requested.

**Item Number:** VIII-B-170

Origin: Southern Natural Gas Company, John Seymour, PE

Category: Non-EGU Point

States Affected: AL, GA

Requested Modification:

Requests modification of affected sources in Georgia and Alabama for Southern Natural Gas.

Georgia

Affected units

No engines qualify as affected

Alabama

Affected units

Engine No. 9 at the Elmore station  
Engines No. 8 and 9 at the Gallion station

These units were added to the list by ADEM because EPA did not initially identify these units to be affected.

Do not qualify as affected

Engine No. 3 at the Elmore station  
Engine No. 1 at the Gallion station  
Engine No. 19 at the Reform station

Additionally, nine 1,350 hp engines at the Reform station are not affected because individually the engines do not meet the 1 ton NOx per day threshold.

SNG believed that a re-evaluation of the determinations made by ADEM was warranted because stack testing conducted since 1995 has provided more accurate emission factors than those previously used to calculate baseline 1995 actual emissions and because SNG suspected that certain units were inaccurately determined to be "affected."

EPA Final Decision:

Modify inventory as requested. Affected status determined by revised inventory revision.

**Item Number:** VIII-B-171

Origin: Celanese Acetate, Donna MacInnis

Category: Non-EGU Point

States Affected: SC

Requested Modification:

Requests modification of point sources for Celanese Acetate's Rock Hill, South Carolina facility.

Five point sources were incorrectly identified as "large" point sources.

001, 002, 003, 004, 005 All boilers have maximum design heat capacities below 250 mmBtu/hr.

Maximum rated heat capacities for six point sources need to be corrected.

	Corrected maximum heat design input
001	183.3 mmBtu/hr
002	183.3 mmBtu/hr
003	183.3 mmBtu/hr
004	244.4 mmBtu/hr
005	244.4 mmBtu/hr
006	325.0 mmBtu/hr

Six point sources are listed twice with different SCC codes. EPA's database needs to be corrected to list each of the point sources once with the SCC code for the primary fuel. These boilers are primarily coal-fired with fuel oil used only during start up. The repeat listing of ID numbers 001, 002, 003, 004, 005, 006 with SCC code 10200501 should be deleted. In addition, the stack parameters listed with ID numbers 001, 002, 003, 004, 005, 006 for SCC code 10200501 are incorrect.

EPA Final Decision:

Modify inventory as requested.

**Item Number:** VIII-B-173

Origin: E.L. Kropp, Chief, Office of Air Quality, West Virginia Division of Environmental Protection (DEP), Office of Air Quality (WVOAQ), Charleston, WV

Category: Non-EGU

States Affected: WV

Requested Modification:

The WV Non-EGU emission inventory contains extensive errors and should be replaced by data being concurrently submitted in the database file: NONEGU.DBF

EPA Final Decision:

Modify inventory as requested.

**Item Number:** VIII-B-174

Origin: C.O. Russell, Director of Environmental Compliance, Lone Star Industries, Inc., Indianapolis, IN

Category: Non-EGU  
States Affected: IN, IL, MO

Requested Modification:

ID 21232, State 17, County 99

Total emissions changed to: 779 tons Nox/season for 1995  
5 lbs NOx/ozone season day for 1995.

With growth factor change to 1.42 (see section below on growth factors):

2007 uncontrolled emissions = 1106.18 tons Nox/season,  
2007 controlled emissions = 774.33 tons Nox/season → 5.06 lb NOx/OSD.

ID 77475, state 29, county 31, plant 21

Total emissions changed to: 1,172 tons NOx/season for 1995  
7.66 lbs NOx/ozone season day for 1995.

With growth factor change to 1.42 (IL EPA):

2007 uncontrolled emissions = 1664.24 tons Nox/season,  
2007 controlled emissions = 1164.97 tons Nox/season → 7.61 lb NOx/OSD.

ID 31488, state 18, county 133, plant 2

Total emissions changed to: "daily ozone" of 10.9639 tons NOx for 1995.

With growth factor change to 1.4:

2007 uncontrolled emissions = 15.3495 tons Nox/OSD,  
2007 controlled emissions = 10.7446 tons Nox/OSD

EPA Final Decision:

IL: modify hours, seasonal and daily emissions as requested.

MO: modify seasonal and daily emissions, stack parameter data as requested.

IN: modify emissions as requested.

No change to growth factor information as this topic was not open for comment during this period.

**Item Number:** VIII-B-175  
**Origin:** Consumers Energy, Richard Savoie  
**Category:** Non-EGU Point  
**States Affected:** MI

Requested Modification:

Requests a reclassification of these sources based on the 1995 and 1996 ozone season NOx emissions data provided. Because the Michigan Air Pollution Reporting System allowed reporting of identical units as a single point, EPA incorporated these identical units as a single source into the NOx budget determination. As a result, a number of these sources were classified as large and a 90% reduction factor was applied to them. The data supplied show that all of the engines operated below the one ton per day threshold for classification as "large" and requiring controls.

Requests a change to the determination of ozone season emissions for the following 4 points based on actual brake horsepower hours, and test or AP-42 emission factors:

Plant ID N1099, Point ID 1, Unit ID 1, and SCC 20300201

1995 actual ozone season emissions: 0 tons

1996 actual ozone season emissions: 0 tons

Plant ID N1099, Point ID 1, Unit ID 2, and SCC 20300201

1995 actual ozone season emissions: 0 tons

1996 actual ozone season emissions: 0 tons

Plant ID N1099, Point ID 1, Unit ID 3, and SCC 20300201

1995 actual ozone season emissions: 18.48 tons

1996 actual ozone season emissions: 23.36 tons

Plant ID N1099, Point ID 1, Unit ID 4, and SCC 20300201

1995 actual ozone season emissions: 7.8 tons

1996 actual ozone season emissions: 9.05 tons

Requests an increase in the IPM growth factor of 1.13 to that of the 1998 total system ozone season heat input increase over the 1995 total system ozone season heat input (1.27), or that of Proscreen II projected 2007 total system ozone season heat input increase over 1995's total system ozone season heat input (1.32).

EPA Final Decision:

Modify inventory as requested.

