

**Appendix F-3: EPA/FLM/Stakeholder Outreach
and Presentations: F-3a - F-3h**

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Appendix F-3a - Consultation Record

VISTAS
FLM/EPA Consultation Record
As of October 26, 2020

1. December 5-7, 2017 – Denver, national RH meeting, various presentations – FLMs, EPA OAQPS, Region 3, Region 4, RPOs, various VISTAS agency attendees
2. January 31, 2018 – teleconference, presentation – FLMs, EPA Region 4, CC/TAWG
3. August 1, 2018 – teleconference, presentation – FLMs, EPA OAQPS, Region 3, Region 4, CC/TAWG
4. September 5, 2018 – teleconference, presentation – MJOs
5. June 3, 2019 – teleconference, presentation – FLMs, EPA OAQPS, Region 3, Region 4, CC/TAWG
6. October 28-30, 2019 – St Louis national RH meeting, various presentations – FLMs, EPA OAQPS, Region 3, Region 4, RPOs, various VISTAS agency attendees
7. April 2, 2020 – teleconference, presentation – FLMS, EPA OAQPS, Region 3, Region 4, CC/TAWG
8. April 21, 2020 – teleconference, presentation – MJOs
9. May 11, 2020 – teleconference, presentation – FLMs, EPA OAQPS, Region 3, Region 4, CC/TAWG
10. May 20, 2020 – webinar, presentation – stakeholders, FLMs, EPA OAQPS, Region 3, Region 4, RPOs and member states, STAD, CC/TAWG
11. July 30, 2020 – webinar, presentation – EPA Region 3, Region 4, and OAQPS
12. August 4, 2020 – webinar, presentation, FLMs, EPA OAQPS, Region 3, Region 4, RPOs and member states, CC/TAWG
13. October 26, 2020 – webinar, presentation, EPA Region 3, Region 4 during the Fall 2020 air directors' meeting

**Appendix F-3b - National Regional Haze Meeting Denver,
Colorado December 5-7, 2017**



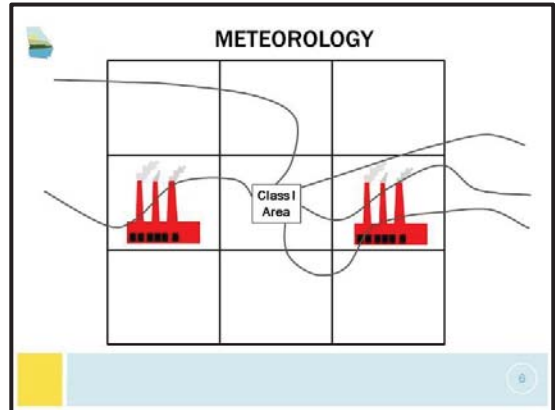
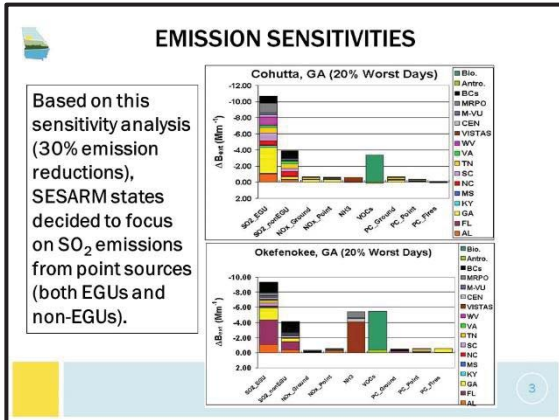
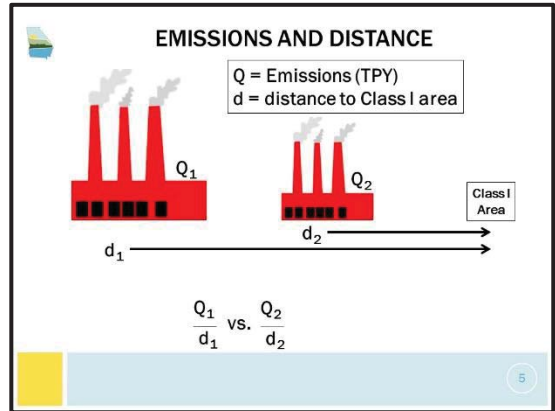
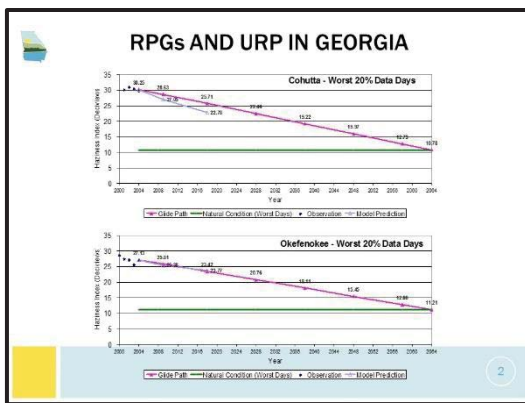
Georgia's Approach for Estimating Reasonable Progress in Round 1

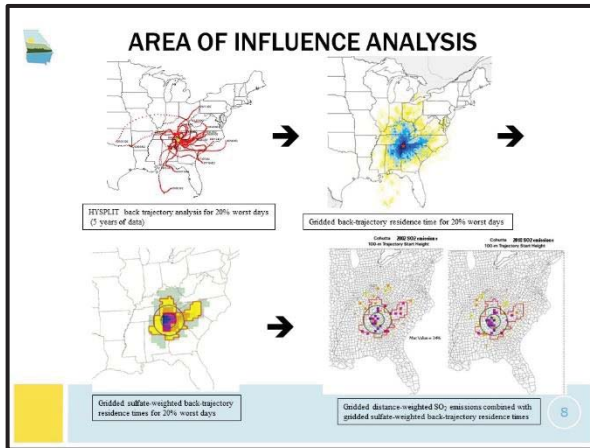
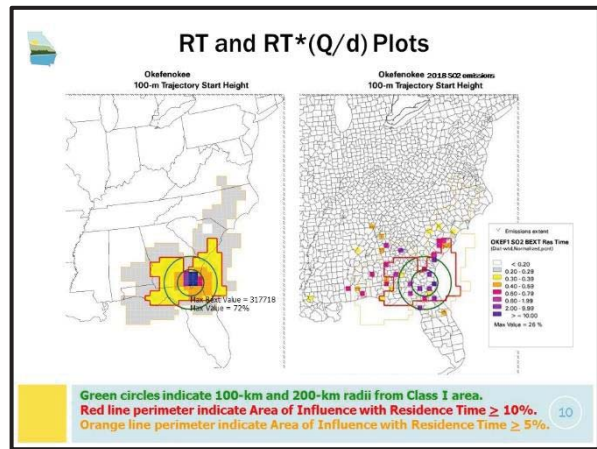
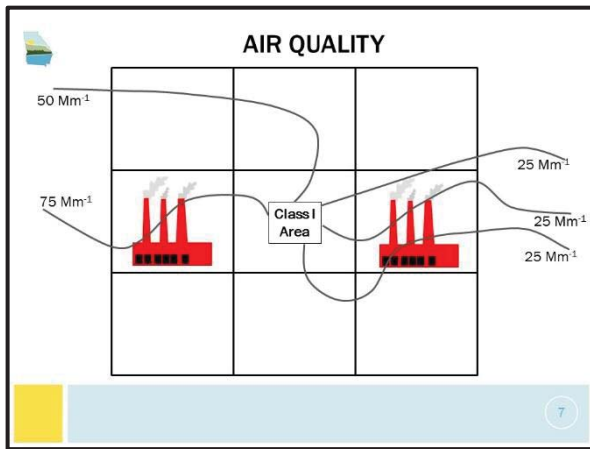
Jim Boylan
Manager, Planning & Support Program
Georgia EPD - Air Protection Branch

Round 2 Regional Haze Planning Workshop
Denver, CO
December 5, 2017

REASONABLE PROGRESS (RP)

- Area of Influence (Q/d^*RT) analysis with 2002 and 2018 emissions
 - This work was performed by SESARM contractors
 - Can be used to screen sources for 4-factor analysis
 - 2018 emissions are more appropriate than 2002 since we are looking at additional controls beyond "on-the-books"
- 4-Factor Analysis
 - This work was performed by the individual SESARM states and was very time consuming (similar to BACT analysis)
 - Cost of compliance (GA EPD included visibility impacts)
 - Time necessary for compliance
 - Energy and non-air quality impacts
 - Remaining useful life of source





SOURCE CONTRIBUTION AT OKEF

Plant	ID	SO ₂ Tons (2002) (2018)	CE	d (km)	Q/d	RT	RT*Q/d	0.8134	0.8134
FL SAINT JOHNS RIVER	17	10,185	7,420	90	65.12	113.95	65.70	7486.4	0.5271
FL SAINT JOHNS RIVER	16	11,076	5,862	90	65.12	80.33	65.70	5924.6	0.5323
FL JEFFERSON SMURFIT CORPORATION (US)	15	3,242	3,639	4	64.58	56.30	71.58	4093.5	0.0000
FL CEDAR BAY GENERATING COMPANY L P	GEN1	0	2,227	90	61.17	36.41	65.70	2360.1	0.0534
GA GEORGIA PACIFIC BRUNSWICK OPERATIONS	BR01	1,642	1,822	4	75.42	24.41	77.47	1734.5	0.0389
FL RAYONIER PERFORMANCE FIBERS LLC	6	1,075	1,256	0	63.34	19.83	71.58	1419.7	0.0917
FL SEMINOLE ELECTRIC COOPERATIVE, INC.	1	10,912	6,779	95	121.83	55.64	22.84	1276.5	0.0280
FL SEMINOLE ELECTRIC COOPERATIVE, INC.	2	12,775	6,568	95	121.83	53.43	22.84	1225.4	0.0274
FL WHITE SPRINGS AGRICULTURAL CHEMICALS INC	66	1,140	1,496	0	69.66	21.39	48.81	1044.0	0.0233
FL WHITE SPRINGS AGRICULTURAL CHEMICALS INC	67	996	1,368	0	69.66	18.69	48.81	912.3	0.0204
FL IFF CHEMICAL HOLDINGS, INC.	3	624	733	0	56.66	12.94	65.70	850.1	0.0190
FL GEORGIA PACIFIC CORP PULP/PAPER MILL	15	3,703	4,339	0	125.35	34.48	22.94	790.9	0.0177
GA INTERNATIONAL PAPER SAVANNAH MILL	IP013	1,040	1,318	4	119.34	47.76	15.53	743.9	0.0169
FL MILLENNIUM SPECIALTY CHEMICALS	6	505	590	0	60.48	9.76	65.70	641.5	0.0143
FL SAVANNAH ELECTRIC MOUNTAIN STEAM ELECTRIC	SE001	7,050	7,015	0	201.59	34.80	15.51	539.7	0.0120
GA LESP MILL BAYONIER PERFORMANCE FIBERS	BR02	156	101	4	108.37	3.7	77.59	419.9	0.0094
FL PROGRESS ENERGY FLORIDA, INC. CRYSTAL R	2	20,728	15,241	0	208.50	74.06	5.47	405.1	0.0090
FL SAVANNAH ELECTRIC KRAFT STEAM ELECTRIC	SE003	3,992	4,174	0	192.45	24.52	15.53	380.9	0.0085
FL PROGRESS ENERGY FLORIDA, INC. CRYSTAL R	1	18,998	13,537	0	203.80	65.78	5.47	359.9	0.0080
GA GEORGIA POWER COMPANY MITCHELL STEAM EL	SI003	4,173	4,930	0	206.79	23.94	14.43	344.0	0.0077
FL JEFFERSON SMURFIT CORPORATION (US)	6	287	300	0	64.42	4.66	71.58	333.3	0.0074
SC SCE&S CANADYS	001	6,214	6,203	0	208.33	17.62	16.79	295.9	0.0065
FL MILLENNIUM SPECIALTY CHEMICALS	5	237	259	0	60.48	4.45	65.70	292.7	0.0065
SC SCE&S CANADYS	002	6,589	5,144	0	206.35	17.42	16.79	292.4	0.0065
FL GEORGIA PACIFIC CORP PULP/PAPER MILL	15	1,354	1,811	4	125.35	12.59	22.94	289.9	0.0064
FL ANCHOR GLASS CONTAINER CORPORATION	4	161	212	0	59.04	3.60	65.70	236.5	0.0053
FL ANCHOR GLASS CONTAINER CORPORATION	3	156	206	0	59.04	3.40	65.70	229.1	0.0051
GA LESP MILL BAYONIER PERFORMANCE FIBERS	BR01	286	334	0	105.68	3.15	77.59	226.7	0.0050
GA LESP MILL BAYONIER PERFORMANCE FIBERS	BR01	285	333	0	106.22	3.14	77.59	224.5	0.0050

- ### GEORGIA'S RP APPROACH
- Determined Area of Influence (AoI) based on normalized sulfate weighted residence times (RT)
 - If $RT \geq 5\%$ → included in AoI
 - Calculated percent contribution caused by sulfates at Class I areas from sources located in the AoI
 - Based on RT*(Q/d) Excel spreadsheets created by VISTAS
 - Q = 2018 SO₂ emissions
 - If contribution $\geq 0.5\%$ → added to RP list
 - Class I areas near Northern GA
 - COHL, GRSM, SHRO, etc. (meeting glide slope)
 - Removed EGUs from the list (CAIR = Reasonable Progress)
 - Class I areas near Southern GA
 - OKEF, WOLF, SAMA, etc. (NOT meeting glide slope)
 - Considered EGUs and non-EGUs
 - Analysis done on each individual emissions unit
- 9

SOURCE CONTRIBUTION AT WOLF

Plant	ID	SO ₂ Tons (2002) (2018)	CE	d (km)	Q/d	RT	RT*Q/d	0.8134	0.8134
GA GEORGIA PACIFIC BRUNSWICK OPERATIONS	BR01	1,642	1,822	4	75.42	24.41	77.47	1734.5	0.0389
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RPGs IN GEORGIA

- Adjusted future year visibility projections using facility-specific sensitivity results from the model to account for additional emission controls.
 - No need to rerun model for final RPGs.
 - Allows for multiple updates to final control limits

Facility Name	Unit	2018 SO2	CO2E	GRSN	OKER	ROSA	SAMA	SFS	WOLF
GEORGIA PACIFIC CORPORATION, CUMBER SPIN	R402	1725.31	-0.0775	-0.0230	-0.0067	-0.0060	-0.0034	-0.0004	-0.0010
GEORGIA PACIFIC CORPORATION, CUMBER SPIN	U360	2425.18	-0.0099	-0.0121	-0.0097	-0.0097	-0.0048	-0.0000	-0.0001
GEORGIA PACIFIC CORPORATION, CUMBER SPIN	U361	2425.00	-0.0084	-0.0117	-0.0097	-0.0097	-0.0050	-0.0004	-0.0007
GEORGIA POWER COMPANY, WICHITA PLANT #1	R003	2925.74	-0.0094	-0.0062	-0.0020	-0.0019	-0.1701	-0.0014	-0.1475
GEORGIA PACIFIC, BRUNSWICK OPERATIONS	U1	1164.37	-0.0181	-0.0174	-0.0149	-0.0149	-0.0024	-0.0010	-0.1176
GEORGIA PACIFIC, BRUNSWICK OPERATIONS	R01	1074.00	-0.0011	-0.0001	-0.0020	-0.0014	-0.0001	-0.0002	-0.0132
GEORGIA PACIFIC, CUMBER SPIN	R001	1114.24	-0.0014	-0.0011	-0.0000	-0.0023	-0.0020	-0.0020	-0.0074
GEORGIA PACIFIC, CUMBER SPIN	R002	1415.17	-0.0000	-0.0001	-0.0001	-0.0011	-0.0001	-0.0001	-0.0007
GEORGIA PACIFIC, CUMBER SPIN	R005	1282.60	-0.0024	-0.0000	-0.0043	-0.0043	-0.0014	-0.0014	-0.0042
INLAND PAPERBOARD & PACKAGING, INC - 428	T8	1147.17	-0.0066	-0.0064	-0.0054	-0.0054	-0.0013	-0.0010	-0.0174
INLAND PAPERBOARD & PACKAGING, INC - 218	T1	1086.13	-0.1099	-0.1217	-0.0628	-0.0628	-0.0447	-0.0738	-0.0317
INTERNATIONAL PAPER, SAVANNAH #1	PH11	1075.26	-0.1623	-0.0987	-0.0208	-0.1213	-0.1201	-0.0051	-0.0600
INTERNATIONAL PAPER, SAVANNAH #1	T1	117.00	-0.0028	-0.0010	-0.0031	-0.0021	-0.0010	-0.0010	-0.0112
IRB PAPER, KAYSONER PERFORMANCE FIBER	PH11	1066.00	-0.0010	-0.0010	-0.0010	-0.0010	-0.0010	-0.0010	-0.0010
IRB PAPER, KAYSONER PERFORMANCE FIBER	PH12	622.15	-0.0010	-0.0010	-0.0010	-0.0010	-0.0010	-0.0010	-0.0010
IRB PAPER, KAYSONER PERFORMANCE FIBER	PH13	332.24	-0.0010	-0.0010	-0.0010	-0.0010	-0.0010	-0.0010	-0.0010
IRB PAPER, KAYSONER PERFORMANCE FIBER	PH14	333.47	-0.0010	-0.0010	-0.0010	-0.0010	-0.0010	-0.0010	-0.0010
PACKAGING CORPORATION OF AMERICA - VALD	U17	553.37	-0.0013	-0.0003	-0.0012	-0.0012	-0.0011	-0.0001	-0.0004
SAY ANNE HILL TRK. KRAFT SYSTEM - ELECTRI	SG01	696.72	-0.0110	-0.0040	-0.0051	-0.0074	-0.0038	-0.0003	-0.0090
SAY ANNE HILL TRK. KRAFT SYSTEM - ELECTRI	SG02	701.40	-0.0112	-0.0041	-0.0050	-0.0074	-0.0039	-0.0004	-0.0091
SAY ANNE HILL TRK. KRAFT SYSTEM - ELECTRI	SG03	4874.17	-0.0715	-0.0260	-0.0278	-0.0482	-0.0572	-0.0486	-0.2528
SAY ANNE HILL TRK. WESTERN SYSTEM - ELECT	SG04	705.13	-0.1088	-0.0609	-0.0471	-0.1110	-0.1217	-0.0953	-0.6221
SAY ANNE HILL TRK. WESTERN SYSTEM - ELECT	U101	997.42	-0.0884	-0.0880	-0.0841	-0.1104	-0.1109	-0.1111	-0.6879
WACHSHEIM STATES PRODMATH & FERTILIZER C	W001	997.40	-0.0813	-0.0809	-0.0809	-0.1001	-0.1011	-0.0809	-0.6817



CONTACT INFORMATION

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GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

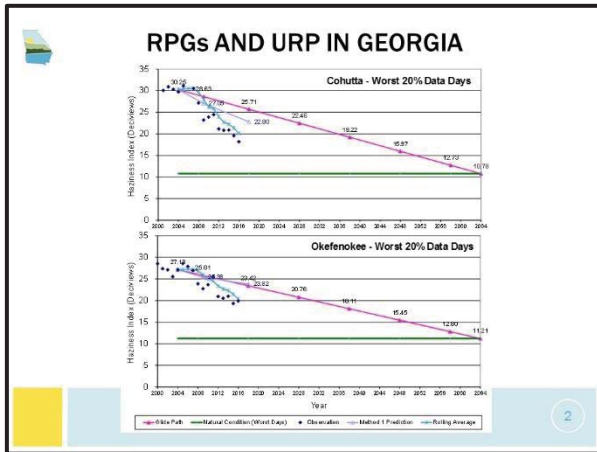
Georgia's Approach for Estimating Reasonable Progress in Round 2

Jim Boylan
Manager, Planning & Support Program
Georgia EPD - Air Protection Branch

Round 2 Regional Haze Planning Workshop
Denver, CO
December 7, 2017

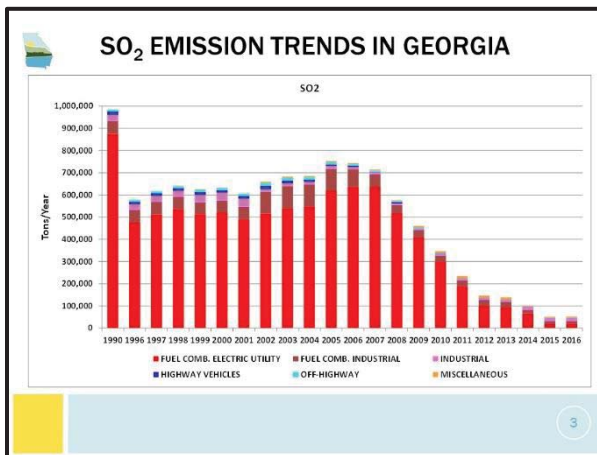
EPA PSAT RESULTS

Based on this analysis, SESARM states will likely focus on SO₂ emissions from point sources (both EGUs and non-EGUs).



REASONABLE PROGRESS (RP)

- Area of Influence (Q/d*RT) analysis with 2011 and 2028 emissions
 - This work will be performed by SESARM contractor
 - Can be used to screen sources for 4-factor analysis
 - 2028 emissions are more appropriate than 2011 since we are looking at additional controls beyond "on-the-books"
 - If contribution > threshold → added to list for RP analysis
 - Thresholds for areas on or below the URP should be less restrictive than areas above the URP**
 - Screening analysis done at facility-level (not unit-level)
- 4-Factor Analysis - performed by SESARM states
 - May include single-source sensitivity modeling or source apportionment to calculate visibility impacts (Mm⁻¹/ton, \$/Mm⁻¹)

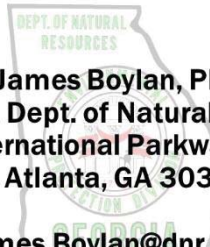


SCREENING EXAMPLES

Cohanutta Wilderness Area			Okfeokee National Wildlife Refuge		
Plant	Fraction	Total	Plant	Fraction	Total
1. TGA WOODS CREEK	0.12%	12.50%	1. LEWIS JONES BEVER	0.30%	30.00%
2. ZEPHYRUS NEWSPRINT & DIRECTORY - CAULKIN	0.12%	12.50%	2. JEFFERSON SAHRT (CORPORATION (LS))	0.30%	31.50%
3. BOSTERMAN HOLDINGS, INC.	0.01%	0.10%	3. BERKELEY ELECTRIC COOPERATIVE, INC.	0.20%	21.00%
4. GEORGIA POWER COMPANY - BOWEN STEAM ELECT.	0.43%	43.00%	4. EDEAR BAY CHEMISTATIC COMPANY L.P.	0.50%	52.50%
5. GEORGIA POWER COMPANY - YATES STEAM ELECT.	0.17%	17.14%	5. WHITE SPRINGS AGRICULTURAL CHEMICALS, INC.	4.50%	47.25%
6. POLARIS PACKAGING & PACKAGING, INC. (LX)	0.13%	13.50%	6. GEORGIA PACIFIC BROWNSUCK OPERATORS	4.43%	46.68%
7. GEORGIA POWER COMPANY - HAMMOND STEAM ELE	3.04%	30.94%	7. HAYWARD PERFORMANCE FIBERS, LLC	3.60%	37.60%
8. KEMUR ENERGY, LLC	2.33%	23.87%	8. GEORGIA PACIFIC CORP - PULP/PAPER MILL	2.14%	22.42%
9. VITA RILL BURN FOSSEL PLANT	2.00%	20.67%	9. MILLENNIUM SPECIALTY CHEMICALS	2.53%	26.55%
10. E. I. DU PONT DE NEMOURS AND COMPANY	1.90%	19.64%	10. PROGRESS ENERGY FLORIDA, INC. CRYSTAL RD	2.35%	24.50%
11. ALUMINUM COMPANY OF AMERICA - SOUTH PLANT	1.90%	19.64%	11. FIF CHEMICAL HOLDINGS, INC.	1.90%	19.95%
12. VITA KINGSTON FOSSEL PLANT	1.60%	16.67%	12. GESP MILL - HAYWARD PERFORMANCE FIBERS	1.92%	19.78%
13. V. E. STATE FIBRE FACTURING COMPANY	1.60%	16.67%	13. INTERNATIONAL PAPER - SAVANNAH MILL	1.17%	12.25%
14. CHEMICAL PRODUCTS CORPORATION	1.50%	15.60%	14. SCSG CANNISAYS	1.45%	15.10%
15. ALABAMA POWER COMPANY - GORGAS	1.50%	15.60%	15. SAVANNAH ELECTRIC - MCINTOSH STEAM - ELEC	1.24%	12.94%
16. WELLS RIDGE PAPER PRODUCTS - CANTON MILL	1.50%	15.60%	16. SAVANNAH ELECTRIC - KNOX 1 STEAM - ELECTRIC	1.50%	15.60%
17. HAWKING INDUSTRIES - SOUTH HAMILTON STREET	1.33%	13.90%	17. ANCHOR GLASS CONTAINER CORPORATION	1.17%	12.25%
18. WEAVER (ALABAMA), INC.	0.93%	9.78%	18. GEORGIA POWER COMPANY - YATES STEAM ELEC	1.86%	19.43%
19. WILSON VERNON MILLS, INC. - JEFFERSON FABRIC	0.93%	9.78%	19. SANTEE COOPER JEFFERSON	0.96%	10.17%
20. WYOMING INDUSTRIES GROUP, INC. PLANT WD	0.80%	8.40%	20. GEORGIA PACIFIC CORP - SAVANNAH RIVER MILL	0.82%	8.61%
21. DOWME ENERGY CORPORATION - BOWEN STEA	0.73%	7.67%	21. GEORGIA POWER COMPANY - MITCHELL STEAM ELE	0.73%	7.67%
22. WYOMING INDUSTRIES GROUP, INC. PLANT 80	0.73%	7.67%	22. BUCKEYE FLORIDA LIMITED PARTNERSHIP	0.71%	7.47%
23. ALABAMA POWER COMPANY - E. C. GASTON	0.73%	7.67%	23. SANDERS LEAD CO	0.63%	6.62%
24. EASTMAN CHEMICAL COMPANY	0.71%	7.47%	24. CENTRAL CARBON COMPANY	0.63%	6.62%
25. SOUTHERN, INC.	0.70%	7.35%	25. GULF POWER COMPANY - GREST	0.56%	5.88%
26. GEORGIA POWER COMPANY - WINDLEY STEAM ELE	0.62%	6.51%	26. SANTEE COOPER GREST	0.57%	5.98%
27. DOWME ENERGY CORPORATION - CLIFSIDE STEA	0.72%	7.56%			
28. CHEM TECH FRESHBET	0.62%	6.51%			
29. AMERICAN ELECTRIC POWER - CINCINNATI RIVER PLA	0.62%	6.51%			
30. GEORGIA POWER COMPANY - MCDONOUGH STEAM E	0.62%	6.51%			
31. CONTINENTAL CARBON COMPANY	0.61%	6.41%			
32. LULU GAS & ELECT. MILL CREEK	0.60%	6.30%			
33. U.S. DEPARTMENT OF ENERGY - Y-12 PLANT	0.53%	5.57%			
34. DOWME ENERGY CORPORATION - BUCK STEAM STA	0.52%	5.46%			
35. TITANESS ALLIOTS CORPORATION	0.47%	4.94%			
36. CARANAFARM MILL GROUP, INC.	0.43%	4.52%			
37. WYOMING INDUSTRIES GROUP, INC. PLANT 80	0.42%	4.41%			
38. ALABAMA POWER COMPANY - MILLER POWER PLANT	0.38%	3.99%			
39. PSI ENERGY - GALLAGHER	0.38%	3.99%			




CONTACT INFORMATION



**James Boylan, Ph.D.
Georgia Dept. of Natural Resources
4244 International Parkway, Suite 120
Atlanta, GA 30354**

**James.Boylan@dnr.ga.gov
404-363-7014**





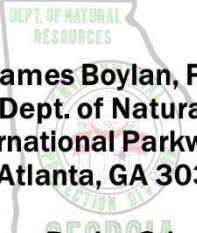
GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Projecting Emissions to 2028 in the Southeast

Jim Boylan
Manager, Planning & Support Program
Georgia EPD - Air Protection Branch

Round 2 Regional Haze Planning Workshop
Denver, CO
December 6, 2017

CONTACT INFORMATION



James Boylan, Ph.D.
Georgia Dept. of Natural Resources
4244 International Parkway, Suite 120
Atlanta, GA 30354

James.Boylan@dnr.ga.gov
404-363-7014

EPA PLATFORM

- SESARM plans to use EPA's 2011/2028 modeling platform (v6.3e1)
 - SESARM will make adjustments to 2028 point sources
- Reasons for going with EPA's platform
 - Timing
 - Will not meet SIP deadline with any other option
 - Budget
 - Regional Haze budget significantly less in Round 2 compared to Round 1
 - Most of the sources sectors are reasonably represented in EPA's platform (i.e., SIP quality)

POINT SOURCE ADJUSTMENTS

- SESARM plans to make adjustments to point sources in EPA's 2011/2028 modeling platform
- EGU Point Sources
 - EPA modeling used IPM and assumed CPP controls
 - Option 1 - Use ERTAC EGU 2028 SMOKE files to replace IPM
 - Option 2 - Scale the EPA 2028 hourly EGU emissions up/down based on ERTAC EGU annual emission and/or state feedback
- Non-EGU Point Sources
 - Scale the EPA 2028 hourly non-EGU emissions up/down based on feedback from SESARM states
 - Plan to look at 2016 NEI and EPA's non-EGU updates in most recent 2017 and 2023 transport modeling

ERTAC EGU Projection Tool: Origin and Uses



Combined cycle facility under construction, slated to begin commercial operations in 2018

Doris McLeod ¹
 Julie McDill, PE ²
 Byeong-Uk Kim, PhD ³
 Jin-Sheng Lin, PhD ¹
 Joseph Jakuta ⁴
 Mark Janssen ⁵

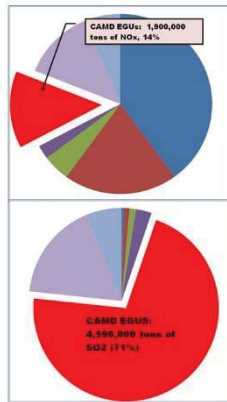
¹ Virginia Department of Environmental Quality
² Mid-Atlantic Regional Air Management Association
³ Georgia Environmental Protection Division
⁴ Ozone Transport Commission
⁵ Lake Michigan Air Directors Consortium

Attributes of ERTAC Model

- **Conservative** – no big swings in power generation.
- **Data intensive** – needs substantial state-supplied data.
- **Regional and fuel modularity.**
- **Calculates future hourly estimates based on base year activity.**
- **Test hourly reserve capacity.**
- **Quickly evaluates various scenarios;**
 - e.g., unit retirement, growth, and control

CAMD EGU Data

- **Clean Air Markets Division**
- **High quality hourly data in electronic format reported under 40 CFR Part 75 for fossil fuel fired units > 25 MWs**
 - Activity (heat input, gross load)
 - Emissions (usually NO_x, SO₂, and CO₂)
- **Emission contributions of the EGU sector**
 - **2011 CAMD data: ≈4,800 unique units**
 - 14% of the NO_x inventory
 - 71% of the SO₂ inventory



*Data from 2011 NEIv1

Introduction to ERTAC EGU v2.7

State and planning organization collaboration to build a model to project future EGU emissions suited to state air quality planning

Starting Points

- **Base Year (BY) hourly continuous emissions monitor (CEM) data**
 - BY & FY unit activity matches meteorology
 - More realistic for SIP modeling
- **Regional growth rates (GRs) – EIA AEO2017 & NERC**
- **Information Supplied By States as of Spring 2017**
 - New units, retirements,
 - Controls, fuel-switches, other

ERTAC EGU Tool Generates Future Hourly Estimates

- **Regional unit capacity never exceeded**
 - Unmet demand applied to other units
 - Generation deficit units (GDUs) created if demand exceeds system capacity on an hourly basis



Hourly Emissions Converted to SMOKE Format for AQ Modeling

Eastern Regional Technical Advisory Committee (ERTAC)

- **ERTAC EGU growth convened 2009**

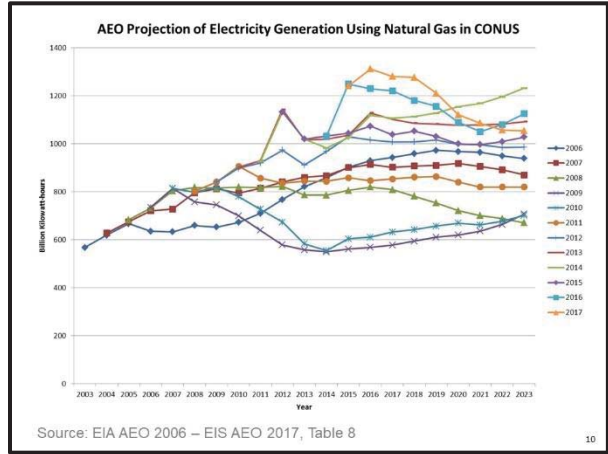
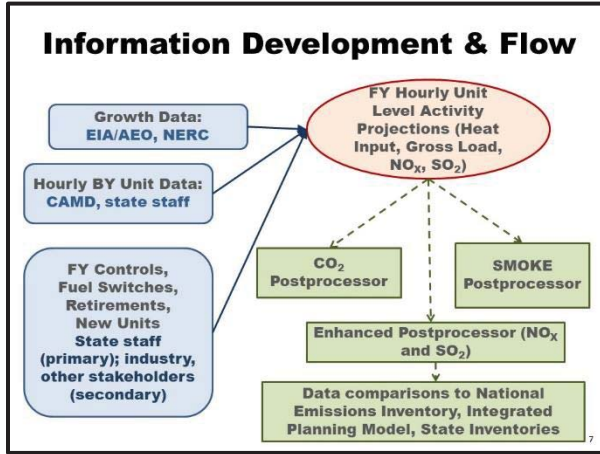
Goal: Build a low-cost, stable/stiff, fast, and transparent model to project electric generating unit (EGU) emissions including reasonable temporal profiles for activity and emissions

Uses: Provide EGU inventories suitable for

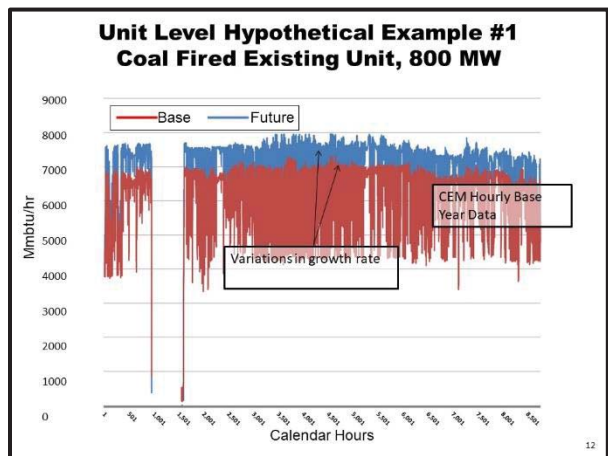
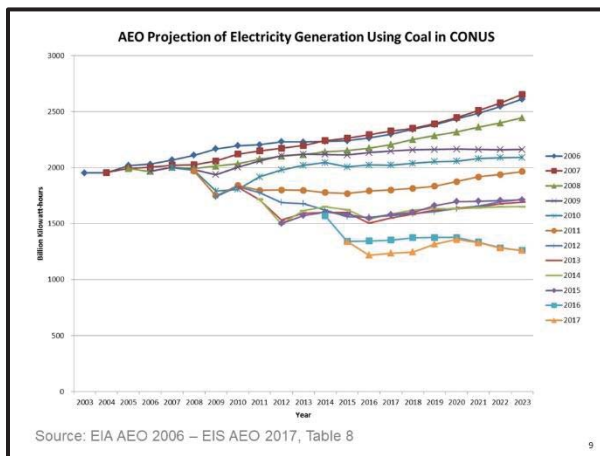
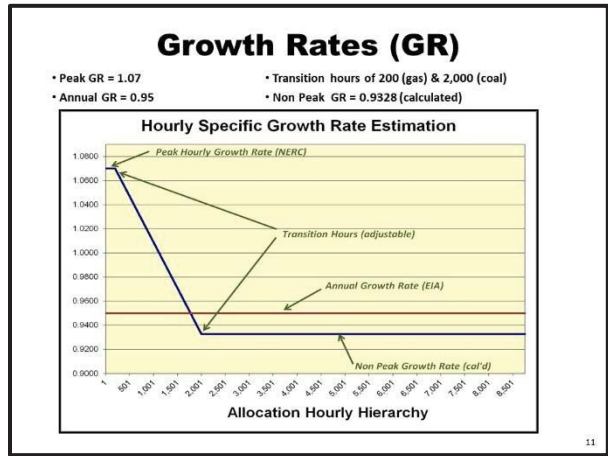
 - State Implementation Plan (SIP) submittals
 - Air quality modeling efforts

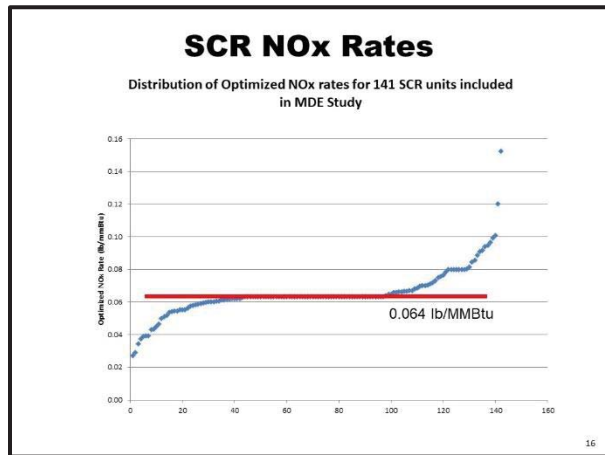
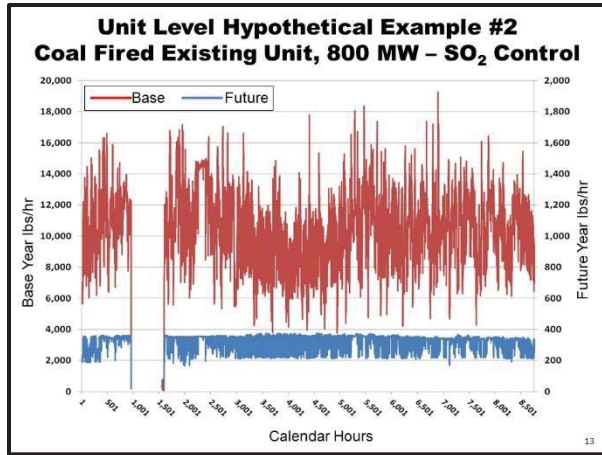
How the Model Works

- **Unit-level inventory of EGUs (capacity, fuel type, controls, hourly CEMs data for base year).**
- **Apply EIA-AEO growth rates by region and fuel type (model does not transfer generation between regions or between fuels).**
- **Model matches available capacity to projected demand; creates “demand deficit” units if demand exceeds capacity.**
- **For units that exceed hourly or annual capacity limits, add generation to Excess Generation Pool.**
- **Empty Excess Generation Pool to other available units.**
- **Calculate emissions and convert to SMOKE and create reports (model does not generate new controls).**



- ### The Five Basic Files
- **Unit Availability File (UAF)**
 - Backbone of the tool
 - Unit level data
 - Sources: CAMD, EIA, NEEDS, State Staff
 - **Controls File**
 - Unit level data for SO₂ and NO_x
 - Emission rates or control efficiencies
 - May be supplemented with the Seasonal Controls File
 - **Growth Rates File**
 - Growth rates by region and fuel unit type
 - Annual based on EIA reference case
 - Peak based on NERC
 - **Input Variables File**
 - A variety of variables that can be changed for each region and fuel unit type
 - Many deal with new, planned units or GDUs
 - **CAMD Hourly Base Year Data**



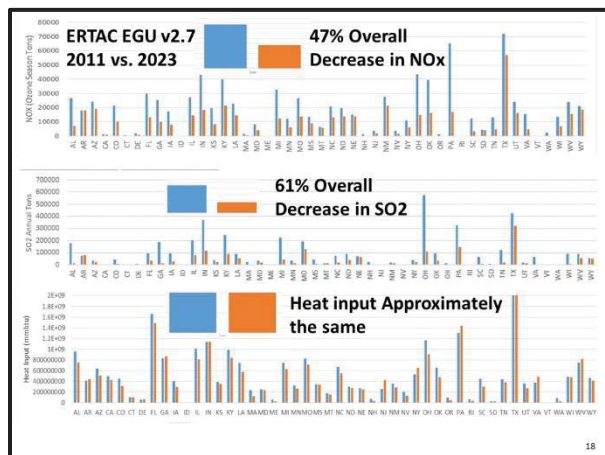
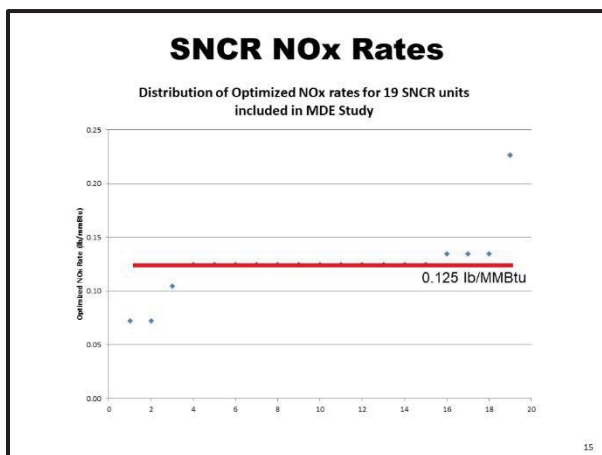


- ### ERTAC EGU v2.7
- ERTAC v2.7 reference case (no CSAPR)
 - AEO2017 (Annual Growth) & NERC (Peak Growth) with two exceptions
 - SRVC and NYCW use IRP derived growth factors
 - State updates as of Spring 2017
 - Generation transfers to alternate fuels to correct specific issues
 - Transfer of Indian Point nuclear power plant generation to combined cycle NG (for years after 2021)
 - Transfer of power in a few hours from coal to NG in RFCE (missing generation)
 - Transfer of power from coal to NG in FRCC/FL to alleviate coal GDU
 - Unit characteristic updates in SRDA to alleviate coal GDU (one unit at Big Cajun 2/LA)
 - Transfer of power from coal to NG in NEWIE to alleviate coal GDU (2017 only)
 - ERTAC v2.7 CSAPR2 Compliant Scenario includes
 - Emission rate adjustments on facilities with SCR & SNCR in CSAPR states for ozone season only
 - Units with SNCR's reduced to 0.125 lb/MMBtu (EPA did not reduce SNCR in their Analytics approach)
 - Units with SCR's reduced to 0.064 lb/MMBtu (EPA used 0.1 lb/MMBtu)
 - Similar to MD study of "best rates"
 - Emission rate adjustments on some facilities without post-combustion controls in OK
- 14

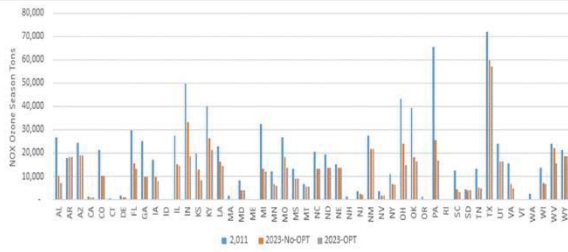
Region	State	Budget	Assurance Level	FY O&M (tens)	Over Budget?	Over Assurance?
CENSARA	AR	12,098	14,578	38,119	6,071	3,541
CENSARA	LA	11,272	13,639	7,801	(3,471)	(5,338)
CENSARA	KS	8,107	9,713	8,307	280	(1,406)
CENSARA	LA	18,639	22,553	14,426	(4,213)	(8,127)
CENSARA	MO	15,780	19,094	13,764	(2,019)	(5,330)
CENSARA	OK	11,641	14,086	16,240	4,599	2,154
CENSARA	TX	52,301	63,284	57,026	4,725	(6,258)
IADCO	IL	13,601	16,457	14,443	842	(2,024)
IADCO	IN	23,303	28,197	18,459	(4,844)	(9,738)
IADCO	MI	17,023	20,598	22,342	(4,781)	(8,366)
IADCO	OH	19,522	23,622	14,707	(4,815)	(8,915)
IADCO	WI	7,915	9,577	6,893	(1,022)	(2,684)
MANE VU	MD	3,828	4,632	3,980	152	(652)
MANE VU	NI	2,062	2,495	1,969	(93)	(526)
MANE VU	NY	5,135	6,213	6,193	1,058	(20)
MANE VU	PA	17,952	21,722	16,840	(1,112)	(4,882)
SESARIM	AL	13,211	15,985	7,148	(6,063)	(8,837)
SESARIM	KY	21,115	25,549	21,259	214	(4,220)
SESARIM	MS	6,315	7,641	9,077	2,762	1,436
SESARIM	TN	7,736	9,361	4,806	(2,930)	(4,556)
SESARIM	VA	9,223	11,160	4,765	(4,458)	(3,395)
SESARIM	WV	17,815	21,556	15,667	(2,148)	(5,889)
TOTAL		315,464		294,201		14,264.07
PENALTY						
TOTAL W/PENALTY		315,464		308,465		

Need a 3:1 ratio for emissions above assurance level

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2023 Optimized vs. Non-Optimized



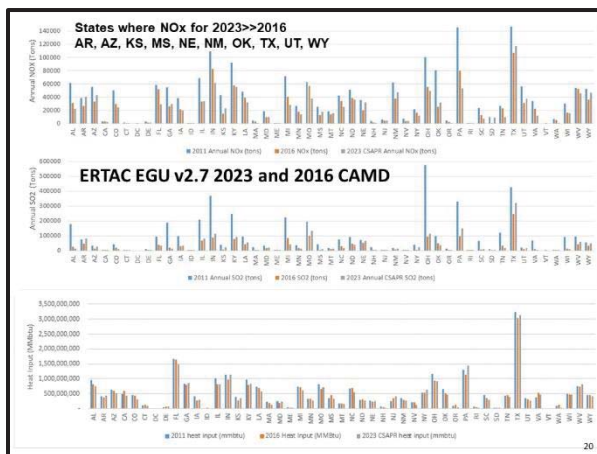
Note: Some states in Western USA did not provide updates to ERTAC EGU for new units and controls. Examples include AZ, NM, WY. Their 2023 emissions might be lower than was estimated. Only CSAPR states were optimized.

