

January 2014

**Did EPA evaluate the PM<sub>2.5</sub> SIP and RACT analysis? What was their feedback?**

Yes. The EPA evaluated the PM<sub>2.5</sub> SIPs and DAQ's RACT analysis. EPA submitted numerous comments on DAQ's RACT analysis and the limits established in the SIPs as a result of the RACT analysis. EPA provided five primary comments, repeated for each point source.

EPA Comment 1: EPA could not determine the relationship between modeled emissions and SIP allowable emissions.

DAQ Response: The DAQ is developing a table to clearly show the relationship between modeled vs. allowable emissions. EPA is also requesting justification if there is a large discrepancy between these values. The DAQ will include information justifying the instances where there is a large difference in the two values.

EPA Comment 2: EPA is concerned that not all equipment identified as RACT in the RACT Evaluation Report is listed in Subpart H of the SIP.

DAQ Response: All equipment for which a RACT evaluation was conducted and RACT implementation is required has an associated limit in Subpart H. If no RACT implementation was required, the equipment is already at least RACT and likely at BACT, and is controlled by the permit.

EPA Comment 3: EPA is concerned that in many instances the SIP does not list specific equipment, but rather numerical limits.

DAQ Response: The DAQ opted in many cases to establish numerical limits for RACT implementation, rather than identify specific control equipment requirements. This approach allows the source to install new controls that are likely more efficient than the limitations established through RACT and may provide for even more reductions.

EPA Comment 4: EPA commented that all emission limitations must apply at all times, not just during steady-state operation (i.e., during start-up and shut-down periods).

DAQ Response: The DAQ has been discussing this issue with EPA and industry for some time and has identified an approach to potentially resolve this concern. As part of the development of the Subpart IV SIP the DAQ is considering establishing two emission limits, one limit for start-up and shut-down periods and one limit for normal operation.

EPA Comment 5: EPA wants many permit requirements to be listed in the SIP.

DAQ Response: The DAQ does not believe including numerous permit requirements to the SIP provides any value added. The DAQ enforces permit conditions as vigorously as it enforces SIP requirements. EPA also requested clarification on the reports and the limits in the SIP. Clarifications have been provided in the response to comments.