No change to growth factor information as this topic was not open for comment during this period.

**Item Number:** VIII-B-177

Origin: W. Shackelford, Commissioner, Georgia Department of Transportation, Atlanta, GA

Category: Mobile

States Affected: GA

Requested Modification:

Requests VMT and VMT growth rate changes for Jones and Peach Counties.

EPA Final Decision:

Modify inventory as requested.

**Item Number:** VIII-B-178

Origin: St. Laurent Paper Products, Darius Rogers

Category: Non-EGU Point

States Affected: VA

Requested Modification:

Requests numerous changes be made to 1995 stack parameters and operating conditions.

Requests that the following sources be added that began operation in 1992:

ID Code 1, Point ID 13, Segment 1, SCC 30700110

953 mmBTU/hr capacity  
1995 emissions of 149.4 tons/yr

ID Code 1, Point ID 14, Segment 1, SCC 30700105

capacity N/A (smelt dissolving tank)  
1995 emissions of 461 tons/yr

Requests that the following sources be removed that ceased operation in 1992:

ID Code 1, Point ID 5, Segment 1, SCC 30700104

352 mmBTU/hr capacity

ID Code 1, Point ID 7, Segment 1, SCC 30700105

capacity N/A (smelt dissolving tank)

Note: St.Laurent Paper Products Corp. acquired the West Point mill from Chesapeake Corp. in May 1997

EPA Final Decision:

Modify inventory as requested.

Calculate seasonal and ozone season daily emissions from annual vaules.

**Item Number:** VIII-B-179

Origin: Earth Tech, Inc., George Lipka on behalf of Medical Area Total Energy Plant (MATEP)

Category: Non-EGU Point

States Affected: MA

Requested Modification:

Requests modification of inventory data for Medical Area Total Energy Plant.

For Zurn Heat Recovery Steam Generator units 004, 005, the approved maximum heat input rating for these two units is only 225 mmBtu/hr after conversion to natural gas firing in 1991/1992 which is documented by the Massachusetts Department of Environmental Protection. The two units are listed in the inventory at their original heat input rating of 263 mmBtu/hr.

Units 004 & 005 Change the entry for "NEWSIZE" from "L" (large) to "S" (small)  
Remove all emissions reductions from "SBNOX" (the 2007 NOx Budget)  
Change the "SCC" from 1200501 to 10200601 for each unit  
Change the "POD" (Source Category Association) from 16 to 17 for each unit

Requests modification of the 1995 NOx baseline emission values for each emission unit be updated to reflect the actual 1995 ozone season fuel use by unit and the allocation of actual recorded (CEMS) NOx emissions.

EPA Final Decision:  
Modify inventory as requested.  
Size and affected status will be revised per the inventory modifications.

**Item Number:** VIII-B-181  
**Origin:** K.A. Colburn, Director, Air Resources Division, New Hampshire Department of Environmental Services (NHDES), Concord, NH  
**Category:** Mobile  
**States Affected:** NH

**Requested Modification:**  
Requests modification to MOBILE model input files.

**EPA Final Decision:**  
Revise MOBILE input files regarding I/M programs as per the commenter's suggestion.

Do not accept commenter's suggestion to use August minimum and maximum average daily temperatures. Retain the use of average monthly temperature ranges for each month, to retain consistency with EPA modeling approach for other states.

**Item Number:** VIII-B-184  
**Origin:** T.R. Ballou, Office of Air Data Analysis, Virginia Department of Environmental Quality (VDEQ), Richmond, VA  
**Category:** Non-EGU  
**States Affected:** VA

Addressed under VIII-B-127.

**Item Number:** VIII-B-187  
**Origin:** J.M. Salvaggio, Director, Pennsylvania Department of Environmental Protection (DEP), Harrisburg, PA  
**Category:** Non-EGU, Mobile  
**States Affected:** PA

**Requested Modification:**  
Requests revision to MOBILE input files.  
Requests EPA state-wide 1995 VMT be replaced by PA state-wide VMT.  
Requests reallocation of county VMT. Requests EPA VMT growth rates be replaced by PA county-specific growth rates.

**EPA Final Decision:**  
Revise MOBILE input files as per the commenter's suggestion.  
Keep EPA 1995 state-wide VMT since the foundation of EPA's methodology is the HPMS data Pennsylvania submitted to the FHWA, it seems that the discrepancy, if any, is due to differences in methodology rather than inconsistency with HPMS.  
Use PA county-specific allocation factors to distribute EPA state-wide VMT.  
Use PA county-specific VMT growth rates.

**Item Number:** VIII-B-188

Origin: St. Lawrence Cement , Victoria Mock  
Category: Non-EGU Point  
States Affected: MD

Requested Modification:  
Requests modification of NOx emissions inventory for St. Lawrence Cement.

Requested Corrections	Present Database
St. Lawrence Cement	St. Lawrence/Independent
7 days per week	5 days/week
52 weeks per year	2 weeks/year
10.55 tons/day 1995 NOx emissions	3.3874 tons/day 1995 NOx emissions

The data submitted indicates that on an annual basis average NOx emissions are 9.59 tons/day. This is a controlled level since the plant was subject to RACT in 1995. Using a conservative 10% reduction the plant's uncontrolled emissions level was 10.55 tons/day in 1995.

EPA Final Decision:  
Modify inventory as requested.  
Use controlled value and RACT estimate in base year.

**Item Number:** VIII-B-190  
Origin: South Carolina Department of Health and Environmental Control, R. Lewis Shaw  
Category: EGU, Non-EGU Point, Mobile  
States Affected: SC

Requested Modification:

Non-EGU: Requests revision and addition of multiple non-EGU facilities.  
Requests reclassification of non-EGU source to EGU.

Mobile: Requests that 1995 VMT by county and roadtype be replaced with annual 1995 VMT provided by SCDOT.

Requests use of speeds developed from actual 1995 speed study performed by SCDOT. These speeds are compared with the speeds used in the SIP Call budgets in the attached file SCSPEEDS.XLS.