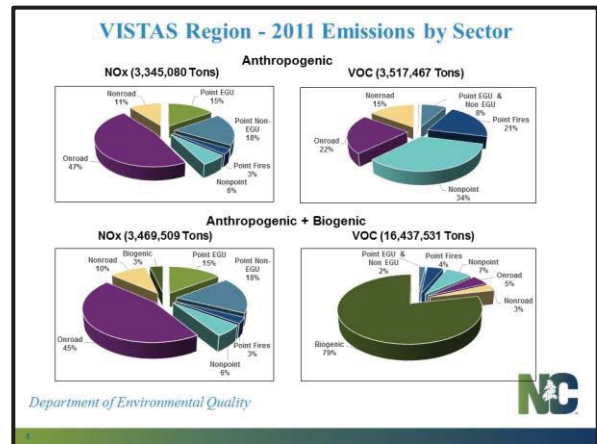
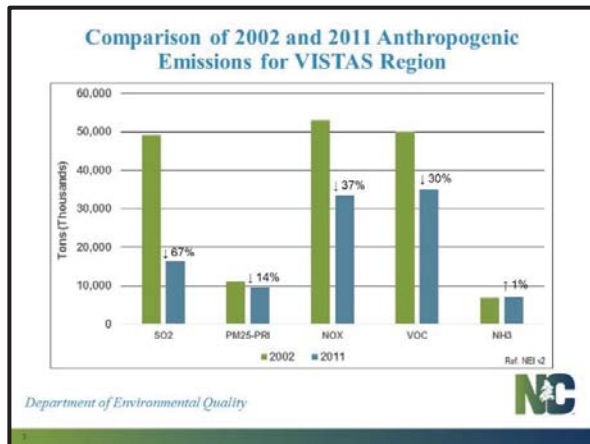
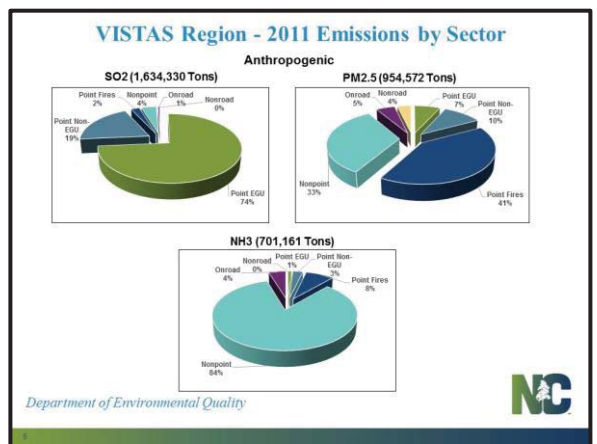
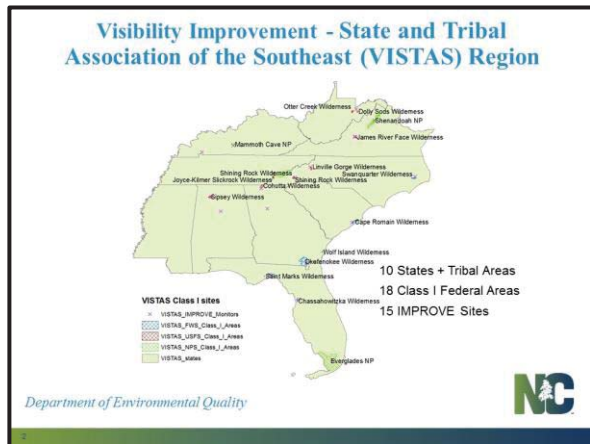
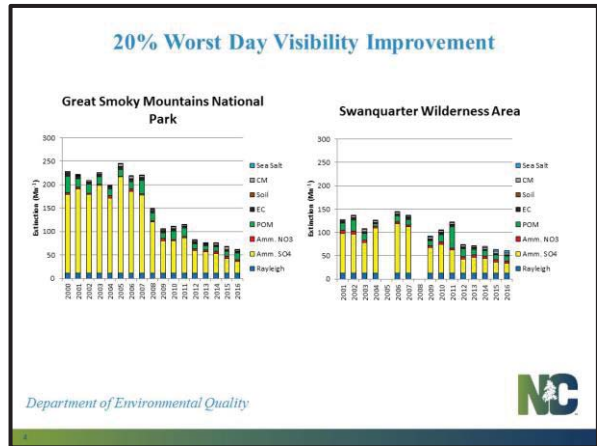
ERTAC EGU Contacts

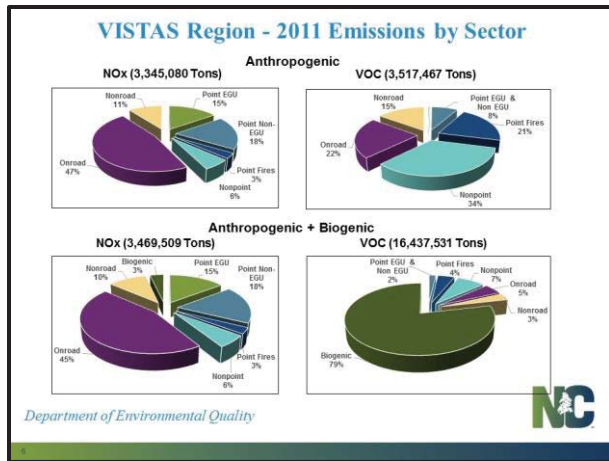
- States send comments to:
 - NE: Wendy Jacobs
Wendy.Jacobs@ct.gov
 - Southeast: John Hornback
Hornback@metro4-sesarm.org
 - Midwest: John Welch
JWelch@idem.in.gov
 - CENRAP: Mark Janssen
Janssen@ladco.org
ertacegufedback@gmail.com

Additional Information

- ERTAC EGU files are located here:
 - <http://www.marama.org/2013-ertac-egu-forecasting-tool-documentation>
 - Currently the latest files on MARAMA webpage are v2.6
 - MARAMA expects to post v.2.7 shortly
 - Also, 2028 ERTAC EGU files are available
- Other ERTAC materials are located here:
 - Sign In [URL:https://marama.sharefile.com/](https://marama.sharefile.com/)
 - Username:apaty@marama.org
 - Password:ERTACoutr3ach
- Next, will create a 2016 base year with new projections.









Conclusions

- EPA's 2011/2028v6.3el modeling platform is a good starting point
 - Although a bit long-in-the-tooth:




Denver Museum of Nature and Science


- 2011 base year is well established and bench-marked
- Focus on updating 2028 inventory and bench-marking of model
- Should be able to develop reasonably accurate 2028 inventory regardless of base year starting point

Department of Environmental Quality 

Thank you! Questions?



Randy Strait, randy.strait@ncdenr.gov
 Division of Air Quality
 North Carolina Department of Environmental Quality



**Appendix F-3c - Presentation to FLMs, EPA Region 4
CC/TAWG, January 31, 2018**

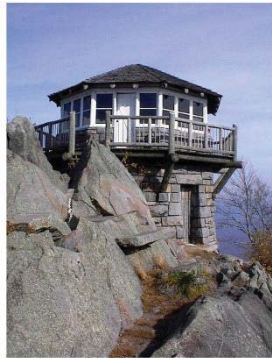


VISTAS

FLM/EPA Discussion
January 31, 2018

Planned Approach (1)

- Similar to last regional haze planning effort
- About half of the time of the first project
- About 5% of the funding
- Will use EPA's 2011 base year and 2028 future year inventory and modeling platform
- Will provide slight adjustments to 2028 inventories for EGUs and some other major sources
- Will use EPA inventories for other categories



Planned Approach (2)

- Intentions
 - assess where we are currently
 - assess 2028 expected visibility and glide slope
 - evaluate progress
 - evaluate impacts on VISTAS Class I areas
 - evaluate downwind receptor impacts
 - consult with surrounding regions
 - consult with FLMs
 - interact with EPA
 - communicate with stakeholders
 - support state SIP submittals by July 31, 2021 deadline

VISTAS Organization

- STAD – State and Tribal Air Directors (policy)
- Coordinating Committee (operations)
- Technical Analysis Work Group
- Project Coordinator (John Hornback)
- EPA
- FLMs
- Stakeholders
- Other RPOs

Procurement Process

- RFP released December 21
- Proposal submittal deadline January 26
- 3 proposals received
 - 1 sole bid
 - 2 team bids
- Selection Committee formed and operating
- Recommendation goal by February 15

Contractor Arrangements

- Execute contract by March 1
- Develop concurrent work plan and QAPP
- Submit QAPP to EPA by March 15
- Receive QAPP approval from EPA by April 15
- Contractor queuing during April
- Technical work begins by May 1

Technical Project Components (2)

- Air quality modeling
- Source apportionment tagging
- Model performance evaluation
- Future year model projections
- Data handling and sharing
- Optional tasks

Technical Project Schedule

- States will begin preparing inventory updates after March 1
- Air quality modeling completed by December
- Other analysis and evaluation by next spring
- All deliverables including data and reports by June 20, 2019
- States begin developing their SIPs thereafter
- States submit SIPs by July 31, 2021

Discussion

- Q&A
- Feedback
- Next steps

Technical Project Components (1)


- Project management
- Emissions inventory updates
- Emissions processing
- Data acquisition and preparation
- Area of influence analysis

Contact Information

- Project Coordinator: John Hornback
- Phone: 404-361-4000
- E-mail: hornback@metro4-sesarm.org
- Web: www.metro4-sesarm.org
 - Technical center tab
 - Contractor web site
 - Cloud?




Appendix F-3d - VISTAS Call with FLMs August 1, 2018



VISTAS


Call with Federal Land Managers (FLMs)
August 1, 2018

Jim Boylan, Georgia EPD
John Hornback, Metro 4/SESARM



VISTAS Technical Plan

- Similar to last regional haze planning effort
- EPA's 2011 el base year emissions (unchanged)
- EPA's 2028 el future year emissions with state specific adjustments for EGU and non-EGU point sources
- EPA's 2028 el inventories without adjustment for other categories
- CAMx v6.40 with PSAT



Presentation Outline


- Introductory comments
- VISTAS contractors
- Completed, ongoing, and future work
- Collaboration/consultation
- State SIP development
- Response to National Park Service questions
- Additional Q&A
- Concluding comments



VISTAS Contractors


- Contractor
 - Eastern Research Group
- Subcontractor
 - Alpine Geophysics





VISTAS Tasks

- Determine current visibility
- Determine 2028 expected visibility and glide slopes
- Perform Area of Influence (AOI) analysis
- Perform source apportionment analysis (PSAT)
- Produce documentation
- Support state SIP submittals by July 31, 2021 deadline
- **NOTE: Individual VISTAS states will assess reasonable progress for sources in their own state**



Progress Report (documents)

- December 21, 2017 – RFP released
- January 26, 2018 – Proposals received
- March 1, 2018 – Contract awarded
- April 4, 2018 – QAPP (approved by EPA Region 4)
- April 19, 2018 – Work plan approved
- June 27, 2018 – Modeling protocol approved *

*(review and input from EPA OAQPS and Region 4)

Progress Report (completed/in process)

- Emission inventory updates – complete
- Emission inventory update report – nearing completion
- Emission processing/merging – complete
- 2028 simulation - running
- Benchmarking – complete (draft report rec'd)
- Base year modeling – initiated

(Q/d)*EWRT Calculations

Row (i)	Col (j)	ΣQ [tpy]	d [km]	Q/d [tpy km ⁻¹]	Q/d*EWRT [tpy km ⁻¹ Mm ⁻¹]	Q/d*EWRT [%]
2	1	300	12	25	965.28	82%
1	2	100	12	8.33	208.33	18%

Progress Report (remaining schedule)

- September 1, 2018 – base year modeling
- September 1, 2018 – area of influence analysis
- October 1, 2018 – model performance evaluation
- December 1, 2018 – future year modeling
- December 31, 2018 – future year projections
- April 19, 2019 – PSAT modeling
- May 3, 2019 – PSAT results
- July 1, 2019 – final report and project ends

Consultation Plan

- Late 2017/early 2018 – initiated by MANE-VU
- December 5-7, 2017 – WESTAR Round 2 Regional Haze Planning Workshop
- January 31, 2018 – discussions with FLMs
- August 1, 2018 – discussions with FLMs
- Late summer 2018/spring 2019 – stakeholders
- Ongoing – EPA OAQPS and Regions 3 & 4
- Ongoing – FLMs – especially late-2018/early-2019
- 2019 – surrounding RPOs (to be initiated by VISTAS states)

Extinction Weighted Residence Time Calculations

Row (i)	Col (j)	# Trajectory hours	Trajectory (k)	Extinction (bext _{ik}) [Mm ⁻¹]	τ _{ijk} [hrs]	(bext _{ik})τ _{ijk} [Mm ⁻¹ hrs]	Στ _{ij} [hrs]	Σ(bext _{ik})τ _{ijk} [Mm ⁻¹ hrs]	EWRT [Mm ⁻¹]
2	1	5	1 (Red)	75	5	375	18	695	38.61
		4	2 (Orange)	80	4	320			
1	2	4	1 (Yellow)	50	4	200	18	450	25
		5	2 (Purple)	50	5	250			

State SIP Development

- Underway via ...
 - Participation in VISTAS process
 - Collaboration and consultation with all interests
- State-specific considerations/analyses have begun and will continue as project deliverables are completed/distributed
- SIP submittals due – July 31, 2021



Questions/Answers



- Using EPA 2011 and 2028 inventories and modeling platform with some upgrades
 - Yes
- 2011 and 2028 inventories
 - 2011 was not adjusted
 - 2028 EGU and non-EGU point updates completed June 30, 2018
 - Inventory update report – final due by mid-August

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Questions/Answers



- Will states be on their own to evaluate control strategies?
 - Each state is ultimately responsible for determinations of the content of their SIPs, as in the last round.
 - Yet, much collaboration will occur in this project leading up to determinations of sources to evaluate and evaluations of feasible controls.

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Questions/Answers



- Area of influence analysis and SO₂/NO_x rankings for 2011 and 2028
 - To be completed by September 1, 2018
- 2028 projections:
 - Modeling to be completed by December 1, 2018
 - Projections to be completed by December 31, 2018
- Nature of 2028 modeling
 - “on-the books / on the way” (required/enforceable)

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Questions/Answers



- How will states use data generated to screen sources for 4-factor analysis?
 - Specific approach(es) be determined.
 - FLM input will be considered.
 - Threshold options
 - Cumulative source contribution (e.g., 80%, 60%, 40%,...)
 - Individual contributions by unit or facility (e.g., 1%, 5%, 10%,...)

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Questions/Answers



- VISTAS states’ usage of project deliverables
 - AOI review – September-December 2018
 - Will use AOI to rank and select sources
 - Start 4-factor analysis early 2019
 - Source apportionment will be part of 4-factor analysis and can be used to adjust reasonable progress goals (RPGs) if additional controls are required
 - May use CoST tool, EPA’s Air Pollution Control Cost Manual, data obtained from facilities, etc.
 - Will consult with FLMs regarding screening and selection methodology and process for sources

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Questions/Answers



- Will a best-and-final run be conducted?
 - Not in contract at this time
 - PSAT can be used to adjust RPGs for new controls at individual facilities without another CAMx run
- Use of state-specific modeling domains?
 - Possible uses include brute force sensitivities, CAMx v6.5, fine grid modeling, best and final CAMx run, etc.

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Questions/Answers



- Opportunities for FLM input
 - Ongoing
 - AOI will be used for ranking sources.
 - Expect this to occur September-December 2018.
 - FLMs may provide thoughts at anytime
 - Early sharing of FLM concerns and reasons would be helpful

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For Further Information (Contact)




- Project Coordinator
 - John Hornback – Metro 4/SESARM hornback@metro4-sesarm.org
- Coord Committee Chair
 - Jim Boylan – Georgia james.boylan@dnr.ga.gov
- Tech Analysis WG Co-chairs
 - Randy Strait – North Carolina randy.strait@ncdenr.gov
 - Alanna Keller – West Virginia alanna.j.keller@wv.gov
- Web site
 - <https://metro4-sesarm.org>
 - Selected information will be made available from the Technical Center dropdown on this web site.
 - Other information will be made available upon request.

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**Appendix F-3e - VISTAS Presentation to other RPOs,
September 5, 2018**

1




VISTAS Technical Plan




- Similar to last regional haze planning effort
- EPA's 2011 el base year emissions (unchanged)
- EPA's 2028 el future year emissions with state specific adjustments for EGU and non-EGU point sources
- EPA's 2028 el inventories without adjustment for other categories
- CAMx v6.40 with PSAT

4



Presentation Outline



- Introductory comments
- VISTAS contractors
- Completed, ongoing, and future work
- Collaboration/consultation
- State SIP development
- Response to National Park Service questions
- Additional Q&A
- Concluding comments

2




VISTAS Contractors




- Contractor
 - Eastern Research Group
- Subcontractor
 - Alpine Geophysics




5




VISTAS Tasks




- Determine current visibility
- Determine 2028 expected visibility and glide slopes
- Perform Area of Influence (AOI) analysis
- Perform source apportionment analysis (PSAT)
- Produce documentation
- Support state SIP submittals by July 31, 2021 deadline
- **NOTE: Individual VISTAS states will assess reasonable progress for sources in their own state**

3



Progress Report (documents)



- December 21, 2017 – RFP released
- January 26, 2018 – Proposals received
- March 1, 2018 – Contract awarded
- April 4, 2018 – QAPP (approved by EPA Region 4)
- April 19, 2018 – Work plan approved
- June 27, 2018 – Modeling protocol approved *
 - *(review and input from EPA OAQPS and Region 4)

6



Progress Report (completed/in process)



- 2028 emission inventory updates and report – complete
- Conversion of 2028 point source emission files – pre-processing – complete (report – nearing completion)
- 2028 emissions SMOKE modeling – ready to begin
- 2011 base year emissions modeling - complete
- Benchmarking – ongoing (1st three reports received – one approved)
- Model performance evaluation – initiated
- Area of influence analysis – nearing completion

7



State SIP Development



- Underway via ...
 - Participation in VISTAS process
 - Collaboration and consultation with all interests
- State-specific considerations/analyses have begun and will continue as project deliverables are completed/distributed
- SIP submittals due – July 31, 2021

10



Progress Report (remaining schedule)



- October 1, 2018 – model performance evaluation
- October 31, 2018 – AOI analysis & report
- December 1, 2018 – future year modeling (currently projected for early November)
- December 31, 2018 – future year projections
- April 19, 2019 – PSAT modeling
- May 3, 2019 – PSAT results
- July 1, 2019 – final report and project ends

8



Questions/Answers



- Using EPA 2011 and 2028 inventories and modeling platform with some upgrades
 - Yes
- 2011 and 2028 inventories
 - 2011 was not adjusted
 - 2028 EGU and non-EGU point updates completed June 30, 2018
 - Inventory update report – final due by mid-August

11



Consultation Plan



- Late 2017/early 2018 – initiated by MANE-VU
- December 5-7, 2017 – WESTAR Round 2 Regional Haze Planning Workshop
- January 31, 2018 – discussions with FLMs
- August 1, 2018 – discussions with FLMs
- October 2018 – initial discussions with CenSARA
- Fall 2018/spring 2019 – stakeholders
- Early/mid-2019 – surrounding RPOs (to be initiated by VISTAS states)
- Ongoing – EPA OAQPS and Regions 3 & 4
- Ongoing – FLMs – especially late-2018/early-2019

9



Questions/Answers



- Area of influence analysis and SO₂/NO_x rankings for 2011 and 2028
 - To be completed by October 31, 2018
- 2028 projections:
 - Modeling to be completed by December 1, 2018
 - Projections to be completed by December 31, 2018
- Nature of 2028 modeling
 - “on-the books / on the way” (required/enforceable)

12



Questions/Answers



- VISTAS states' usage of project deliverables
 - AOI review – September-December 2018
 - Will use AOI to rank and select sources
 - Start 4-factor analysis early 2019
 - Source apportionment will be part of 4-factor analysis and can be used to adjust reasonable progress goals (RPGs) if additional controls are required
 - May use CoST tool, EPA's Air Pollution Control Cost Manual, data obtained from facilities, etc.
 - Will consult with FLMs regarding screening and selection methodology and process for sources

13



Questions/Answers



- Will a best-and-final run be conducted?
 - Not in contract at this time
 - PSAT can be used to adjust RPGs for new controls at individual facilities without another CAMx run
- Use of state-specific modeling domains?
 - Possible uses include brute force sensitivities, CAMx v6.5, fine grid modeling, best and final CAMx run, etc.

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Questions/Answers



- Will states be on their own to evaluate control strategies?
 - Each state is ultimately responsible for determinations of the content of their SIPs, as in the last round.
 - Yet, much collaboration will occur in this project leading up to determinations of sources to evaluate and evaluations of feasible controls.

14



Questions/Answers



- Opportunities for FLM input
 - Ongoing
 - AOI will be used for ranking sources.
 - Expect this to occur September-December 2018.
 - FLMs may provide thoughts at anytime
 - Early sharing of FLM concerns and reasons would be helpful

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Questions/Answers



- How will states use data generated to screen sources for 4-factor analysis?
 - Specific approach(es) be determined.
 - FLM input will be considered.
 - Threshold options
 - Cumulative source contribution (e.g., 80%, 60%, 40%,...)
 - Individual contributions by unit or facility (e.g., 1%, 5%, 10%,...)

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For Further Information (Contact)



- Project Coordinator
 - John Hornback – Metro 4/SESARM hornback@metro4-sesarm.org
- Coord Committee Chair
 - Jim Boylan – Georgia james.boylian@dnr.ga.gov
- Tech Analysis WG Co-chairs
 - Randy Strait – North Carolina randy.strait@ncdenr.gov
 - Alanna Keller – West Virginia alanna.j.keller@wv.gov
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**Appendix F-3f - VISTAS Regional Haze Project Update,
June 3, 2019**

VISTAS Regional Haze Project Update



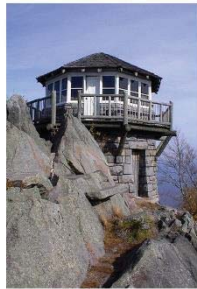
Jim Boylan (GA DNR), Randy Strait (NC DAQ),
and John Hornback (Metro 4/SESARM)

FLM and EPA Consultation Conference Call
June 3, 2019



Presentation Outline

- Background
- Key VISTAS project tasks
- VISTAS technical analysis status
- What we've learned
- Consultation and communications
- Remaining work and projected schedule



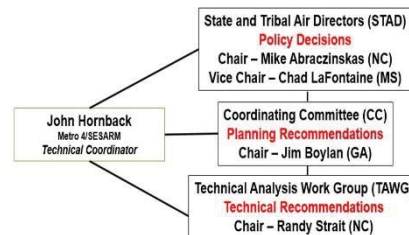
Participating Agencies in VISTAS Project

- **Visibility Improvement State and Tribal Association of the Southeast (VISTAS)**
- 10 SESARM states
- Knox County, Tennessee local agency
 - Represents the 17 local agencies in the Southeast
- Eastern Band of Cherokee Indians
 - Represents the 6 federally-recognized tribes in the Southeast

1999/2017 Regional Haze Rule

- Reduction of visibility impairment on the 20% "most impaired days" (anthropogenic impairment) in national park and wilderness (Class I) areas to natural conditions by 2064.
- No worsening of visibility on the 20% "clearest" days.
- Development of State Implementation Plans (SIPs) every 10 years to address emissions that contribute to regional haze.
- Round 2 SIP deadline extended to July 31, 2021

VISTAS Project Management Team



VISTAS Contractor Team

Primary Contractor

- Eastern Research Group, Inc
 - Regi Oommen, Project Manager



Subcontractor

- Alpine Geophysics, LLC
 - Greg Stella, Subcontractor Manager



VISTAS and Nearby Class I Areas

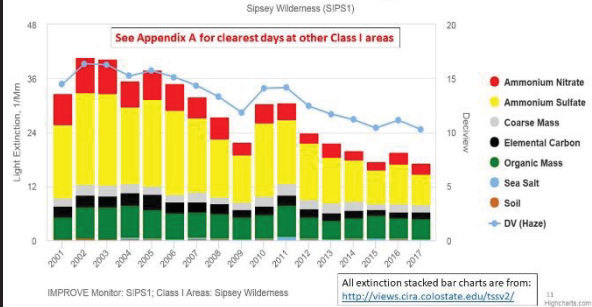
VISTAS FEDERAL CLASS I AREAS		NEARBY NON-VISTAS FEDERAL CLASS I AREAS	
AL - Sipsy Wilderness Area (SIPS)	USDA Forest Service	AR - Coney Creek Wilderness Area (CACR)	USDA Forest Service
FL - Ocala National Park (ONP)	USDI Fish and Wildlife Service	CA - Upper Middlebush Wilderness Area (UMBU)	USDA Forest Service
FL - Everglades National Park (EVER)	USDI National Park Service	LA - Breton Wilderness Area (BREB)	USDI Fish and Wildlife Service
FL - Saint Marks Wilderness Area (SAMA)	USDI Fish and Wildlife Service	MO - Herculaneum-Glades Wilderness Area (HEGL)	USDA Forest Service
GA - Cohutta Wilderness Area (COHU)	USDA Forest Service	MO - Mingo Wilderness Area (MING)	USDI Fish and Wildlife Service
GA - Okefenokee Wilderness Area (OKEF)	USDI Fish and Wildlife Service	NJ - Ringneck Wilderness Area (RING)	USDI Fish and Wildlife Service
GA - Wolf Island Wilderness Area (WOLF)	USDI Fish and Wildlife Service		
NY - Minnow Creek National Park (MINA)	USDI National Park Service		
NC - Linville Gorge Wilderness Area (LIGO)	USDA Forest Service		
NC - Shining Rock Wilderness Area (SHRO)	USDA Forest Service		
NC - Swainquarter Wilderness Area (SWAN)	USDI Fish and Wildlife Service		
SC - Cape Romain Wilderness Area (ROMA)	USDI Fish and Wildlife Service		
TX/NC - Great Smoky Mountains National Park (GISM)	USDI National Park Service		
TX/NC - Joyce Kilmer-Sladeford Wilderness Area (JOKY)	USDA Forest Service		
VA - James River Face Wilderness Area (JARF)	USDA Forest Service		
VA - Shenandoah National Park (SHEN)	USDI National Park Service		
WV - Dutchman's Creek Wilderness Area (DUCR)	USDA Forest Service		
WV - Otter Creek Wilderness Area (OTCR)	USDA Forest Service		

*This Class I Area does not have an IMPROVE monitor and will be represented by measurement data from a nearby Class I Area with an IMPROVE monitor.

VISTAS Project Tasks

- RFP
- Bids & contractor selection
- Contract development
- Work plan and QAPP
- Modeling protocol
- Contract management
- Data acquisition/analysis
- Emission updates
- Emission processing
- Air quality modeling
- Model performance evals
- Future year projections
- Area of influence analysis
- Source apportionment tags
- Reports and archival

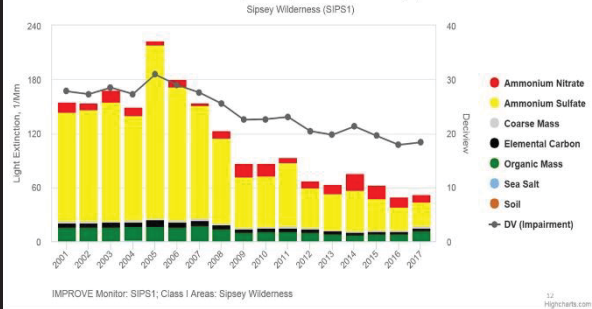
Annual Extinction Composition, Clearest Days, 2000 - 2017

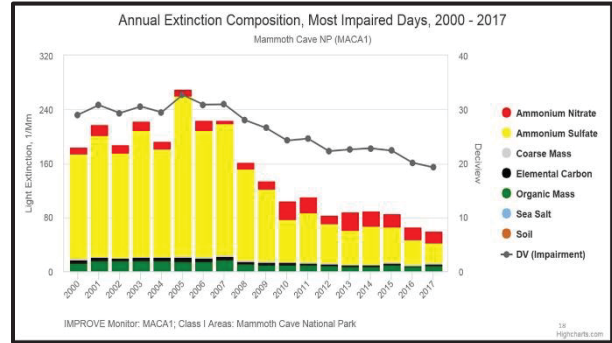
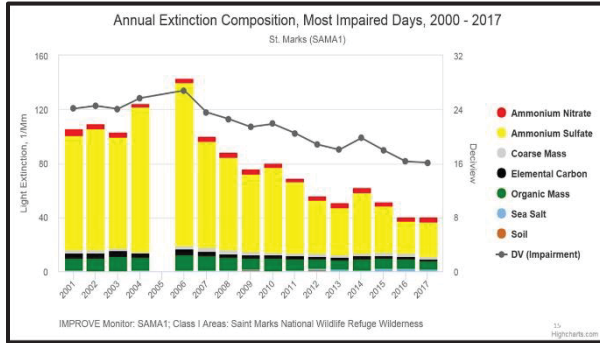
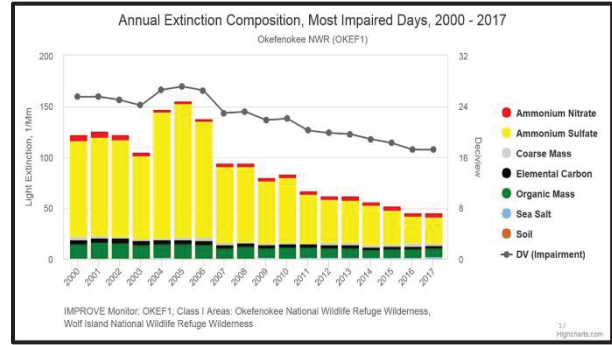
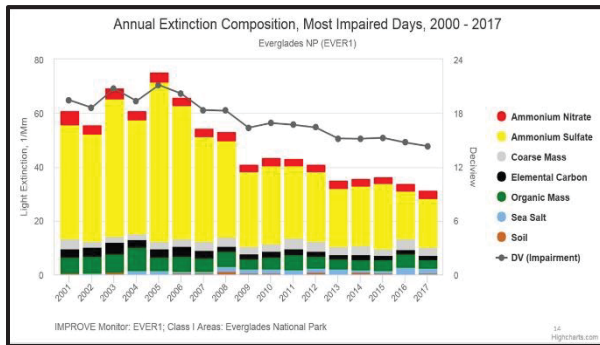
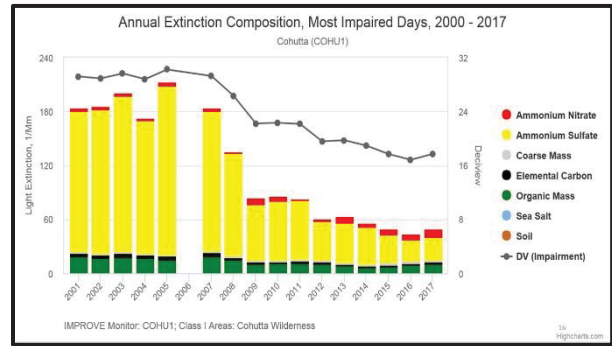
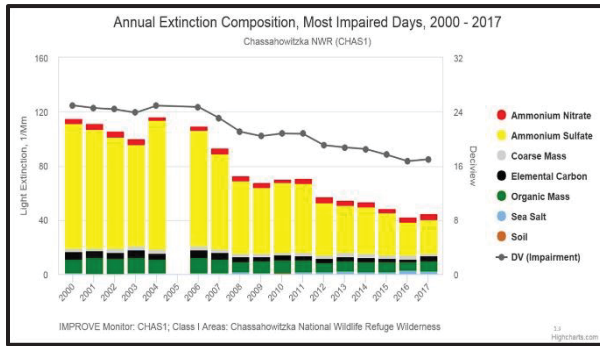


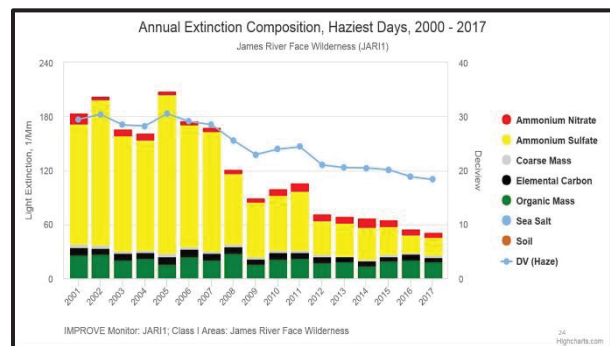
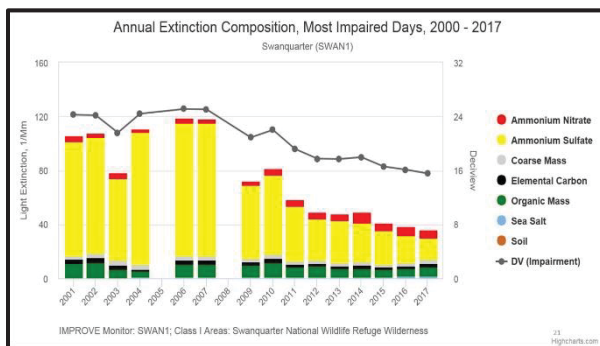
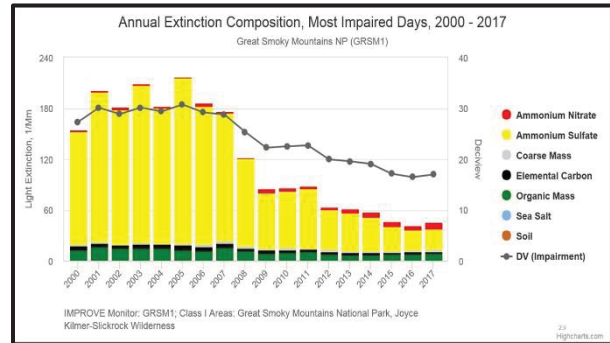
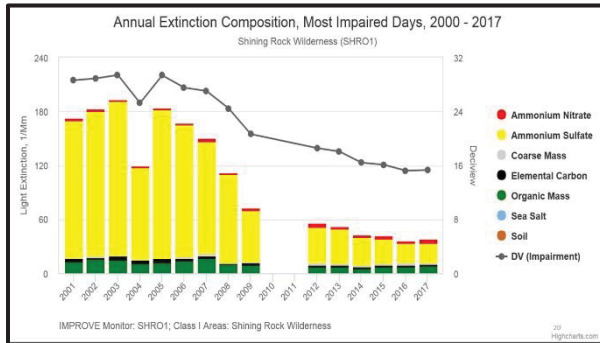
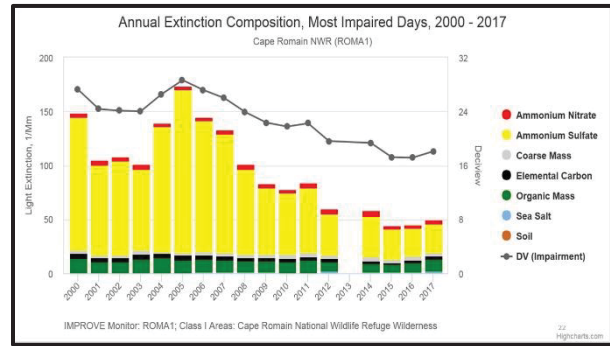
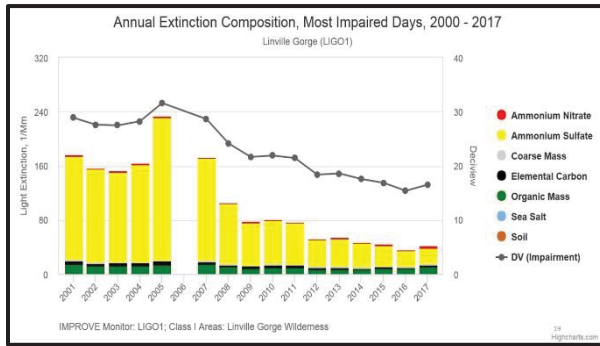
Mandatory Class I Areas

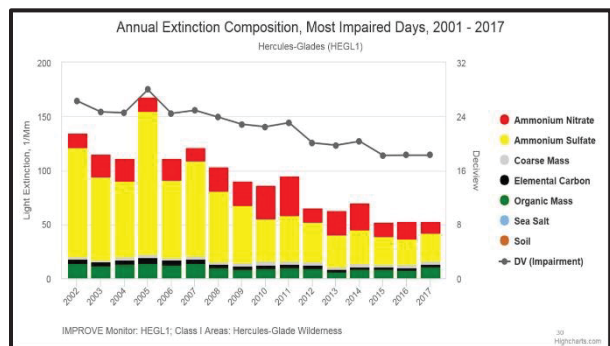
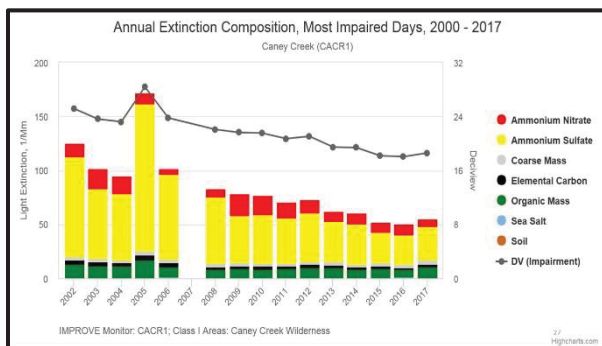
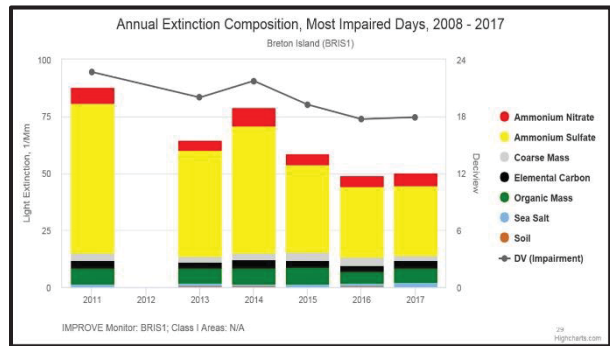
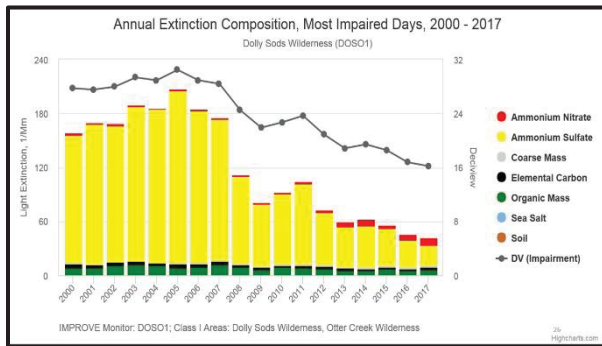
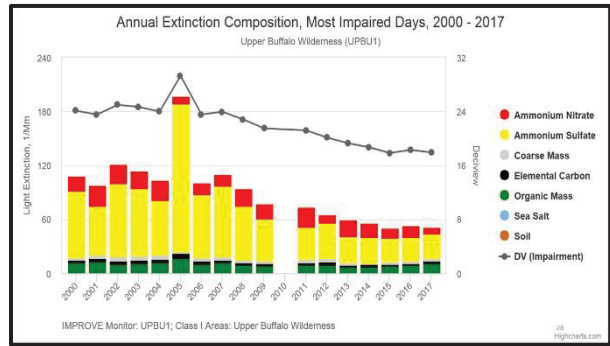
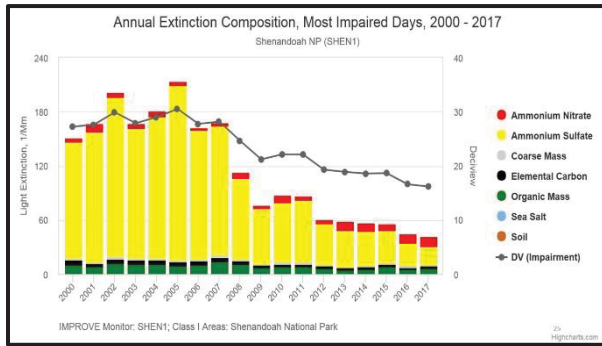


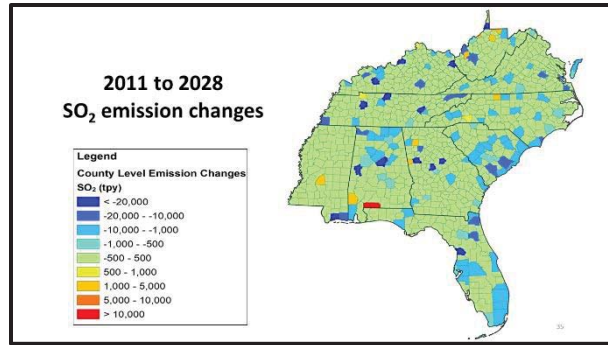
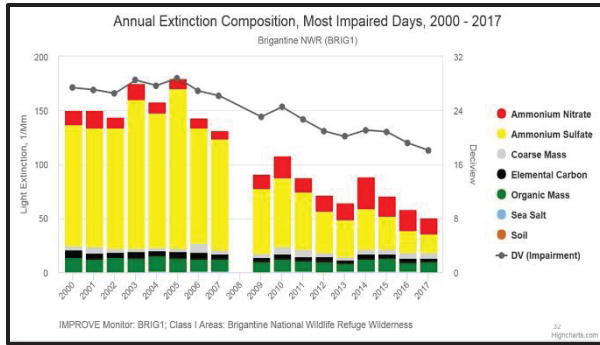
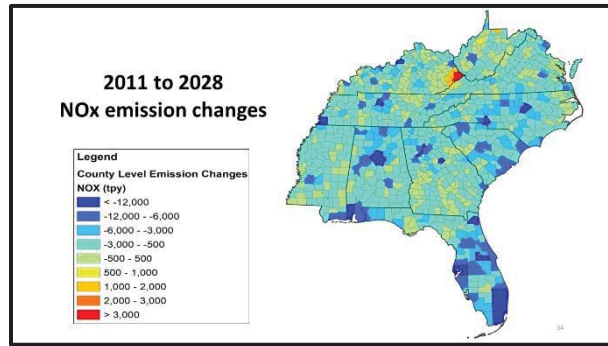
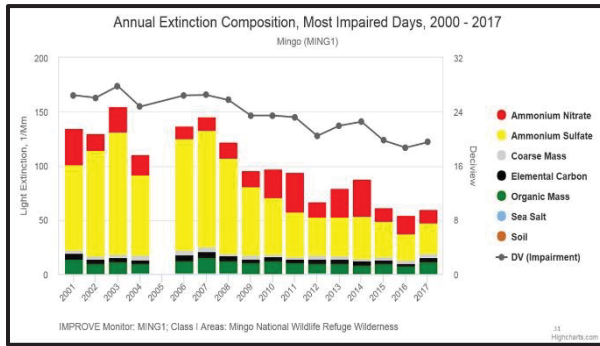
Annual Extinction Composition, Most Impaired Days, 2000 - 2017











