From: WILLIAMS Karen
To: ALLEN Philip
Cc: Infrastructure2018
Subject: EPA comments to interstate SIP draft
Date: Wednesday, June 20, 2018 18:52:41

Phil,

EPA – Claudia Vaupel - has reviewed a draft of the interstate SIP I sent last week. Claudia has asked for us to "elaborate" on why we think EPA's modeling is representative for Oregon. In particular, she'd like to see a statement about the emissions inventory data EPA used and their 2023 projections. As an example, she asks if "the EI accounted for any EGU's expected to be shut down," referring to Boardman. I asked how we would know how EPA's model – and the EI data that was input – accounted for particular future occurrences to this level of detail? She suggested I review the files at this link and "ask one of your modelers to help you." I started reviewing the Technical Support Document found at this link for "2011v6.3 Update for 2011 el and 20233el" and found this on page 33:

"4.1 EGU sector projections (ptegu)
The future-year data for the ptegu sector used in the air quality modeling were created by IPM version 5.16. The IPM is a multiregional, dynamic, deterministic linear programming model of the U.S. electric power sector. IPM version 5.16 reflects state rules, consent decrees and announced shutdowns forecast through calendar year 2023."

Based on that underlined sentence, and since Boardman is going to shut down in 2020, I think I can say, "yes" to Claudia's for-instance question. I also noted later in the document (p. 82) that the EI projections considered states that adopted California's LEV standards.

Could I ask you to review what I propose writing below (with my additions to draft language noted in red) and suggest any additions or corrections? Thank you, Phil, for all your assistance.

DEQ considers the 2011 base year emissions inventory used in the modeling to be representative, and also finds the projected 2023 emissions reasonable for Oregon. For example, in projecting 2023 emissions, EPA's emissions inventory took into account state rules and announced shutdowns of electric generating units (footnote with page citation) such as Oregon's 2020 shutdown of the Boardman power plant, announced in 2010 (footnote w/link to DEQ website). EPA's model also used emissions inventory projections that considered states, such as Oregon, that have adopted California's Low Emission Vehicles III program (footnote with link). Based on DEQ's review of the technical supporting documents, the results of the model performance evaluation and the modifications made in response to public comment, DEQ is confident that the modeled data provided by EPA in the March 27, 2018, memorandum accurately represent likely Oregon ozone contributions to downwind monitors.

Karen Font Williams | Air Quality Planner
DEQ Air Quality Division
700 NE Multnomah St., Ste. 600 | Portland, OR 97232

(503) 229 - 5519