EPA Final Decision:  
Modify inventory as requested with the exception of the following:  
Carolina Eastman No change as could not match existing data to point "N02".  
International Paper, G'town No change as could not match existing data to point "004".  
Sunoco, Hartsville Assumed Plant ID='0012'.  
Reallocate VMT among remaining SCCs.  
Use SC county-specific VMT and speeds.

**Item Number:** VIII-B-193  
Origin: West Virginia Manufacturers Association, John K. Pitner  
Category: Non-EGU point  
States Affected: WV

Requested Modification:  
Endorses the corrected data submitted to EPA by the West Virginia Office of Air Quality for non-EGU sources. Notes that EPA has both overestimated NOx from this category and incorrectly identified many units as "large" that are not greater than 250 mmBtu heat capacity.

EPA Final Decision:  
No action taken as no emissions data provided.

**Item Number:** VIII-B-194  
Origin: J.E. Olashuk, Manager, Environmental Affairs, National Steel Corporation, Mishawaka, IN  
Category: Non-EGU  
States Affected: IN

Requested Modification:  
Requests modification to Great Lakes Division facility of National Steel Corporation.

EPA Final Decision:  
No modifications made as data indicated as provided not submitted to docket.

**Item Number:** VIII-B-196  
**Origin:** Rohm and Haas Company, Patrick J. Moran  
**Category:** Non-EGU Point  
**States Affected:** KY

Requested Modification:  
FIPST 13, FIPSCNTY 111, Plant ID 0189, Unit ID 10201301:  
Design capacity of 242 mmBtu/hr  
(Also notes that ozone season NOx emissions listed by EPA are too high because unit is operated on a limited basis, although they don't list their estimated emissions.)

FIPST 13, FIPSCNTY 111, Plant ID 0189, Unit ID 10200202:  
Design capacity of 248 mmBtu/hr  
1995 Ozone season NOx emissions of 45 tons based on CEM data (1996 emissions were 36 tons; EPA estimated 569+ tons).  
NOx control is Low-NOx burners with Flue Gas Recirculation (no control efficiency is listed)

EPA Final Decision:  
Modify inventory as requested.

**Item Number:** VIII-B-201  
**Origin:** R.D. Randolph, Director, Missouri Department of Natural Resources (MDNR), Jefferson City, MO  
**Category:** Non-EGU, Mobile  
**States Affected:** MO

Requested Modification:  
Replacement of non-EGU and mobile source inventory data with submitted files.

EPA Final Decision:  
Modify inventory as requested.

**Item Number:** VIII-B-202  
**Origin:** Georgia-Pacific Corporation, W. Samuel Adams, Jr.  
**Category:** Non-EGU Point  
**States Affected:** WI, WV, VA, TN, SC, OH, NC, NY, NJ, MI, GA, AL

Requested Modification:  
Requests changes to stack parameters, plant operating information, coordinates, SIC, SCC, capacity and emissions for numerous plants and points.

Plattsburgh Mill and South Boston Particleboard/MDF were permanently shut down in October 1994 and October 1996, respectively.

Requests that several points be added to the inventory.

This commenter notes that certain data necessary for updating the inventory is still not available (indicated in red on spreadsheets).

EPA Final Decision:  
Modify inventory as requested in comments.  
Plants not updated where commenter indicates necessary data not available for plants.

**Item Number:** VIII-B-203  
**Origin:** Holnam, Inc., Jerry Epperson  
**Category:** Non-EGU Point  
**States Affected:** MO

Requested Modification:

Requests changes in 1995 emissions based on baseline operational emission levels which reflect actual conditions, rather than levels which were derived from emission factors.

Plant ID 0001, Point ID 014, SCC 30500706

Requests change in stack parameters, control efficiency and coordinates.  
Requests change in 1995 ozone season daily emissions (DNOx) to 40.1 tons/day

EPA Final Decision:

Modify stack parameters, control efficiency, and coordinates as requested.  
Seasonal emissions not modified as source requested controlled 40.1 tpd NOx emissions with a 35% control efficiency. Supporting information not provided to justify this change. Emissions from State modification used.

**Item Number:** VIII-B-205  
**Origin:** DuPont, John A. Dege  
**Category:** Non-EGU Point  
**States Affected:** DE, KY, LA, MS, NJ, NC, SC, TN, TX, VA, WV

Requested Modification:

Requests changes to numerous facilities and units. Changes include revisions to emissions, heat input capacities, stack parameters, design capacities, plant operating data, SCCs, coordinates and fuel use.

This commenter lists several sources that have been taken out of service or sold.

EPA Final Decision:

Modify inventory as requested.  
No change to growth factor information as this topic was not open for comment during this period.

**Item Number:** VIII-B-207  
**Origin:** L. Siebenberger, Manager- Environmental Technology, National Steel Corporation, Granite City, IL  
**Category:** Non-EGU  
**States Affected:** IL

Requested Modification:

Requests the following changes to the heat utilization rates for 10 boilers, and that these boilers be classified as non-regulated (i.e., with a heat capacity less than 250 mmBtu/hr).

Plant ID 119813 AAI, Point ID 73031119041  
Requests the heat input capacity be changed to 60 mmBtu/hr for these 7 boilers.

Plant ID 119813 AAI, Point ID 73031119042  
Requests the heat input capacity be changed to 60 mmBtu/hr for these 3 boilers.

EPA Final Decision:

Modify inventory as requested. Renumber boilers with increasing alphanumeric (A, B, etc.)

**Item Number:** VIII-B-210  
**Origin:** Union Camp Corporation, Sheryl S. Raulston  
**Category:** Non-EGU Point  
**States Affected:** VA

Requested Modification:

Several sources should be removed from the EPA NOx SIP Call Emission Inventory.

- Point Source ID numbers 006, 007, and 008 are recovery furnaces at our facility.
- Point Source ID numbers 009, 010, and 011 are recovery furnace smelt dissolving tanks at our facility.
- Point Source ID numbers 012, 013, and 014 are lime kilns at our facility.
- Point Source ID number 005 (No. 5 Power Boiler) should be removed from the inventory.
- Point Source ID number 016 (No. 3 Recovery Boiler) should be removed from the inventory.



Several revision/addition request revisions to the NOx SIP call emission inventory for the remaining point sources at the facility not previously addressed above.