Emissions Updates

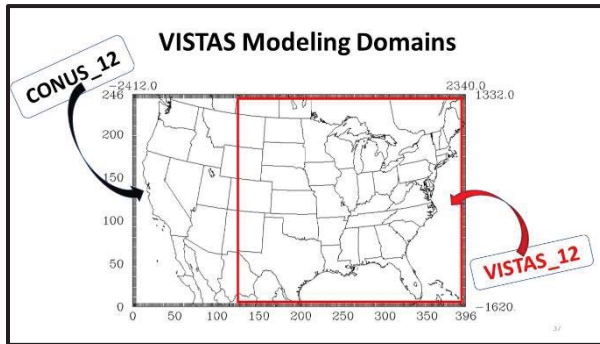
- Used EPA's 2011 base year emissions without change
- Updated EPA's 2028 projection year emissions
 - EGU and major non-EGU sources
 - Removed Clean Power Plan assumptions
 - Adjusted for changes in fuels and facility operating plans

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VISTAS Air Quality Model

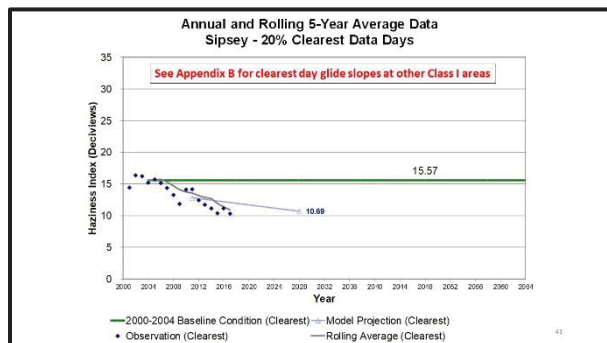
- Started with EPA's 2011/2028 modeling platform
 - Version 6.3el
 - CAMx v6.32
- Replaced CAMx v6.32 with CAMx v6.40
- Used 2011 meteorology
- Reasons for using EPA platform
 - Time limited
 - Budget limited
 - Most source sectors acceptably represented in EPA platform

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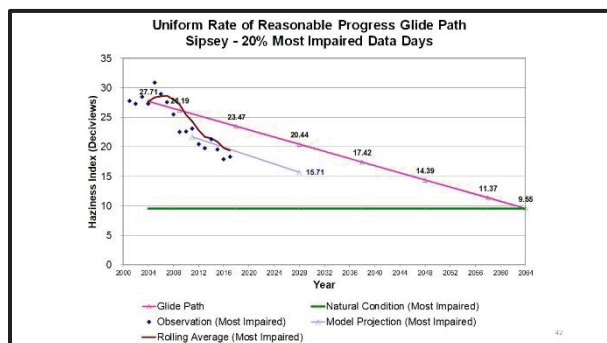


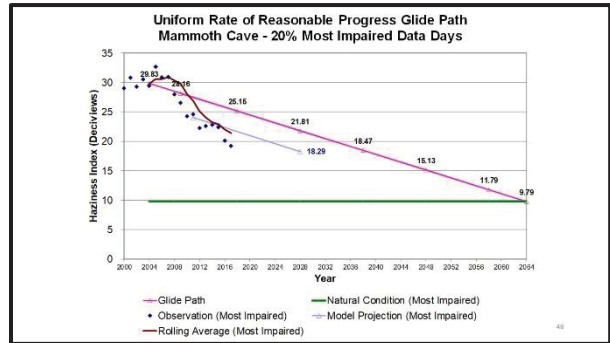
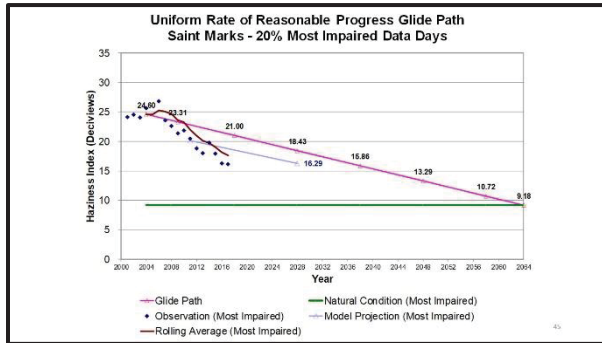
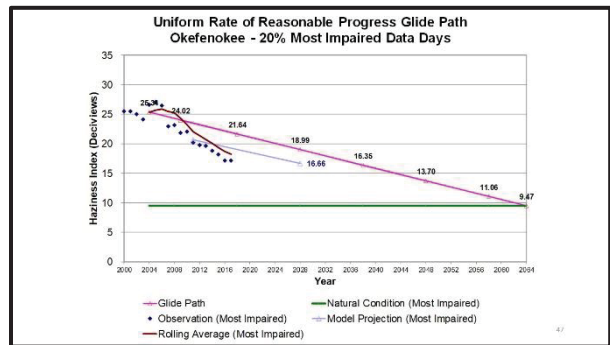
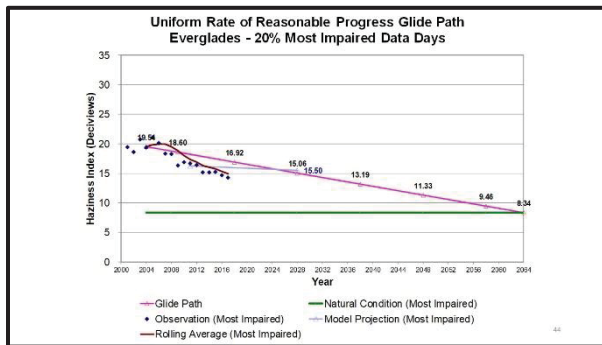
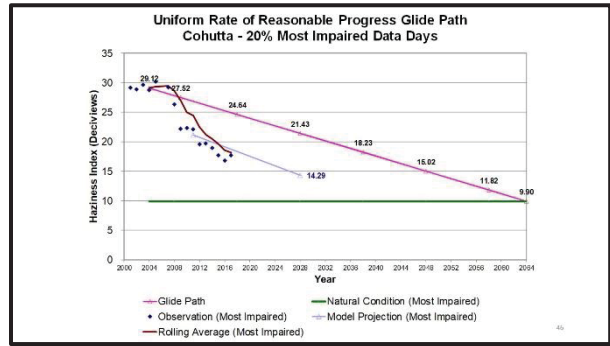
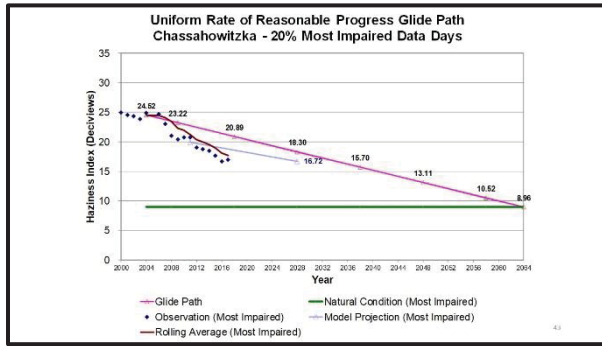
- ### VISTAS Future Year Model Projections
- Calculation of relative response factors (RRFs)
 - Gives average percent change in pollutant or species concentrations due to emission changes between 2011 and 2028
 - Produces design values for 2028

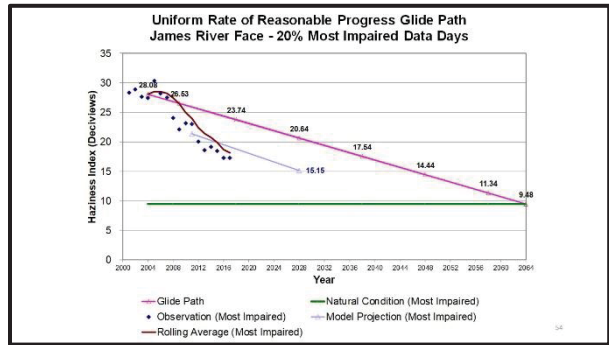
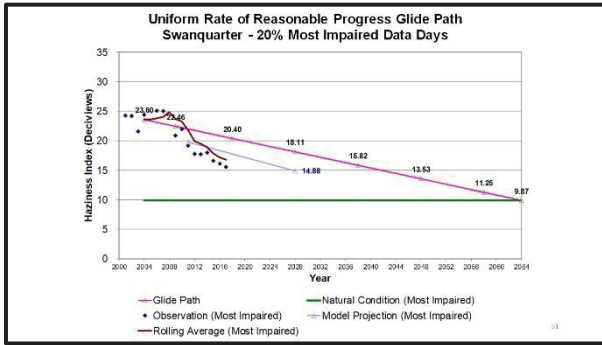
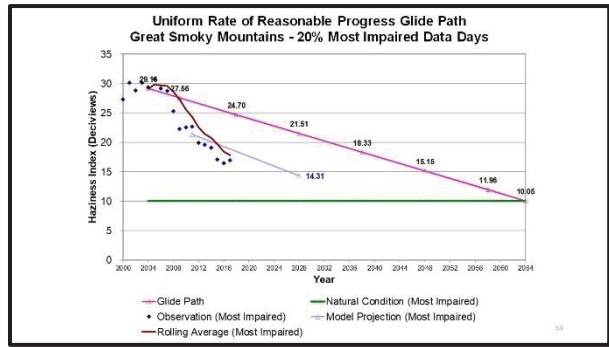
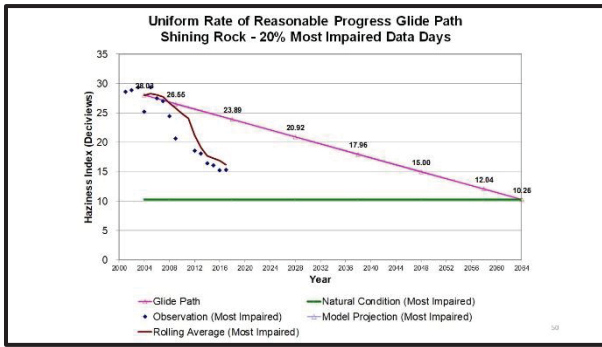
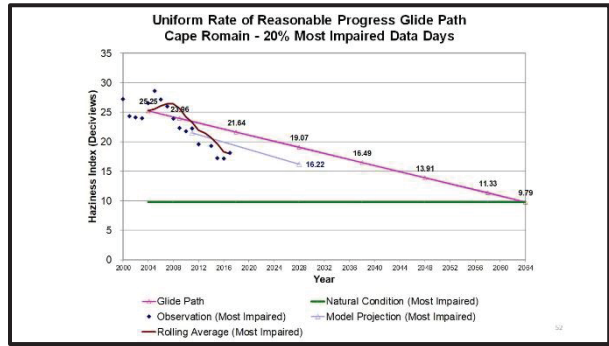
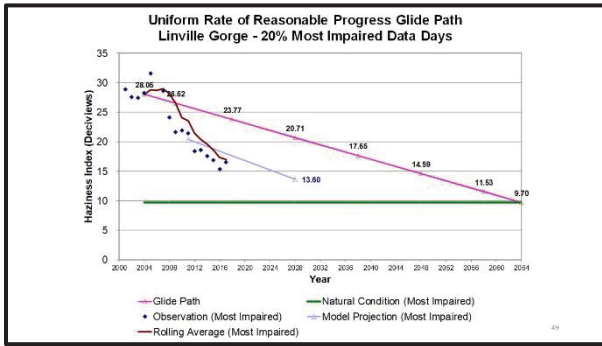
- ### Benchmark Comparisons
1. EPA 2011 with CAMx_6.32 (CONUS) vs. Alpine 2011 with CAMx_6.32 (CONUS)
 2. Alpine 2011 with CAMx_6.32 (CONUS) vs. Alpine 2011 with CAMx_6.40 (CONUS)
 3. Alpine 2011 with CAMx_6.40 (CONUS) vs. **Alpine 2011 with CAMx_6.40 (VISTAS)**
 4. EPA 2028 with CAMx_6.32 (CONUS) vs. Alpine 2028 with CAMx_6.40 (CONUS)
 5. Alpine 2028 with CAMx_6.40 (CONUS) vs. **Alpine 2028 with CAMx_6.40 (VISTAS)**

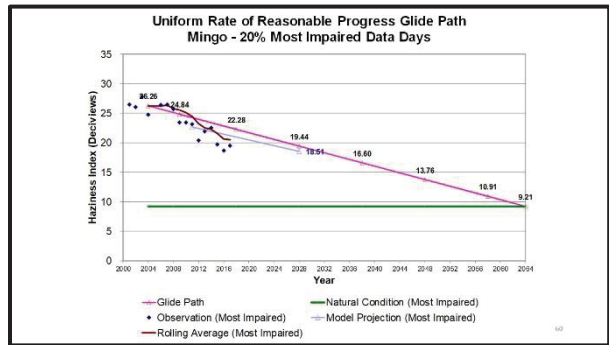
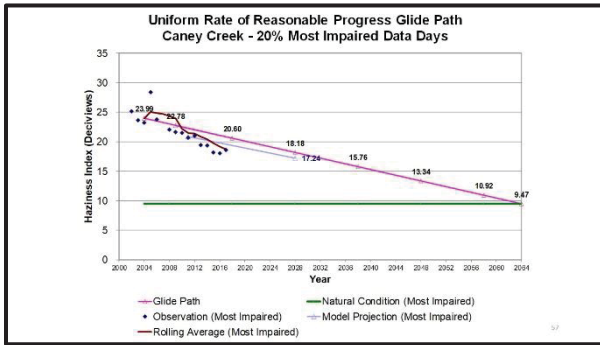
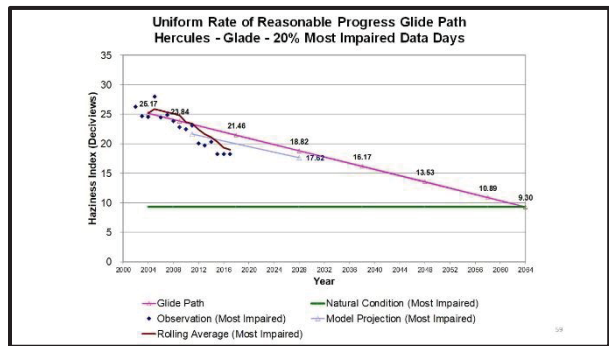
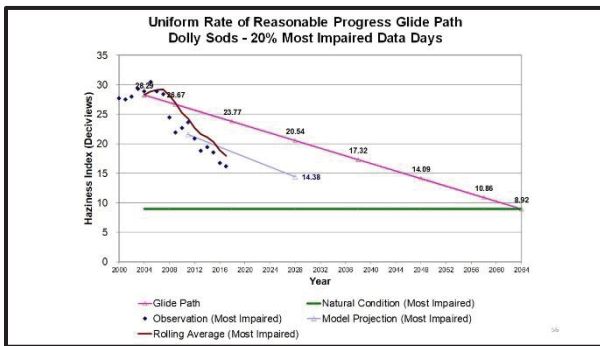
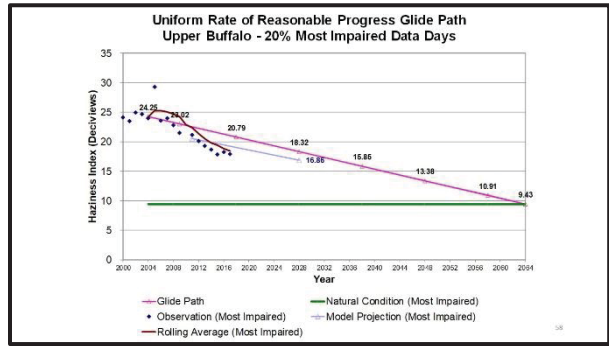
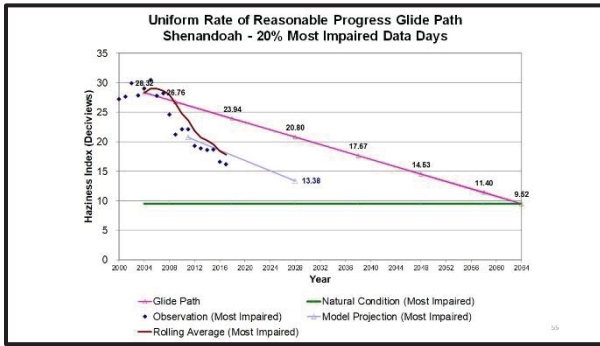


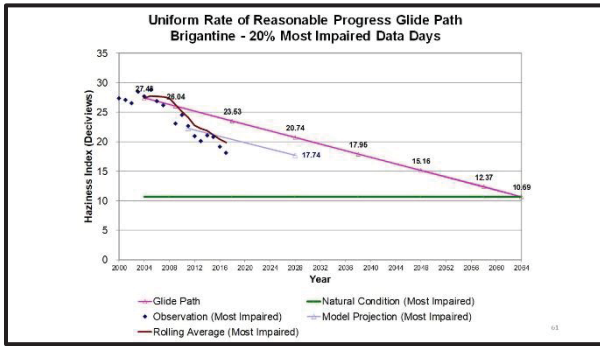
- ### Model Performance Evaluation
- Compared model results to observations. Looked at statistics, comparison plots, and spatial plots
 - Ozone
 - PM_{2.5} and light extinction
 - Wet and dry deposition
 - Overall, the model performance is generally within the range deemed acceptable for regulatory applications





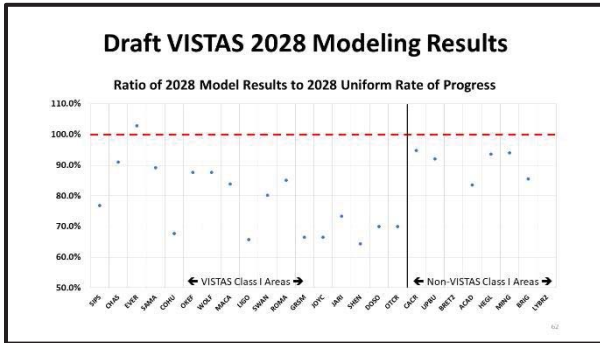






Draft AOI Source Categories for COHU

SOURCE CATEGORY	SO2	NOx	TOTAL
NONPOINT	4.9%	3.1%	8.1%
NONROAD_MAR	0.1%	3.3%	3.4%
NONROAD_OTHER	0.2%	2.4%	2.6%
ONROAD	0.6%	6.4%	7.0%
POINT	68.0%	8.0%	75.9%
PT_FIRES_PRESCRIBED	2.5%	0.5%	3.1%
TOTAL	76.3%	23.7%	100.0%



Draft AOI Point Contributions for COHU

State	FACILITY NAME	DISTANCE (km)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	SO2 Contribution	NOx Contribution
GA	Fsa Power Company - Plant Bowen	78.0	6,643.3	10,453.4	18.77%	1.10%
IN	INDIANA MICHIGAN POWER DBA AEP ROCKPORT	410.1	9,906.8	30,536.3	4.47%	0.13%
GA	TEMPLE INLAND	87.4	1,773.4	1,791.0	4.46%	0.17%
IN	Spooon	487.1	12,280.3	23,117.2	2.20%	0.10%
IN	INDIANAPOLIS POWER & LIGHT PETERSBURG	477.0	10,668.3	18,141.9	2.09%	0.15%
IY	Indiana Valley Authority (IYA) - Shawnee Fossil Plant	457.2	7,097.3	19,504.7	2.08%	0.07%
TN	TVA KINGSTON FOSSIL PLANT	124.0	1,687.4	1,886.1	2.08%	0.13%
GA	Fsa Power Company - Plant Chammond	98.5	964.9	777.5	1.90%	0.08%
OH	General James M. Gavin Power Plant (0627010056)	512.0	8,122.5	41,595.8	1.64%	0.02%
TN	TVA CUMBERLAND FOSSIL PLANT	327.0	4,916.5	8,427.3	1.32%	0.00%
KY	Ing. Moore Electric Corp - Wilson Station	269.0	1,151.3	6,958.7	1.02%	0.01%
OH	Public Energy Ohio, Wm. II Zimmer Station (1413090154)	454.6	2,150.0	77,133.9	1.01%	0.06%
GA	Fsa Power Company - Plant Wardsley	156.8	2,052.2	4,856.0	1.01%	0.04%
KY	KY Utilities Co - Ghent Station	441.5	7,979.9	10,109.3	1.00%	0.08%
IL	Joseph Stream	466.9	4,706.3	20,529.3	0.99%	0.03%
GA	Mohawk Industries Inc	32.0	66.5	77.3	0.97%	0.07%
TN	FASTMAN CHEMICAL COMPANY	769.8	6,961.3	6,420.7	0.95%	0.08%
MO	MARSHFIELD MISSOURI ENERGY PLANT	679.4	9,865.5	45,746.3	0.93%	0.01%
TN	TATF & VTF, Loudon	109.0	883.3	477.8	0.89%	0.09%
IL	Newton	564.0	1,934.9	10,631.6	0.87%	0.01%

- ### VISTAS Area of Influence (AOI) Analysis
- Evaluates emissions (Q), distance to Class I area (d), and extinction weighted residence time (EWRT) in model grid cells (point) or counties (source categories)
 - Formula: $(Q/d) * EWRT$
 - Establishes each facility's contribution to light extinction at each Class I area on the 20% most impaired days
 - Ranks facilities based on projected contributions
 - Facilities with highest contributions may be subject to 4-factor analysis

Draft AOI Source Categories for WOLF

SOURCE CATEGORY	SO2	NOx	TOTAL
NONPOINT	2.6%	1.5%	4.1%
NONROAD_MAR	1.4%	2.7%	4.1%
NONROAD_OTHER	0.3%	3.0%	3.3%
ONROAD	0.7%	5.2%	5.9%
POINT	70.4%	6.8%	77.1%
PT_FIRES_PRESCRIBED	4.7%	0.8%	5.5%
TOTAL	79.9%	20.1%	100.0%

See Appendix C for draft AOI source categories at other Class I areas

Draft AOI Point Contributions for WOLF

State	FACILITY NAME	DISTANCE (mi)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	SO2 Contribution	NOx Contribution
GA	Brunswick Cellulose Inc.	27.9	1,554.5	294.2	8.61%	2.87%
FL	ROCK TENN CP, LLC	74.9	2,316.8	2,606.7	8.34%	0.38%
GA	International Paper - Savannah	85.9	1,550.7	3,945.4	7.34%	0.23%
FL	ISA	105.1	551.8	2,094.5	4.24%	0.09%
GA	Isosport Pacific Consumer Products LP (Savannah River Mill)	109.9	551.5	1,860.2	2.58%	0.09%
FL	WHITE SPRINGS AGRICULTURAL CHEMICALS, INC	173.6	117.4	3,197.8	2.74%	0.01%
SC	ALUMAX OF SOUTH CAROLINA	223.0	108.1	3,751.7	1.79%	0.00%
FL	RAYONIER PERFORMANCE FIBERS LLC	77.4	3,377.1	502.0	1.74%	0.37%
FL	SEMINOLE ELECTRIC COOPERATIVE, INC.	181.4	917.8	3,713.4	1.72%	0.02%
OH	General James M. Gavin Tower Plant (0627010056)	853.3	4,122.5	41,595.8	1.67%	0.02%
SC	SANTH CEXPHR CROSS GENERATING SYSTEM	251.0	3,275.5	4,281.2	1.55%	0.06%
GA	Southern States Phosphate & Fertilizer	84.1	1.0	597.1	1.51%	0.00%
FL	ISA CHEMICALS HOLDINGS, INC.	118.5	37.7	808.9	1.19%	0.00%
FL	DUKE ENERGY FLORIDA, INC. (DECF)	296.6	2,489.8	5,306.4	1.10%	0.04%
GA	Isa Power Company - Plant Bowen	458.1	6,643.3	10,453.4	1.05%	0.09%
GA	Savannah Sugar Refinery	89.9	521.9	582.0	1.03%	0.07%
SC	INTERNATIONAL PAPER EASTOVER	288.2	1,780.3	3,212.9	0.97%	0.09%
GA	Isa Power Company - Plant McManus	27.1	77.2	30.1	0.91%	0.14%
AL	Escambia Generating Company LLC	578.2	249.3	18,974.4	0.88%	0.00%
SC	KAPSTONE CHARLESTON BRATTLE	213.6	2,355.8	1,863.7	0.87%	0.09%

See Appendix C for draft AOI point contributions at other Class I areas

Round 1 Facility Tags

Facility State	Facility RPO	FACILITY_ID_STD	FACILITY_NAME_STD	NOx Tag	SO2 Tag
AL	VSTAS	01053-444011	Escambia Operating Company LLC		1
AL	VSTAS	01053-985111	Alumax Operating Company LLC		1
AL	VSTAS	01073-1018711	BRIMMONG COMPANY, INC		1
AL	VSTAS	00097-1056111	Ala Power - Barry		1
AL	VSTAS	01097-1061611	Union Oil of California - Chunchula Gas Plant		1
AL	VSTAS	01097-949811	Akzo Nobel Chemicals Inc		1
AL	VSTAS	01103-1000011	Placer Steel Decatur LLC		1
AL	VSTAS	01108-985711	Sanderson Eco		1
FL	VSTAS	12005-535411	ROCKTENN CP, LLC		1
FL	VSTAS	12017-640611	DUKE ENERGY FLORIDA, INC. (DEF)	1	1
FL	VSTAS	12031-640211	IFP		1
FL	VSTAS	12033-752711	GULF POWER - Crist		1
FL	VSTAS	12047-769711	WHITE SPRINGS AGRICULTURAL CHEMICALS, INC		1
FL	VSTAS	12057-536611	TAMPA ELECTRIC COMPANY (TECF)		1
FL	VSTAS	12057-164611	MOSAIC FERTILIZER, LLC		1
FL	VSTAS	12089-753711	ROCK TENN CP, LLC	1	1
FL	VSTAS	12089-845811	RAYONIER PERFORMANCE FIBERS LLC		1
FL	VSTAS	12105-717711	MOSAIC FERTILIZER LLC		1
FL	VSTAS	12105-919811	MOSAIC FERTILIZER, LLC		1
FL	VSTAS	12123-752411	BUCKEYE FLORIDA, LIMITED PARTNERSHIP		1

VISTAS Source Apportionment Modeling

- Quantifies visibility impacts from individual point sources, source sectors, and geographic regions
- NOx and SO₂ tagging
- Used for further evaluation of AOI results
- Refines information on contributions to visibility impairment
- Can be used to adjust future year visibility projections to account for additional emission controls
- VISTAS contract with ERG allows for up to 250 tags

Round 1 Facility Tags

Facility State	Facility RPO	FACILITY_ID_STD	FACILITY_NAME_STD	NOx Tag	SO2 Tag
GA	VSTAS	13015-2813011	Isa Power Company - Plant Bowen		1
GA	VSTAS	13015-3079811	International Paper - Savannah		1
GA	VSTAS	13177-3721011	Brunswick Cellulose Inc.		1
KY	VSTAS	21091-7352411	Century Aluminum of KY LLC		1
KY	VSTAS	21145-66037011	Tennessee Valley Authority (TVA) - Shawnee Fossil Plant		1
KY	VSTAS	21177-5196711	Tennessee Valley Authority - Paradise Fossil Plant		1
KY	VSTAS	22183-0561611	Big Rivers Electric Corp. - Wilson Station		1
NC	VSTAS	37013-8479311	PCS Phosphate Company, Inc. - Aurora		1
NC	VSTAS	37087-2929211	Blue Ridge Paper Products - Canton Mill		1
SC	VSTAS	45015-483911	ALUMAX OF SOUTH CAROLINA		1
SC	VSTAS	45019-4973611	KAPSTONE CHARLESTON BRATTLE LLC	1	1
SC	VSTAS	45043-3698811	INTERNATIONAL PAPER GEORGETOWN MILL		1
TN	VSTAS	47001-6196011	TVA BULL RUN FOSSIL PLANT	1	1
IN	VSTAS	47009-9159211	Mc Ghee Tyson	1	1
TN	VSTAS	47093-4979911	Knoxco - Knoxville Plant	1	1
TN	VSTAS	47105-6129211	IAE & PLE - Loudon	1	1
IN	VSTAS	47145-4979111	TVA KINGSTON FOSSIL PLANT	1	1
TN	VSTAS	47161-4979311	TVA CUMBERLAND FOSSIL PLANT	1	1
IN	VSTAS	47163-3982311	EASTMAN CHEMICAL COMPANY		1

PSAT SO₂ and NOx Tags

Round 1 (124 tags)

- Total SO₂ tags for 10 individual VISTAS states + 3 MJOs = 13 tags
- Total NOx tags for 10 individual VISTAS states + 3 MJOs = 13 tags
- EGU point SO₂ tags for 10 individual VISTAS states + 3 MJOs = 13 tags
- EGU point NOx tags for 10 individual VISTAS states + 3 MJOs = 13 tags
- SO₂ tags for individual VISTAS facilities = 51 tags
- NOx tags for individual VISTAS facilities = 21 tags

Round 2 (45 tags identified so far...)

- Non-EGU point SO₂ for 10 individual VISTAS states + 3 MJOs = 13 tags
- Non-EGU point NOx for 10 individual VISTAS states + 3 MJOs = 13 tags
- SO₂ tags for individual non-VISTAS facilities = 13 tags
- NOx tags for individual non-VISTAS facilities = 4 tags

Round 1 Facility Tags

Facility State	Facility RPO	FACILITY_ID_STD	FACILITY_NAME_STD	NOx Tag	SO2 Tag
VA	VSTAS	51027-3019811	Beaumont Cement Company		1
VA	VSTAS	51027-4034811	Bonwell Coke Company LP		1
VA	VSTAS	51580-5788711	Minnowbrook Packaging Resource Group		1
WV	VSTAS	54023-8257011	Dominion Resources, Inc. - MOUNT STROM POWER STATION	1	1
WV	VSTAS	54031-6271711	ALLI GENNY ENERGY SUPPLY CO, LLC HARRISON	1	1
WV	VSTAS	54041-6900311	EQUITRANS - CORLEY RUN CS 70	1	1
WV	VSTAS	54049-4864511	AMERICAN OILUMINOUS POWER GRANT TOWN PLT	1	1
WV	VSTAS	54051-6802311	MITCHELL PLANT	1	1
WV	VSTAS	54061-1632011	LONGVIEW POWER	1	1
WV	VSTAS	54061-6773811	MONONGAHELA POWER CO. - FORT MARTIN POWER	1	1
WV	VSTAS	54061-6773811	MONONGAHELA POWER CO. - FORT MARTIN POWER	1	1
WV	VSTAS	54073-4782811	MONONGAHELA POWER CO-PLEASANTS POWER STA	1	1
WV	VSTAS	54079-6789111	APPALACHIAN POWER COMPANY - JOHN F. AMOS PLANT	1	1
WV	VSTAS	54083-6790511	GLADY #2 #3#5	1	1
WV	VSTAS	54083-6790711	FILES CREEK #2 #3#4	1	1
WV	VSTAS	54093-6327811	KINGSFORD MANUFACTURING COMPANY	1	1

Round 2 Facility Tags

Facility State	Facility RPO	FACILITY_ID_STD	FACILITY_NAME STD	NOx Tag	SO2 Tag
MD	CE/NEAP	29143-2392811	NEW MARCH POWER PLANT-MAARSDEN		1
MD	MANE-VU	24001-7763811	Luke Paper Company		1
PA	MANE-VU	42005-3866111	GENON NE MGMT CO/KEYSTONE STA		1
PA	MANE-VU	42063-3005711	ROMPER CITY GFN139 / CENTER TWP	1	1
IL	Midwest RPO	17227-7908911	Joppa Steam		1
IN	Midwest RPO	18051-7363111	Gibson		1
IN	Midwest RPO	18125-7362411	INDIANAPOLIS POWER & LIGHT - PELEHSBURG		1
IN	Midwest RPO	18129-8166111	Sigeco AS Brown South Indiana Gas & Ele		1
IN	Midwest RPO	18147-8017211	INDIANA MICHIGAN POWER DBA AEP - ROCKPORT		1
OH	Midwest RPO	39025-8294311	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)		1
OH	Midwest RPO	39053-7983011	Ohio Valley Electric Corp., Egger Creek Station (0627000003)	1	1
OH	Midwest RPO	39053-8144511	General James M. Gavin Power Plant (0627010056)	1	1
OH	Midwest RPO	39081-8115711	Cardinal Power Plant (Cardinal Operating Company) (0641050002)	1	1

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What We've Learned

- The major facility landscape continues to change
 - Shutdowns, fuel switches, additional emission controls
- Emissions continue to go down
- SO₂ emissions are still the major haze contributor, but NOx emissions are becoming more important
- Regional haze levels continue to be reduced
- Visibility improvement is well ahead of schedule

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4-Factor Analysis

- States will evaluate certain sources and emissions to determine if reasonable controls are in place or available
- Considers four important factors
 - Potential costs of compliance
 - Time necessary for compliance
 - Energy and non-air quality environmental impacts of compliance
 - Remaining useful life of sources subject to this analysis

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VISTAS Consultation and Communications

- Sharing information with EPA OAQPS, Regions 3 and 4
- Sharing information and seeking input from Federal Land Managers (next call early June)
- Preparing for briefing to stakeholders (later this year)
- Considering a face-to-face VISTAS meeting – TBD
- Working with RPO colleagues towards a national regional haze meeting this fall
- VISTAS staff available to present information at meetings in your state upon request

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VISTAS Technical Work Status

Task	Status
Data collection/analysis	nearing completion
VISTAS 2011 modeling	done
Emission updates	done
Emission processing	done
2028 modeling	done
Benchmarking	nearing completion
Area of influence analysis	nearing completion
Source apportionment modeling	beginning in May
Future year model projections	draft results available

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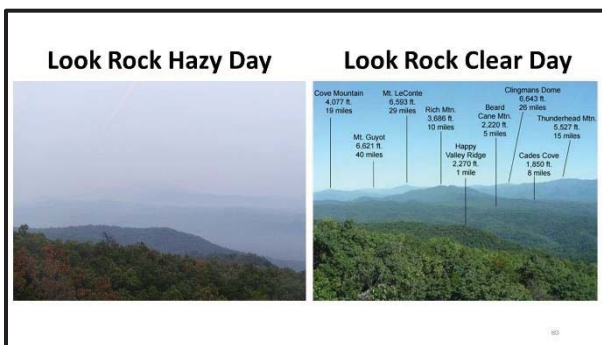
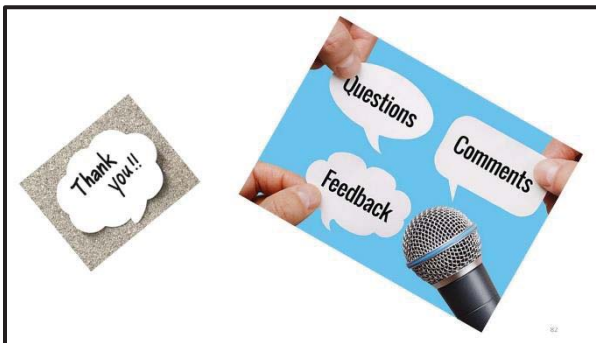
VISTAS Remaining Work/Technical Schedule

Task	Schedule
Benchmarking	May-June 2019
Area of influence analysis	May 2019
Source apportionment (tagging)	August 2019
Data collection/analysis	May-June 2019
Future year projections (RRFs)	August 2019
Best and final run???	Necessity uncertain
Final reports and documentation	December 2019
Web site updates and postings	Ongoing task

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VISTAS State Responsibilities

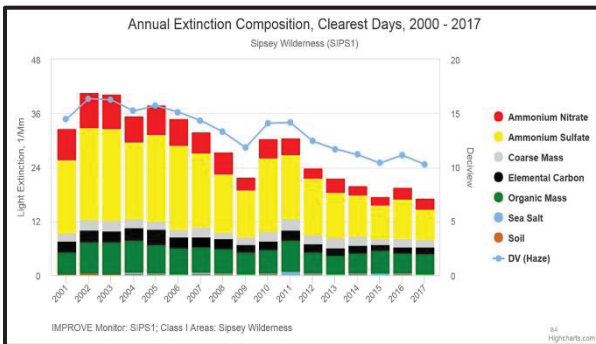
- Perform 4-factor analysis
- Consult and communicate with state stakeholders
- Consult with in-state FLM contacts if applicable
- Consult with surrounding states if applicable
- Complete state-specific analysis and documentation
- Follow state regulatory and SIP development processes
- Seek input and respond to public comment
- Submit regional haze SIPs to EPA by July 31, 2021
- Why all of this work?

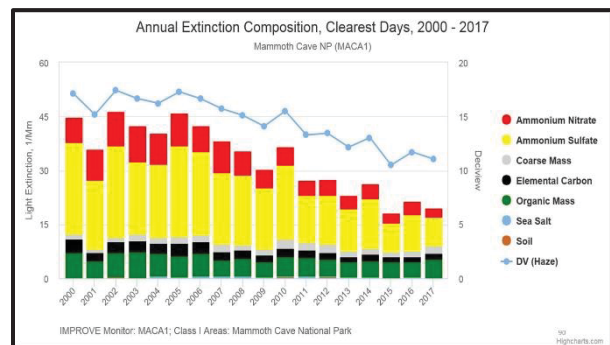
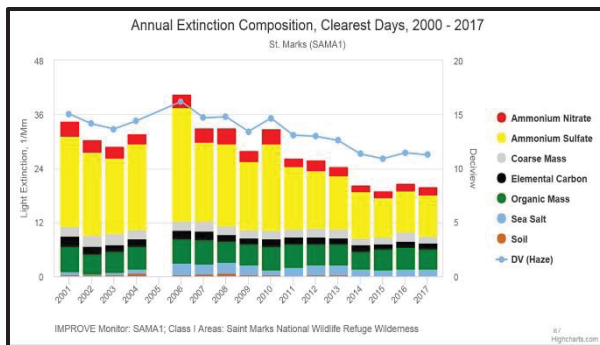
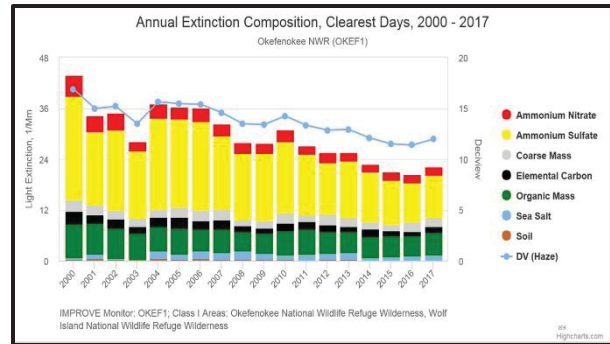
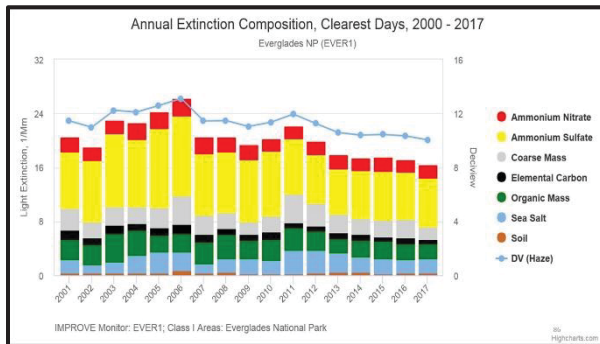
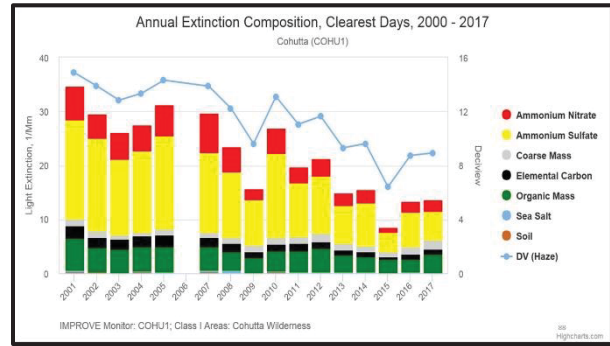
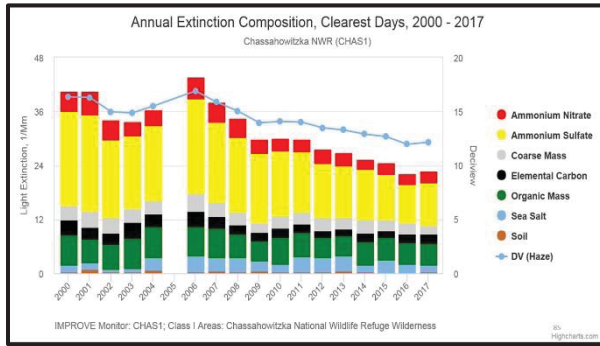


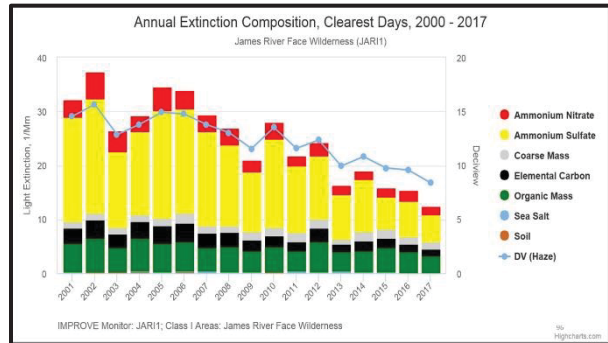
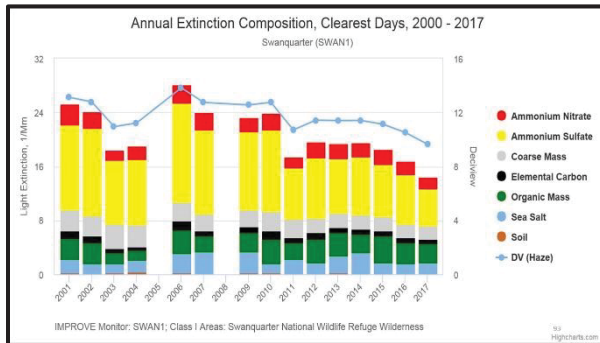
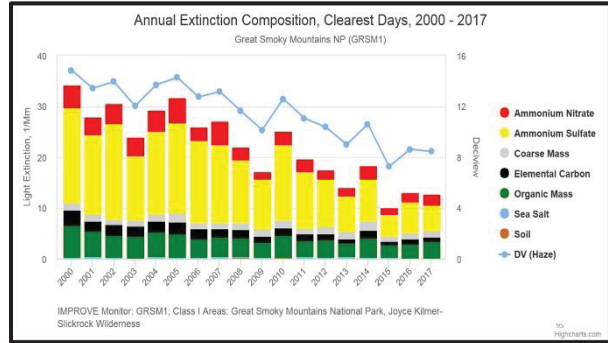
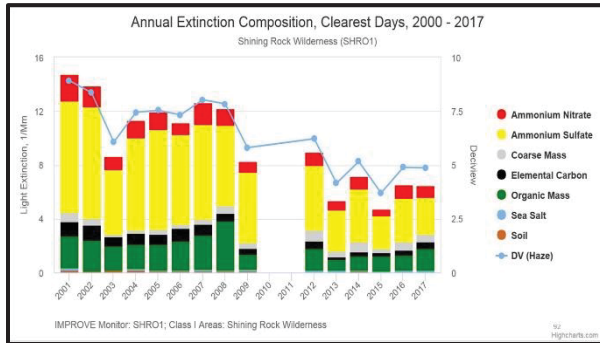
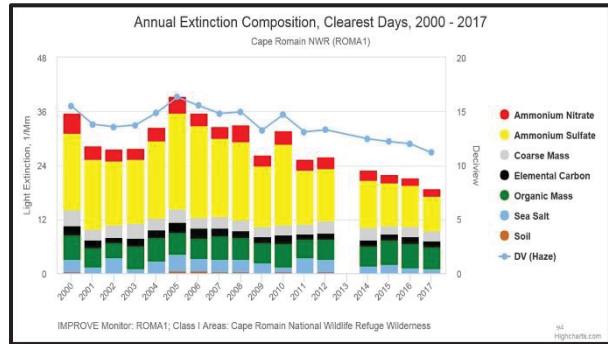
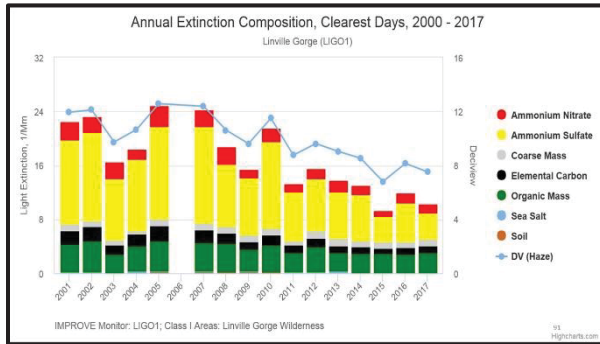
Appendix A