The sources remaining on the inventory are Point Source ID number 003 (No. 6 Power Boiler), Point Source ID number 004 (No. 7 Power Boiler), and Point Source ID number 017 (No. 8 Power Boiler).

Also, one new source needs to be added to the NOx SIP emission inventory for our facility. The 910 Gas Turbine started up in 1998 at our facility. The Point Source ID number for the 910 Gas Turbine is 029.

EPA Final Decision:

Modify inventory as requested.

Do not remove any source from inventory as all sources contribute to budget, regardless of source type.

Do not add 910 gas turbine as unit came online after 1995.

**Item Number:** VIII-B-212

Origin: Procter & Gamble Paper Products Company, Janna Stathyelich

Category: Non-EGU Point

States Affected: MO

Requested Modification:

Provided corroborating documents for previous docket number VIII-B-156.

EPA Final Decision:

Addressed in VIII-B-156.

**Item Number:** VIII-B-213

Origin: V.C. Holton, Environmental Manager, Tenneco Packaging, Valdosta, GA

Category: Non-EGU

States Affected: GA

Requested Modification:

Requests modification to capacities, emissions, stack parameter data for multiple facilities.

EPA Final Decision:

Addressed by VIII-B-111.

**Item Number:** VIII-B-214

Origin: Union Camp Corporation, James Witkowski

Category: Non-EGU Point

States Affected: SC

Requested Modification:

Requests modification to NOx Inventory for Union Camp Corporation.

No. 1 Power Boiler

FIPS State Code	47
FIPS County Code	79
Plant Name	Union Camp: Eastover
State Agency Tracking #	1900-0046
Unit ID	001/No. 1 Power Boiler
Change Requested	545 mmBtu/hr maximum design capacity 290 tons 1995 ozone season emissions 1.9 tons 1995 daily ozone season emissions 34% 1995 existing NOx Control efficiency 13.5 feet stack diameter

Sources to be excluded from the inventory

FIPS State Code	47
FIPS County Code	79
Plant Name	Union Camp: Eastover
State Agency Tracking #	1900-0046
Unit ID	02/No. 1 Recovery Furnace 03/No. 1 Lime Kiln CBO (also 016)/No. 2 Recovery Furnace CDO (also 018)/No. 2 Lime Kiln

CEO (also 019)/No. 2 Power Boiler

EPA Final Decision:

Note: FIPSST code assumed "45." This comment is addressed by VIII-B-190.  
Did not exclude units as all sources contribute to budget inventory.

**Item Number:** VIII-B-215

Origin: R. Raney, Director, Division of Pollution Control, Metropolitan Government of Nashville and Davidson County, Nashville, TN

Category: Non-EGU

States Affected: TN

Requested Modification:

Substitute all facility data for Davidson county with data from AIRS-AFS.

EPA Final Decision:

Use AIRS data as requested. This comment overrides VIII-B-103

**Item Number:** VIII-B-218

Origin: City of Philadelphia, Pennsylvania, Morris Fine

Category: Non-EGU Point

States Affected: PA

Requested Modification:

Requests modifications to several sources located in the City of Philadelphia.

EPA Final Decision:

Modify inventory as requested with the exception of the following:

42-101-1551-050	No change as new fuel SCC not provided
42-101-1551-051	No change as new fuel SCC not provided
42-101-1501-007	No change as individual heaters not identified for unit separation
42-101-1501-038	No change as individual heaters not identified for unit separation
42-101-1501-002	No change as unit not found in existing inventory
42-101-1501-022	No change as unit not found in existing inventory
42-101-1501-023	No change as unit not found in existing inventory

**Item Number:** VIII-B-219

Origin: Holnam, Inc., Byron Taylor, Counsel

Category: Non-EGU Point

States Affected: AL

Requested Modification:

Requests modifications to the Holnam facility.

FIPSST	01
FIPS CNTY	097
Plant ID	8026/Holnam
Point ID	006
SCC	39000201
BOILCAP	N/A
DNOx 95	9.266 tons
NOxCE95	0

Emissions are based on AP-42 emission factor of 4.2 lbs/NOx per ton of clinker produced.

EPA Final Decision:

Modify inventory as requested.

As unit operated 283 days for the year, modify days/week to 5 to account for this schedule.

Calculate seasonal emissions accordingly.

**Item Number:** VIII-B-220

Origin: Jefferson Smurfit Corporation, Richard Palicki

Category: Non-EGU Point

States Affected: PA

Requested Modification:

Requests modifications to the NOx SIP Call Inventory for Jefferson Smurfit Corporation.

Number 1 Boiler	240 mmBtu/hr incorrectly listed as 273 mmBtu/hr
Number 2 Boiler	225 mmBtu/hr incorrectly listed as 273 mmBtu/hr

The City of Philadelphia has submitted its own comments in reference to Jefferson Smurfit Corporation (VIII-B-218). This comment is addressed by City of Philadelphia.

EPA Final Decision:  
Modify inventory as requested.

**Item Number:** VIII-B-222  
**Origin:** D.J. Shaw, Assistant Director, Division of Air Resources, New York State Department of Environmental Conservation, Albany, NY  
**Category:** EGU, nonEGU, Mobile  
**States Affected:** NY

**Requested Modification:**  
Requests replacement of existing data set with State provided data.

**EPA Final Decision:**  
**Non-EGU:** Modify as requested.  
**Nonroad:** Modify as requested.  
**Mobile:** Revise the MOBILE input files as requested.  
Retain the use of average monthly temperature ranges for each month, to retain consistency with EPA modeling approach for other states.

**Item Number:** VIII-B-223  
**Origin:** Indiana Department of Environmental Management, Ken Ritter  
**Category:** Non-EGU Point  
**States Affected:** IN

**Requested Modification:**

Requests revision to SCC for multiple units located at INLAND STEEL COMPANY and as submitted in previous comments.

**EPA Final Decision:**  
Modify inventory as requested.

**Item Number:** VIII-B-224  
**Origin:** Lone Star Industries, Inc., Christa Russell  
**Category:** Non-EGU Point  
**States Affected:** IN

**Requested Modification:**  
Requests modifications to the growth factors used in the inventories for Indiana.

**EPA Final Decision:**  
No change to growth factor information as this topic was not open for comment during this period.