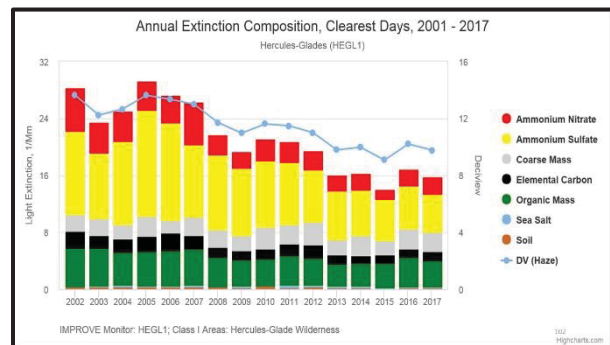
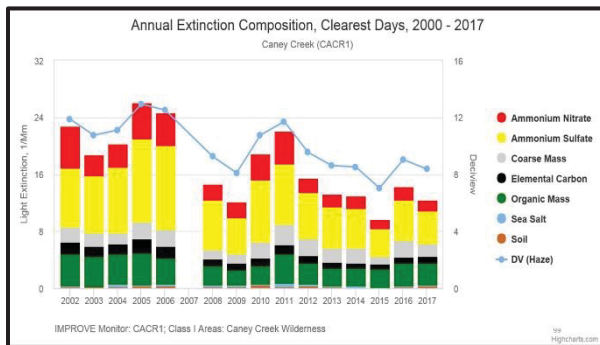
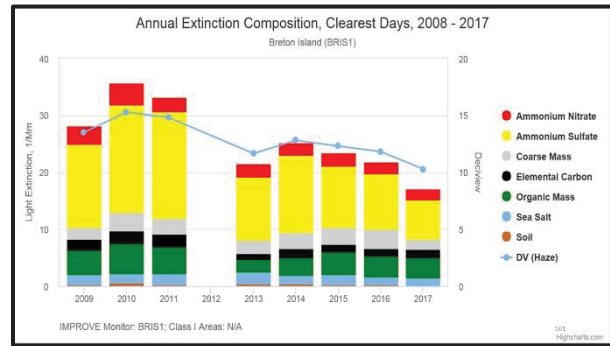
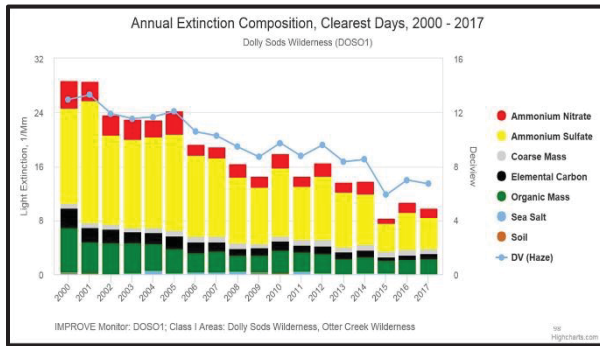
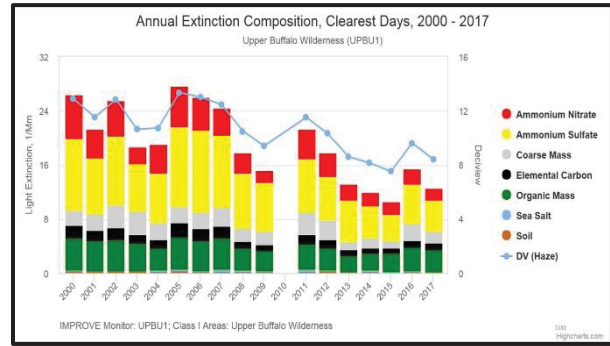
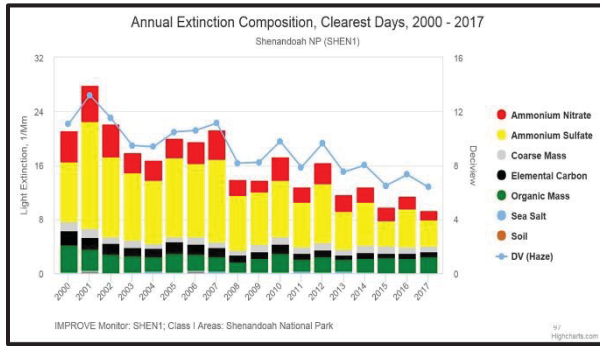
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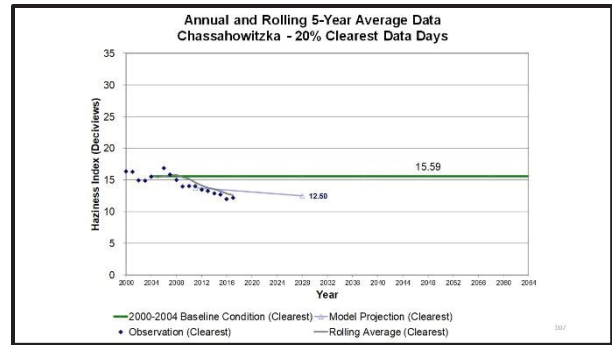
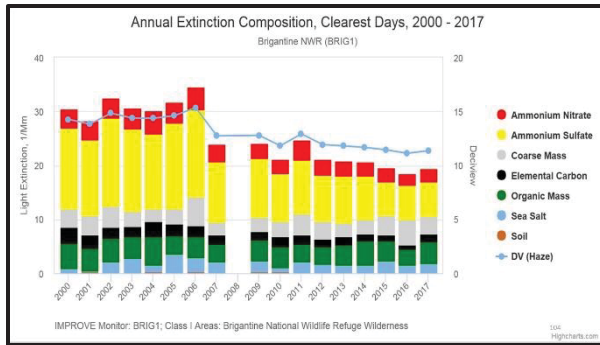
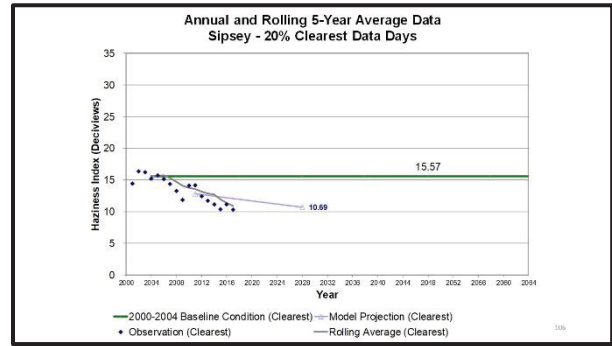
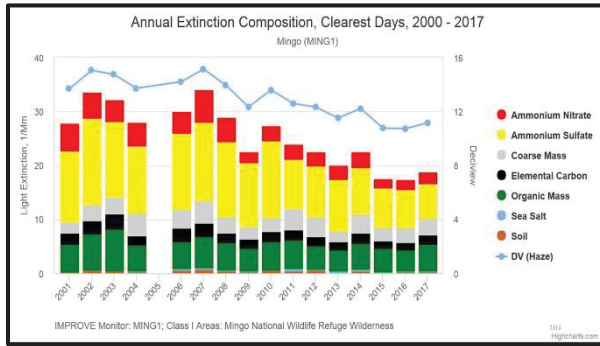
- **James Boylan, PhD., Georgia DNR**
 - Email: James.Boylan@dnr.ga.gov
 - Phone: 404-363-7014
- **Randy Strait, North Carolina DAQ**
 - Email: randy.strait@ncdenr.gov
 - Phone: 919-707-8721
- **John Hornback, Metro 4/SESARM**
 - Email: hornback@metro4-sesarm.org
 - Phone: 404-361-4000





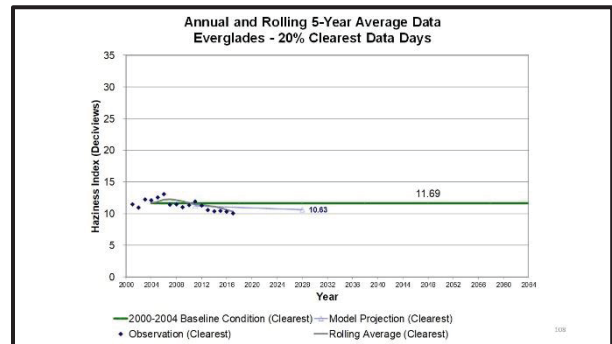


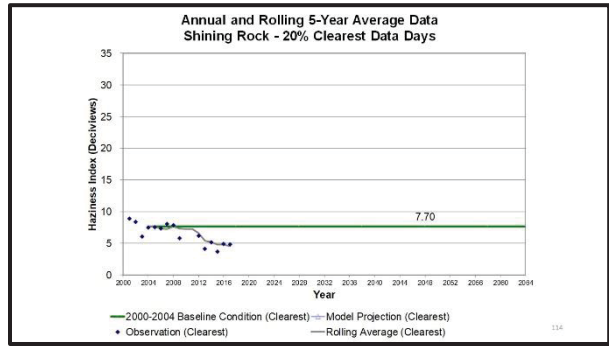
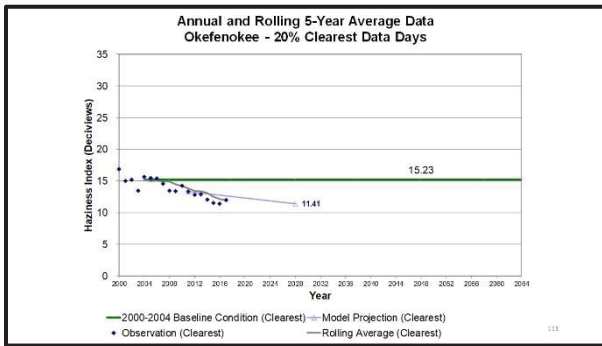
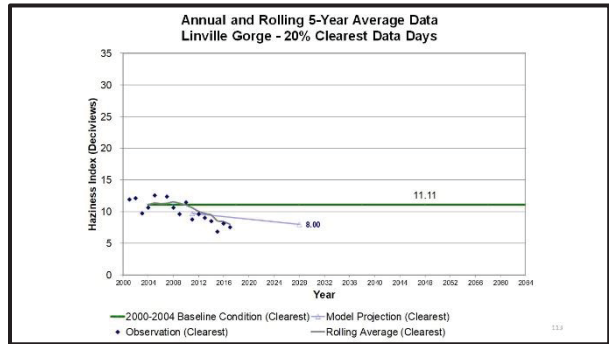
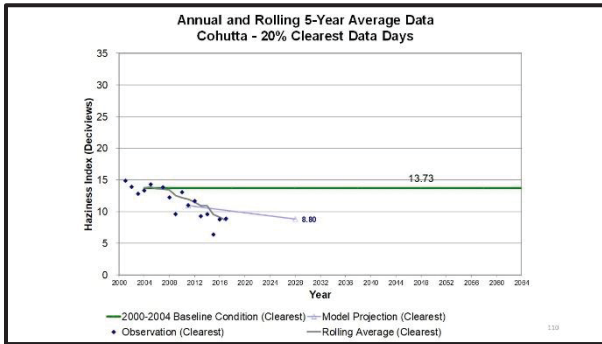
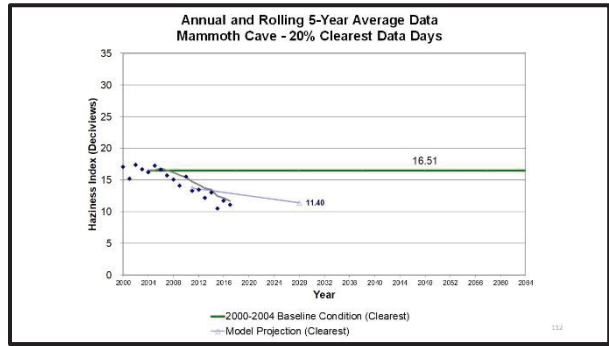
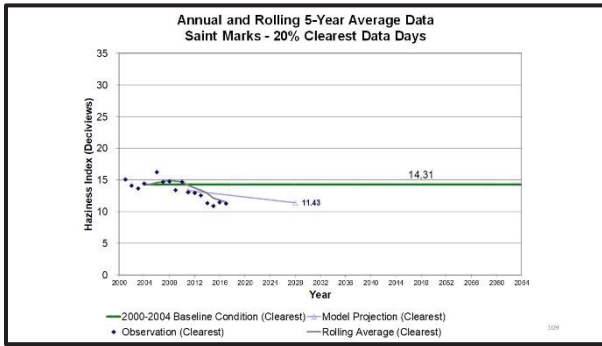


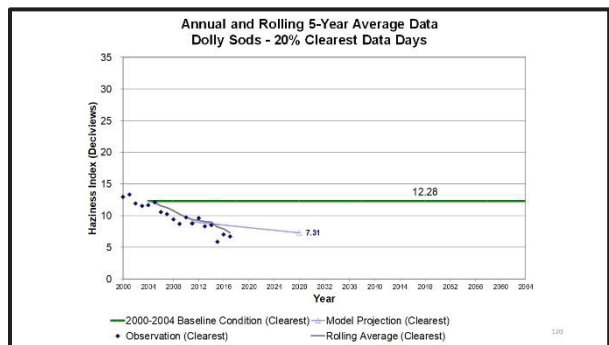
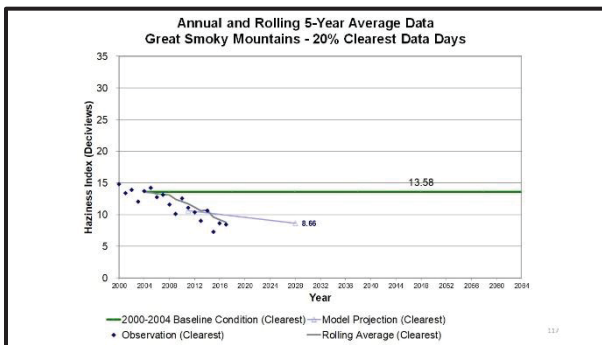
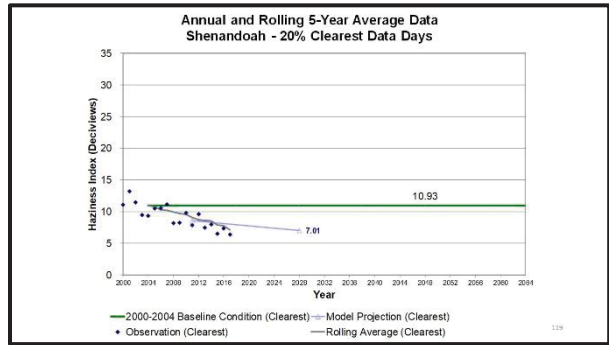
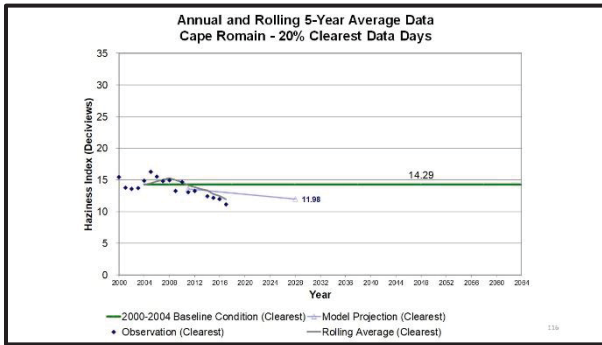
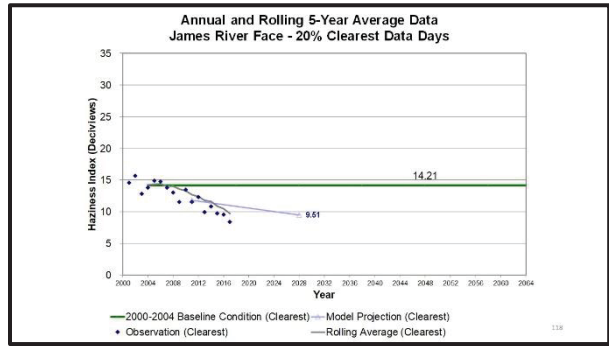
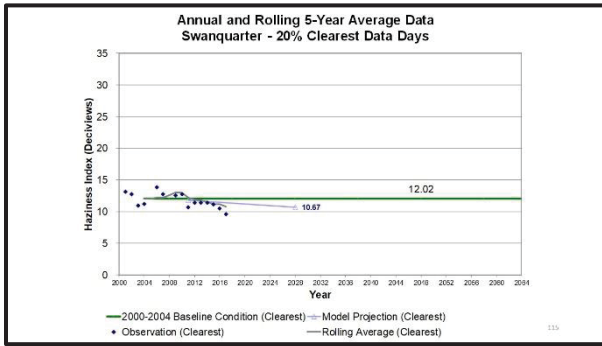


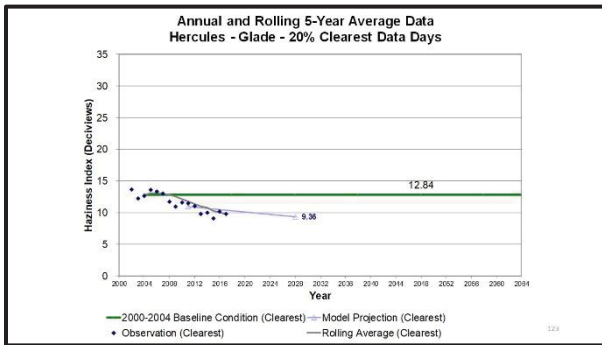
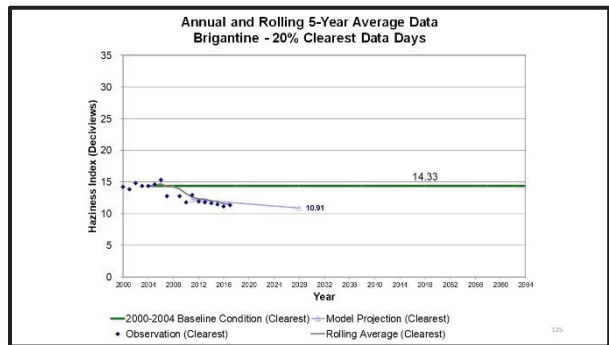
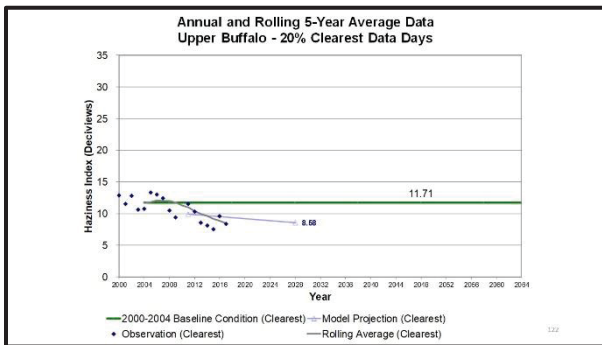
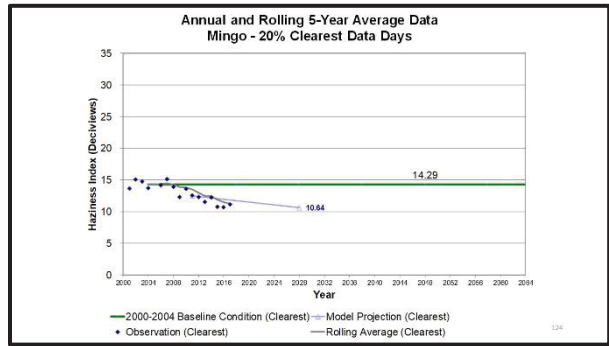
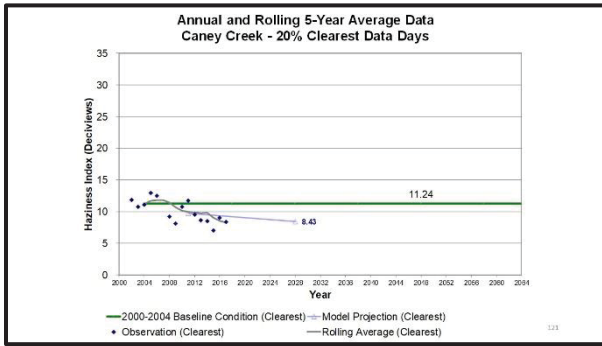
Appendix B

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Appendix C

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Draft AOI Source Categories for SIPS

SOURCE CATEGORY	SO2	NOx	TOTAL
NONPOINT	9.8%	5.8%	15.5%
NONROAD_MAR	0.1%	4.1%	4.2%
NONROAD_OTHER	0.2%	4.2%	4.4%
ONROAD	0.3%	8.6%	9.0%
POINT	44.4%	13.6%	58.0%
PT_FIRES_PRESCRIBED	6.2%	2.7%	8.9%
TOTAL	61.0%	39.0%	100.0%

127

Draft AOI Point Contributions for CHAS

State	FACILITY NAME	DISTANCE (km)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	SO2 Contribution	NOx Contribution
FL	DUKE ENERGY FLORIDA, INC. (DEE)	77.4	2,489.8	5,300.4	60.69%	1.86%
FL	TAMPA ELECTRIC COMPANY (TEC)	106.8	2,665.0	6,084.9	4.51%	0.23%
FL	MOSIAC FERTILIZER LLC	112.6	310.4	7,900.7	4.40%	0.02%
FL	CEMEX CONSTRUCTION MATERIALS FLORIDA LLC	215.5	631.6	335.0	4.11%	1.00%
FL	MOSIAC FERTILIZER, LLC	99.7	159.7	3,084.1	3.68%	0.02%
FL	F. D. MCINTOSH, JR. POWER PLANT	96.1	1,265.3	4,202.7	7.98%	0.17%
FL	MOSIAC FERTILIZER, LLC	112.2	141.0	4,425.6	2.22%	0.01%
FL	ORLANDO UTILITIES COMMISSION	138.8	4,033.4	2,690.6	1.13%	0.18%
FL	SEMINOLE ELECTRIC COOPERATIVE, INC.	141.2	917.8	3,713.4	0.72%	0.02%
FL	MOSIAC FERTILIZER, LLC	123.0	29.5	1,123.5	0.54%	0.00%
AL	Inscambia Operating Company LLC	550.7	349.3	18,974.4	0.49%	0.00%
FL	CITY OF GAINESVILLE, GRU	113.1	410.0	881.4	0.47%	0.01%
FL	INTEC FLORA, INC.	239.3	1,116.8	2,608.7	0.39%	0.01%
FL	WHITE SPRINGS AGRICULTURAL CHEMICALS, INC.	189.0	112.4	3,192.8	0.38%	0.00%
FL	BUCKEYE FLORIDA, LIMITED PARTNERSHIP	174.0	1,830.7	1,520.4	0.32%	0.02%
FL	HEA	209.9	651.8	2,094.5	0.30%	0.01%
FL	FLORIDA PACIFIC CONSUMER OPERATIONS, LLC	133.7	1,187.6	758.6	0.24%	0.04%
FL	EPRI	27.1	269.2	19.1	0.22%	0.20%
FL	INDUCTIVAP LLC	355.3	1,404.9	2,980.9	0.22%	0.01%
FL	FLORIDA GAS TRANSMISSION COMPANY	33.6	7.1	4.0	0.18%	0.00%

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Draft AOI Point Contributions for SIPS

State	FACILITY NAME	DISTANCE (km)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	SO2 Contribution	NOx Contribution
IN	INDIANA MICHIGAN POWER DBA AEP ROCKPORT	398.4	8,806.8	30,536.3	5.58%	0.30%
MO	NEW MADRID POWER PLANT-MARSTON	314.5	4,394.1	16,783.7	3.40%	0.20%
KY	Tennessee Valley Authority (TVA) Shawnee Fossil Plant	337.2	7,007.3	19,504.7	3.23%	0.55%
TN	TVA CUMBERLAND FOSSIL PLANT	228.9	4,916.5	8,427.3	3.11%	0.46%
IN	Elston	448.2	12,280.3	25,117.2	2.76%	0.28%
KY	Big Rivers Electric Corp. Wilson Station	345.5	1,151.9	6,934.2	1.90%	0.01%
IL	Joppa Steam	346.5	4,706.3	20,509.3	1.90%	0.24%
IN	INDIANAPOLIS POWER & LIGHT PETERSBURG	464.4	10,665.3	18,141.9	1.68%	0.73%
AL	Nucor Steel Decatur LLC	40.0	331.2	170.2	1.66%	0.75%
AL	DRUMMOND COMPANY, INC.	98.7	1,228.5	2,562.2	1.66%	0.16%
AL	Alabama Power - Etowah	78.5	3,976.4	1,410.8	1.47%	0.80%
AL	Waldor Coke, Inc.	99.6	781.8	2,278.2	1.43%	0.10%
MO	SKELETON POWER STATION-SKELETON POWER STATION	549.1	1,826.0	12,252.1	1.26%	0.05%
MO	NOTIANDA ALUMINUM INC. NEW MADRID	314.5	39.1	5,876.5	1.19%	0.00%
IN	Steeple Hill Brown South Indiana Gas & Oil	395.2	1,578.6	7,664.2	1.17%	0.07%
AL	Ala power - MILLER	82.9	11,047.1	1,490.5	1.10%	3.03%
GA	Eva Power Company - Plant Bowen	274.1	6,441.3	10,453.4	1.04%	0.14%
AL	Ec Gaston	148.2	2,629.8	2,288.9	0.98%	0.12%
IL	Norton	516.6	1,934.9	10,631.6	0.97%	0.02%
IN	ALCOA WARRICK POWER PLTAG DIV OFAL	396.3	11,158.6	5,071.3	0.89%	0.61%

128

Draft AOI Source Categories for EVER

SOURCE CATEGORY	SO2	NOx	TOTAL
NONPOINT	5.4%	6.4%	11.8%
NONROAD_MAR	12.9%	23.2%	36.1%
NONROAD_OTHER	0.4%	12.5%	12.9%
ONROAD	2.0%	17.2%	19.2%
POINT	10.2%	7.5%	17.7%
PT_FIRES_PRESCRIBED	1.8%	0.4%	2.3%
TOTAL	32.8%	67.2%	100.0%

131

Draft AOI Source Categories for CHAS

SOURCE CATEGORY	SO2	NOx	TOTAL
NONPOINT	0.5%	0.5%	1.0%
NONROAD_MAR	0.1%	0.3%	0.4%
NONROAD_OTHER	0.1%	1.2%	1.3%
ONROAD	0.2%	1.8%	2.0%
POINT	88.6%	4.0%	92.6%
PT_FIRES_PRESCRIBED	2.3%	0.4%	2.7%
TOTAL	91.8%	8.2%	100.0%

129

Draft AOI Point Contributions for EVER

State	FACILITY NAME	DISTANCE (km)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	SO2 Contribution	NOx Contribution
FL	Miami Infil	58.6	4,371.9	424.9	8.75%	13.77%
FL	MOSIAC FERTILIZER, LLC	303.3	310.4	7,900.7	4.70%	0.02%
FL	MIAMI DADE WATER AND SEWER DEPARTMENT	38.1	90.5	61.1	3.73%	0.41%
FL	TAMPA ELECTRIC COMPANY (TEC)	316.6	2,665.0	6,084.9	2.85%	0.08%
FL	F. D. MCINTOSH, JR. POWER PLANT	322.8	1,265.3	4,202.2	2.68%	0.16%
FL	MOSIAC FERTILIZER, LLC	304.7	141.0	4,425.6	2.54%	0.01%
FL	MIAMI DADE WATER AND SEWER DEPARTMENT	66.1	51.2	331.8	1.97%	0.11%
FL	Port Landridale/Trolyons	93.1	1,972.6	207.7	1.91%	2.39%
FL	WASTE MANAGEMENT INC. OF FLORIDA	173.2	5.8	390.4	1.87%	0.00%
FL	FLORIDA POWER & LIGHT (FPL)	35.4	170.6	13.0	1.48%	2.35%
FL	MOSIAC FERTILIZER, LLC	322.3	150.7	3,084.1	1.47%	0.01%
FL	ORLANDO UTILITIES COMMISSION	346.1	4,033.4	2,690.6	1.33%	0.24%
TX	Martin Lake	1,552.8	12,358.3	56,110.3	1.11%	0.01%
FL	MOSIAC FERTILIZER, LLC	293.1	29.5	1,123.5	1.10%	0.00%
FL	WASTE MANAGEMENT INC. OF FLORIDA	112.0	64.5	175.3	0.92%	0.05%
FL	DUKE ENERGY FLORIDA, INC. (DEE)	443.2	2,489.8	5,306.4	0.79%	0.02%
TX	WAL PARESH ELECTRIC OPERATING STATION	1,444.8	3,865.5	37,774.2	0.75%	0.00%
FL	CEMEX CONSTRUCTION MATERIALS FLORIDA, LLC	50.8	920.4	29.5	0.69%	2.60%
FL	SEMINOLE ELECTRIC COOPERATIVE, INC.	490.3	917.8	3,713.4	0.68%	0.02%
IN	INDIANA MICHIGAN POWER DBA AEP ROCKPORT	1,513.9	8,806.8	30,536.3	0.61%	0.04%

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Draft AOI Source Categories for SAMA

SOURCE CATEGORY	SO2	NOx	TOTAL
NONPOINT	2.5%	1.4%	3.9%
NONROAD_MAR	0.5%	1.4%	1.8%
NONROAD_OTHER	0.3%	2.1%	2.3%
ONROAD	0.5%	3.1%	3.5%
POINT	61.5%	4.3%	65.8%
PT_FIRES_PRESCRIBED	19.9%	2.7%	22.7%
TOTAL	85.2%	14.8%	100.0%

133

Draft AOI Point Contributions for COHU

State	FACILITY NAME	DISTANCE (mi)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	SO2 Contribution	NOx Contribution
GA	Co Power Company - Plant Bowen	78.0	6,643.3	10,453.4	18.77%	1.10%
IN	INDIANA MICHIGAN POWER DBA AEP - ROCKPORT	410.1	8,806.6	30,536.3	4.47%	0.13%
GA	ITAMPAE INLAND	87.4	1,773.4	1,791.0	4.46%	0.17%
IN	Colten	487.1	12,880.3	23,111.2	2.20%	0.16%
IN	INDIANAPOLIS POWER & LIGHT - PETERSBURG	477.0	10,665.3	18,141.9	2.09%	0.15%
KY	Tennessee Valley Authority (TVA) - Shawnee Fossil Plant	457.7	7,007.3	19,524.7	2.08%	0.07%
TN	TVA KINGSTON FOSSE PLANT	124.0	1,087.4	1,886.1	2.08%	0.13%
GA	Co Power Company - Plant Hammond	88.5	864.4	777.5	1.90%	0.08%
OH	Genex at James M. Griffin Power Plant (062701005)	512.0	8,112.5	41,595.8	1.64%	0.02%
TN	TVA CUMBERLAND FOSSE PLANT	327.0	4,938.5	8,127.9	1.12%	0.09%
KY	Big Rivers Electric Corp - Wilson Station	369.0	1,151.0	6,954.2	1.02%	0.01%
OH	Duke Energy Ohio, Wm. J. Zimmer Station (1413090154)	454.6	7,150.0	22,131.9	1.01%	0.06%
GA	Isa Power Company - Plant Wansley	156.8	2,057.5	4,806.0	1.01%	0.04%
KY	KY Utilities Co. - Owsen Station	441.5	7,939.9	10,109.3	1.00%	0.08%
IL	Jopka Steam	466.9	4,706.3	20,509.3	0.99%	0.02%
GA	Mohawk Industries Inc	32.0	66.5	77.5	0.07%	0.01%
TN	FASTMAN CHEMICAL COMPANY	769.4	6,900.3	6,470.2	0.95%	0.08%
MO	AMEREN MISSOURI-LABADIE PLANT	695.4	9,685.5	41,740.3	0.92%	0.01%
IL	TAIT & LITE, Loudon	109.0	881.3	477.8	0.89%	0.09%
IL	Newton	564.0	1,934.9	10,631.6	0.87%	0.01%

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Draft AOI Point Contributions for SAMA

State	FACILITY NAME	DISTANCE (mi)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	SO2 Contribution	NOx Contribution
AL	Escambia Operating Company LLC	375.6	149.3	18,974.4	17.05%	0.01%
FL	ROCKTECH CP, LLC	140.8	3,404.9	2,590.9	7.26%	0.20%
FL	BUCKLEY FLORIDA, LIMITED PARTNERSHIP	61.4	1,830.7	1,520.4	5.67%	0.43%
FL	DUKE ENERGY FLORIDA, INC. (DEF)	189.3	2,489.8	5,306.0	4.63%	0.20%
FL	WHITE SPRINGS AGRICULTURAL CHEMICALS, INC	197.7	112.4	3,197.8	4.29%	0.01%
AL	Escambia Operating Company LLC	315.0	149.6	8,589.6	3.81%	0.00%
AL	Sanders Lead Co	255.9	121.7	7,951.1	2.60%	0.00%
FL	MCSAFC FERTILIZER LLC	333.9	310.4	7,900.7	1.70%	0.01%
FL	TAMPA ELECTRIC COMPANY (TEC)	307.1	2,665.0	6,084.9	1.62%	0.06%
AL	Isa Power - Barry	382.1	2,181.9	6,025.6	1.42%	0.09%
IL	ISURA POWER - Crist	299.5	2,998.4	2,615.7	1.27%	0.08%
AL	Union Oil of California - Chunchula Gas Plant	396.3	349.2	2,273.2	0.97%	0.01%
LA	Columbian Chemicals Co. - Northwood Plant	789.9	640.1	7,814.0	0.94%	0.00%
FL	JEA	253.7	651.8	2,094.5	0.91%	0.03%
MO	AMEREN MISSOURI-LABADIE PLANT	1,121.8	9,685.5	41,740.3	0.86%	0.00%
AL	Continental Carbon Company	270.8	2,260.0	2,988.5	0.85%	0.02%
FL	MCSAFC FERTILIZER, LLC	376.1	141.0	4,425.6	0.81%	0.00%
AL	Akzo Nobel Chemicals Inc	383.2	20.7	3,335.7	0.79%	0.00%
AL	BrownSouth Energy Corp - 1 normal	380.7	2,918.8	4,184.9	0.76%	0.07%
GA	Georgia-Pacific Corp Cedar Springs Operation	149.2	2,884.2	510.1	0.75%	0.24%

134

Draft AOI Source Categories for OKEF

SOURCE CATEGORY	SO2	NOx	TOTAL
NONPOINT	1.8%	1.6%	3.4%
NONROAD_MAR	0.6%	5.6%	6.2%
NONROAD_OTHER	0.1%	1.6%	1.7%
ONROAD	0.5%	4.2%	4.6%
POINT	65.6%	5.5%	71.1%
PT_FIRES_PRESCRIBED	10.6%	2.4%	12.9%
TOTAL	79.3%	20.7%	100.0%

137

Draft AOI Source Categories for COHU

SOURCE CATEGORY	SO2	NOx	TOTAL
NONPOINT	4.9%	3.1%	8.1%
NONROAD_MAR	0.1%	3.3%	3.4%
NONROAD_OTHER	0.2%	2.4%	2.6%
ONROAD	0.6%	6.4%	7.0%
POINT	68.0%	8.0%	75.9%
PT_FIRES_PRESCRIBED	2.5%	0.5%	3.1%
TOTAL	76.3%	23.7%	100.0%

135

Draft AOI Point Contributions for OKEF

State	FACILITY NAME	DISTANCE (mi)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	SO2 Contribution	NOx Contribution
FL	WHITE SPRINGS AGRICULTURAL CHEMICALS, INC	71.5	112.4	3,197.8	16.11%	0.03%
FL	ROCKTECH CP, LLC	64.8	2,316.8	2,605.7	12.12%	0.83%
FL	JEA	65.6	651.8	2,094.5	6.23%	0.17%
FL	SEMINOLE ELECTRIC COOPERATIVE, INC.	121.6	917.8	3,723.4	3.68%	0.66%
FL	III CHEMICAL HOLDINGS, INC.	36.8	37.7	808.9	3.07%	0.01%
FL	WANTNUT PERFORMANCE FIBERS LLC	63.4	2,127.1	1,607.0	2.67%	0.80%
GA	International Paper - Savannah	178.9	1,560.7	3,945.4	2.60%	0.07%
FL	BUCKLEY FLORIDA, LIMITED PARTNERSHIP	151.5	1,830.7	1,520.4	2.60%	0.13%
FL	PRENSSENZ LLC	59.8	66.3	569.5	1.85%	0.02%
FL	DUKE ENERGY FLORIDA, INC. (DEF)	205.0	2,489.9	5,306.0	1.33%	0.65%
AL	Escambia Operating Company LLC	501.9	349.3	18,974.4	1.20%	0.00%
AL	Sanders Lead Co	384.6	121.7	7,951.1	1.05%	0.00%
AL	Escambia Operating Company LLC	491.9	141.6	8,589.6	1.03%	0.00%
GA	Isosigma Pacific Consumer Products LP (Savannah River Mill)	197.2	351.5	1,860.2	0.99%	0.01%
GA	Isa Power Company - Plant Bowen	458.1	6,643.3	10,453.4	0.97%	0.05%
GA	Brunswick Cellulose Inc	75.3	1,554.5	294.2	0.56%	0.23%
SC	ALLUMAX OF SOUTH CAROLINA	322.7	108.1	3,751.7	0.92%	0.00%
GA	JEA Walden Mill	112.7	1,032.6	485.7	0.80%	0.08%
SC	SAWTEE COPPER CROSS-GENERATING STATION	348.1	3,273.5	4,781.9	0.80%	0.07%
FL	CITY OF GAINESVILLE, GRU	111.7	410.0	881.4	0.74%	0.03%

138

Draft AOI Source Categories for WOLF

SOURCE CATEGORY	SO2	NOx	TOTAL
NONPOINT	2.6%	1.5%	4.1%
NONROAD_MAR	1.4%	2.7%	4.1%
NONROAD_OTHER	0.3%	3.0%	3.3%
ONROAD	0.7%	5.2%	5.9%
POINT	70.4%	6.8%	77.1%
PT_FIRES_PRESCRIBED	4.7%	0.8%	5.5%
TOTAL	79.9%	20.1%	100.0%

139

Draft AOI Point Contributions for MACA

State	FACILITY NAME	DISTANCE (mi)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	SO2 Contribution	NOx Contribution
IN	INDIANA MICHIGAN POWER DBA AEP ROCKPORT	118.0	8,806.8	30,536.3	16.11%	2.49%
KY	Big Rivers Electric Corp - Wilson Station	89.9	1,151.9	6,934.2	6.42%	0.35%
IN	Gilson	198.2	12,280.3	23,117.2	4.97%	1.15%
KY	Tennessee Valley Authority - Paradise Fossil Plant	75.1	2,927.4	2,990.2	3.54%	1.15%
KY	Century Aluminum of KY LLC	108.0	197.7	5,044.2	3.43%	0.04%
IN	INDIANAPOLIS POWER & LIGHT PT THSRIBES	167.9	10,665.3	18,141.9	2.95%	0.91%
IN	Shore AB Brown South Indiana Gas & Dk	102.9	1,578.6	7,644.7	2.00%	0.20%
IN	ALCOA WABRICK POWER PLANT AGC DIV OF AL	136.1	11,158.6	5,071.3	1.91%	1.60%
IL	Joplin Steam	241.0	4,706.3	20,509.3	1.72%	0.16%
KY	Century Aluminum Sebree LLC	133.2	75.5	4,199.4	1.63%	0.01%
KY	Tennessee Valley Authority (TVA) - Shawnee Fossil Plant	233.6	7,007.3	19,304.7	1.52%	0.14%
TN	TVA CUMBERLAND FOSSIL PLANT	157.6	4,916.5	8,427.3	1.51%	0.34%
IN	ALCOA INC - WABRICK OPERATIONS	135.9	352.8	5,892.8	1.47%	0.00%
IN	SABIC INNOVATIVE PLASTICS MT. VERNON LLC	179.3	1,751.8	4,703.4	1.38%	0.17%
OH	General James M. Gavin Power Plant (0627010056)	406.5	8,142.5	41,595.8	1.38%	0.04%
KY	Louisville Gas & Electric Co. Mill Creek Station	104.6	1,460.1	4,335.3	1.29%	0.42%
OH	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	256.1	7,150.0	22,133.9	1.16%	0.13%
KY	KY UTILITIES Co - Ghent Station	204.5	7,939.9	10,169.3	0.97%	0.22%
IN	POSCO CEMENT CORP	146.5	7,265.0	4,681.7	0.96%	0.11%
MO	SIKESTON POWER STATION-SIKESTON POWER STATION	310.4	1,826.0	12,252.1	0.84%	0.03%

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Draft AOI Point Contributions for WOLF

State	FACILITY NAME	DISTANCE (mi)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	SO2 Contribution	NOx Contribution
GA	Brunswick Cellulose Inc	27.9	1,544.5	294.2	4.61%	2.87%
FL	ROCK TENN CP, LLC	74.9	2,316.8	2,606.7	8.34%	0.38%
GA	International Paper - Savannah	85.9	1,550.7	3,945.4	7.34%	0.23%
FL	IPA	105.1	651.8	2,094.5	4.31%	0.09%
GA	Isacora Pacific Consumer Products LP (Savannah River Mill)	109.9	551.5	1,864.2	2.58%	0.05%
FL	WHITTY SPENDS AGRICULTURAL CHEMICALS, INC	173.6	112.4	3,197.8	2.24%	0.01%
SC	ALLIANCE OF SOUTH CAROLINA	223.0	108.1	3,751.7	1.79%	0.00%
FL	BAYVIEW PERFORMANCE FIBERS LLC	77.4	2,377.1	567.0	1.74%	0.37%
FL	SEMINOLE ELECTRIC COOPERATIVE, INC	181.4	917.8	3,733.4	1.72%	0.02%
OH	General James M. Gavin Power Plant (0627010056)	405.3	8,122.5	41,595.8	1.67%	0.02%
SC	NORTH CAROLINA GREENWATER SYSTEM	251.0	3,274.5	4,281.2	1.53%	0.08%
GA	Southern States Phosphate & Fertilizer	84.1	1.0	597.1	1.51%	0.00%
FL	ISA CHEMICAL INDUSTRIES, INC	118.5	37.7	808.9	1.49%	0.00%
FL	DUKE ENERGY FLORIDA, INC (DEE)	296.6	2,489.8	5,306.4	1.16%	0.04%
GA	Isa Power Company - Plant Bowen	458.1	6,643.3	10,453.4	1.05%	0.03%
GA	Savannah Sugar Refinery	89.9	521.6	582.0	1.03%	0.07%
SC	INTERNATIONAL PAPER EASTOVER	288.2	1,780.3	3,212.9	0.93%	0.05%
GA	Isa Power Company - Plant McManus	27.1	77.2	30.1	0.91%	0.14%
AL	Fluorobla Densating Company LLC	598.2	349.3	18,974.4	0.88%	0.00%
SC	KANSOLINE CHARLESTON BRPT LLC	243.6	2,356.8	1,863.7	0.87%	0.09%

140

Draft AOI Source Categories for LIGO

SOURCE CATEGORY	SO2	NOx	TOTAL
NONPOINT	9.9%	1.7%	11.6%
NONROAD_MAR	0.1%	0.6%	0.7%
NONROAD_OTHER	0.1%	0.8%	0.9%
ONROAD	0.5%	1.9%	2.4%
POINT	80.0%	3.0%	83.1%
PT_FIRES_PRESCRIBED	1.2%	0.1%	1.3%
TOTAL	91.9%	8.1%	100.0%

143

Draft AOI Source Categories for MACA

SOURCE CATEGORY	SO2	NOx	TOTAL
NONPOINT	1.0%	6.4%	7.4%
NONROAD_MAR	0.1%	3.4%	3.5%
NONROAD_OTHER	0.1%	3.3%	3.4%
ONROAD	0.2%	8.1%	8.3%
POINT	62.0%	14.1%	76.1%
PT_FIRES_PRESCRIBED	0.8%	0.5%	1.3%
TOTAL	64.1%	35.9%	100.0%

144

Draft AOI Point Contributions for LIGO

State	FACILITY NAME	DISTANCE (mi)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	SO2 Contribution	NOx Contribution
TN	FASTMAN CHEMICAL COMPANY	81.9	6,900.3	6,420.2	18.98%	0.67%
NC	Duke Energy Carolinas, LLC - Marshall Steam Station	37.2	7,511.3	4,139.2	6.55%	0.40%
OH	General James M. Gavin Power Plant (0627010056)	329.2	8,122.5	41,595.8	5.83%	0.04%
VA	Jewell Coke Company LLP	140.4	520.2	5,090.9	5.28%	0.01%
NC	ISL Carbon LLC	32.3	21.7	281.6	4.00%	0.01%
OH	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	380.1	7,150.0	22,133.9	2.79%	0.13%
NC	Duke Energy Carolinas, LLC - Cliffside Steam Station	85.3	1,947.7	1,082.3	2.35%	0.11%
WV	MONTICABELLA POWER CO PT ASANTS POWER STA	381.0	5,497.4	16,817.4	2.01%	0.01%
NC	Duke Energy Carolinas, LLC - Bulboro Creek Steam Station	372.2	5,264.3	4,946.1	1.91%	0.08%
WV	APPALACHIAN POWER COMPANY - JOHN E AMOS PLANT	277.7	4,878.1	10,984.2	1.76%	0.02%
TN	ASIS INDIANAPOLIS GREEN AND PLANT	246.7	2,068.1	441.6	1.72%	0.21%
IN	INDIANA MICHIGAN POWER DBA AEP ROCKPORT	103.5	8,806.8	30,536.3	1.16%	0.11%
PA	SPRINGBROOK MGMT COMPANY/STONE ISIA	367.5	6,578.5	56,939.2	0.93%	0.00%
NC	Brookhaven Hospital	35.6	15.8	65.8	0.92%	0.01%
NC	Duke Energy Progress, LLC - Roxboro Steam Electric Plant	269.4	4,527.9	6,665.5	0.91%	0.03%
WV	ALLEGHENY ENERGY SUPPLY CO, LLC-HARRISON	404.3	11,830.0	10,082.9	0.76%	0.03%
SC	PRESCOTT EPLS INC	156.8	1,803.7	2,571.8	0.76%	0.07%
OH	Waukegan Paper Products - Canton Mill	39.4	2,293.4	1,127.1	0.76%	0.05%
OH	Aaron Lake Power Plant (D247030013)	614.2	3,606.7	21,188.9	0.75%	0.00%
KY	KY UTILITIES Co - Ghent Station	412.9	7,939.9	10,169.3	0.71%	0.02%

144

Draft AOI Source Categories for SHRO

SOURCE CATEGORY	SO2	NOx	TOTAL
NONPOINT	12.2%	4.2%	16.4%
NONROAD_MAR	0.1%	1.1%	1.2%
NONROAD_OTHER	0.2%	2.7%	2.8%
ONROAD	0.7%	5.9%	6.6%
POINT	61.8%	9.7%	71.5%
PT_FIRES_PRESCRIBED	1.4%	0.2%	1.6%
TOTAL	76.2%	23.8%	100.0%

140

Draft AOI Point Contributions for SWAN

State	FACILITY NAME	DISTANCE (km)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	SO2 Contribution	NOx Contribution
NC	PFS Photostat Company, Inc. - Aurora	57.5	495.6	4,845.9	37.59%	0.57%
PA	GENCON NE MGMT CO/KEYSTONE STA	640.2	6,578.5	56,939.2	2.98%	0.08%
NC	Dominant Paper Company, LLC	69.0	1,796.5	687.4	2.25%	1.01%
NC	Duke Energy Progress, LLC - Roxboro Steam Electric Plant	282.6	4,521.9	6,665.5	2.03%	0.18%
OH	General James M. Gavin Power Plant (0627010056)	651.5	8,122.5	43,595.8	1.76%	0.06%
MD	Rivern Power East Smallwood LLC	414.7	4,387.8	10,947.9	1.75%	0.16%
NC	Marine Corps Air Station - Cherry Point	88.4	201.1	607.8	1.30%	0.05%
MD	Julek Paper Company	512.5	3,607.0	22,659.8	0.99%	0.02%
WV	MONONGAHELA POWER CO- PLEASANTS POWER STA	625.7	5,497.4	16,817.4	0.83%	0.07%
MI	ST. CLAIR/ BELLE RIVER POWER PLANT	977.5	9,488.2	25,225.9	0.83%	0.01%
NC	Weyerhaeuser NR Company - Vanceboro Pulp	86.8	771.8	288.7	0.74%	0.24%
MD	GenOn Energy, Inc. - Morgantown	379.9	895.4	3,737.0	0.73%	0.03%
WV	AMERICAN PAPER SUPPLY CO., LLC - MARIETTA	348.8	11,833.9	10,087.9	0.66%	0.08%
OH	Duke Energy Ohio, Wm. H. Zimmer Station (14133090154)	806.7	7,150.0	22,133.9	0.65%	0.05%
WV	APPALACHIAN POWER COMPANY - JOHN E AMOS PLANT	602.0	4,878.1	10,984.2	0.62%	0.04%
SC	SANTEE COOPER CROSS GENERATING STATION	426.9	3,273.5	4,281.2	0.55%	0.07%
PA	HIMMELSTEIN GEN/PT CENTER TWO	620.1	5,216.0	13,865.7	0.54%	0.05%
NY	KY UTILITIES Co. - Ghent Station	885.4	7,939.9	10,169.3	0.52%	0.07%
MI	JAMES H. MISSOURI LAGADIC PLANT	1,145.4	5,085.5	41,740.3	0.51%	0.03%
OH	Department of Public Utilities, City of Orrville, Ohio (0285010188)	771.9	1,809.9	13,038.0	0.46%	0.01%

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Draft AOI Point Contributions for SHRO

State	FACILITY NAME	DISTANCE (km)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	SO2 Contribution	NOx Contribution
NC	Blue Ridge Paper Products - Canton Mill	115.9	2,792.4	1,127.1	40.57%	15.33%
TN	EASTMAN CHEMICAL COMPANY	126.9	6,900.3	6,420.2	4.35%	0.39%
NC	Duke Energy Carolinas, LLC - Marshall Steam Station	166.0	7,511.3	4,139.2	2.16%	0.48%
GA	Sea Power Company - Plant Bowen	241.6	6,643.3	10,653.8	1.67%	0.07%
NC	Duke Energy Carolinas, LLC - Cliffside Steam Station	94.1	1,941.7	1,082.5	1.34%	0.28%
NC	Duke Energy Carolinas, LLC - Belenus Creek Steam Station	764.4	5,764.3	4,946.1	1.40%	0.14%
TN	THE KINGSTON FOSSIL PLANT	167.7	1,687.4	1,886.1	1.38%	0.10%
OH	General James M. Gavin Power Plant (0627010056)	397.3	8,122.5	43,595.8	1.36%	0.03%
OH	Duke Energy Ohio, Wm. H. Zimmer Station (14133090154)	406.7	7,150.0	22,133.9	1.35%	0.02%
VA	Jewell Coke Company LLP	214.7	520.2	5,090.9	1.31%	0.01%
WV	APPALACHIAN POWER COMPANY - JOHN E AMOS PLANT	392.1	4,878.1	10,984.2	1.20%	0.04%
IN	INDIANA MICHIGAN POWER FIBRA A/P - ROCKPORT	473.3	8,806.8	30,536.3	0.68%	0.01%
TN	THE KIMBERLAND FIBRE PLANT	454.1	4,916.5	8,477.1	0.53%	0.00%
CA	TECH P F INLAND	265.7	1,773.4	1,791.0	0.53%	0.00%
TN	THE BULL RUN FOSSIL PLANT	143.0	964.2	623.5	0.53%	0.05%
WV	MONONGAHELA POWER CO- PLEASANTS POWER STA	460.0	5,497.4	16,817.4	0.51%	0.01%
TN	TRIT & TITE, London	145.2	885.1	477.8	0.49%	0.07%
PA	GENCON NE MGMT CO/KEYSTONE STA	657.8	6,578.5	56,939.2	0.48%	0.00%
KY	Big Rivers Electric Corp. - Wilson Station	448.4	1,151.9	6,934.7	0.47%	0.01%
MO	JAMES H. MISSOURI LAGADIC PLANT	799.0	5,085.5	41,740.3	0.46%	0.01%

140

Draft AOI Source Categories for ROMA

SOURCE CATEGORY	SO2	NOx	TOTAL
NONPOINT	1.7%	1.1%	2.9%
NONROAD_MAR	1.7%	2.4%	4.0%
NONROAD_OTHER	0.1%	1.8%	1.9%
ONROAD	0.3%	2.8%	3.2%
POINT	79.3%	5.9%	85.1%
PT_FIRES_PRESCRIBED	2.5%	0.4%	2.9%
TOTAL	85.6%	14.4%	100.0%

140

Draft AOI Source Categories for SWAN

SOURCE CATEGORY	SO2	NOx	TOTAL
NONPOINT	4.2%	3.6%	7.7%
NONROAD_MAR	0.3%	3.5%	3.8%
NONROAD_OTHER	0.2%	8.7%	8.9%
ONROAD	0.2%	4.1%	4.4%
POINT	66.9%	7.2%	74.1%
PT_FIRES_PRESCRIBED	0.8%	0.3%	1.1%
TOTAL	72.6%	27.4%	100.0%

147

Draft AOI Point Contributions for ROMA

State	FACILITY NAME	DISTANCE (km)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	SO2 Contribution	NOx Contribution
SC	KAPSTONE CHARLESTON KRAFT LLC	79.3	2,155.8	1,863.7	29.97%	2.72%
SC	ALUMAX OF SOUTH CAROLINA	39.1	108.1	3,751.7	16.95%	0.03%
SC	SANTEE COOPER CROSS GENERATING STATION	63.8	3,273.5	4,281.2	6.52%	0.45%
SC	SANTEE COOPER WINYAH GENERATING STATION	51.4	1,772.5	2,426.9	4.57%	0.38%
SC	INTERNATIONAL PAPER GEORGETOWN MILL	57.6	2,091.9	2,767.5	4.28%	0.35%
SC	NEE&WILMARS	76.7	987.7	393.5	3.88%	0.19%
SC	NUCOR STEEL BERKELEY	22.1	440.0	348.3	1.82%	0.42%
GA	International Paper - Savannah	166.1	1,560.7	3,945.4	1.75%	0.04%
SC	SINOVA DENMO CARBON INC.	66.1	264.6	971.2	1.70%	0.03%
GA	Georgia Pacific Consumer Products LP (Savannah River Mill)	159.9	351.5	1,860.2	1.45%	0.02%
SC	INTERNATIONAL PAPER LEASFLOWER	199.0	1,780.3	5,212.9	1.05%	0.04%
SC	ECOPAPER PARTNER LLC	275.9	58.4	58.3	0.04%	0.01%
OH	General James M. Gavin Power Plant (0627010056)	701.0	8,122.5	43,595.8	0.83%	0.00%
SC	SC&G WATREX	133.1	1,344.0	2,376.8	0.66%	0.03%
SC	Charleston AFB Int'l Airport	26.8	358.4	46.2	0.43%	0.24%
GA	Sea Power Company - Plant Bowen	508.2	6,643.3	10,653.8	0.35%	0.01%
SC	FLUANT ELEMENT CO	80.6	509.4	309.0	0.34%	0.04%
FL	WOLK TENN CP, LLC	302.9	2,316.8	2,806.7	0.34%	0.02%
TN	EASTMAN CHEMICAL COMPANY	476.9	6,900.3	6,420.2	0.34%	0.01%
SC	SC&G COPE	136.5	644.0	962.3	0.33%	0.02%

150

Draft AOI Source Categories for GRSM

SOURCE CATEGORY	SO2	NOx	TOTAL
NONPOINT	10.4%	8.3%	18.7%
NONROAD_MAR	0.1%	3.1%	3.2%
NONROAD_OTHER	0.3%	4.6%	4.9%
ONROAD	1.5%	11.3%	12.7%
POINT	50.9%	7.1%	58.0%
PT_FIRES_PRESCRIBED	2.3%	0.3%	2.6%
TOTAL	65.4%	34.6%	100.0%

158

Draft AOI Point Contributions for JOYC

State	FACILITY NAME	DISTANCE (km)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	SO2 Contribution	NOx Contribution
TN	IVA KINGSTON FOSSEL PLANT	73.7	1,687.4	1,885.1	7.35%	0.53%
TN	EASTMAN CHEMICAL COMPANY	179.2	6,900.3	6,420.2	5.51%	0.15%
OH	General James M. Gavin Power Plant (0627010056)	425.1	8,122.5	41,595.8	4.43%	0.04%
IN	INDIANA MICHIGAN POWER DBA/AEP - ROCKPORT	391.2	9,806.9	30,536.3	4.05%	0.13%
TN	TATE & LYLE, Loudon	88.1	883.3	472.8	4.05%	0.58%
OH	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	385.1	7,150.0	22,133.9	3.40%	0.06%
GA	Co Power Company - Plant Bowen	166.2	6,643.3	10,453.4	3.38%	0.09%
TN	IVA RUII RUN FOSSEL PLANT	70.3	964.2	622.5	2.33%	0.44%
IN	INDIANAPOLIS POWER & LIGHT - PETERSBURG	453.0	10,665.3	18,141.9	2.02%	0.13%
IN	Sison	471.7	12,280.3	23,117.2	1.87%	0.10%
KY	Cerbery Aluminum of KY LLC	317.1	197.7	5,042.2	1.48%	0.01%
TN	Mc Ghee Tyson	44.3	594.7	78.6	1.25%	0.67%
KY	Knoxville Gas & Electric Co., Mill Creek Station	340.9	4,169.1	4,335.8	1.14%	0.11%
KY	KT Utilities Co. - Ghent Station	383.0	7,339.9	10,109.3	1.03%	0.07%
IN	INDIANA KENTUCKY ELECTRIC CORPORATION	391.6	6,188.5	9,038.1	0.95%	0.04%
IN	BASSING CEMENT CORP	380.5	2,365.0	4,681.2	0.96%	0.04%
IL	Jopka Steam	480.1	4,746.3	70,526.3	0.96%	0.01%
VA	Lowell Coke Company LLP	267.5	520.2	5,090.9	0.93%	0.00%
KY	Big Rivers Electric Corp - Wilson Station	359.1	1,151.9	6,934.7	0.85%	0.07%
MO	AMERICAN MISSOURI LAMAR PLANT	700.9	9,685.5	41,740.3	0.84%	0.03%

154

Draft AOI Point Contributions for GRSM

State	FACILITY NAME	DISTANCE (km)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	SO2 Contribution	NOx Contribution
TN	IVA KINGSTON FOSSEL PLANT	60.0	1,687.4	1,886.1	6.67%	0.64%
TN	EASTMAN CHEMICAL COMPANY	160.1	6,900.3	6,430.2	5.43%	0.17%
TN	TATE & LYLE, Loudon	36.1	883.3	472.8	4.74%	0.74%
IN	INDIANA MICHIGAN POWER DBA/AEP - ROCKPORT	375.5	9,806.8	30,536.3	4.21%	0.19%
TN	Mc Ghee Tyson	19.7	594.7	78.6	3.89%	2.72%
TN	IVA RUII RUN FOSSEL PLANT	47.1	964.2	622.5	3.76%	0.58%
OH	General James M. Gavin Power Plant (0627010056)	400.5	8,122.5	41,595.8	2.03%	0.04%
GA	Co Power Company - Plant Bowen	188.7	6,643.3	10,453.4	1.96%	0.01%
OH	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	360.0	7,150.0	22,133.9	1.66%	0.08%
TN	Cemex - Knoxville Plant	44.3	711.5	121.5	1.55%	0.82%
IL	Jopka Steam	414.4	4,746.3	70,526.3	1.41%	0.04%
IN	INDIANA KENTUCKY ELECTRIC CORPORATION	368.7	6,188.5	9,038.1	1.44%	0.11%
IN	INDIANAPOLIS POWER & LIGHT - PETERSBURG	435.6	10,665.3	18,141.9	1.34%	0.11%
KY	KT Utilities Co. - Ghent Station	359.2	7,339.9	10,109.3	1.29%	0.08%
KY	Tennessee Valley Authority (TVA) - Shawnee Fossil Plant	465.3	7,007.3	19,504.7	1.21%	0.02%
IN	Sison	458.3	12,280.3	23,117.2	1.13%	0.06%
KY	Big Rivers Electric Corp - Wilson Station	345.8	1,151.9	6,934.7	1.06%	0.07%
KY	Cerbery Aluminum of KY LLC	360.5	197.7	5,042.2	0.97%	0.00%
WV	MCKINNONGAIHEI & POWELL CO. PLEASANTS POWER STA	475.9	5,497.4	16,817.4	0.96%	0.01%
WV	APPALACHIAN POWER COMPANY - JOHN E AMOS PLANT	367.1	4,878.1	10,984.2	0.94%	0.01%

155

Draft AOI Source Categories for JARI

SOURCE CATEGORY	SO2	NOx	TOTAL
NONPOINT	5.7%	3.6%	9.3%
NONROAD_MAR	0.1%	2.4%	2.5%
NONROAD_OTHER	0.1%	1.7%	1.7%
ONROAD	0.4%	7.2%	7.6%
POINT	70.2%	7.4%	77.5%
PT_FIRES_PRESCRIBED	1.1%	0.2%	1.3%
TOTAL	77.5%	22.5%	100.0%

156

Draft AOI Source Categories for JOYC

SOURCE CATEGORY	SO2	NOx	TOTAL
NONPOINT	7.5%	4.6%	12.1%
NONROAD_MAR	0.1%	2.2%	2.3%
NONROAD_OTHER	0.2%	2.6%	2.8%
ONROAD	0.8%	7.1%	7.9%
POINT	64.8%	6.4%	71.2%
PT_FIRES_PRESCRIBED	3.3%	0.4%	3.7%
TOTAL	76.6%	23.4%	100.0%

159

Draft AOI Point Contributions for JARI

State	FACILITY NAME	DISTANCE (km)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	SO2 Contribution	NOx Contribution
VA	McAuliffeva Packaging Resource Group	46.51	1,985.69	2,115.31	17.46%	1.12%
OH	General James M. Gavin Power Plant (0627010056)	270.18	8,122.53	41,595.81	7.55%	0.14%
VA	Roanoke Cement Company	46.43	3,977.97	7,360.17	6.50%	0.47%
WV	MONONGAHELA POWER CO- PLEASANTS POWER STA	247.97	5,497.37	16,817.43	3.82%	0.15%
WV	APPALACHIAN POWER COMPANY - JOHN E AMOS PLANT	223.52	4,878.10	10,984.24	3.45%	0.13%
PA	McMILLIN W. MEYER COVER PLYSTON STA	311.13	6,356.47	46,936.75	2.94%	0.06%
WV	ALLEGHENY ENERGY SUPPLY CO. LLC - HARRISON	207.56	11,830.88	10,082.94	2.72%	0.35%
MD	Fuler Paper Company	208.66	3,607.00	22,659.84	2.66%	0.04%
OH	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	435.18	7,149.97	22,133.90	1.87%	0.05%
NC	Duke Energy Progress, LLC - Roxboro Steam Electric Plant	122.76	4,427.87	6,665.68	1.49%	0.15%
OH	Cardinal Power Plant (Cardinal Operating Company) (0610101004)	306.40	7,467.31	7,463.73	1.33%	0.04%
PA	ROMBER CITY GEN CO CENTER TWP	321.57	5,214.96	11,805.70	1.19%	0.07%
NC	Duke Energy Carolinas, LLC - Bellows Creek Steam Station	156.88	6,264.28	4,949.09	1.07%	0.16%
VA	ISP Big Island LLC	17.13	240.68	39.67	0.92%	0.50%
MI	ST. CLAIR / BELLE RIVER POWER PLANT	625.38	9,446.19	25,225.90	0.86%	0.04%
KY	KT Utilities Co. - Ghent Station	699.92	7,939.91	10,169.85	0.81%	0.04%
NC	Duke Energy Progress, LLC - Mayo Electric Generating Plant	133.86	1,934.76	1,730.36	0.81%	0.04%
WV	MONONGAHELA POWER CO. - FORD MARTIN POWER	234.03	15,743.92	4,681.87	0.80%	0.27%
VA	Lowell Coke Company LLP	272.64	520.17	5,090.91	0.77%	0.00%
PA	PPPL MONTOUR LLC/MONTOURSES	454.21	4,855.41	21,482.00	0.73%	0.02%

156

Draft AOI Source Categories for SHEN

SOURCE CATEGORY	SO2	NOx	TOTAL
NONPOINT	7.9%	5.3%	13.2%
NONROAD_MAR	0.2%	1.8%	1.9%
NONROAD_OTHER	0.1%	2.4%	2.5%
ONROAD	0.3%	5.5%	5.8%
POINT	67.4%	8.2%	75.6%
PT_FIRES_PRESCRIBED	0.7%	0.2%	0.9%
TOTAL	76.6%	23.4%	100.0%

137

Draft AOI Point Contributions for DOSO

State	FACILITY NAME	DISTANCE (mi)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	SO2 Contribution	NOx Contribution
WV	All COHENY ENERGY SUPPLY CO, LLC HARRISON	83.6	11,830.9	10,087.9	17.69%	1.77%
MD	Luke Paper Company	51.7	3,607.0	22,659.8	11.48%	0.12%
WV	Dominion Resources, Inc. - MIDCONT STORM POWER STATION	17.5	3,984.4	2,123.6	9.88%	0.33%
OH	General James M. Gavin Power Plant (0627010056)	233.8	8,122.5	41,593.8	7.12%	0.09%
WV	MONONGAHELA POWER CO - FORT MARTIN POWER	79.8	13,743.3	4,881.9	6.11%	1.00%
WV	MONONGAHELA POWER CO - PLEASANTS POWER STA	163.8	5,497.4	16,817.4	4.34%	0.13%
PA	GENON NE MGMT CO/KEYSTONE STA	172.8	6,578.5	56,939.2	3.85%	0.01%
WV	APPALACHIAN POWER COMPANY - JOHN F AMOS PLANT	719.8	4,878.1	10,984.2	3.33%	0.10%
WV	KONOVEW POWER	81.2	1,556.6	2,333.7	2.85%	0.11%
WV	AMERICAN BITUMINOUS POWER-GRANT TOWN PLT	81.3	1,245.1	2,210.3	2.92%	0.10%
OH	Arvon Lake Power Plant (0247030013)	347.6	5,800.7	21,388.9	1.43%	0.01%
WV	MITCHELL PLANT	144.2	2,719.6	5,372.4	1.36%	0.06%
OH	Duke Energy Ohio, Wm. H. Zimmer Station (1433090154)	416.9	21,500.0	22,133.9	1.31%	0.02%
OH	Cardinal Power Plant (Cardinal Operating Company) (0641050002)	163.9	2,467.3	7,460.8	1.27%	0.03%
WV	MONONGANTOWN ENERGY ASSOCIATES	75.1	655.6	828.6	1.10%	0.05%
PA	HOMER CITY GEN LP/ CENTER TWP	157.6	5,216.0	13,865.7	1.05%	0.02%
PA	NRG Wholesale Gen/Seaward Gen STA	148.4	2,754.6	8,880.3	0.94%	0.01%
OH	Drimet Primary Aluminum Corp. (0684000001)	158.9	0.4	2,470.8	0.93%	0.00%
OH	Department of Public Utilities, City of Conville, Ohio (0285010088)	278.2	1,901.9	13,038.0	0.93%	0.01%
OH	Conesville Power Plant (0616000000)	242.3	9,957.9	6,356.2	0.67%	0.11%

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Draft AOI Point Contributions for SHEN

State	FACILITY NAME	DISTANCE (mi)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	SO2 Contribution	NOx Contribution
MD	Luke Paper Company	118.4	3,607.0	22,659.8	14.52%	0.21%
PA	GENON NE MGMT CO/KEYSTONE STA	243.8	6,578.5	56,939.2	10.85%	0.09%
OH	General James M. Gavin Power Plant (0627010056)	303.4	8,122.5	41,593.8	8.82%	0.13%
WV	MONONGAHELA POWER CO-PLEASANTS POWER STA	265.0	5,497.4	16,817.4	4.55%	0.22%
WV	ALLEGHENY ENERGY SUPPLY CO, LLC-HARRISON	189.7	11,830.9	10,087.9	4.23%	0.91%
PA	HOMER CITY GEN LP/ CENTER TWP	220.4	5,216.0	13,865.7	2.98%	0.12%
WV	MONONGAHELA POWER CO. FORT MARTIN POWER	184.4	13,743.3	4,881.9	2.21%	1.16%
WV	Dominion Resources, Inc. - MIDCONT STORM POWER STATION	104.2	3,984.4	2,123.6	1.93%	0.24%
WV	APPALACHIAN POWER COMPANY - JOHN F AMOS PLANT	295.6	4,878.1	10,984.2	1.93%	0.09%
PA	NRG Wholesale Gen/Seaward Gen STA	215.5	2,254.6	8,880.3	1.65%	0.04%
PA	GENON NE MGMT CO/KEYSTONE STA	213.6	6,074.9	8,655.2	1.59%	0.09%
OH	Cardinal Power Plant (Cardinal Operating Company) (0641050002)	209.6	2,467.3	7,460.8	1.40%	0.07%
WV	MITCHELL PLANT	271.8	2,719.6	5,372.4	1.34%	0.10%
OH	Duke Energy Ohio, Wm. H. Zimmer Station (1433090154)	505.4	21,500.0	22,133.9	1.20%	0.10%
MD	Raven Power Fort Smallwood LLC	180.7	4,387.8	10,942.9	1.20%	0.08%
WV	AMERICAN BITUMINOUS POWER-GRANT TOWN PLT	188.9	1,245.1	2,210.3	1.19%	0.11%
OH	Department of Public Utilities, City of Conville, Ohio (0285010088)	385.1	1,901.9	13,038.0	1.18%	0.07%
OH	Arvon Lake Power Plant (0247030013)	452.7	3,600.7	23,188.9	1.16%	0.04%
WV	KONOVEW POWER	186.3	1,556.6	2,333.7	1.04%	0.13%
MD	AES Warrior Run	122.1	638.0	1,331.5	0.93%	0.04%

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Draft AOI Source Categories for OTCR

SOURCE CATEGORY	SO2	NOx	TOTAL
NONPOINT	7.4%	3.7%	11.1%
NONROAD_MAR	0.1%	0.7%	0.8%
NONROAD_OTHER	0.0%	0.7%	0.7%
ONROAD	0.2%	1.4%	1.6%
POINT	78.1%	7.0%	85.2%
PT_FIRES_PRESCRIBED	0.5%	0.1%	0.6%
TOTAL	86.4%	13.6%	100.0%

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Draft AOI Source Categories for DOSO

SOURCE CATEGORY	SO2	NOx	TOTAL
NONPOINT	6.8%	2.8%	9.6%
NONROAD_MAR	0.1%	0.6%	0.7%
NONROAD_OTHER	0.0%	0.6%	0.7%
ONROAD	0.2%	1.3%	1.4%
POINT	81.2%	5.7%	86.9%
PT_FIRES_PRESCRIBED	0.5%	0.1%	0.6%
TOTAL	88.9%	11.1%	100.0%

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Draft AOI Point Contributions for OTCR

State	FACILITY NAME	DISTANCE (mi)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	SO2 Contribution	NOx Contribution
WV	All COHENY ENERGY SUPPLY CO, LLC HARRISON	77.8	11,830.9	10,087.9	16.97%	1.77%
OH	General James M. Gavin Power Plant (0627010056)	214.2	8,122.5	41,593.8	10.22%	0.18%
WV	MONONGAHELA POWER CO-PLEASANTS POWER STA	148.3	5,497.4	16,817.4	8.60%	0.29%
WV	MONONGAHELA POWER CO - FORT MARTIN POWER	82.7	13,743.3	4,881.9	4.86%	0.90%
WV	APPALACHIAN POWER COMPANY - JOHN F AMOS PLANT	198.0	4,878.1	10,984.2	4.28%	0.12%
MD	Luke Paper Company	71.3	3,607.0	22,659.8	4.11%	0.04%
PA	GENON NE MGMT CO/KEYSTONE STA	186.5	6,578.5	56,939.2	3.64%	0.03%
WV	AMERICAN BITUMINOUS POWER-GRANT TOWN PLT	77.0	1,245.1	2,210.3	2.56%	0.09%
WV	KONOVEW POWER	83.4	1,556.6	2,333.7	2.38%	0.10%
OH	Cardinal Power Plant (Cardinal Operating Company) (0641050002)	162.7	2,467.3	7,460.8	1.90%	0.05%
WV	Dominion Resources, Inc. - MIDCONT STORM POWER STATION	99.9	3,984.4	2,123.6	1.85%	0.06%
WV	MITCHELL PLANT	136.8	2,719.6	5,372.4	1.53%	0.06%
OH	Cardinal Power Plant (Cardinal Operating Company) (0641050002)	129.6	0.4	7,470.8	1.31%	0.00%
OH	Drimet Primary Aluminum Corp. (0684000001)	232.8	9,957.9	6,356.2	1.10%	0.17%
OH	Conesville Power Plant (0616000000)	397.5	7,150.0	22,133.9	1.10%	0.02%
OH	Duke Energy Ohio, Wm. H. Zimmer Station (1433090154)	345.6	3,600.2	23,188.9	1.09%	0.01%
OH	Arvon Lake Power Plant (0247030013)	345.6	3,600.2	23,188.9	1.09%	0.01%
OH	Koraton Polymer U.S. LLC (0684010011)	175.1	555.8	2,061.8	1.00%	0.02%
OH	Drimet Primary Aluminum Corp. (0684000001)	169.6	391.8	1,933.3	0.97%	0.01%
WV	MONONGANTOWN ENERGY ASSOCIATES	76.3	655.6	828.6	0.89%	0.04%
PA	HOMER CITY GEN LP/ CENTER TWP	172.6	5,216.0	13,865.7	0.87%	0.04%

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**Appendix F-3g - VISTAS Regional Haze Meeting, St. Louis,
MO, October 28-30, 2019**

VISTAS REGION PROJECT MANAGEMENT

A Comparison of Approaches Used in Planning Periods 1 and 2

John Hornback, Executive Director
Metro 4/SESARM/VISTAS
October 29, 2019

1

VISTAS What is it?



- **Visibility Improvement State and Tribal Association of the Southeast**
- **Formed in 2001**

4

PRESENTATION Outline

- **Region**
- **Organization**
- **Resources**
- **Technical Approaches**
- **Collaboration/Consultation**
- **Schedule**
- **Summary**

2

VISTAS Participating Agencies



- **U.S. EPA Region 3 states (2)**
 - Virginia, West Virginia
- **U.S. EPA Region 4 agencies (10)**
 - Alabama, Florida
 - Georgia, Kentucky
 - Mississippi, North Carolina,
 - South Carolina, Tennessee
 - Eastern Band of Cherokee Indians
 - Knox County, TN local air agency

5

THE VISTAS REGION

3

VISTAS The 18 Southeastern Class I Areas



6

VISTAS PROJECT ORGANIZATION

7

- ## VISTAS
- Policy / Operations / Analysis – 2nd Planning Period*
-
- STAD
 - Coordinating Committee (CC)
 - Technical Analysis Work Group (TAWG)
 - Occasional sub-groups
 - (e.g., Data Collection and Analysis)
 - CC/TAWG generally functioning together
- 10

- ## VISTAS
- ### Governance
-
- Southeastern States Air Resource Managers, Inc.
 - Board of Directors
 - State and Tribal Air Directors (STAD)
 - States
 - Tribe
 - Local Agency
 - Governance, policy, general direction
 - Similar structure for both planning periods
- 8

- ## VISTAS
- ### Project Management – 1st Planning Period
-
- Project Manager – John Hornback
 - Technical Coordinator – Pat Brewer
 - Technical Advisors
 - Contracts – 24
 - MOUs - 3
 - Key VISTAS agency staff
- 11

- ## VISTAS
- Policy / Operations / Analysis – 1st Planning Period*
-
- STAD
 - Coordinating Committee
 - Planning Work Group
 - Data Work Group
 - Technical Analysis Work Group
 - Various sub-groups and teams
- 9

- ## VISTAS
- ### Project Management – 2nd Planning Period
-
- Project Manager – John Hornback (much larger role)
 - Coordination and Technical Analysis – Jim Boylan
 - Coordination and Technical Analysis – Randy Strait
 - 1 contract with a lead contractor and a sub-contractor
- 12

VISTAS PROJECT RE\$OURCES\$

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VISTAS PROJECT Technical Approaches

16

- ### VISTAS Resources – 1st Planning Period
-
- Staffing – Metro 4/SESARM, coordinators, advisors
 - In-kind services from SESARM states
 - Contractor services – many contractors
 - Shared expenses - VIEWS data warehouse, ERTAC
 - Budget resources – approximately \$10,000,000
 - Leveraged federal work products – limited
 - Federal coordination - significant

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VISTAS Technical Approaches for 1st & 2nd Rounds

ACTIVITY	1 ST PLANNING PERIOD	2 ND PLANNING PERIOD
Monitoring and Data Collection/Analysis	Yes	Data collect/analysis
Emissions Inventories (base and future years)	Yes	EPA with updates
Emissions Processing	Yes	Yes
International Emissions, Air Quality, BART Modeling	Yes	Air Quality
Area of Influence Analysis	Yes	Yes
Source Apportionment Modeling/Tagging/Projections/RRFs	Yes	Yes
Support – Coordination, Advice, GIS, Archival	Yes	Limited

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- ### VISTAS Resources – 2nd Planning Period
-
- Staffing – Metro 4/SESARM
 - In-kind services from SESARM states
 - Contractor services – 1 lead plus 1 subcontractor
 - Shared expenses - none
 - Budget resources ... ~ 5% of first round funds
 - Leveraged federal work products – significant
 - Federal coordination - limited

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VISTAS PROJECT Collaboration/Consultation

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VISTAS COLLABORATION/CONSULTATION *1st Planning Period*

- Extensive face-to-face meetings
- Some VISTAS/FLM conference calls
- Some VISTAS/stakeholder conference calls
- MANE-VU/VISTAS consultation meeting
- Frequent federally-coordinated calls
- Weekly RPO calls during certain phases
- Resources and time were available

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VISTAS *Schedule – 1st Planning Period*

- 2001 – created the VISTAS organizational plan
- 2002-2006 – focused technical work
- 2006-2007 – continued technical work and SIP development
- December 17, 2007 – SIPs were due
- At least 7 years to design and complete the project plus state SIP submittals to EPA

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VISTAS COLLABORATION/CONSULTATION *2nd Planning Period*

- No face-to-face meetings to-date
- Several VISTAS/FLM/EPA conference calls
- No VISTAS/stakeholder conference calls (to-date)
- MANE-VU/VISTAS consultation calls
- Federally-coordinated regional haze calls (limited)
- Monthly MJO calls include periodic regional haze topics
- Overall goals remains same
- Resources and time are limited for face-to-face meetings

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VISTAS *Schedule – 2nd Planning Period*

- December 2017 – Denver – created initial plan
- April 2018 – executed contract
- December 2019 – most technical work will be completed
- 2020-2021 – completion of any remaining technical work and SIP development
- July 31, 2021 – SIPs due
- 3 ½ years for technical work and SIP development

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VISTAS PROJECT SCHEDULE

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VISTAS PROJECT SUMMARY

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VISTAS PROJECT Summary (1 of 2)

- Similar basic organizational structure but streamlined
- Similar oversight and standards of performance including QA
- Similar internal participation –
 - states, locals, tribes
- Similar external participation –
 - RPOs, FLMs, EPA

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VISTAS PROJECT Summary (2 of 2)

- Fewer resources (~ 5% of 1st planning period funding)
- Less time (~ 50% of 1st planning period time)
- Similar desired outcomes
 - Technically sound, credible, approvable regional SIPs
 - Maintenance of relationships developed in 1st round
 - Continued progress toward 2064 goals

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COMMENTS / QUESTIONS?



- **Jim Boylan**
 - Chair, Coordinating Committee
 - james.boylan@dnr.ga.gov
- **Randy Strait**
 - Chair, Technical Analysis Work Group
 - randy.strait@ncdenr.gov
- **John Hornback**
 - Project Coordinator, VISTAS Project
 - hornback@metro4-sesarm.org

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VISTAS 2028 Emissions and Modeling Analyses



Jim Boylan (GA DNR), Randy Strait (NC DAQ), and John Hornback (Metro 4/SESARM)

2019 National Regional Haze Meeting
St. Louis, MO - October 28, 2019

VISTAS Air Quality Model

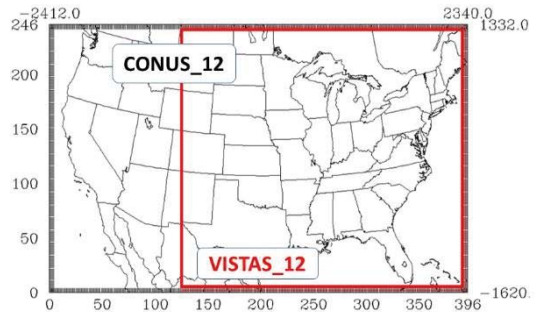
- Started with EPA's 2011/2028 modeling platform
 - Version 6.3el
 - CAMx v6.32
- Replaced CAMx v6.32 with CAMx v6.40
- Used 2011 meteorology
- Reasons for using EPA platform
 - Time limited
 - Budget limited
 - Most source sectors acceptably represented in EPA platform

Outline

- Modeling Overview
- 2028 Emission Projections
- 2028 Model Projections
- Next Steps



VISTAS Modeling Domains



MODELING OVERVIEW

Benchmark Comparisons

1. EPA 2011 with CAMx_6.32 (CONUS) vs. Alpine 2011 with CAMx_6.32 (CONUS)
2. Alpine 2011 with CAMx_6.32 (CONUS) vs. Alpine 2011 with CAMx_6.40 (CONUS)
3. Alpine 2011 with CAMx_6.40 (CONUS) vs. **Alpine 2011 with CAMx_6.40 (VISTAS)**
4. EPA 2028 with CAMx_6.32 (CONUS) vs. Alpine 2028 with CAMx_6.40 (CONUS)
5. Alpine 2028 with CAMx_6.40 (CONUS) vs. **Alpine 2028 with CAMx_6.40 (VISTAS)**

Model Performance Evaluation

- Compared model results to observations. Looked at statistics, comparison plots, and spatial plots
 - Ozone
 - PM_{2.5} and light extinction
 - Wet and dry deposition
- Overall, the model performance is generally within the range deemed acceptable for regulatory applications

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Point Source Adjustments

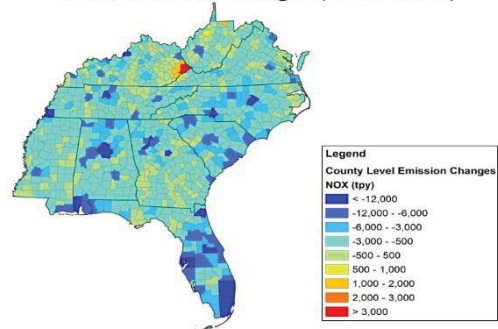
- **EGU Point Sources**
 - EPA modeling used IPM and assumed CPP controls
 - Adjust the EPA 2028 EGU emissions up/down based on ERTAC EGU annual emission, 2023 “en” emissions (based on 2016 NEI), and/or other emissions provided by individual states
- **Non-EGU Point Sources**
 - Adjust the EPA 2028 non-EGU emissions up/down based on feedback from SESARM states
 - States looked at 2014-2016 NEI and EPA’s non-EGU 2023 “en” emissions

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2028 EMISSION PROJECTIONS

8

NOx Emission Changes (2028-2011)



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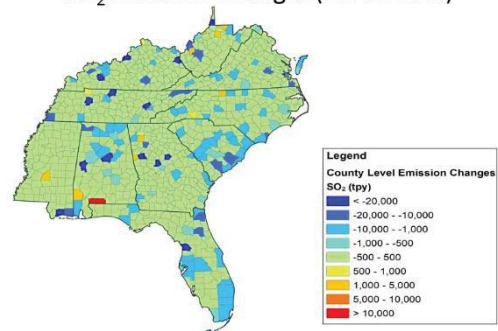
Emissions Updates

- Used EPA’s 2011 base year emissions without change
- Updated EPA’s 2028 projection year emissions
 - EGU and major non-EGU sources
 - Removed Clean Power Plan assumptions
 - Adjusted for changes in fuels and facility operating plans



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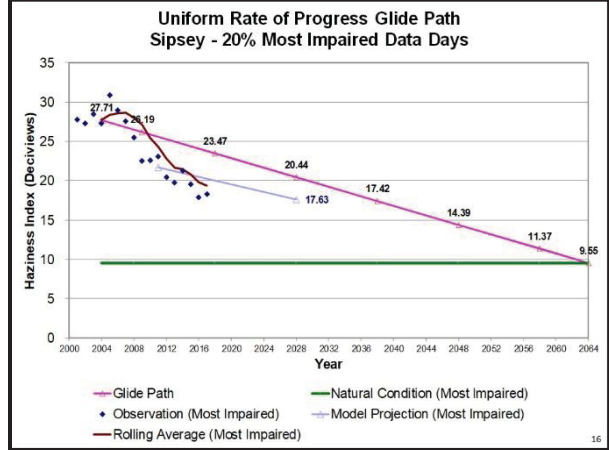
SO₂ Emission Changes (2028-2011)



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2028 MODEL PROJECTIONS

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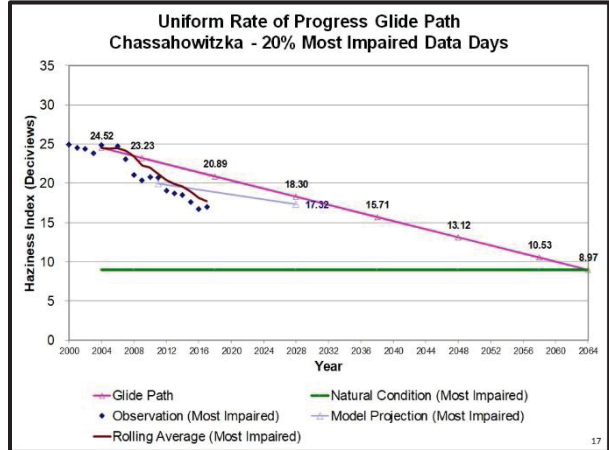


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Class I Areas of Interest to VISTAS States



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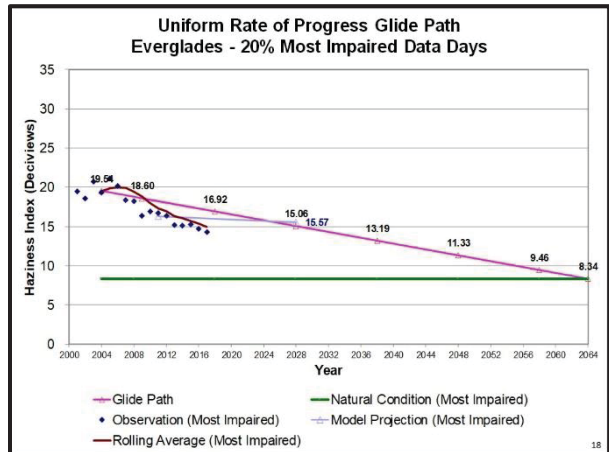
17