**Item Number:** VIII-B-229  
**Origin:** G.M. Roberts, Transportation Director, Alabama Department of Transportation, Montgomery, AL  
**Category:** Mobile  
**States Affected:** AL

Same request and addressed in VIII-B-148.

**Item Number:** VIII-B-232  
**Origin:** L. Eagan, State of Wisconsin, Madison, WI  
**Category:** Non-EGU  
**States Affected:** WI

Requested Modification:  
Numerous changes to non-EGU inventory.

EPA Final Decision:  
Addressed under VIII-B-260.

**Item Number:** VIII-B-235  
**Origin:** T. J. Bach, QEP, Manager, Environmental Services, Natural Gas Pipeline Company of America, KN Energy, Lakewood, CO  
**Category:** Non-EGU  
**States Affected:** IL, MO

Requested Modification:  
Requests unit modification to KN Energy facilities.

EPA Final Decision:  
No change as facility could not be matched to existing inventory.

**Item Number:** VIII-B-239  
**Origin:** T.G. Botkins, Jr., Environmental Manager, Westvaco, Covington, VA  
**Category:** Non-EGU  
**States Affected:** VA

Requested Modification:  
Requestes unit level modifications to Westvaco facility.

EPA Final Decision:  
Assume plant is Covington, VA (51-005-003)  
Modify inventory as requested.

**Item Number:** VIII-B-240  
**Origin:** Great Lakes Gas Transmission Company, Douglas S. Andrews  
**Category:** Non-EGU Point  
**States Affected:** MI, WI

Requested Modification:

Requests capacity changes resulting in reclassification from "large" Non-EGU to "small" Non-EGU for 8 sources.  
Requests stack parameter changes for all 21 units.  
Requests SIC changes for 3 units.  
Requests changes to 1995 daily average uncontrolled ozone season NOx emissions for all of Great Lakes' 21 units.

EPA Final Decision:  
Modify inventory as requested.

**Item Number:** VIII-B-242  
**Origin:** R.P. Berube, Acting Director, Office of Environmental Policy and Assistance, Department of Energy, Washington, DC  
**Category:** Non-EGU  
**States Affected:** TN

Requested Modification:  
Requests modification to multiple boilers at the Oak Ridge Y-12 plant.

EPA Final Decision:  
Modify inventory as requested.  
Change natural gas SCC to 10200601.

**Item Number:** VIII-B-243  
**Origin:** F. George, Sr. Environmental Engineer, Tennessee Gas Pipeline, El Paso Energy, Houston, TX  
**Category:** point  
**States Affected:** AL, KY, IL, IN, MA, MS, NJ, NY, OH, PA, TN

Requested Modification:  
Requests modification to multiple TGP facilities.

EPA Final Decision:  
No change as data submitted can not be matched to existing data set using identifiers supplied.

**Item Number:** VIII-B-246  
**Origin:** Ruth Arisman, Southdown, Inc.  
**Category:** Non-EGU  
**States Affected:** AL, GA, OH, PA

Requested Modification:  
Requests emission modification to multiple Southdown facilities.

EPA Final Decision:  
Addressed by VIII-B-111.

**Item Number:** VIII-B-247  
**Origin:** Solutia, Inc., Charles Chen, PE  
**Category:** Non-EGU Point  
**States Affected:** AL

Requested Modification:  
Requests modifications to the NOX SIP call inventory for Solutia Inc., Decatur Plant.

	Heat Input Corrections	1995 Summer HI	Unit Allocations by HI
Point ID 013 (Boiler #4)	290 mmBtu/hr	1064880 mmBtu	90.5 tons/season
Point ID 014 (Boiler #5)	290 mmBtu/hr	1064880 mmBtu	90.5 tons/season
Point ID 015 (Boiler #6)	320 mmBtu/hr	1175040 mmBtu	99.9 tons/season
Point ID 016 (Coker #1)	384 mmBtu/hr	1410048 mmBtu	119.9 tons/season

Requests addition of points to inventory:

Boiler #7	536.1 mmBtu/hr	1968559 mmBtu	167.3 tons/season
Coker #2	384 mmBtu/hr	1410048 mmBtu	119.9 tons/season

Coker #1 and #2 were built and are being run to produce coke from coal. The coke is sold as a commercial product which makes the units chemical production units not boilers. Heat, in the form of steam, is recovered from the combustion of the volatile removed from the coal. Solutia believes that Coker #1 and #2 should be removed from the list of industrial boilers.

EPA Final Decision:  
Modify capacity and heat input information as provided in comment with following associations as provided by AL:  
Boiler #7 = Point ID 009  
Coker #2 = Point ID 017  
Coker units #1 and #2 will be reclassified based on the information modified in the inventory.

**Item Number:** VIII-B-248  
**Origin:** Lafarge Corporation, Michael Pelan  
**Category:** Non-EGU Point  
**States Affected:** MI, IL, OH, MO, PA

Requested Modification:  
Requests modifications to the NOX SIP call inventory for several sources located in Alpena, Michigan; Grand Chain (Joppa), Illinois; Paulding, Ohio; Sugar Creek, Missouri; and Whitehall, Pennsylvania.

EPA Final Decision:  
Modify inventory as requested with following exceptions:  
No change to growth factor information as this topic was not open for comment during this period.  
MI: Addressed under MI State submittal.  
MO: Addressed under MO State submittal.  
OH: Addressed under OH State submittal.

**Item Number:** VIII-B-249  
**Origin:** General Services Administration West Heating Plant; Steven Williford  
**Category:** Non-EGU  
**States Affected:** DC

Requested Modification:

Requests boiler capacity and emissions revisions to the General Services Administration West Heating Plant in Washington, DC.

EPA Final Decision:

Modify inventory as requested.

**Item Number:** VIII-B-251

Origin: APCA (American Portland Cement Alliance), Tom Carter  
Category: Non-EGU Point  
States Affected: AL, IL, IN, MD, MI, MO, NY, OH, PA

Requested Modification:

Requests changes to 1995 typical ozone season daily NOx, stack parameters, operating information, growth factors, and more for numerous plants.