VISTAS Class I Areas

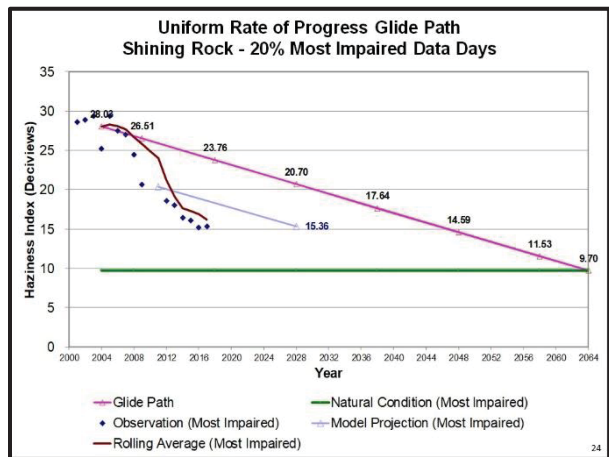
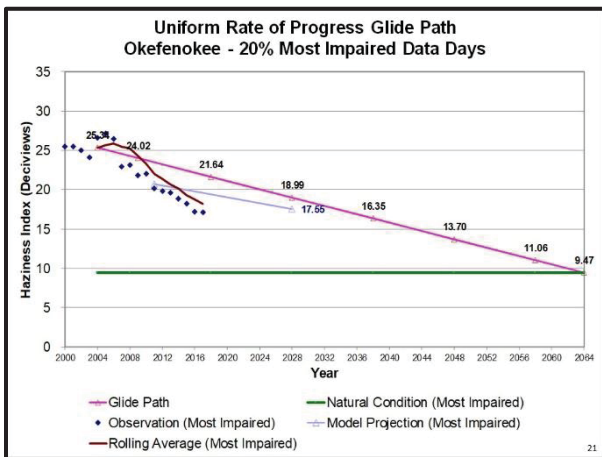
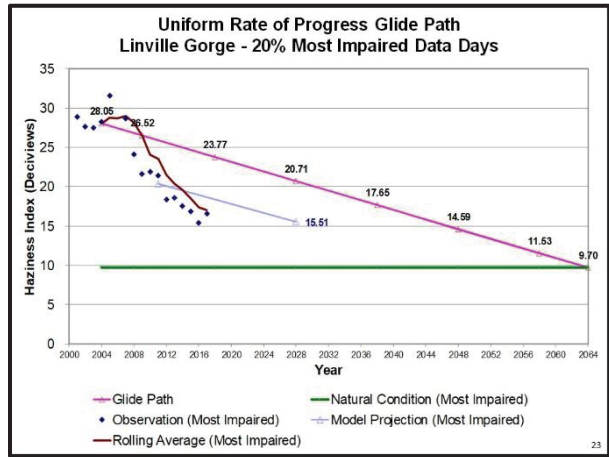
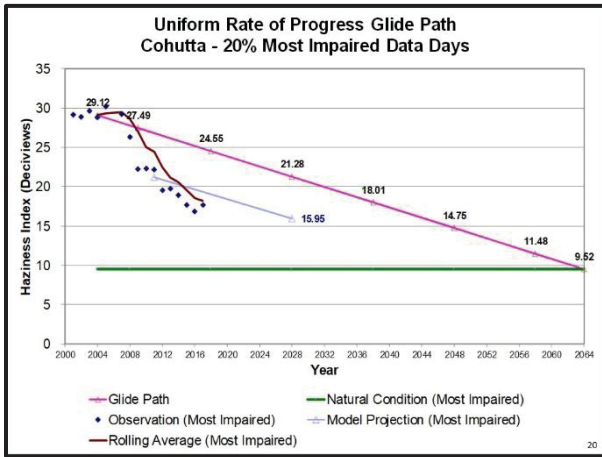
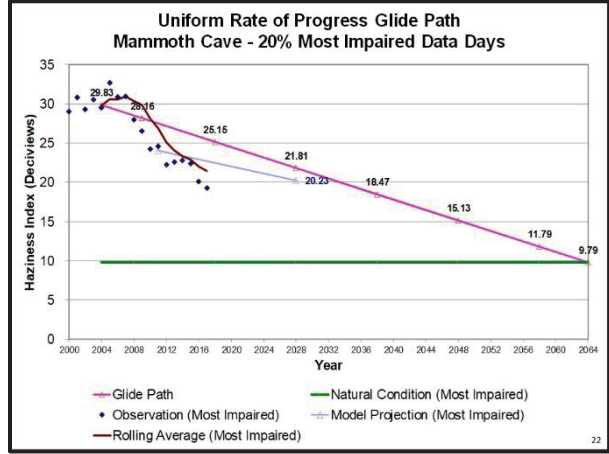
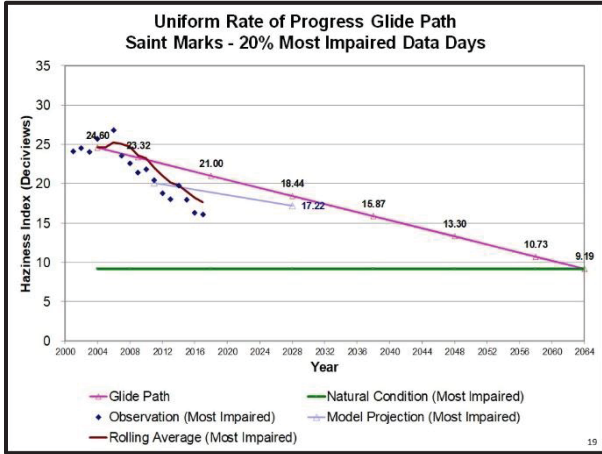
VISTAS FEDERAL CLASS I AREAS	
AL - Sipsey Wilderness Area (SIPS)	USDA Forest Service
FL - Chassahowitzka Wilderness Area (CHAS)	USDI Fish and Wildlife Service
FL - Everglades National Park (EVER)	USDI National Park Service
FL - Saint Marks Wilderness Area (SAMA)	USDI Fish and Wildlife Service
GA - Cohutta Wilderness Area (COHU)	USDA Forest Service
GA - Okefenokee Wilderness Area (OKEF)	USDI Fish and Wildlife Service
GA - Wolf Island Wilderness Area (WOLF)*	USDI Fish and Wildlife Service
KY - Mammoth Cave National Park (MACA)	USDI National Park Service
NC - Linville Gorge Wilderness Area (LIGO)	USDA Forest Service
NC - Shining Rock Wilderness Area (SHRO)	USDA Forest Service
NC - Swanquarter Wilderness Area (SWAN)	USDI Fish and Wildlife Service
SC - Cape Romain Wilderness Area (ROMA)	USDI Fish and Wildlife Service
TN/NC - Great Smoky Mountains National Park (GRSM)	USDI National Park Service
TN/NC - Joyce Kilmer-Slickrock Wilderness Area (JOYC)*	USDA Forest Service
VA - James River Face Wilderness Area (JARI)	USDA Forest Service
VA - Shenandoah National Park (SHEN)	USDI National Park Service
WV - Dolly Sods Wilderness Area (DOSD)	USDA Forest Service
WV - Otter Creek Wilderness Area (OTCR)*	USDA Forest Service

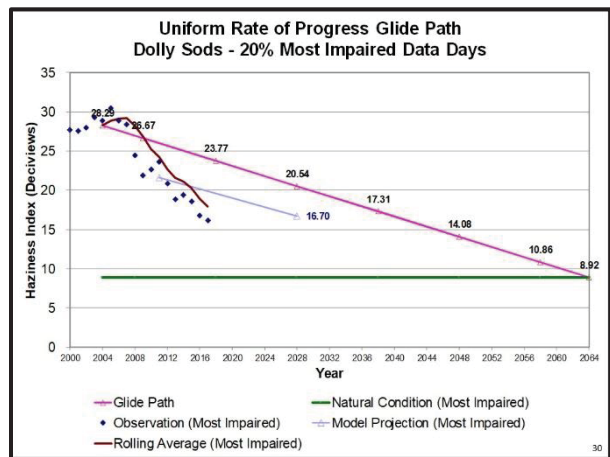
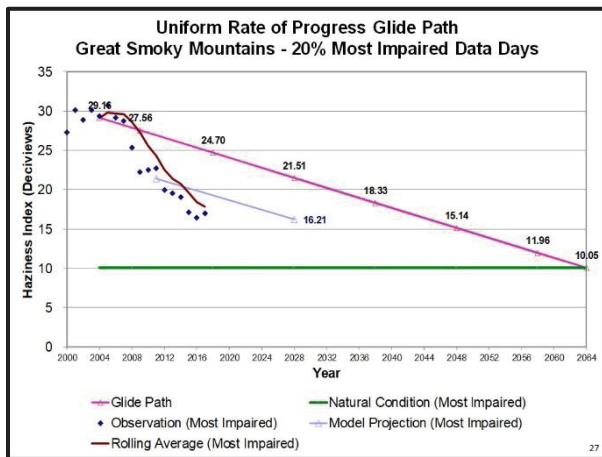
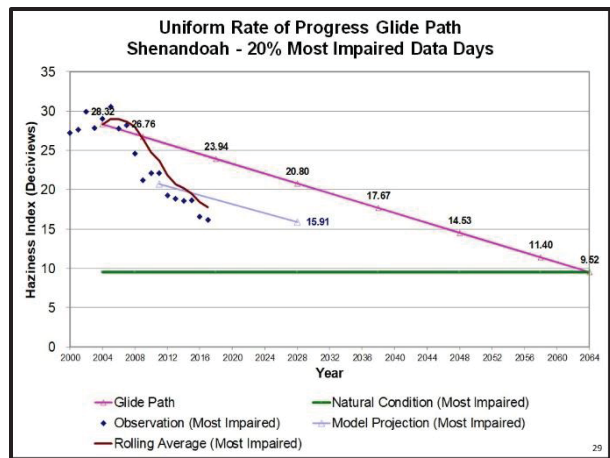
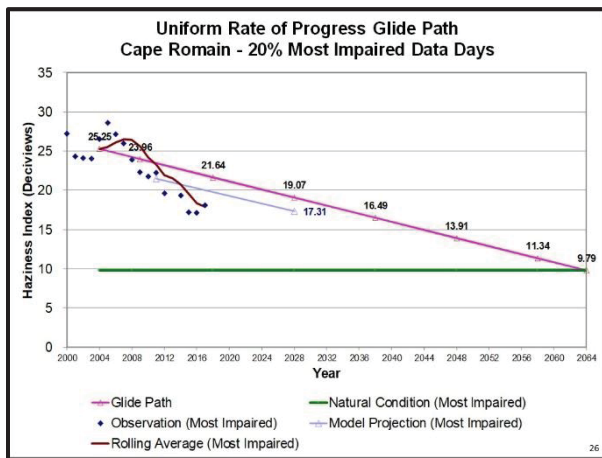
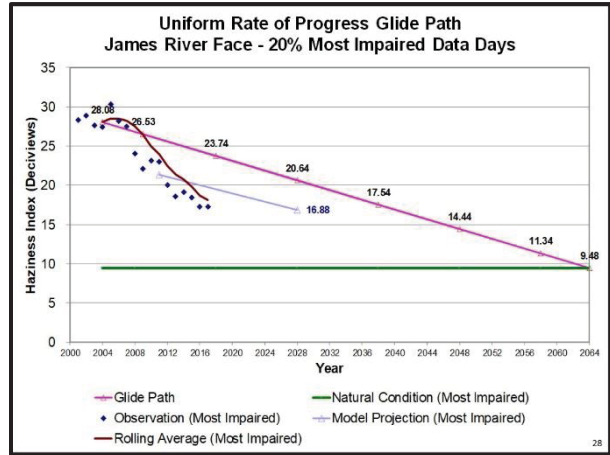
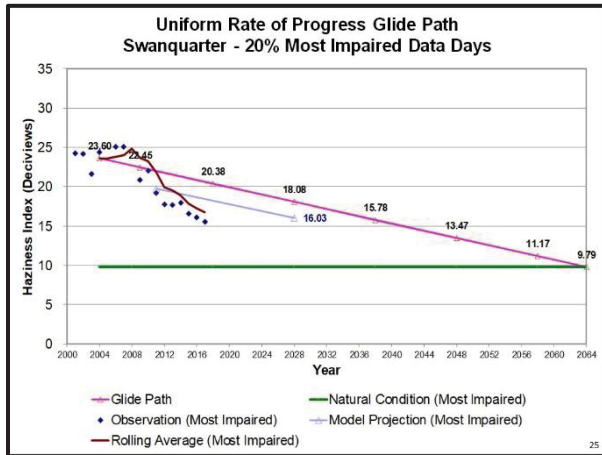
*This Class I Area does not have an IMPROVE monitor and will be represented by measurement data from a nearby Class I Area with an IMPROVE monitor.

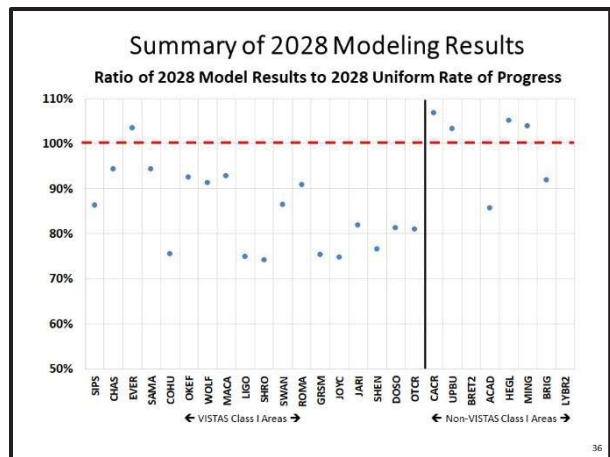
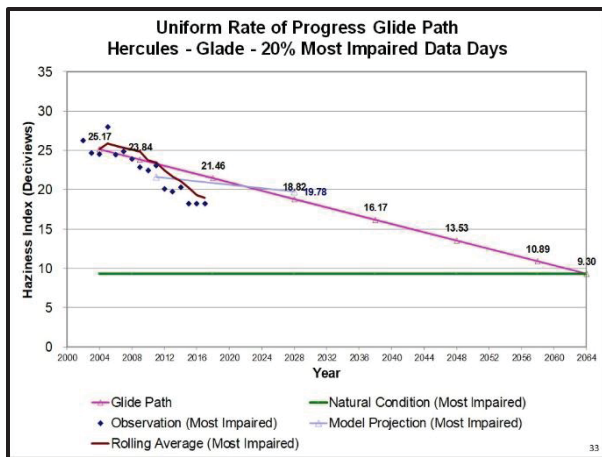
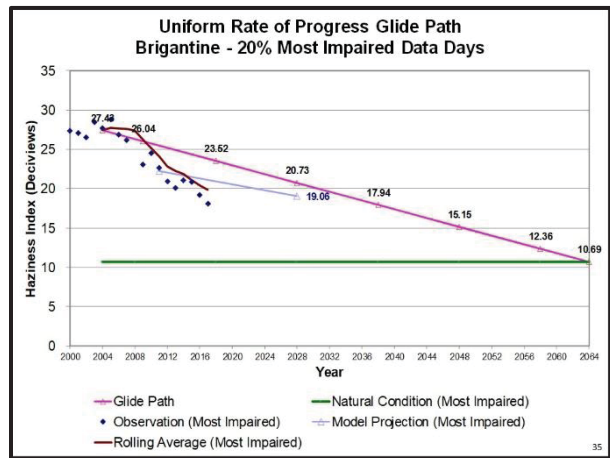
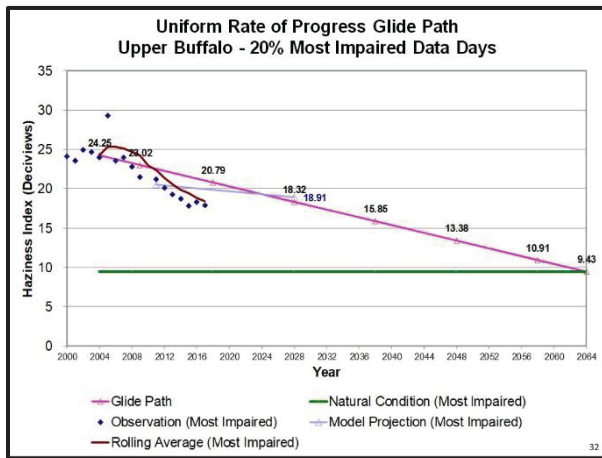
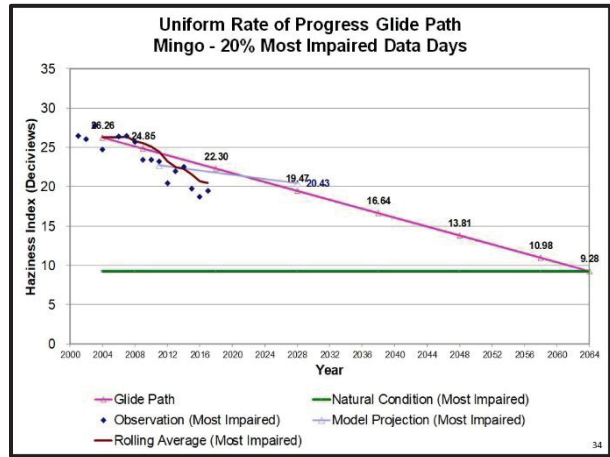
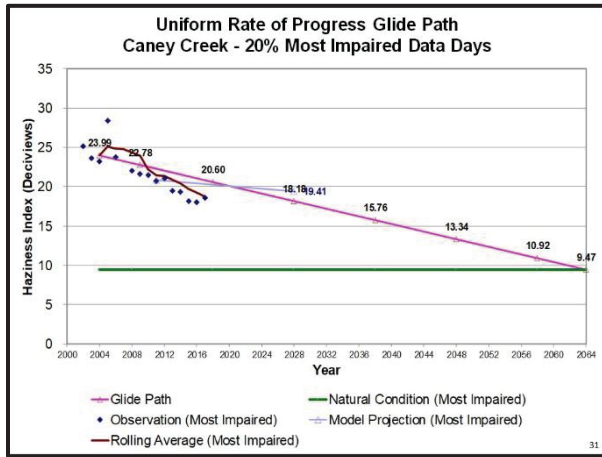
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Remaining Work Schedule

Task	Schedule
Best and final 2028 run?	Necessity uncertain
Final reports and documentation	February 2020
Website updates and postings	Ongoing task
Regional Haze SIPs Due to EPA	July 31, 2021

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VISTAS Source Selection and 4-Factor Analyses



Jim Boylan (GA DNR), Randy Strait (NC DAQ), and John Hornback (Metro 4/SESARM)

2019 National Regional Haze Meeting
St. Louis, MO - October 29, 2019

Area of Influence (AOI) Analysis

- Evaluates 2028 emissions (Q), distance to Class I area (d), and extinction weighted residence time (EWRT) in model grid cells (point) or counties (source categories)
- Formula: $(Q/d)*EWRT$
- Establishes each county's and each facility's contribution to light extinction at each Class I area on the 20% most impaired days
- Can use contributions to rank and screen facilities for the 4-factor analysis

Outline

- AOI Analysis
- PSAT Analysis
- Next Steps

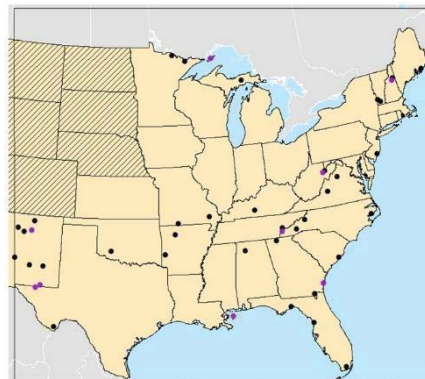


HYSPLIT Trajectories

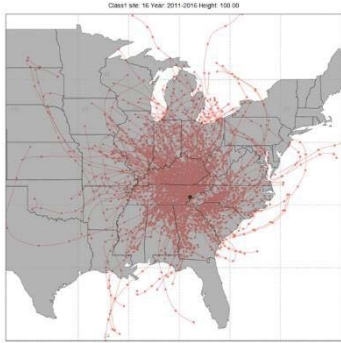
- Trajectories were run using NAM-12 meteorology for the 20% most impaired days in 2011-2016 at 44 Class I areas.
 - Trajectories were run with starting heights of 100, 500, 1,000, and 1,500 meters.
 - Trajectories were run 72 hours backwards in time for each height at each location.
 - Trajectories were run with start times of 12AM (midnight of the start of the day), 6AM, 12PM, 6PM, and 12AM (midnight at the end of the day) local time.
- **44 Class I areas x 6 years x 24 days/year x 4 heights x 5 start times = 126,720 trajectories**

AOI ANALYSIS

Class I Areas Analyzed

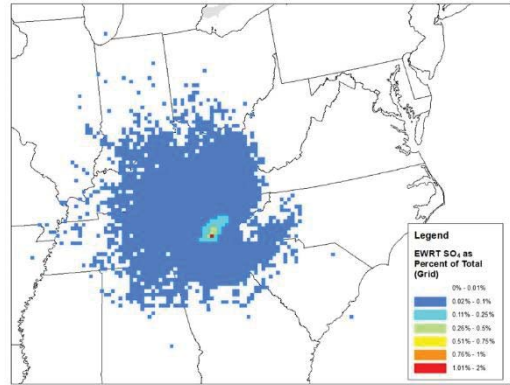


100 Meter Trajectories at GRSM



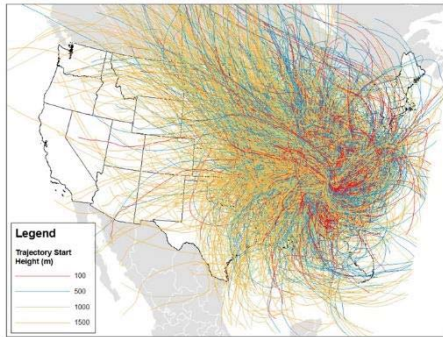
7

Sulfate EWRT at GRSM



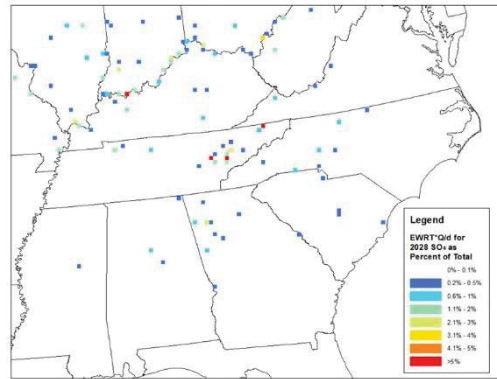
10

All Trajectories at GRSM



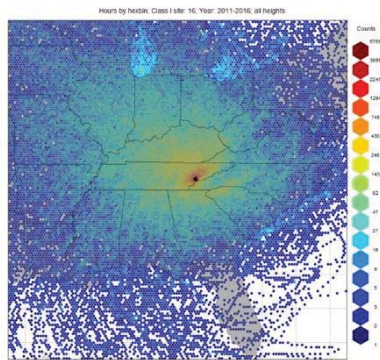
8

Sulfate Q/d*EWRT at GRSM



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Residence Time for GRSM



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AOI Point Contributions for GRSM

State	FACILITY NAME	DISTANCE (km)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	NOx Contribution	SO2 Contribution
TN	TVA KINGSTON FOSSIL PLANT	60.0	1,687.4	1,866.1	0.71%	0.9%
TN	EASTMAN CHEMICAL COMPANY	160.1	6,900.3	6,420.2	0.19%	4.66%
IN	INDIANA MICHIGAN POWER DBA AEP ROCKPORT	375.5	8,806.8	30,536.3	0.21%	4.66%
TN	McChee Tyson	19.7	594.7	78.6	3.01%	4.31%
OH	General James M. Gavin Power Plant (0927010056)	400.5	8,122.5	41,595.8	0.04%	2.25%
GA	Gas Power Company - Plant Bowen	189.7	6,643.3	10,453.4	0.04%	2.00%
OH	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	360.0	7,150.0	22,133.9	0.09%	1.84%
TN	Kennesaw-Knoxville Plant	44.3	711.5	121.5	0.90%	1.71%
IL	Joppa Steam	474.4	4,706.3	20,509.3	0.04%	1.62%
IN	INDIANA KENTUCKY ELECTRIC CORPORATION	368.7	6,188.5	9,038.1	0.13%	1.60%
IN	INDIANAPOLIS POWER & LIGHT - PETERSBURG	435.6	10,665.3	18,141.9	0.12%	1.48%
KY	KY Utilities Co. - Ghent Station	359.2	7,939.9	10,169.3	0.09%	1.43%
KY	Tennessee Valley Authority (TVA) - Shawnee Fossil Plant	465.3	7,007.3	19,504.7	0.02%	1.34%
IN	Gibson	456.3	12,280.3	23,117.2	0.07%	1.25%
TN	TATE & LYLE, Loudon	36.1	252.5	110.2	0.23%	1.22%
KY	Big Rivers Electric Corp. - Wilson Station	345.8	1,151.9	6,934.2	0.03%	1.17%
KY	Century Aluminum of KY LLC	360.5	197.7	5,044.2	0.00%	1.07%
WV	MIDMONTGABLE POWER CO-PLEASANT'S POWER STA.	475.9	5,697.4	19,817.4	0.02%	1.05%
WV	APPALACHIAN POWER COMPANY-JOHN AMOS PLANT	367.1	4,878.1	10,984.2	0.01%	1.05%
MO	AMEREN MISSOURI-RUSH ISLAND PLANT	628.2	3,349.3	20,151.5	0.00%	0.90%

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AOI Source Categories for GRSM

SOURCE CATEGORY	NOx	SO ₂	TOTAL
NONPOINT	8.5%	10.7%	19.2%
NONROAD_MAR	3.1%	0.1%	3.2%
NONROAD_OTHER	4.7%	0.3%	5.0%
ONROAD	11.6%	1.5%	13.1%
POINT	7.0%	49.9%	56.8%
PT_FIRES_PRESCRIBED	0.3%	2.3%	2.6%
TOTAL	35.2%	64.8%	100.0%

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AOI Source Categories for OKEF

SOURCE CATEGORY	NOx	SO ₂	TOTAL
NONPOINT	1.7%	2.0%	3.7%
NONROAD_MAR	6.0%	0.6%	6.6%
NONROAD_OTHER	1.7%	0.1%	1.9%
ONROAD	4.5%	0.5%	5.0%
POINT	5.9%	62.9%	68.8%
PT_FIRES_PRESCRIBED	2.6%	11.4%	13.9%
TOTAL	22.4%	77.6%	100.0%

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AOI Source Categories for COHU

SOURCE CATEGORY	NOx	SO ₂	TOTAL
NONPOINT	3.2%	5.1%	8.3%
NONROAD_MAR	3.4%	0.1%	3.5%
NONROAD_OTHER	2.5%	0.2%	2.7%
ONROAD	6.6%	0.6%	7.2%
POINT	8.1%	67.0%	75.1%
PT_FIRES_PRESCRIBED	0.5%	2.6%	3.2%
TOTAL	24.3%	75.7%	100.0%

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AOI Point Contributions for OKEF

State	FACILITY NAME	DISTANCE (km)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	NOx Contribution	SO2 Contribution
FL	WHITE SPRINGS AGRICULTURAL CHEMICALS, INC	71.5	112.4	2,745.0	0.03%	21.1%
FL	ROCK TENN CO, LLC	64.8	2,316.8	2,506.7	0.88%	19.8%
FL	SEA	65.6	851.8	2,094.5	0.18%	17.8%
FL	SEMINOLE ELECTRIC COOPERATIVE, INC.	121.4	917.8	3,713.4	0.07%	3.25%
FL	IFF CHEMICAL HOLDINGS, INC.	56.8	37.7	898.9	0.01%	3.25%
FL	RAYONIER PERFORMANCE FIBERS LLC	63.4	2,327.1	562.0	0.90%	2.82%
GA	International Paper - Savannah	178.9	1,560.7	3,945.4	0.08%	2.81%
FL	BUCKEYE FLORIDA, LIMITED PARTNERSHIP	153.5	1,830.7	1,520.4	0.14%	2.18%
FL	RENSENYZ LLC	59.8	66.3	565.5	0.02%	1.96%
FL	DUKE ENERGY FLORIDA, INC. (DEF)	205.0	2,489.8	5,306.4	0.06%	1.40%
AL	Sanders Lead Co	384.6	121.7	7,951.1	0.00%	1.11%
GA	Georgia-Pacific Consumer Products LP (Savannah River Mill)	197.2	351.5	1,860.2	0.01%	1.05%
GA	Kia Power Company - Plant Bowen	458.1	6,643.3	10,459.4	0.05%	1.02%
GA	Brownwick Cellulose Inc	75.1	1,534.3	284.2	0.34%	1.01%
SC	ALUMAX OF SOUTH CAROLINA	322.7	108.1	3,751.7	0.00%	0.97%
GA	PCA Valdosta Mill	112.7	1,032.6	485.7	0.09%	0.85%
SC	SANTEE COOPER CROSS GENERATING STATION	348.1	3,273.5	4,281.2	0.05%	0.85%
FL	CITY OF GAINESVILLE GRU	111.7	410.0	881.4	0.03%	0.79%
SC	HARPSTONE CHARLESTON RAFT LLC	314.9	2,355.8	1,861.7	0.06%	0.65%
GA	Kia Power Company - Plant Wansley	403.7	2,052.5	4,856.0	0.02%	0.65%

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AOI Point Contributions for COHU

State	FACILITY NAME	DISTANCE (km)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	NOx Contribution	SO2 Contribution
GA	Kia Power Company - Plant Bowen	78.0	6,643.3	10,459.4	1.15%	19.8%
IN	INDIANA MICHIGAN POWER (DMA) ASP - ROCKPORT	410.1	8,806.8	30,536.3	0.13%	4.66%
GA	International Paper - Home	87.4	1,773.4	1,791.0	0.18%	4.66%
IN	Gibson	487.1	12,280.3	23,117.2	0.10%	2.31%
IN	INDIANAPOLIS POWER & LIGHT - PETERSBURG	477.0	10,665.3	18,141.9	0.16%	2.18%
KY	Tennessee Valley Authority (TVA) - Shawnee Fossil Plant	457.2	7,007.3	19,504.7	0.07%	2.18%
TN	TVA WINSTON FOSSIL PLANT	124.0	1,687.4	1,886.1	0.13%	2.17%
OH	General James M. Gavin Power Plant (0627010056)	512.0	8,122.5	41,595.8	0.02%	1.71%
TN	TVA CUMBERLAND FOSSIL PLANT	327.0	4,916.5	8,427.3	0.09%	1.38%
KY	Big Rivers Electric Corp. - Wilson Station	369.0	1,151.9	6,934.2	0.01%	1.07%
OH	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	454.6	7,150.0	22,133.9	0.06%	1.05%
GA	Kia Power Company - Plant Wansley	156.8	2,052.5	4,856.0	0.04%	1.05%
KY	KY Utilities Co. - Ghent Station	441.5	2,539.9	10,169.3	0.08%	1.05%
IL	Joppa Steam	466.9	4,706.3	20,509.3	0.02%	1.04%
GA	Mohawk Industries Inc.	32.0	66.5	77.1	0.07%	1.02%
TN	EASTMAN CHEMICAL COMPANY	269.8	6,900.3	6,420.2	0.09%	0.99%
MO	JAMEREN MISSOURI-LABADIE PLANT	695.4	9,685.5	41,740.3	0.01%	0.96%
IL	Newton	564.0	3,534.9	10,633.6	0.01%	0.91%
GA	Chemical Products Corporation	71.9	19.3	513.8	0.00%	0.89%
IN	INDIANA KENTUCKY ELECTRIC CORPORATION	444.4	6,188.5	9,038.1	0.04%	0.76%

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AOI Source Categories for WOLF

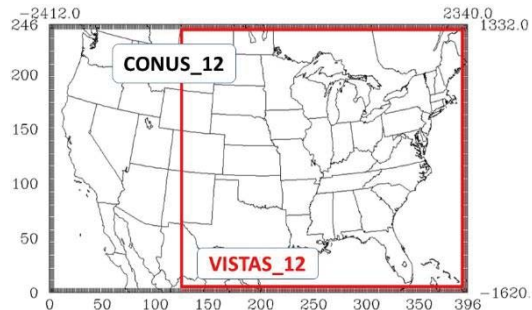
SOURCE CATEGORY	NOx	SO ₂	TOTAL
NONPOINT	1.7%	2.8%	4.4%
NONROAD_MAR	2.9%	1.5%	4.4%
NONROAD_OTHER	3.3%	0.3%	3.6%
ONROAD	5.7%	0.7%	6.4%
POINT	7.3%	67.9%	75.2%
PT_FIRES_PRESCRIBED	0.9%	5.1%	6.0%
TOTAL	21.8%	78.2%	100.0%

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AOI Point Contributions for WOLF

State	FACILITY NAME	DISTANCE (km)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	NOx Contribution	SO2 Contribution
GA	Brunswick Cellulose Inc.	27.9	1,554.5	294.2	2.34%	1.89%
FL	ROCK TENN. CO. LLC	74.9	2,316.8	2,626.7	0.39%	1.07%
GA	International Paper - Savannah	85.9	1,560.7	3,945.4	0.24%	1.91%
FL	JEA	105.1	651.8	2,094.5	0.09%	4.43%
GA	Georgia-Pacific Consumer Products LP (Savannah River Mill)	109.9	351.5	1,860.2	0.03%	2.65%
FL	WHITE SPRINGS AGRICULTURAL CHEMICALS,INC	173.6	112.4	2,745.0	0.01%	1.97%
SC	ALUMAX OF SOUTH CAROLINA	223.0	108.1	3,751.7	0.00%	1.64%
FL	RAYONIER PERFORMANCE FIBERS LLC	77.4	3,327.1	562.0	0.38%	1.79%
FL	SEMINOLE ELECTRIC COOPERATIVE, INC.	181.4	917.8	3,713.4	0.02%	1.77%
OH	General James M. Gavin Power Plant (0627010056)	845.3	8,122.5	41,595.8	0.02%	1.71%
SC	SANTEC COOPER CROSS GENERATING STATION	251.0	3,273.5	4,281.2	0.09%	1.59%
GA	Southern States Phosphate & Fertilizer	84.1	1.0	397.1	0.00%	1.55%
FL	JFF CHEMICAL HOLDINGS, INC.	118.5	37.7	898.9	0.00%	1.22%
FL	DUKE ENERGY FLORIDA, INC. (DEF)	296.6	2,489.8	5,306.4	0.04%	1.19%
GA	Ga Power Company - Plant Bowen	458.1	6,643.3	10,453.4	0.03%	1.08%
GA	Savannah Sugar Refinery	89.9	521.6	582.0	0.08%	1.06%
SC	INTERNATIONAL PAPER EASTOVER	288.7	3,780.3	3,212.9	0.05%	0.95%
GA	Ga Power Company - Plant McManus	27.1	72.2	30.1	0.14%	0.93%
SC	KAPSTONE CHARLESTON KRAFT LLC	213.6	2,355.8	1,863.7	0.09%	0.89%
PA	GENON NE MGMT CO/KEYSTONE STA	1,048.6	6,578.5	56,939.2	0.01%	0.84%

VISTAS Modeling Domains



PSAT ANALYSIS

PSAT SO₂ and NO_x Tags (209)

Round 1 (122 tags)

- Total SO₂ tags for 10 individual VISTAS states + 3 MJOs = 13 tags
- Total NO_x tags for 10 individual VISTAS states + 3 MJOs = 13 tags
- EGU point SO₂ tags for 10 individual VISTAS states + 3 MJOs = 13 tags
- EGU point NO_x tags for 10 individual VISTAS states + 3 MJOs = 13 tags
- SO₂ tags for individual VISTAS facilities = 50 tags
- NO_x tags for individual VISTAS facilities = 20 tags

Round 2 (87 tags)

- Non-EGU point SO₂ for 10 individual VISTAS states + 3 MJOs = 13 tags
- Non-EGU point NO_x for 10 individual VISTAS states + 3 MJOs = 13 tags
- SO₂ and NO_x for N/S/W/E boundaries = 8 tags
- SO₂ tags for individual VISTAS facilities = 10 tags
- NO_x tags for individual VISTAS facilities = 16 tags
- SO₂ tags for individual non-VISTAS facilities = 17 tags
- NO_x tags for individual non-VISTAS facilities = 10 tags

Source Apportionment Modeling

- Particulate Matter Source Apportionment Technology (PSAT) tags applied to "VISTAS_12" 2028 model projections (2011 meteorology)
- Quantifies visibility impacts from individual point sources, source sectors, and geographic regions
- Both NO_x and SO₂ tagging
- Refines information on AOI contributions to visibility impairment
- Can be used to adjust future year visibility projections to account for additional emission controls
- VISTAS contract with ERG allows for up to 250 tags

VISTAS Round 1 Facility Tags

Facility/State	Facility #PO	FACILITY_ID_S10	FACILITY_NAME_S10	NOx Tag	SO2 Tag
AL	VISTAS	01053-7402211	Escambia Operating Company LLC		1
AL	VISTAS	01053-985111	Escambia Operating Company LLC		1
AL	VISTAS	01073-1018711	DRUMMOND COMPANY, INC.		1
AL	VISTAS	01097-1056111	Ala Power - Barry		1
AL	VISTAS	01097-1061611	Union Oil of California - Chunchula Gas Plant		1
AL	VISTAS	01097-949811	Alco Nobel Chemicals Inc		1
AL	VISTAS	01103-1000011	Nucor Steel Decatur LLC		1
AL	VISTAS	01109-985711	Sanders Lead Co		1
FL	VISTAS	12005-535411	ROCKTENN CP LLC		1
FL	VISTAS	12017-640611	DUKE ENERGY FLORIDA, INC. (DEF)	1	1
FL	VISTAS	12031-640211	JEA		1
FL	VISTAS	12033-752711	GULF POWER - Crist		1
FL	VISTAS	12047-769711	WHITE SPRINGS AGRICULTURAL CHEMICALS,INC		1
FL	VISTAS	12057-538611	TAMPA ELECTRIC COMPANY (TEC)		1
FL	VISTAS	12057-716411	MOSIAC FERTILIZER, LLC		1
FL	VISTAS	12089-753711	ROCK TENN CP, LLC	1	1
FL	VISTAS	12089-845811	RAYONIER PERFORMANCE FIBERS LLC	1	1
FL	VISTAS	12106-717711	MOSIAC FERTILIZER LLC		1
FL	VISTAS	12106-919811	MOSIAC FERTILIZER, LLC		1
FL	VISTAS	12123-752411	BUCKEYE FLORIDA, LIMITED PARTNERSHIP		1

VISTAS Round 1 Facility Tags

Facility State	Facility RPO	FACILITY_ID_STD	FACILITY_NAME STD	NOx Tag	SO2 Tag
GA	VISTAS	13015-2813011	Ea Power Company - Plant Bowen	1	1
GA	VISTAS	13051-9679811	International Paper - Savannah	1	1
GA	VISTAS	13127-3721011	Brunswick Cellulose Inc	1	1
KY	VISTAS	21091-7352411	Century Aluminum of KY LLC	1	1
KY	VISTAS	21145-6037011	Tennessee Valley Authority (TVA) - Shawnee Fossil Plant	1	1
KY	VISTAS	21177-5196711	Tennessee Valley Authority - Paradise Fossil Plant	1	1
KY	VISTAS	21883-5561611	Big Rivers Electric Corp - Wilson Station	1	1
NC	VISTAS	37013-8479311	PCS Phosphate Company, Inc. - Aurora	1	1
NC	VISTAS	37087-7920511	Blue Ridge Paper Products - Canton Mill	1	1
SC	VISTAS	45015-4834911	ALLUMAX OF SOUTH CAROLINA	1	1
SC	VISTAS	45019-4978611	KAPSTONE CHARLESTON KRAFT LLC	1	1
SC	VISTAS	45043-5698611	INTERNATIONAL PAPER GEORGETOWN MILL	1	1
TN	VISTAS	47001-6196011	TVA BULL RUN FOSSIL PLANT	1	1
TN	VISTAS	47093-4979911	Cemex - Knoxville Plant	1	1
TN	VISTAS	47105-4129211	IATE & LYLE, Loudon	1	1
TN	VISTAS	47145-4979311	TVA KINGSTON FOSSIL PLANT	1	1
TN	VISTAS	47161-4979311	TVA CUMBERLAND FOSSIL PLANT	1	1
TN	VISTAS	47163-3982311	EASTMAN CHEMICAL COMPANY	1	1

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Non-VISTAS Round 2 Facility Tags

Facility State	Facility RPO	FACILITY_ID_STD	FACILITY_NAME STD	NOx Tag	SO2 Tag
AR	CENRAP	05063-1083411	ENTERGY ARKANSAS INC-INDEPENDENCE PLANT	1	1
MO	CENRAP	29143-5363811	NEW MADRID POWER PLANT-MARSTON	1	1
MD	MANE-VU	24001-7765811	Luke Paper Company	1	1
PA	MANE-VU	42005-3866111	GENON NE MGMT CO/KEYSTONE STA	1	1
PA	MANE-VU	42063-3005211	HOMER CITY GEN LP/CENTER TWP	1	1
PA	MANE-VU	42063-3005111	NRG WHOLESALE GEN/SEWARD GEN STA	1	1
IL	LADCO	17127-7808911	loopa Steam	1	1
IN	LADCO	18173-8183111	Alcoa Warrick Power Plc Agc Div of AL	1	1
IN	LADCO	18051-7363111	Gibson	1	1
IN	LADCO	18147-8017211	INDIANA MICHIGAN POWER DBA AEP ROCKPORT	1	1
IN	LADCO	18125-7564211	INDIANAPOLIS POWER & LIGHT PETERSBURG	1	1
IN	LADCO	18129-8166111	Stgeco AB Brown South Indiana Gas & Ele	1	1
OH	LADCO	39081-8115711	Cardinal Power Plant (Cardinal Operating Company) (0641050002)	1	1
OH	LADCO	39031-8010811	Conesville Power Plant (0616000000)	1	1
OH	LADCO	39025-8294311	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	1	1
OH	LADCO	39053-8148511	General James M. Gavin Power Plant (0627010056)	1	1
OH	LADCO	39053-7983011	Ohio Valley Electric Corp., Kyger Creek Station (0627000003)	1	1

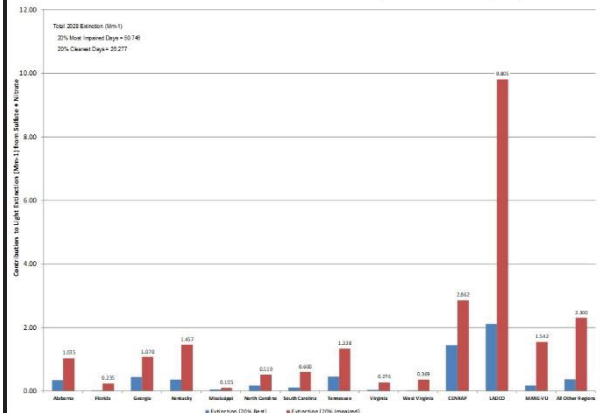
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VISTAS Round 1 Facility Tags

Facility State	Facility RPO	FACILITY_ID_STD	FACILITY_NAME STD	NOx Tag	SO2 Tag
VA	VISTAS	51023-8039811	Roanoke Cement Company	1	1
VA	VISTAS	51027-4034811	Jewell Coke Company LLP	1	1
VA	VISTAS	51580-5798711	Meadwestvaco Packaging Resource Group	1	1
WV	VISTAS	54023-6257011	Dominion Resources, Inc. - MOUNT STORM POWER STATION	1	1
WV	VISTAS	54033-6271711	ALLEGHENY ENERGY SUPPLY CO. LLC-HARRISON	1	1
WV	VISTAS	54041-6900311	EQUITRANS - COPELY RUN CS 70	1	1
WV	VISTAS	54049-4884511	AMERICAN BITUMINOUS POWER-GRANT TOWN PLT	1	1
WV	VISTAS	54051-6902311	MITCHELL PLANT	1	1
WV	VISTAS	54061-1652011	LONGVIEW POWER	1	1
WV	VISTAS	54061-6736111	MONONGAHELA POWER CO. - FORT MARTIN POWER	1	1
WV	VISTAS	54061-6738111	MORGANTOWN ENERGY ASSOCIATES	1	1
WV	VISTAS	54073-4782811	MONONGAHELA POWER CO-PLEASANTS POWER STA	1	1
WV	VISTAS	54079-6789111	APPALACHIAN POWER COMPANY - JOHN F AMOS PLANT	1	1
WV	VISTAS	54083-6796511	GLADY 6C4350	1	1
WV	VISTAS	54083-6790711	FILES CREEK 6C4340	1	1
WV	VISTAS	54093-6327811	KINGSFORD MANUFACTURING COMPANY	1	1

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2028 Contribution of All Anthro + Natural Sources to Cohutta Wilkesmes, GA from Sulfate + Nitrate (Mm-1)



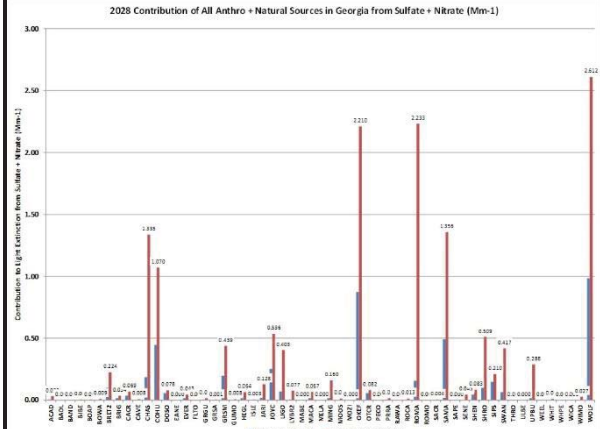
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VISTAS Round 2 Facility Tags