Requests the addition of the LaFarge - Sugar Creek Plant to the inventory.

EPA Final Decision:

Addressed under MI State submittal.

No change to growth factor information as this topic was not open for comment during this period.

**Item Number:** VIII-B-253

Origin: J. S. Lane, AICP, CAMPO Administrator, Capital Area Metropolitan Planning Organization, Raleigh, NC  
Category: Mobile  
States Affected: NC

Requested Modification:

Does not agree with the EPA estimate for VMT growth for Wake County.

EPA Final Decision:

As the State of NC provided 2007 VMT for the State, this comment is addressed in VIII-B-179.

**Item Number:** VIII-B-256

Origin: M.R. Poole, Ph.D., P.E., Manager, Statewide Planning Branch, North Carolina Department of Transportation, Raleigh, NC  
Category: Mobile  
States Affected: NC

Requested Modification:

Requests modification to State VMT to reflect historical growth rates.

EPA Final Decision:

No modification made as NC DNR supplied VMT for inventory modification.

Addressed under VIII-B-279.

**Item Number:** VIII-B-260

Origin: T. Karman, Wisconsin Department of Natural Resources, Madison, WI  
Category: Non-EGU, Mobile  
States Affected: WI

Requested Modification:

Requests capacity changes to multiple sources.

Requests changes to mobile input files, VMT, VMT growth, speeds, use of MOBILE5b, and updated vehicle registration.

Requests use of speeds developed by SEWRPC for its seven counties and speeds developed by WDOT for the remaining 65 counties. The attached table, WISPEEDS.XLS, compares the speeds by road type and vehicle type for the 65 counties developed by WDOT to those used to model the SIP Call budgets. Speeds for the remaining seven counties were modeled in increments of 5 mph for standard arterials and freeways and non-arterials were modeled at 15 mph and 40 mph. Emission factors modeled at each of these speeds were then multiplied by the fraction of VMT estimated to occur at each of these speeds.

EPA Final Decision:

Modify boiler capacities as requested.

Modify mobile input files, VMT, VMT mix, modeling month as requested.

Speed fractionization not used by EPA as the Agency was unable to duplicate the emission factor modeling by using speed fraction calculation for VMT.

**Item Number:** VIII-B-261

**Origin:** T.J. Bach, Manager, Environmental Services, Natural Gas Pipeline Company of America, a KN Energy, Inc. Company, Lakewood, CO

**Category:** Non-EGU

**States Affected:** IL, MO

Addressed under VIII-B-235

**Item Number:** VIII-B-262

**Origin:** R.F. Hodanbosi, Chief, Division of Air Pollution Control, Ohio Environmental Protection Agency (EPA), Columbus, OH

**Category:**

**States Affected:** OH

**Requested Modification:**

Requests modification to MOBILE model input files and MOBILE model NLEV implementation schedule be modified.

EPA Final Decision:

Modify inventory as requested.

**Item Number:** VIII-B-265

**Origin:** DaimlerChrysler Corporation, Patricia Strabbing

**Category:** Non-EGU Point

**States Affected:** DE, MO

**Requested Modification:**

Requests modification to the NOx SIP call inventory for DaimlerChrysler Newark Assembly Plant in Delaware, and the St. Louis North Assembly Plant in Missouri.

As DaimlerChrysler does not have "large" combustion sources in either plant, therefore EPA should remove both facilities from the proposed list of section 126 sources.

EPA Final Decision:

Addressed by VIII-B-51.

**Item Number:** VIII-B-268

**Origin:** K. Singleton, Henkel Corporation

**Category:**

**States Affected:** OH

**Requested Modification:**

Modifications to Henkel Corporation - Cincinnati Plant (39-061-1431070035).

Addition of units B001, B004, B007, B013, B018, B019, and B031.

These are small units not included in the original data set.

Correction of boiler capacities and base year control efficiencies to B014 and B015.

B014	154 MMBtu/hr	60% NOx
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B015	250 MMBtu/hr	60% NOx
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Addition of boiler characteristics (capacities, stack parameters, emissions, operating schedules, etc.) for other units at the facility.

Removal of units P007, P045, P048, and P053 as they are not NOx emitting sources.

EPA Final Decision:

Modify inventory as requested.

Do not remove units P007, P045, P048, and P053 as they will be used in ozone air quality modeling as CO or VOC emitters.

**Item Number:** VIII-B-269  
**Origin:** Indiana Department of Environmental Management, Janet G. McCabe  
**Category:** Non-EGU  
**States Affected:** IN

**Requested Modification:**  
Requests numerous changes to large Non-EGUs.

Also requests changes to many "sources not listed in any budget categories."

**EPA Final Decision:**  
Modify inventory as requested.

**Item Number:** VIII-B-270  
**Origin:** Essroc Italcementi Group, F. L. Streitman  
**Category:** Non-EGU Point  
**States Affected:** PA

**Requested Modification:**  
Requests modification to the NOx SIP call inventory for Essroc Cement Corp. plants located in Pennsylvania - Bessmer Plant (ID 42-73-26), Nazareth I Plant (ID 42-95-45) and Nazareth III Plant (ID 42-95-49).

**EPA Final Decision:**  
Modify inventory as requested.

**Item Number:** VIII-B-271  
**Origin:** Essroc - Italcementi Group, F.L. Streitman  
**Category:** Non-EGU Point  
**States Affected:** IN

**Requested Modification:**

Plant ID 5, Point ID 401, Segment 1, SCC 30500706  
Plant ID 5, Point ID 413, Segment 1, SCC 30500706

Requests change in operating period to 52 weeks per year for the above two points.  
Requests change in plant name to Essroc Cement Corp.

Plant ID 8, Point ID 011, Segment 1, SCC 30500706  
Plant ID 8, Point ID 012, Segment 1, SCC 30500706

Requests change in operating period to 52 weeks per year for the above two points.  
Requests change in plant name to Essroc Cement Corp for the above two points.  
Requests change in 1995 typical day NOx emissions to 2.4165 tons ( Point 011) and 5.2505 tons (Point 012)

Note - emissions changes are based on CEM data.