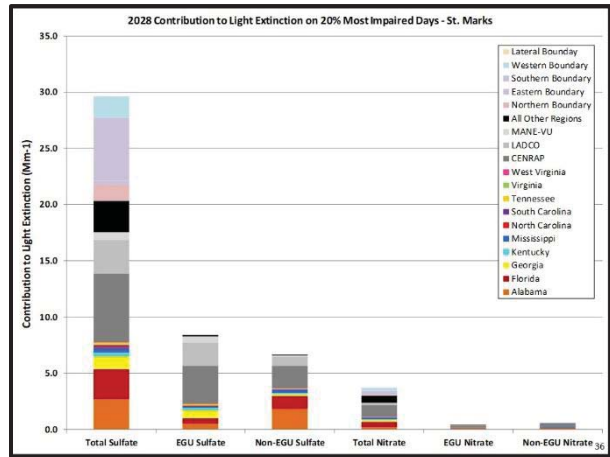
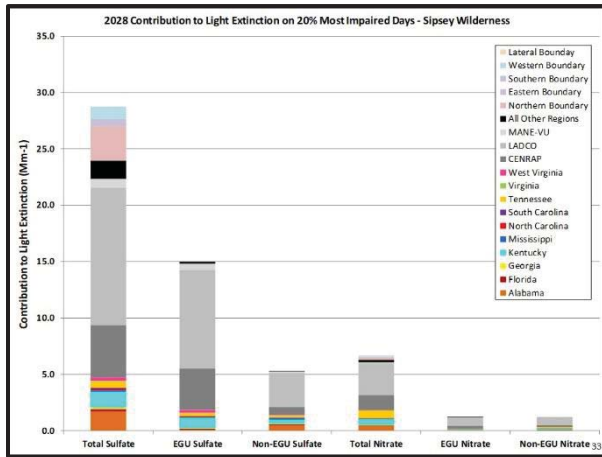
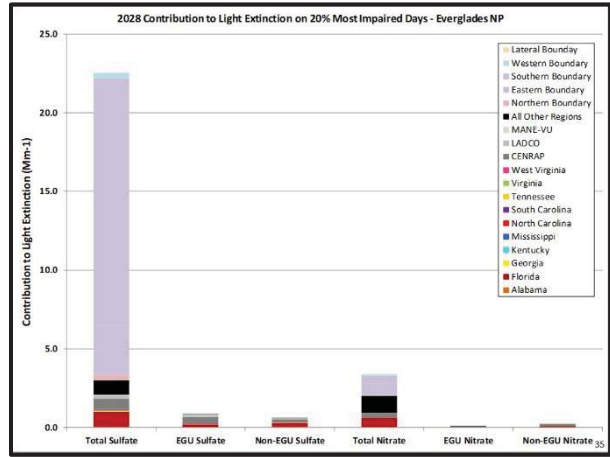
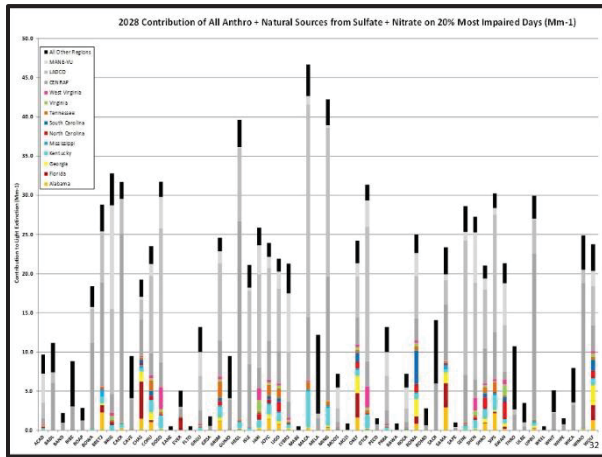
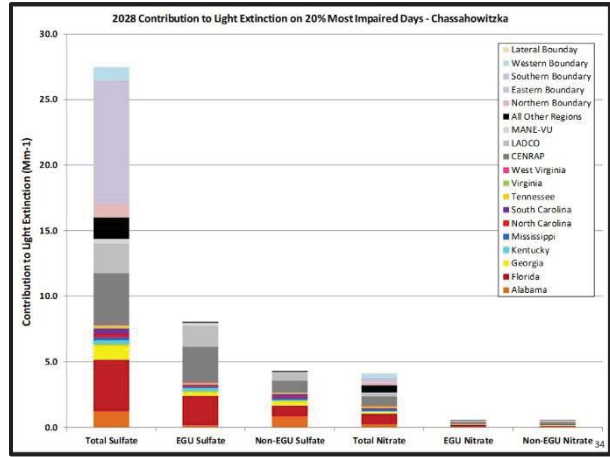
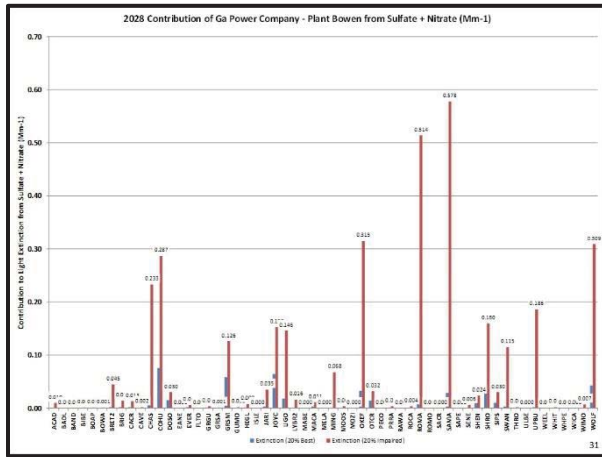
Facility State	Facility RPO	FACILITY_ID_STD	FACILITY_NAME STD	NOx Tag	SO2 Tag
AL	VISTAS	01129-1128711	American Midstream Chatham, LLC	1	1
FL	VISTAS	12123-752411	BUCKEYE FLORIDA, LIMITED PARTNERSHIP	1	1
FL	VISTAS	12086-900111	CEMEX CONSTRUCTION MATERIALS FL, LLC.	1	1
FL	VISTAS	12086-900011	FLORIDA POWER & LIGHT (PFL)	1	1
FL	VISTAS	12086-900011	FLORIDA POWER & LIGHT (PFL)	1	1
FL	VISTAS	12129-2731711	TALLAHASSEE CITY FURDOM GENERATING STA.	1	1
FL	VISTAS	12086-899911	TARMAAC AMERICA LLC	1	1
GA	VISTAS	13127-3721011	Brunswick Cellulose Inc	1	1
GA	VISTAS	13103-536311	Energia-Pacific Consumer Products LP (Savannah River Mill)	1	1
GA	VISTAS	13115-539311	International Paper - Rome	1	1
MS	VISTAS	28059-8384311	Chevron Products Company, Pascagoula Refinery	1	1
MS	VISTAS	28059-6251011	Mississippi Power Company, Plant Victor J Daniel	1	1
NC	VISTAS	37087-7920511	Blue Ridge Paper Products - Canton Mill	1	1
NC	VISTAS	37117-8049311	Davtar Paper Company, LLC	1	1
NC	VISTAS	37035-8370411	Duke Energy Carolinas, LLC - Marshall Steam Station	1	1
NC	VISTAS	37013-8479311	PCS Phosphate Company, Inc. - Aurora	1	1
NC	VISTAS	37023-8513011	SGL Carbon LLC	1	1
SC	VISTAS	45015-4120411	SANTEC COOPER CROSS GENERATING STATION	1	1
SC	VISTAS	45043-6652811	SANTEC COOPER WINYAH GENERATING STATION	1	1
SC	VISTAS	45015-8306711	SCE&G WILLIAMS	1	1
VA	VISTAS	51027-4034811	Jewell Coke Company LLP	1	1
VA	VISTAS	51580-5798711	Meadwestvaco Packaging Resource Group	1	1
VA	VISTAS	51023-8039811	Roanoke Cement Company	1	1

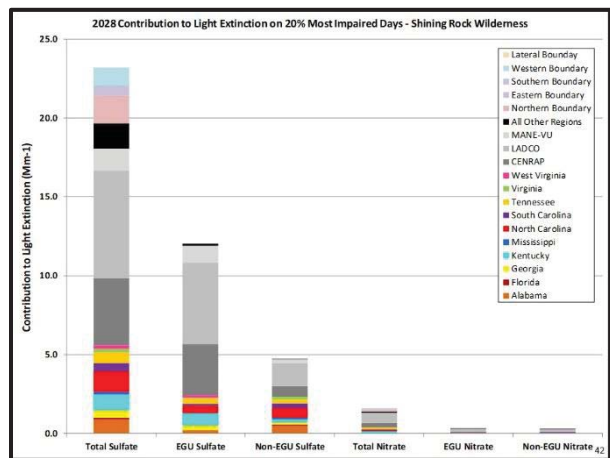
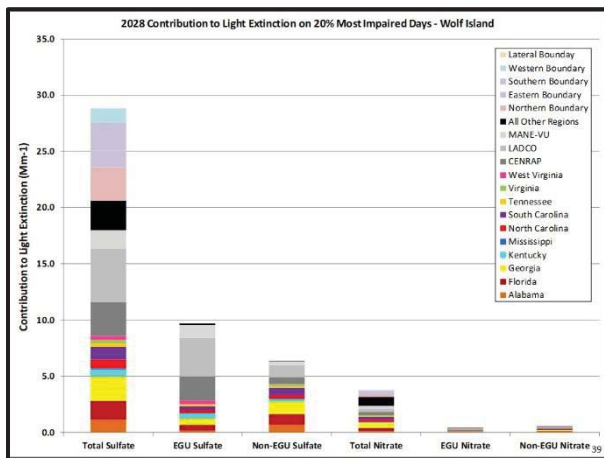
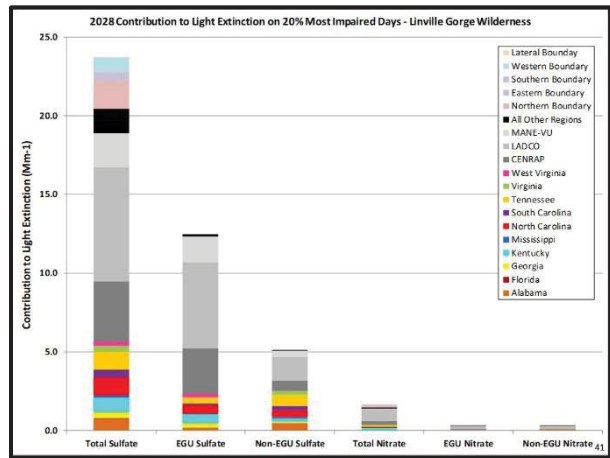
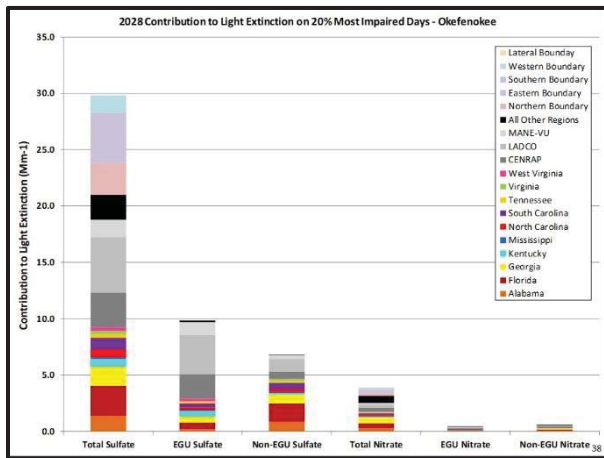
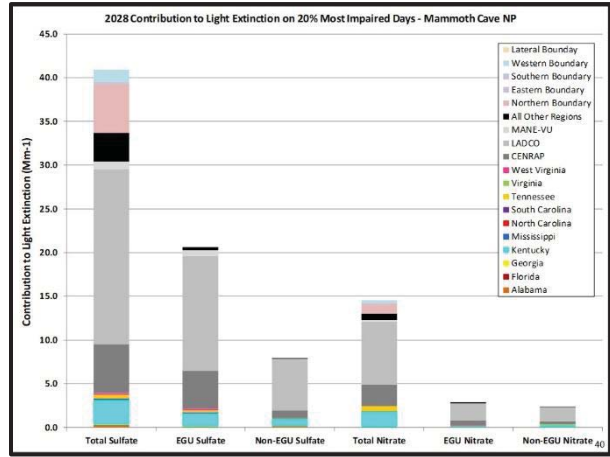
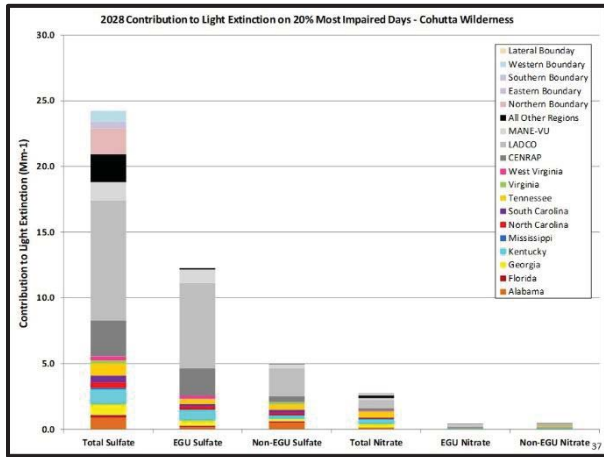
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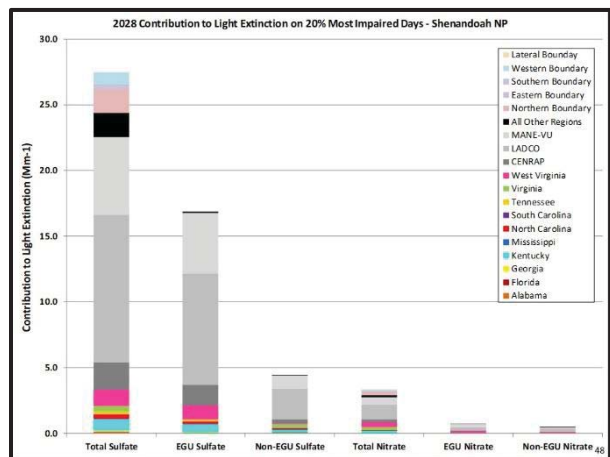
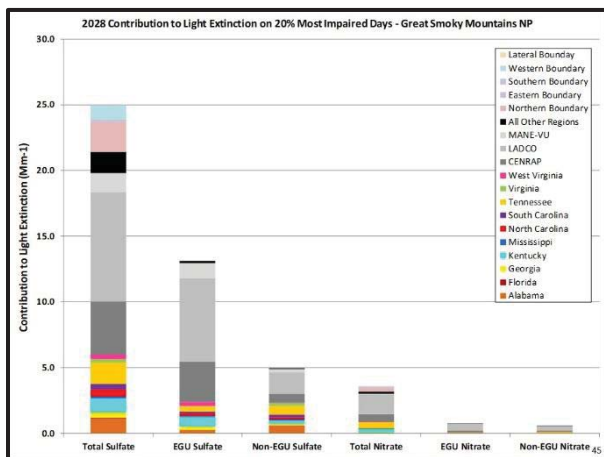
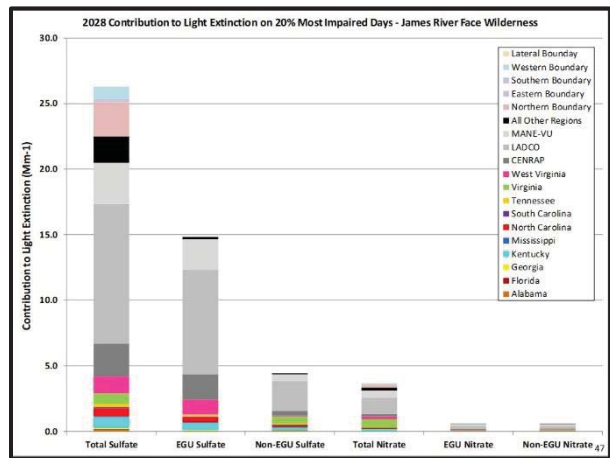
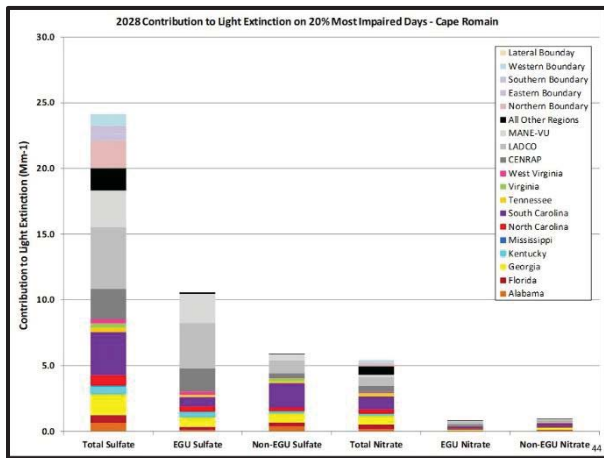
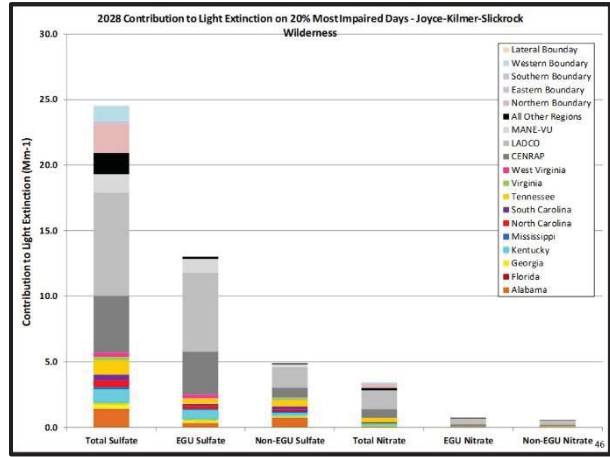
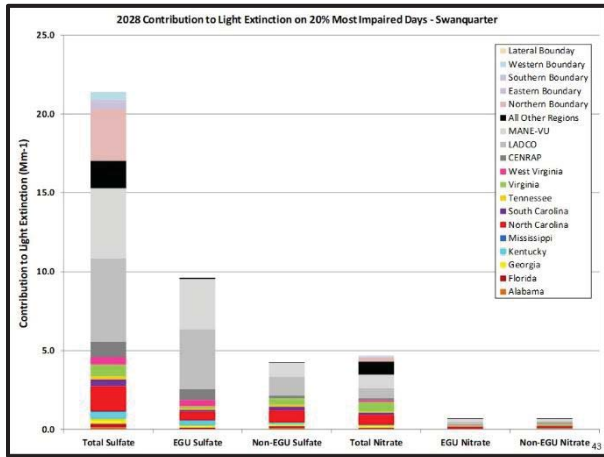
2028 Contribution of All Anthro + Natural Sources in Georgia from Sulfate + Nitrate (Mm-1)

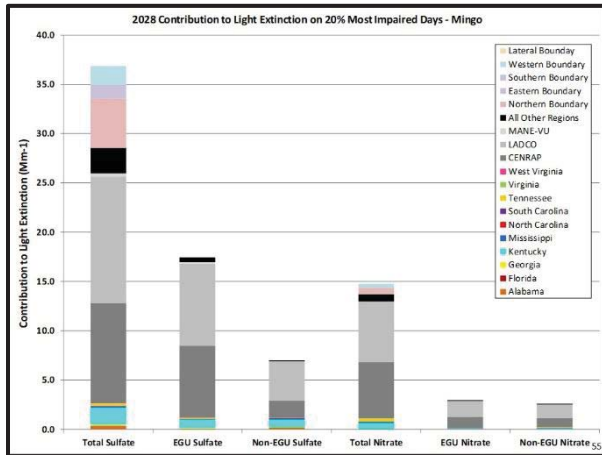


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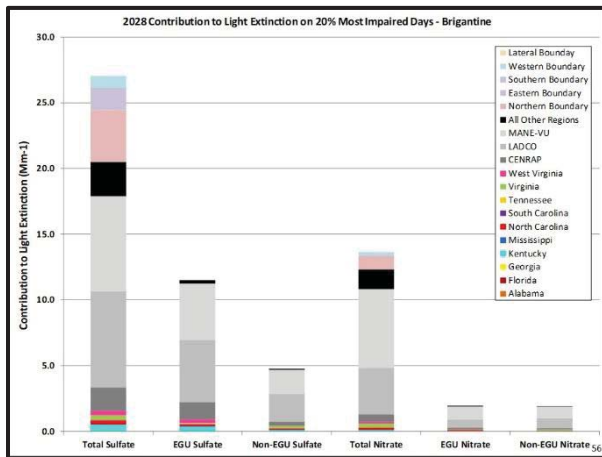








- ### Screening for 4-Factor Analysis
- States are in the process of selecting sources for the reasonable progress 4-factor analysis
 - State need to make decisions on screening thresholds:
 - Most states will likely use a screening threshold based on a facility's percent contribution to point source contributions
 - Likely range is between 2% to 5%
 - Sulfate and nitrate separately vs. combination
 - AOI contributions, PSAT contributions, or combination
 - In some cases, the AOI contributions are significantly different than the PSAT contributions



- ### 4-Factor Analysis
- States will evaluate certain sources and emissions to determine if reasonable controls are in place or available
 - Considers four important factors
 - Potential costs of compliance
 - \$/ton and \$/Mm⁻¹
 - Time necessary for compliance
 - Energy and non-air quality environmental impacts of compliance
 - Remaining useful life of sources subject to this analysis

NEXT STEPS

Remaining Work Schedule

Task	Schedule
Additional PSAT tagging runs?	Necessity uncertain
Final reports and documentation	February 2020
Website updates and postings	Ongoing task
Regional Haze SIPs Due to EPA	July 31, 2021

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- Phone: 404-361-4000



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**Appendix F-3h - VISTAS Regional Haze Project Update,
April 2, 2020**

VISTAS Regional Haze Project Update



FLM and EPA Conference Call
April 2, 2020

Old ERTAC (2.7opt) vs. New ERTAC (16.0)

SO2	16.0 2028	2.7opt 2028	Δ SO2	Δ SO2
CENSARA	367,683.7	760,828.2	-393,144.5	-51.67%
LADCO	266,047.0	379,577.5	-113,530.5	-29.91%
MANE-VU	78,657.0	196,672.6	-118,015.6	-60.01%
VISTAS	161,502.5	273,582.1	-112,079.6	-40.97%
TOTAL	976,471.2	1,783,376.5	-806,905.3	-45.25%

NOx	16.0 2028	2.7opt 2028	Δ NOx	Δ NOx
CENSARA	244,499.3	354,795.1	-110,295.8	-31.09%
LADCO	166,429.4	198,966.9	-32,537.4	-16.35%
MANE-VU	56,315.3	83,432.5	-27,117.2	-32.50%
VISTAS	200,791.1	270,615.7	-69,824.6	-25.80%
TOTAL	840,973.6	1,166,663.1	-325,689.5	-27.92%

Outline

- Background Information
- 2028 Emissions Updates
- Revised 2028 PSAT Stacked Bar Charts
- Four Factor Analysis
- Next Steps & Schedule



VISTAS CC/TAWG Conclusions

1. 2028 emission updates are necessary
 - **VISTAS States** – States will:
 - Update 2028 major source emissions projections (SO₂, NO_x, PM_{2.5}, PM₁₀, NH₃, CO) at the facility and unit level
 - Add any new sources of significance
 - **LADCO States** – SESARM will:
 - Replace ERTAC_2.7 with ERTAC_16.1 based on LADCO input
 - **All Other States** – SESARM will:
 - Replace ERTAC_2.7 with ERTAC_16.0
 - Verify accuracy of large SO₂ and NO_x source emissions projections via contact with surrounding states/RPOs and update emissions as needed
2. Additional 2028 air quality modeling is needed

VISTAS vs. EPA Emission Projections

- The table below compares the 2028 point emissions used by VISTAS vs. the latest 2028fh emissions used by EPA (projected from 2016). The emissions below are extracted from the VISTAS 12 modeling domain which covers the Eastern U.S.

Pollutant	VISTAS 2028 (tpy)	New EPA 2028 (tpy)	Change (tpy)	Change (%)
NOx	2,641,463.83	2,108,115.50	533,348.33	20.19%
SO2	2,574,542.02	1,400,287.10	1,174,254.92	45.61%

Additional Modeling-Related Tasks

- Emissions processing
- Updated 2028 CAMx modeling
- Updated 2028 visibility projections
- Documentation

Updated 2028 Point Emissions

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Revised 2028 PSAT Stacked Bar Charts (Original and Adjusted)

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2028 SO₂ Comparison

State/RPO	Point_OLD (tpy)	Point_NEW (tpy)	Delta (%)	EGU_OLD (tpy)	EGU_NEW (tpy)	Delta (%)	NEGU_OLD (tpy)	NEGU_NEW (tpy)	Delta (%)
AL	87,111.28	59,056.98	-32.2%	15,480.96	8,365.96	-46.0%	71,630.32	50,691.02	-29.2%
FL	63,501.23	52,982.68	-16.6%	28,547.41	24,004.67	-15.9%	34,953.82	28,978.01	-17.1%
GA	37,065.83	36,166.09	-2.4%	18,473.28	17,573.54	-4.9%	18,592.55	18,592.55	0.0%
KY	75,140.26	65,636.83	-12.6%	56,262.06	49,585.95	-11.9%	18,878.20	16,050.88	-15.0%
MS	21,234.31	8,405.06	-60.4%	6,984.57	3,236.28	-53.7%	14,249.74	5,168.78	-63.7%
NC	35,232.88	24,347.18	-30.9%	19,734.80	9,571.47	-51.5%	15,498.08	14,775.71	-4.7%
SC	29,600.85	29,601.25	0.0%	10,693.79	10,695.34	0.0%	18,907.05	18,905.91	-0.6%
TN	23,447.58	21,057.17	-10.2%	12,114.30	10,030.04	-17.2%	11,333.28	11,027.13	-2.7%
VA	19,839.18	18,551.32	-6.5%	3,264.09	1,976.23	-39.5%	16,575.09	16,575.09	0.0%
WV	63,404.07	53,715.79	-15.3%	57,828.67	47,744.49	-17.4%	5,575.41	5,971.30	7.1%
CENSARA	1,012,946.59	621,321.79	-38.7%	773,625.13	382,000.54	-50.6%	239,321.46	239,320.75	-0.0%
LADCO	660,186.42	498,171.62	-24.5%	444,508.99	282,492.18	-36.4%	215,679.44	215,679.44	0.0%
MANEVE	270,810.83	149,439.76	-44.8%	203,661.43	95,074.20	-53.3%	67,149.39	54,365.55	-19.0%
WRAP	182,121.89	135,483.18	-25.6%	136,955.17	90,316.46	-34.1%	45,166.72	45,166.73	0.0%
TOTAL	2,581,643.20	1,773,936.20	-31.3%	1,788,132.63	1,032,667.35	-42.2%	793,510.56	741,268.85	-6.6%

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PSAT Source Apportionment Modeling

- Quantifies visibility impacts from individual point sources, source sectors, and geographic regions
- NOx and SO₂ tagging
- Used for further evaluation of AOI results
- Refines information on contributions to visibility impairment
- Can be used to adjust future year visibility projections to account for additional emission controls
- VISTAS contract with ERG allows for up to 250 tags

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2028 NOx Comparison

State/RPO	Point_OLD (tpy)	Point_NEW (tpy)	Delta (%)	EGU_OLD (tpy)	EGU_NEW (tpy)	Delta (%)	NEGU_OLD (tpy)	NEGU_NEW (tpy)	Delta (%)
AL	80,389.97	70,824.72	-11.9%	26,895.35	20,008.14	-25.6%	53,494.61	50,816.58	-5.0%
FL	68,006.19	70,010.40	2.9%	26,250.73	25,049.90	-4.6%	41,755.45	44,960.50	7.7%
GA	67,197.50	65,885.55	-2.0%	25,899.67	24,587.73	-5.1%	41,297.83	41,297.83	0.0%
KY	66,240.03	62,130.83	-6.2%	36,781.72	32,695.94	-11.1%	29,458.31	29,434.89	-0.1%
MS	52,159.32	46,853.62	-10.2%	18,279.53	12,208.89	-33.2%	33,879.79	34,644.73	2.3%
NC	65,863.97	58,933.80	-10.5%	27,842.23	20,977.65	-24.7%	38,021.74	37,956.15	-0.2%
SC	36,051.31	36,170.87	0.3%	10,522.78	10,707.42	1.8%	25,528.53	25,463.44	-0.3%
TN	45,879.07	42,954.25	-6.4%	10,086.01	7,814.13	-22.5%	35,793.06	35,140.12	-1.8%
VA	43,210.19	41,674.99	-3.6%	11,973.97	10,435.77	-12.8%	31,236.22	31,236.22	0.0%
WV	65,054.07	68,200.77	4.8%	46,721.77	49,874.15	6.7%	18,332.30	18,326.62	-0.0%
CENSARA	903,979.85	791,397.59	-12.5%	382,706.66	270,182.46	-29.4%	521,273.19	521,215.14	-0.0%
LADCO	548,865.74	491,345.00	-10.5%	244,035.28	185,513.52	-23.6%	304,830.46	304,831.49	0.0%
MANEVE	244,280.15	222,991.41	-9.7%	103,465.15	82,176.41	-20.6%	140,815.00	140,815.00	0.0%
WRAP	362,819.80	301,433.41	-16.9%	187,944.97	126,558.55	-32.7%	174,874.83	174,874.86	0.0%
TOTAL	2,649,998.14	2,370,804.22	-10.5%	1,159,405.80	879,790.66	-24.1%	1,490,592.35	1,491,013.55	0.0%

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PSAT SO₂ and NOx Tags (209)

Round 1 (122 tags)

- Total SO₂ tags for 10 individual VISTAS states + 3 MJOs = 13 tags
- Total NOx tags for 10 individual VISTAS states + 3 MJOs = 13 tags
- EGU point SO₂ tags for 10 individual VISTAS states + 3 MJOs = 13 tags
- EGU point NOx tags for 10 individual VISTAS states + 3 MJOs = 13 tags
- SO₂ tags for individual VISTAS facilities = 50 tags
- NOx tags for individual VISTAS facilities = 20 tags

Round 2 (87 tags)

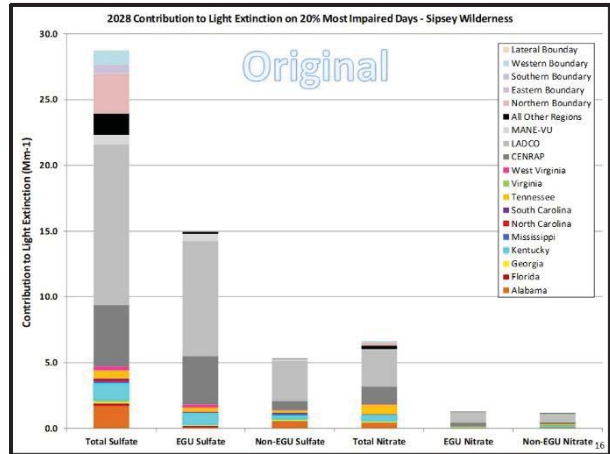
- Non-EGU point SO₂ for 10 individual VISTAS states + 3 MJOs = 13 tags
- Non-EGU point NOx for 10 individual VISTAS states + 3 MJOs = 13 tags
- SO₂ and NOx for N/S/W/E boundaries = 8 tags
- SO₂ tags for individual VISTAS facilities = 10 tags
- NOx tags for individual VISTAS facilities = 16 tags
- SO₂ tags for individual non-VISTAS facilities = 17 tags
- NOx tags for individual non-VISTAS facilities = 10 tags

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PSAT Adjustment Ratios

State/RPO	SO ₂ EGU Ratio	SO ₂ NEGU Ratio	NOx EGU Ratio	NOx NEGU Ratio
AL	0.540	0.708	0.744	0.950
FL	0.841	0.829	0.954	1.077
GA	0.951	1.000	0.949	1.000
KY	0.881	0.850	0.889	0.999
MS	0.463	0.363	0.668	1.023
NC	0.485	0.953	0.753	0.998
SC	1.000	1.000	1.018	0.997
TN	0.828	0.973	0.775	0.982
VA	0.605	1.000	0.872	1.000
WV	0.826	1.071	1.067	1.000
CENSARA	0.494	1.000	0.706	1.000
LADCO	0.636	1.000	0.764	1.000
MANE-VE	0.467	0.810	0.794	1.000

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Revised State/RPO PSAT Results

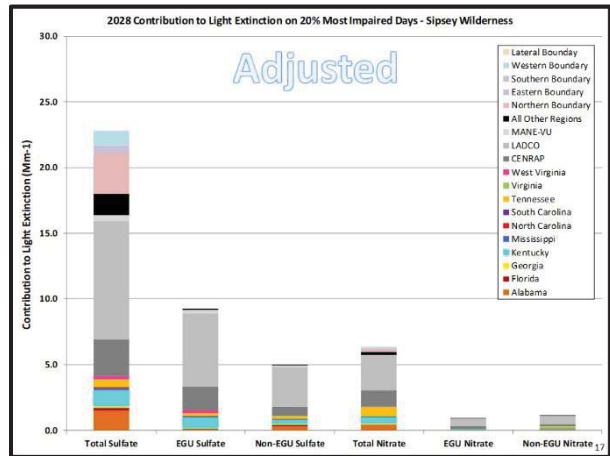
- Revised EGU Sulfate PSAT Results = Original EGU Sulfate PSAT Results * SO₂ EGU Ratio

$$\text{where, SO}_2 \text{ EGU Ratio} = \frac{\text{(Revised EGU SO}_2 \text{ emissions)}}{\text{(Original EGU SO}_2 \text{ emissions)}}$$

- Revised NEGU Sulfate PSAT Results = Original NEGU Sulfate PSAT Results * SO₂ NEGU Ratio

$$\text{where, SO}_2 \text{ NEGU Ratio} = \frac{\text{(Revised EGU SO}_2 \text{ emissions)}}{\text{(Original EGU SO}_2 \text{ emissions)}}$$

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Revised State/RPO PSAT Results

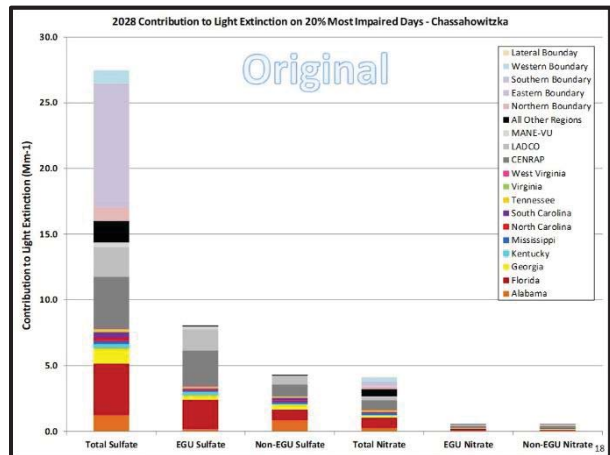
- Revised EGU Nitrate PSAT Results = Original EGU Nitrate PSAT Results * NOx EGU Ratio

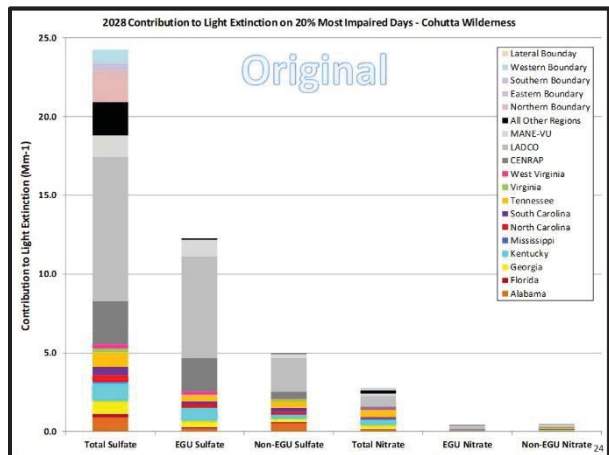
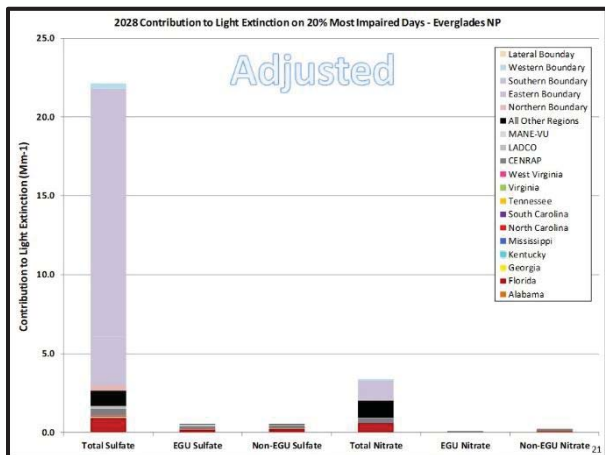
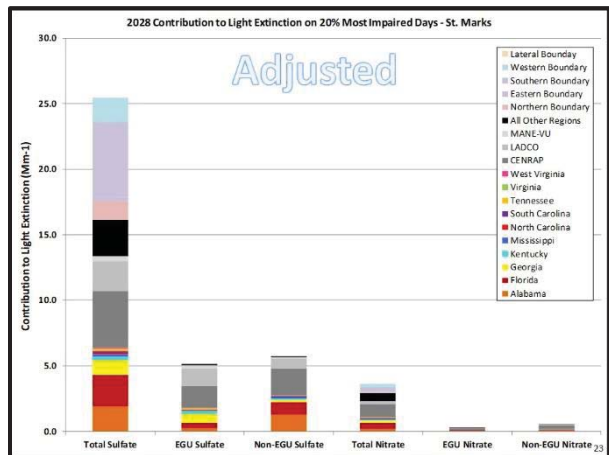
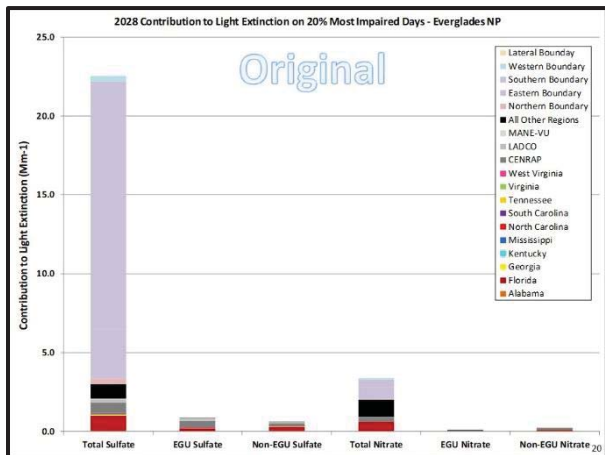
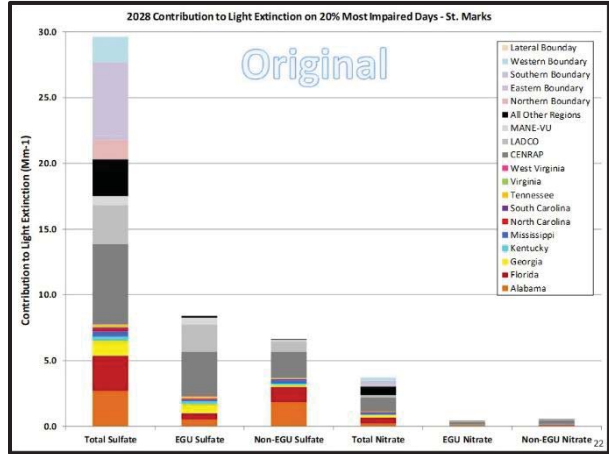
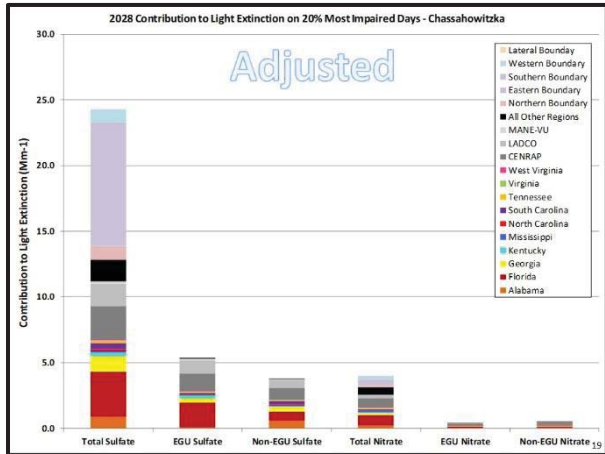
$$\text{where, NOx EGU Ratio} = \frac{\text{(Revised EGU NOx emissions)}}{\text{(Original EGU NOx emissions)}}$$

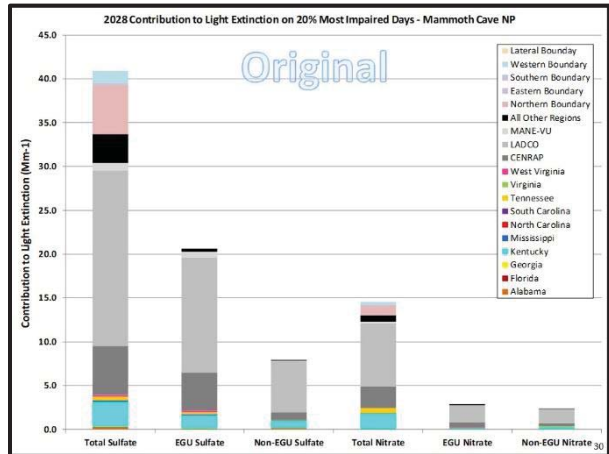
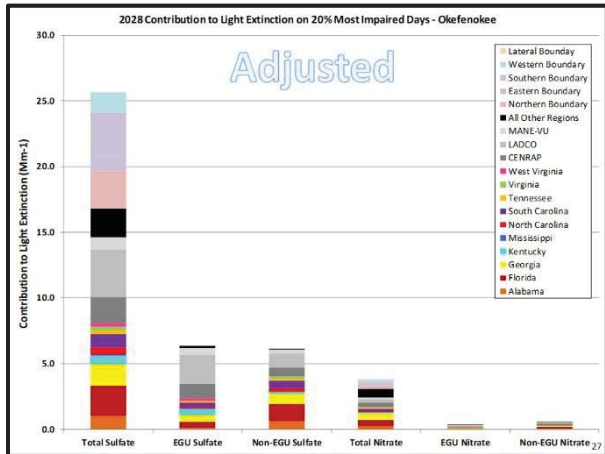
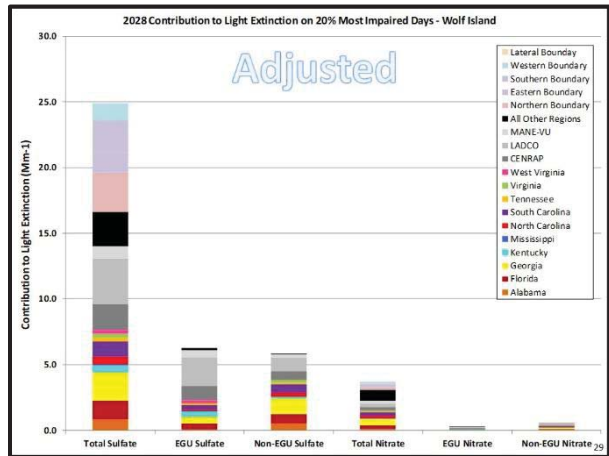
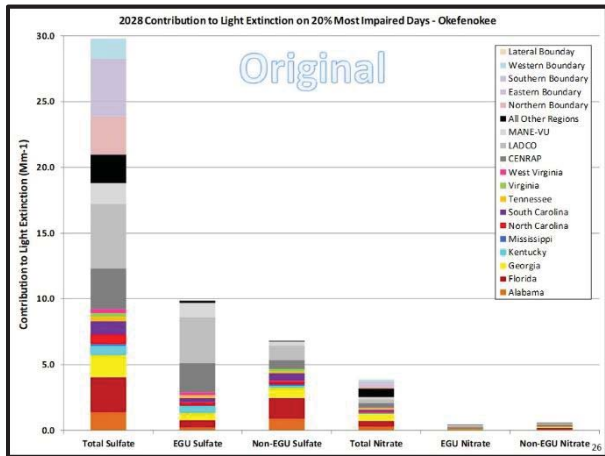
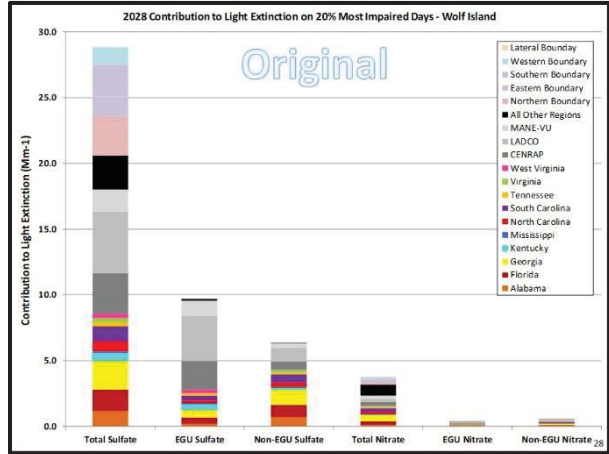
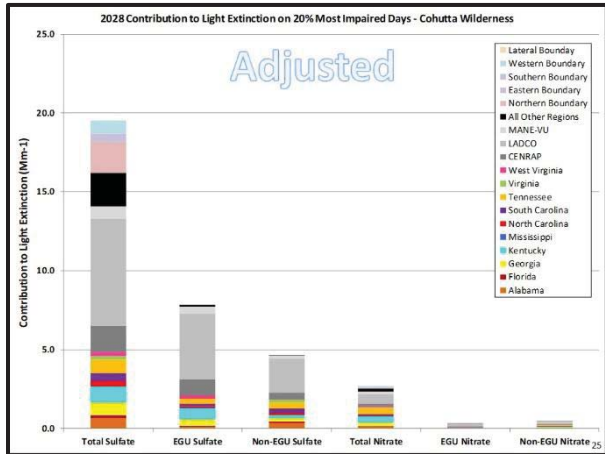
- Revised NEGU Nitrate PSAT Results = Original NEGU Nitrate PSAT Results * NOx NEGU Ratio