Plant ID 8, Point ID 011, Segment 1, 2, and 4

This commenter requests the deletion of the three Segments above and the replacement of them with Plant ID 8, Point ID 011, Segment 1's revised information (see changes above).

Plant ID 8, Point ID 012, Segment 1, 2 and 4, and  
Plant ID 8, Point ID 013, Segment 1

This commenter requests the deletion of the four Segments above and the replacement of them with Plant ID 8, Point ID 012, Segment 1's revised information (see changes above).

**EPA Final Decision:**  
Modify inventory as requested.

**Item Number:** VIII-B-272  
**Origin:** Essroc - Italcementi Group, F.L. Streitman



Category: Non-EGU Point  
States Affected: MD

Requested Modification:  
Plant ID 13, Point ID 3, Segment 1  
Plant ID 13, Point ID 4, Segment 1

Requests changes to plant name, stack parameters, plant operating data, and limited emissions data.

For emissions, specifically requests that the "2007 Typical Ozone Season Saturday NOx Emissions (tons)" category and the "2007 Typical Ozone Season Sunday NOx Emissions (tons)" category indicate emissions equal to the 2007 typical ozone season weekday NOx emissions.

Requests a change in the 1995-2007 growth factor to at least 1.0.

EPA Final Decision:  
Modify base year inventory as requested.  
No change to growth factor information as this topic was not open for comment during this period.

**Item Number:** VIII-B-279  
**Origin:** Michigan Department of Environmental Quality, Dennis Drake  
**Category:** Non-EGU, Mobile  
**States Affected:** MI

Requested Modification:

1. Michigan State University - Partial revision
2. Great Lakes Gas Transmission - Partial revision
3. Steelcase Inc. - Partial revision
4. MEAD Paper Company - Complete replacement
5. National Steel Great Lakes Division - Partial revision  
Plant # 11 not found—not added because seasonal NOx=0
6. Lefarge Corp. - Partial Revision
7. Consumers Energy - Michigan Gas Storage - Partial revision for multiple facilities.

Mobile source revision requests for:

Supplied five MOBILE5a input files each for 1995 and 2007.  
Michigan provided electronic speed files for 1995 and 2007.  
VMT and VMT mixes by vehicle type provided.

EPA Final Decision:  
Modify inventory as requested.  
Revise MOBILE input files as requested.  
Modify VMT, VMT mix as requested.

**Item Number:** VIII-B-280  
**Origin:** P.J. Maciejewski, North American Operations, Worldwide Facilities Group, Detroit, MI  
**Category:** Non-EGU  
**States Affected:** IN, NY, MI

Requested Modification:  
Requests removal of facilities from list of sources identified in Section 126 petitions as these sources do not meet either the source classification definitions, provided in the petitions, or the criteria for applicability in the proposed rule.

EPA Final Decision:  
No modification made to the inventory as information supporting the requested change was not provided.

**Item Number:** VIII-B-281  
**Origin:** M. James, Manager of Transportation Analysis, East Gateway Coordinating Council, St. Louis, MO  
**Category:** Mobile  
**States Affected:** MO

Requested Modification:  
Modifications to MOBILE input files.

EPA Final Decision:  
RVP changed from 7.8 psi to 7.0 psi in St. Louis area, and from 8.7 to 7.2 in Kansas City area as requested.  
Modified I/M program inputs, oxygenated fuel input changes in St. Louis area as requested.

**Item Number:** VIII-B-283  
**Origin:** Jefferson County Department of Health, Henry U. Burnett  
**Category:** Non-EGU Point  
**States Affected:** AL

Requested Modification:  
Requests changes in emissions for the following three points:

Drummond Company, Inc. - change emissions to 1.085 tons per day.

Lehigh Portland Cement Co. - change emissions to 2.234 tons per day.

U.S. Steel Fairfield, Point Source #105 - change emissions to 1.112 tons per day.

Requests that only the Lehigh Portland Cement Co. be included in the SIP Call point inventory, as only the Lehigh Portland Cement Co. is among the RACT control groups specified by the U.S. EPA.

EPA Final Decision:  
Modify U.S. Steel Fairfield, Unit #105 emissions as requested.

As Drummond Co. and Lehigh comments are based on review of large source inventory only and tonnage change request reflects the entire facilities' sources, EPA did not modify the inventory for these sources as the Agency could not determine which of the facilities' sources (large or small) were included or excluded from this change.

**Item Number:** VIII-B-285  
**Origin:** Ohio EPA, Robert F. Hodanbosi  
**Category:** Non-EGU Point  
**States Affected:** OH

Requested Modification:

Plant ID 1431390903, Point ID B001  
Requests the modification of maximum heat input capacity to 164 mmBtu/hr.

EPA Final Decision:  
Modify inventory as requested.

## SECTION III

### RESPONSE TO COMMENTS NOT RELATED TO EMISSION INVENTORY MODIFICATION REQUESTS

By notice dated October 27, 1998, EPA published, "Finding of Significant Contribution and Rulemaking for Certain States in the Ozone Transport Assessment Group Region for Purposes of Reducing Regional Transport of Ozone" (63 FR 57356), which may be referred to as the NO<sub>x</sub> SIP call. The final NO<sub>x</sub> SIP call provided that the opportunity for comment on 2007 baseline sub-inventory revisions would be available for 60 days after signature of the NO<sub>x</sub> SIP call. The EPA received numerous requests to allow more time to accept revisions to source-specific inventory data used to establish each State's base and budget in the NO<sub>x</sub> SIP call and to also allow revisions to VMT projections. Therefore, by notice dated December 24, 1998, EPA published, "Correction and Clarification to the Finding of Significant Contribution and Rulemaking for Purposes of Reducing Regional Transport of Ozone" (63 FR 71220), which may be referred to as the correction notice.

In these notices, EPA reopened and extended the comment period on emissions inventory revisions to 2007 baseline sub-inventory information used to establish each State's budget in the NO<sub>x</sub> SIP call. This included source-specific emission inventory data, data on VMT and nonroad mobile growth rates, VMT distribution by vehicle class, average speed by roadway type, inspection and maintenance program parameters, and other input parameters used in the calculation of highway vehicle emissions. The EPA extended this time period for additional comment to February 22, 1999 in the correction notice.

The EPA believes that the comments indicated below do not request emission inventory revisions to the 1995 base or sub-inventory information necessary for estimating each State's budget. For this reason, these comments are beyond the scope of this rulemaking and therefore the Agency is not responding to these comments in this document.

**Letters:** VIII-B-49, 50, 194, 195, 236, 237, 238, 245, 254, 255, 264, 273

**SUMMARY:** Some commenters generally expressed concern regarding the accuracy of the data included in the EGU inventory. Another commenter requested that EPA perform a quality control on its inventory. One commenter generally noted that EPA has flawed heat input data, and may have incorrect heat rate data, for many units. This same commenter noted that EPA had failed to include numerous combustion turbine units in the EGU inventory. Some commenters noted that the documentation for the data contained in the emissions inventory is insufficient.

**LETTERS:** Consumers Energy (III-D-77), Illinois EPA (III-D-9) (IV-D-5), Indiana Dept. of Environmental Management (IV-D-72), Utility Air Regulatory Group (III-D-71 and VIII-B-197) (inc. by ref. to section 126 docket), West Virginia DEP (VIII-B-173)

**RESPONSE:** As EPA explained in the SIP Call NFR, EPA used the final OTAG version of the inventory for the emission estimates in that November 1997 NPR. EPA then improved the inventory with data supplied by commenters including States and industry through the public comment period. As a result, the revised emissions inventory was the most accurate available for

modeling, strategy analyses, and budget calculation purposes. The inventory has been through numerous versions, each version reviewed and extensively commented on by States, industry, and the public. These inventory data are more accurate than any other data used in the past as the basis for the various State-specific SIP revisions (such as rate-of progress SIP revisions or attainment demonstrations). The EPA considered the inventory data sufficiently accurate for purposes of determining the budgets in the SIP Call Final Rule (63 FR 57356 Oct. 27, 1998). Nonetheless, EPA provided the public including States and sources the opportunity to further comment on the inventories used to calculate the budgets. Initially EPA provided a comment period to November 23, 1998 (63 FR 57356). Later, in response to requests for more time to comment, EPA extended the comment period to February 22, 1999 (63 FR 71220). EPA believes that collectively, the processes described above have given the public ample opportunity to comment on specific data concerns.

**SUMMARY:** Some commenters expressed concern regarding the use of "typical ozone season daily emissions" as listed in the inventory for EGUs. One commenter requested that EPA confirm that the daily NO<sub>x</sub> tons attributed to individual units in the Oct 1998 inventory are not final and that they do not have any particular relevance outside the context of the OTAG modeling. Others noted that there is considerable confusion as to just how these estimates were calculated, objected to the use of these "daily" estimates, and suggested that EPA provide a more detailed explanation of its estimation methodology and allow the opportunity for review and comment on these estimates.

**LETTERS:** Utility Air Regulatory Group (VIII-B-197) (III-G-150), VA Power (VIII-B-168), Old Dominion Electric Cooperative (VIII-B-165)

**RESPONSE:** For EGUs the data at issue is not relevant to the calculation of the 2007 baselines or the SIP Call budgets. Therefore, these comments are beyond the scope of this rulemaking and the Agency is not responding to the comments.

**SUMMARY:** One commenter noted generally that the numerous errors in the inventory call into question the validity of the NO<sub>x</sub> SIP Call as well as the 126 and FIP rulemakings. This commenter added that seeking emissions inventory input three months after using the inventory to support the final SIP call rule and as part of the rulemaking process in the proposed section 126 rule and the proposed FIP rule violates the statutory requirements of the rulemaking process. This commenter also noted that the Agency violated procedures to publish proposed rules as established under the CAA and the APA, and that EPA's approach does not allow affected entities to adequately verify data and methodologies.

**LETTERS:** Council of Industrial Boiler Owners (VIII-B-134) (IV-G-98)

**RESPONSE:** As stated in the preamble to this rule, EPA believes it has complied with the procedural requirements that apply to this rulemaking. The EPA effectively reopened for reconsideration only a very narrow aspect of the SIP Call rule and comments on any other aspect of the SIP Call are not germane to this rulemaking. Further, comments on the Section 126 and FIP rulemakings fall outside the scope of this rule.

**SUMMARY:** One commenter asserted that EPA has inappropriately imposed its burden of accurately analyzing data in the inventory on affected entities, and that the CAA and the APA do not require affected entities to redo the work of the Agency.

**LETTERS:** Council of Industrial Boiler Owners (VIII-B-134) (IV-G-98)

**RESPONSE:** The EPA disagrees with the commenter's characterization of events. The inventories were a topic for comment in the SIP call rulemaking, for which the final rule was published October 1998. In the current rulemaking, EPA provided an additional opportunity to comment on inventory data. In both rulemakings, EPA engaged in the ordinary procedures for rulemaking with respect to the inventory data, allowing the public an opportunity to comment on the inventory data on which EPA proposed to rely.

**SUMMARY:** One commenter noted that the CAA and the APA require that the underlying data and assumptions be sufficiently transparent for the regulated community to make sense of the rule, and that the budget allocation process and the documents and computer databases associated with the process is extremely confusing.

**LETTERS:** Council of Industrial Boiler Owners (VIII-B-134) (IV-G-98)

**RESPONSE:** As stated in the preamble to this rule, EPA believes it has complied with the procedural requirements that apply to this rulemaking. The underlying data were made available to the public and EPA staff were available to answer questions from the public concerning the data. Further, in light of the complexity of the data and requests from the public, EPA extended the period of opportunity to comment.

**SUMMARY:** One commenter specifically requested that EPA postpone the SIP submittal deadline to April 27, 2000 as allowed under the CAA, since States do not have adequate time to implement the budget allocations to individual sources. This commenter added that many States cannot adopt permanent rules to comply with the SIP call in time to prevent EPA from invoking a FIP.

**LETTERS:** WV DEP (VIII-B-173)

**RESPONSE:** This comment is beyond the scope of this rulemaking and therefore the Agency is not responding to the comment.