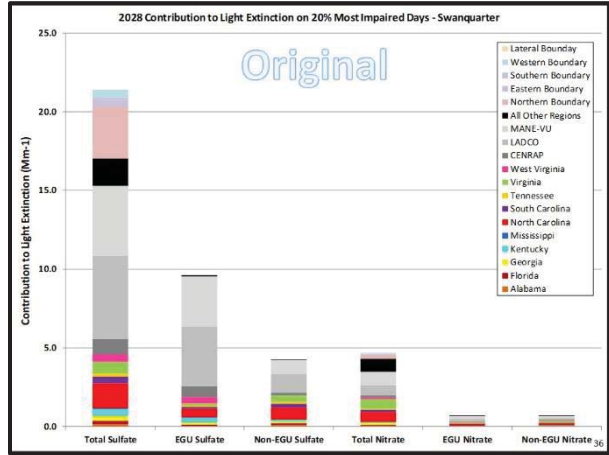
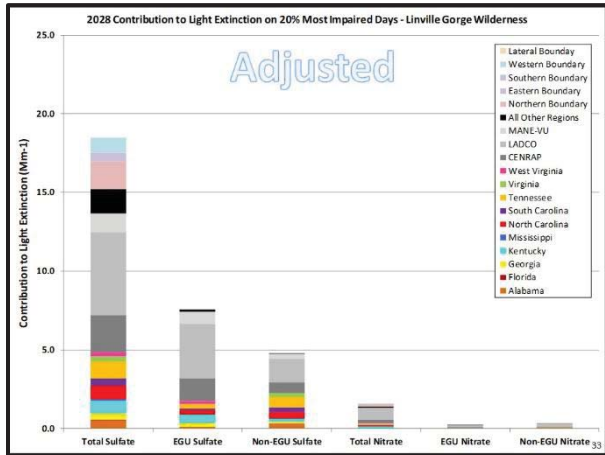
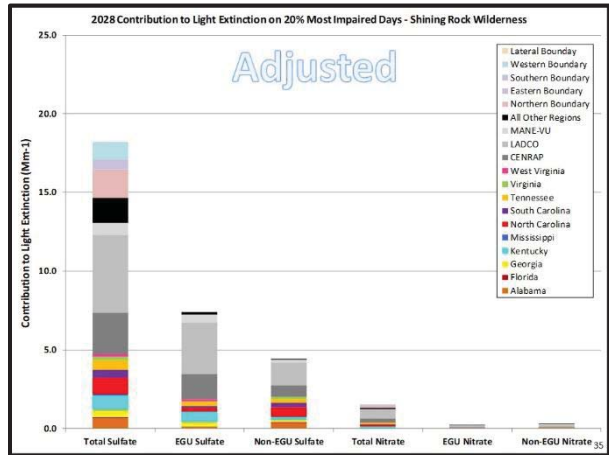
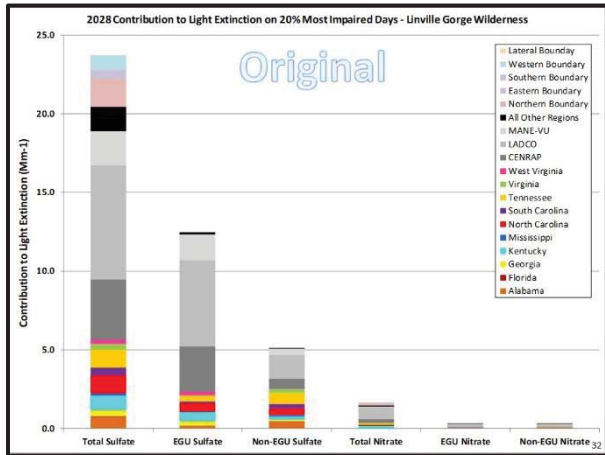
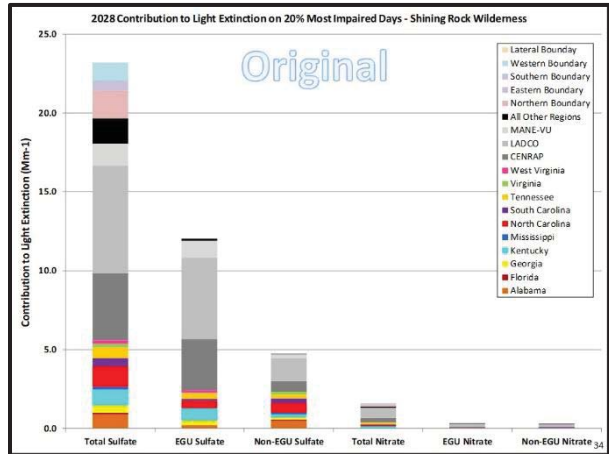
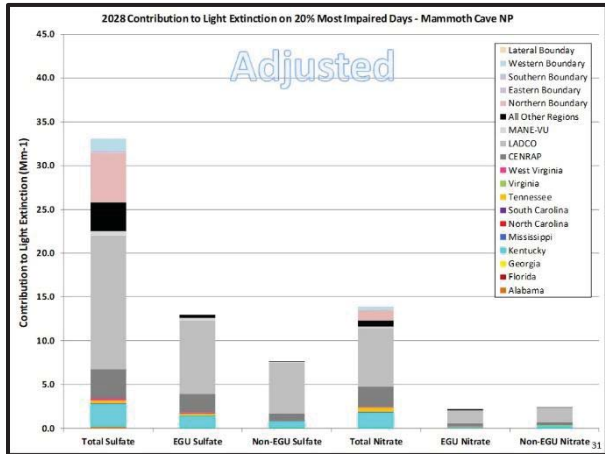
$$\text{where, NOx NEGU Ratio} = \frac{\text{(Revised EGU NOx emissions)}}{\text{(Original EGU NOx emissions)}}$$

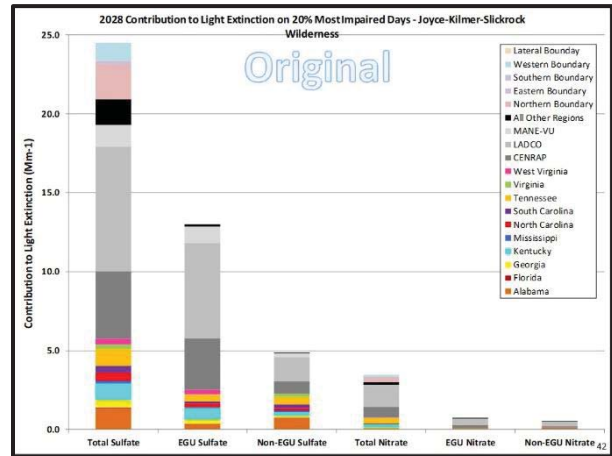
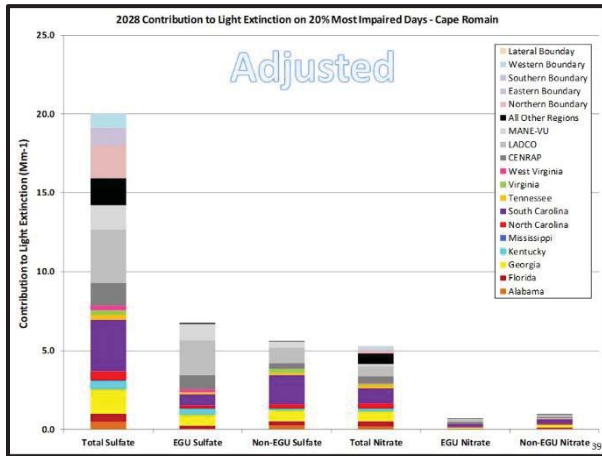
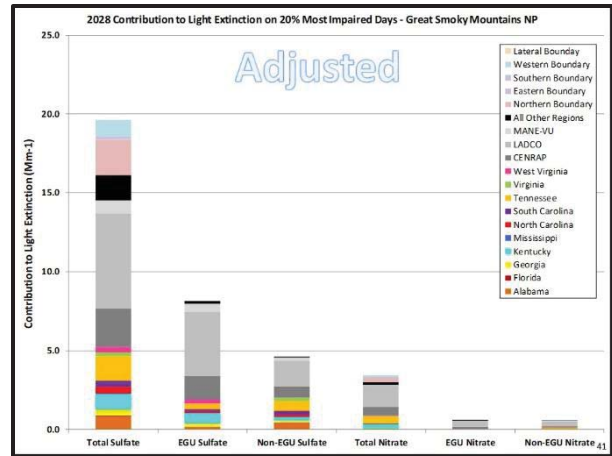
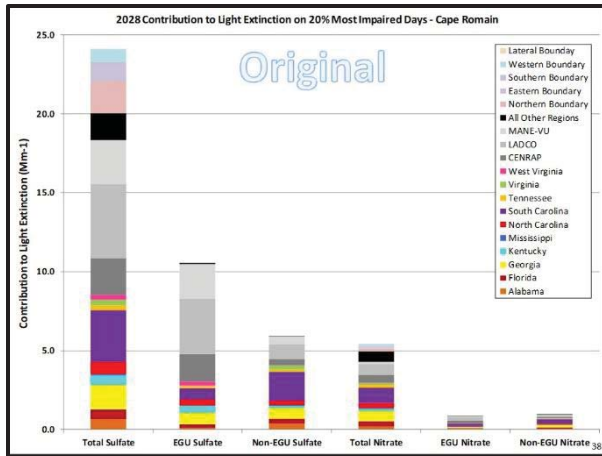
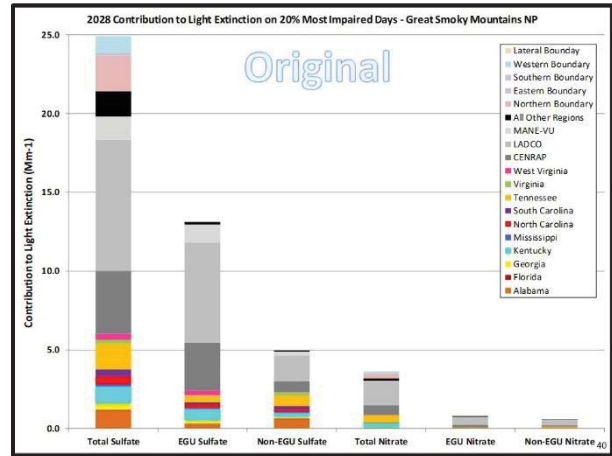
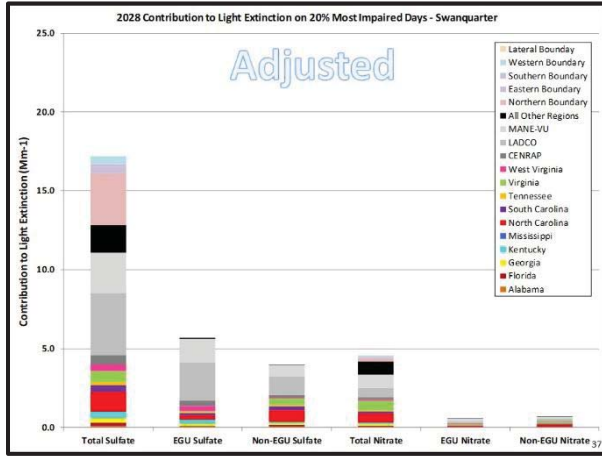
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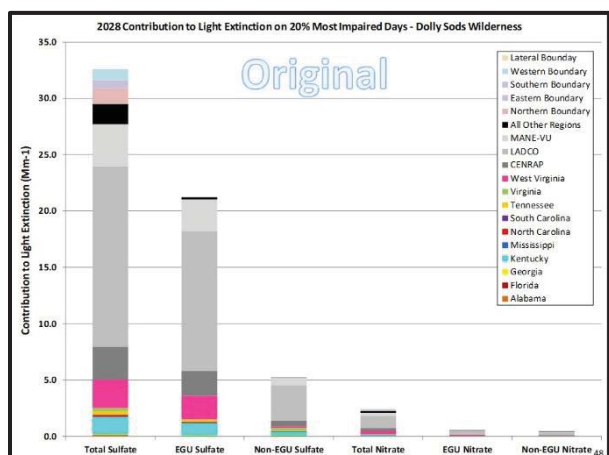
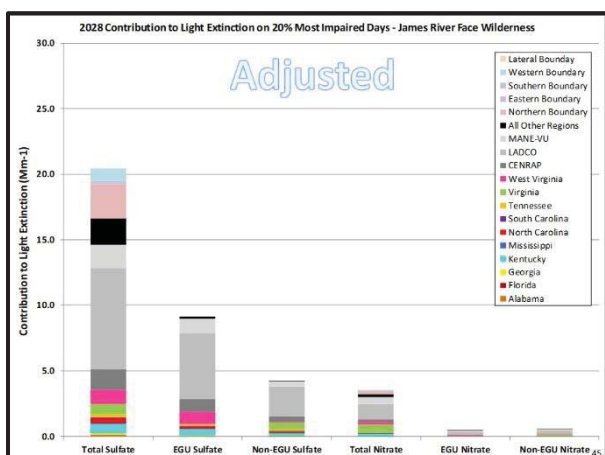
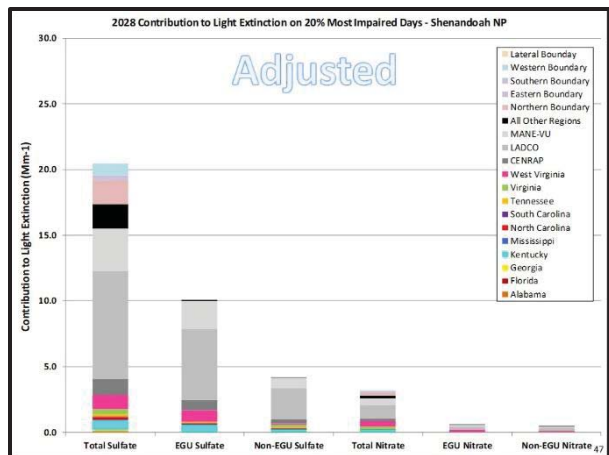
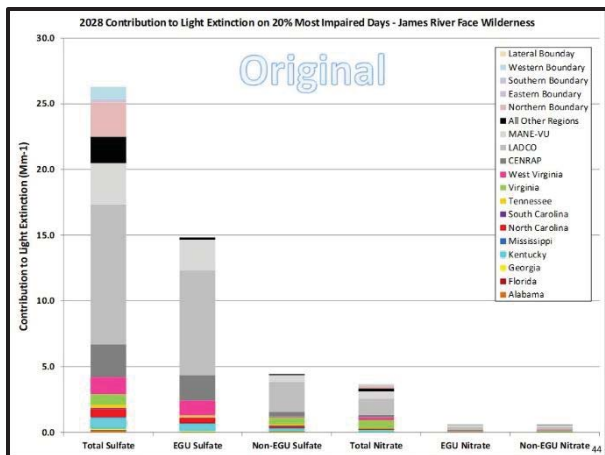
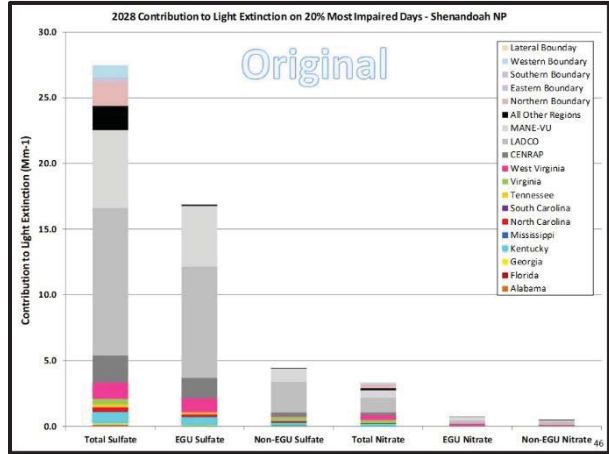
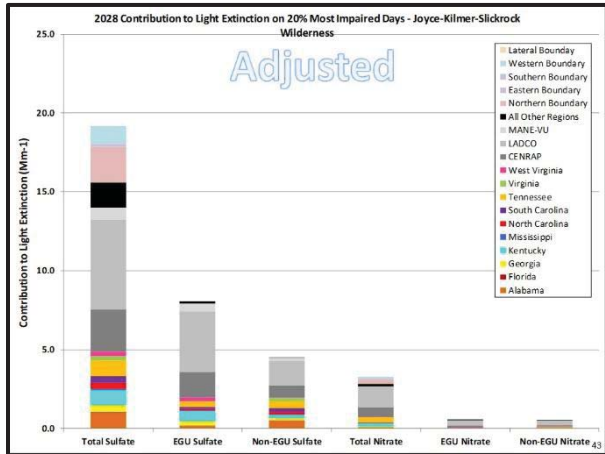


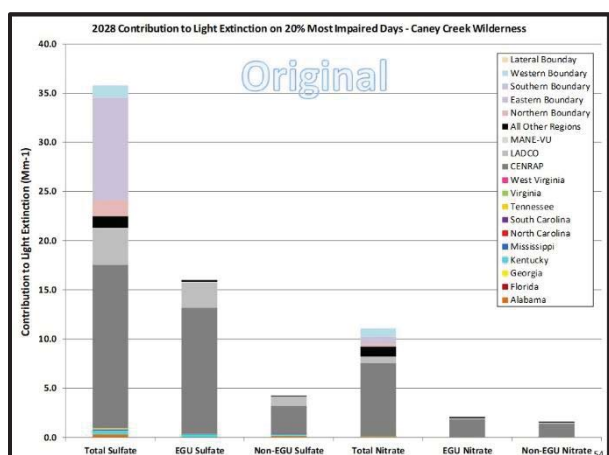
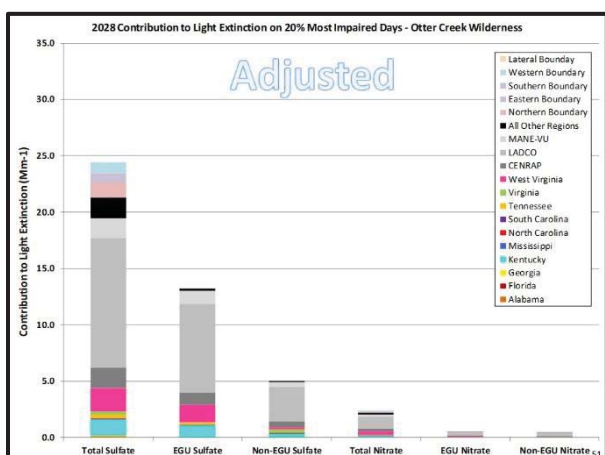
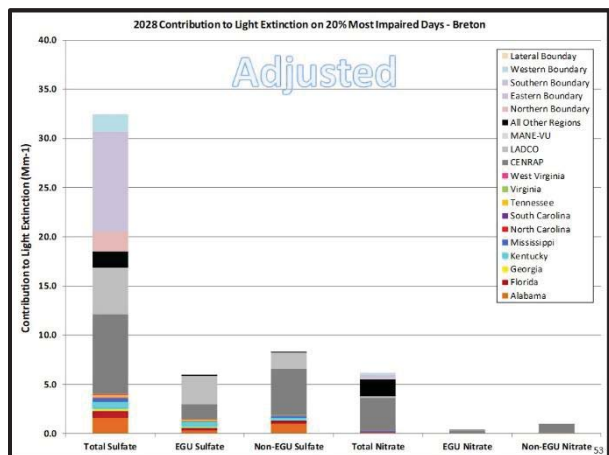
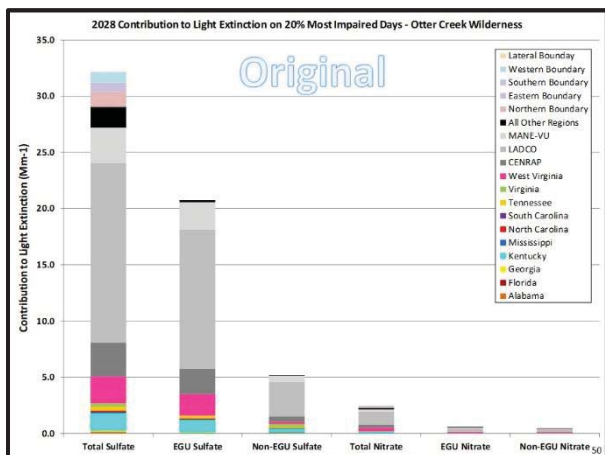
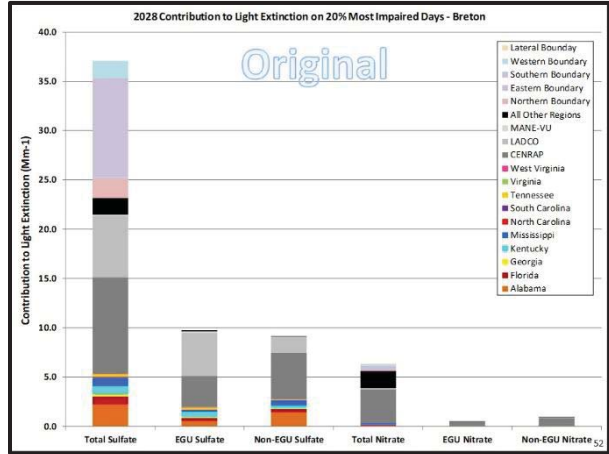
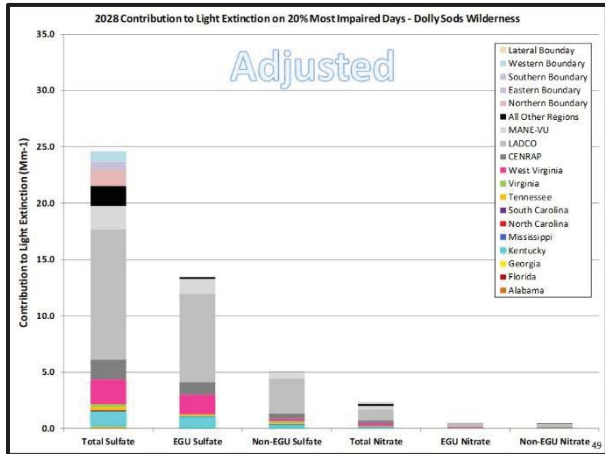


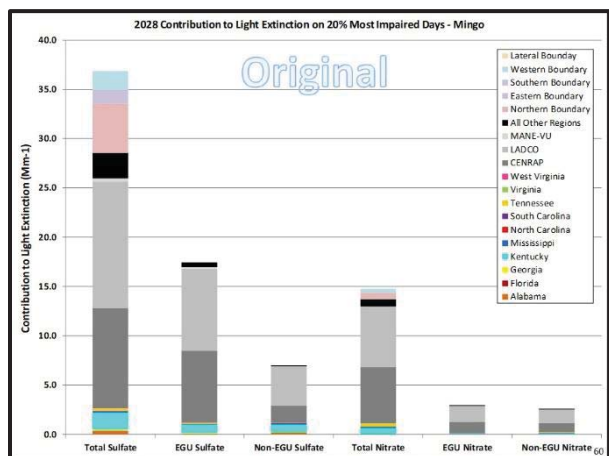
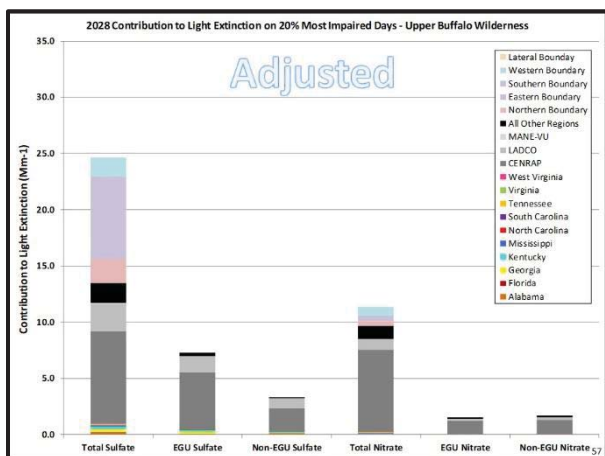
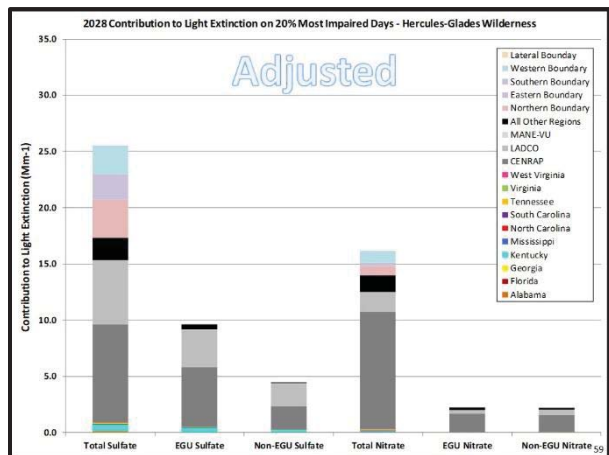
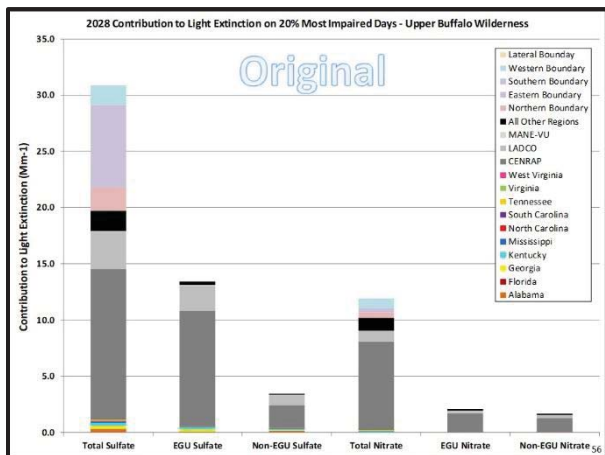
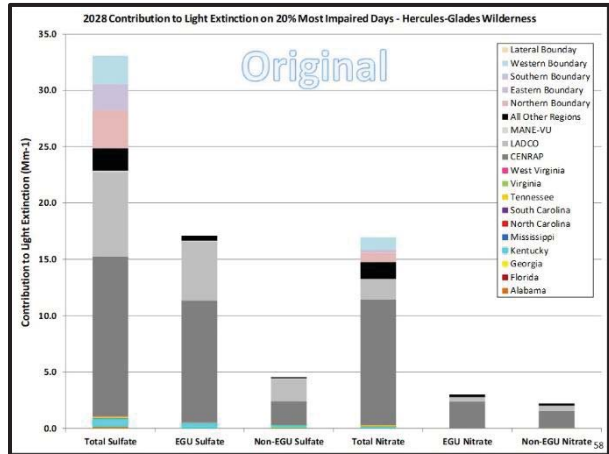
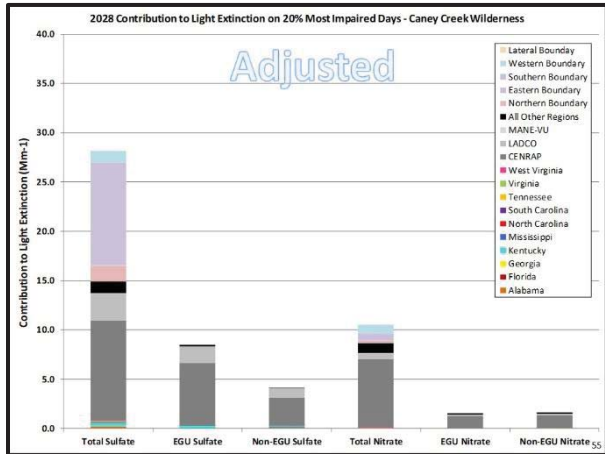


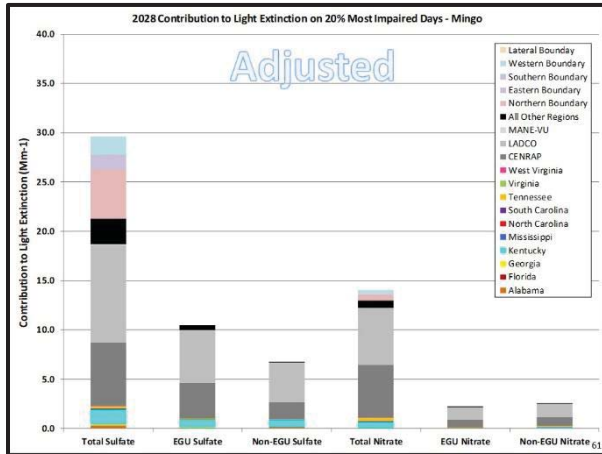




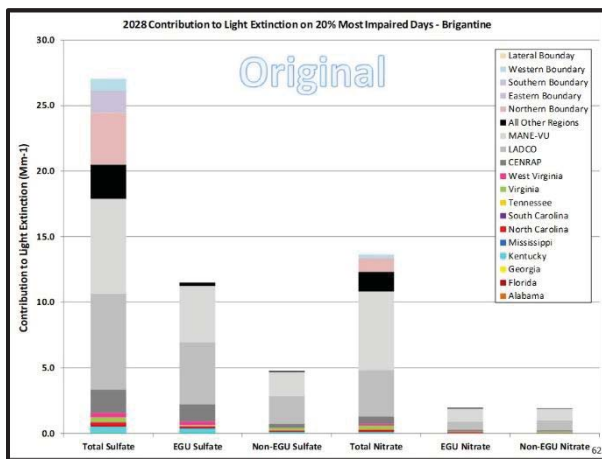




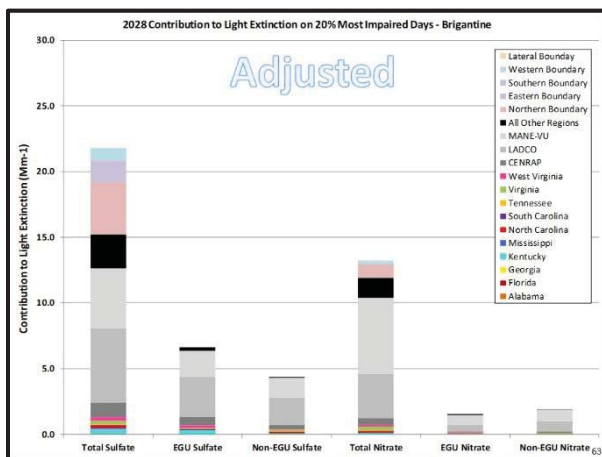




Four Factor Analysis



- ### Four-Factor Analysis Screening Approach
1. The VISTAS four-factor analysis approach is based on an initial AOI screening ($Q/d * EWRT$) to rank facilities based on their sulfate and nitrate contributions at each Class I area.
 2. These rankings were used to identify 87 individual facilities for PSAT tagging. PSAT tagging was used to determine the nitrate and sulfate contributions from each facility at each Class I area in the VISTAS_12 domain.
 3. Each individual VISTAS state will apply a PSAT contribution threshold based on the facility sulfate or facility nitrate impacts divided by the total impact of sulfate + nitrate from all point sources to determine which sources will need to be considered for a four-factor analysis.
 - If sulfate contribution $\geq 1\%$ \rightarrow SO₂ Four-Factor Analysis
 - If nitrate contribution $\geq 1\%$ \rightarrow NO_x Four-Factor Analysis



- ### Why 1% Threshold?
- In the Round 1 Regional Haze SIPs, many VISTAS states used the AOI approach and a 1% threshold on a Unit basis.
 - We are using the AOI/PSAT approach and a 1% threshold based on a Facility basis. This will pull in more facilities compared to a Unit basis.
 - The CSAPR interstate transport rules use a 1% contribution threshold for determining significant contributions to nonattainment and maintenance areas.
 - The use of a 1% significance threshold would be consistent with the CSAPR approach.

Area of Influence (AOI) Analysis

- Evaluates emissions (Q), distance to Class I area (d), and extinction weighted residence time (EWRT) in model grid cells (point) or counties (source categories)
- Formula: $(Q/d)*EWRT$
- Establishes each county's and each facility's contribution to light extinction at each Class I area on the 20% most impaired days
- Can use contributions to rank and screen facilities for the 4-factor analysis
- Georgia Example:
 - Sources in Georgia, used $\geq 2\%$ threshold
 - Sources outside Georgia, used $\geq 4\%$ threshold

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AOI Point Contributions for WOLF

State	FACILITY NAME	DISTANCE (km)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	NOx Contribution	SO2 Contribution
GA	Brunswick Cellulose Inc	27.9	1,554.5	294.2	2.94%	8.84%
FL	ROCK TENN CP, LLC	74.9	2,316.8	2,606.7	0.39%	8.56%
GA	International Paper - Savannah	85.9	1,560.7	3,945.4	0.24%	7.53%
FL	JEA	105.1	651.8	2,094.5	0.09%	4.43%
GA	Georgia-Pacific Consumer Products LP (Savannah River Mill)	109.9	351.5	1,860.2	0.03%	2.83%
FL	WHITE SPRINGS AGRICULTURAL CHEMICALS, INC.	173.6	112.4	2,745.0	0.01%	1.97%
SC	ALUMAX OF SOUTH CAROLINA	223.0	108.1	3,751.7	0.00%	1.84%
FL	RAYONIER PERFORMANCE FIBERS LLC	77.4	2,327.1	562.0	0.38%	1.79%
FL	SEMINOLE ELECTRIC COOPERATIVE, INC.	181.4	917.8	3,713.4	0.02%	1.77%
OH	General James M. Gavin Power Plant (0627010056)	845.3	8,122.5	41,595.8	0.02%	1.71%
SC	SANTEE COOPER CROSS GENERATING STATION	251.0	3,273.5	4,281.2	0.09%	1.59%
GA	Southern States Phosphate & Fertilizer	84.1	1.0	997.1	0.00%	1.55%
FL	IFF CHEMICAL HOLDINGS, INC.	118.5	37.7	898.9	0.00%	1.22%
FL	DUKE ENERGY FLORIDA, INC. (DEF)	296.6	2,489.8	5,306.4	0.04%	1.19%
GA	Ga Power Company - Plant Bowen	498.1	6,643.3	10,453.4	0.03%	1.08%
GA	Savannah Sugar Refinery	89.9	521.6	582.0	0.00%	1.06%
SC	INTERNATIONAL PAPER EASTOVER	288.7	1,780.3	3,212.9	0.05%	0.95%
GA	Ga Power Company - Plant McManus	27.1	72.2	30.1	0.14%	0.93%
SC	KAPSTONE CHARLESTON KRAFT LLC	213.6	2,355.8	1,863.7	0.09%	0.89%
PA	KENON NE MGMT CO/KEYSTONE STA	1,048.6	6,578.5	56,939.2	0.01%	0.84%

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AOI Point Contributions for COHU

State	FACILITY NAME	DISTANCE (km)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	NOx Contribution	SO2 Contribution
GA	Ga Power Company - Plant Bowen	78.0	6,643.3	10,453.4	1.15%	19.58%
IN	INDIANA MICHIGAN POWER DBA AEP ROCKPORT	430.1	8,806.8	39,536.3	0.13%	4.66%
GA	International Paper - Rome	87.4	1,773.4	1,791.0	0.18%	4.66%
IN	Sibson	487.1	12,280.3	23,117.2	0.10%	2.31%
IN	INDIANAPOLIS POWER & LIGHT PETERSBURG	477.0	10,665.3	18,141.9	0.16%	2.18%
KY	Tennessee Valley Authority (TVA) - Shawnee Fossil Plant	457.2	7,007.3	19,504.7	0.07%	2.18%
TN	TVA KINGSTON FOSSIL PLANT	124.0	1,687.4	1,886.1	0.13%	2.17%
OH	General James M. Gavin Power Plant (0627010056)	512.0	8,122.5	41,595.8	0.02%	1.71%
TN	TVA CUMBERLAND FOSSIL PLANT	327.0	4,916.5	8,427.3	0.09%	1.38%
KY	Big Rivers Electric Corp. - Wilson Station	369.0	1,151.9	6,934.2	0.01%	1.07%
OH	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	454.6	7,150.0	22,133.9	0.06%	1.05%
GA	Ga Power Company - Plant Wansley	156.8	2,052.5	4,856.0	0.04%	1.05%
KY	KY Utilities Co. - Ghent Station	441.5	7,939.9	10,169.3	0.08%	1.05%
IL	Joppa Steam	466.9	4,706.3	20,509.3	0.02%	1.04%
GA	Mohawk Industries Inc.	32.0	66.5	77.1	0.07%	1.02%
TN	EASTMAN CHEMICAL COMPANY	269.8	6,900.3	6,420.2	0.09%	0.99%
MO	JAMEREN MISSOURI LABADIE PLANT	695.8	9,685.5	41,740.3	0.01%	0.96%
IL	Newport	564.0	3,934.9	10,633.6	0.01%	0.91%
GA	Chemical Products Corporation	71.9	19.5	513.8	0.00%	0.89%
IN	INDIANA KENTUCKY ELECTRIC CORPORATION	444.4	6,188.5	9,038.1	0.04%	0.76%

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Georgia Tagging for PSAT

- Sources in Georgia ($\geq 2\%$ threshold)
 - Ga Power Company – Plant Bowen
 - International Paper – Rome (aka TEMPLE INLAND)
 - International Paper – Savannah
 - Brunswick Cellulose Inc
 - Georgia-Pacific Consumer Products LP (Savannah River Mill)
- Sources outside Georgia ($\geq 4\%$ threshold)
 - INDIANA MICHIGAN POWER DBA AEP ROCKPORT (IN)
 - ROCK TENN CP, LLC (FL)
 - JEA (FL)

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AOI Point Contributions for OKEF

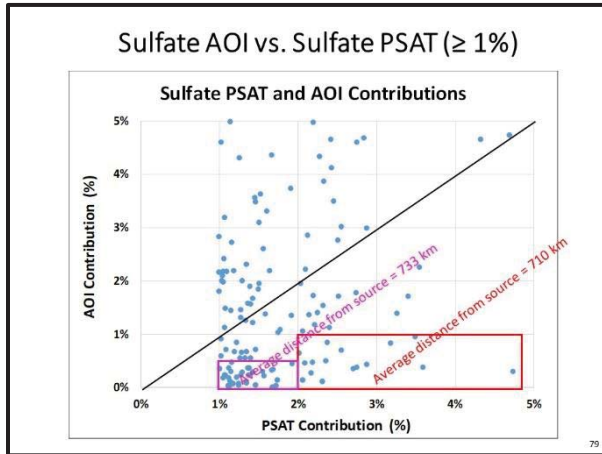
State	FACILITY NAME	DISTANCE (km)	NOx_2028 (tons/year)	SO2_2028 (tons/year)	NOx Contribution	SO2 Contribution
FL	WHITE SPRINGS AGRICULTURAL CHEMICALS, INC.	71.5	112.4	2,745.0	0.03%	14.63%
FL	ROCK TENN CP, LLC	64.8	2,316.8	2,606.7	0.88%	12.82%
FL	JEA	65.6	651.8	2,094.5	0.18%	6.60%
FL	SEMINOLE ELECTRIC COOPERATIVE, INC.	121.4	917.8	3,713.4	0.07%	3.25%
FL	IFF CHEMICAL HOLDINGS, INC.	56.8	37.7	898.9	0.01%	3.25%
FL	RAYONIER PERFORMANCE FIBERS LLC	63.4	2,327.1	562.0	0.00%	2.82%
GA	International Paper - Savannah	178.9	1,560.7	3,945.4	0.08%	2.81%
FL	BUCKEYE FLORIDA LIMITED PARTNERSHIP	153.5	1,830.7	1,520.4	0.14%	2.18%
FL	RENSSENZ LLC	59.8	66.3	560.5	0.02%	1.96%
FL	DUKE ENERGY FLORIDA, INC. (DEF)	205.0	2,489.8	5,306.4	0.06%	1.40%
AL	Sanders Lead Co	384.6	121.7	7,951.1	0.00%	1.11%
GA	Georgia-Pacific Consumer Products LP (Savannah River Mill)	197.2	351.5	1,860.2	0.01%	1.05%
GA	Ga Power Company - Plant Bowen	498.1	6,643.3	10,453.4	0.05%	1.02%
GA	Brunswick Cellulose Inc	79.3	1,554.5	294.2	0.34%	1.01%
SC	ALUMAX OF SOUTH CAROLINA	322.7	108.1	3,751.7	0.00%	0.97%
GA	PCA Valdosta Mill	112.7	1,032.6	485.7	0.09%	0.85%
SC	SANTEE COOPER CROSS GENERATING STATION	348.1	3,273.5	4,281.2	0.05%	0.85%
FL	CITY OF GAINESVILLE, FLU	111.7	410.0	881.4	0.03%	0.79%
SC	KAPSTONE CHARLESTON KRAFT LLC	314.9	2,355.8	1,863.7	0.06%	0.65%
GA	Ga Power Company - Plant Wansley	403.7	2,052.5	4,856.0	0.02%	0.65%

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AOI Screening Summary

State	Threshold	Notes
AL	2%	Sulfate only
FL	5%	Sulfate or nitrate, plus Gulf Crist, Mosaic Bartow, Mosaic New Wales, and Mosaic Riverview
GA	2% - 4%	Sulfate or nitrate, 2% threshold for GA facilities, 4% threshold for facilities outside GA
KY	2%	Sulfate or nitrate
MS	2%	Sulfate or nitrate
NC	3%	Sulfate + nitrate
SC	2% - 5%	2% for sulfate, 5% for nitrate, plus Santee Cooper Winyah, International Paper Georgetown, and SCE&G Williams
TN	3%	Sulfate + nitrate, plus CEMEX
VA	2%	Sulfate + nitrate
WV	0.2%	Sulfate or nitrate

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Four-Factor Analysis Screening Approach

- Due to the amount of resources already invested in the AOI and PSAT analysis, **VISTAS plans to continue with our original approach** for determining which sources will require a four-factor analysis.
- In cases where emissions decreased or increased at individual facilities being considered for a four-factor analysis, the facility contributions will be adjusted to be consistent with the lower/higher facility emissions before comparing to the PSAT contribution threshold.
- **EPA verbally stated this should be okay 2/6/2020.**

AOI vs. PSAT Summary

- AOI tends to overestimate impacts for facilities near the Class I area.
- AOI tends to underestimate impacts for facilities far away from the Class I area.
 - AOI uses 72-hour back trajectories, sulfate can last for weeks and travel hundreds to thousands of km.
- PSAT is the most reliable modeling tool for tracking facility contributions to visibility impairment at Class I areas.

Revised Facility PSAT Results

- **Revised Facility Sulfate PSAT Results**
 = Original Facility Sulfate PSAT Results * SO_2 Ratio

$$\text{where, } SO_2 \text{ Ratio} = \frac{(\text{Revised facility } SO_2 \text{ emissions})}{(\text{Original facility } SO_2 \text{ emissions})}$$
- **Revised Facility Nitrate PSAT Results**
 = Original Facility Sulfate PSAT Results * NO_x Ratio

$$\text{where, } NO_x \text{ Ratio} = \frac{(\text{Revised facility } NO_x \text{ emissions})}{(\text{Original facility } NO_x \text{ emissions})}$$

Four-Factor Analysis Screening Approach

- The updated 2028 CAMx modeling will impact the **total sulfate and total nitrate impacts** from all sources at each Class I area since the SO_2 and NO_x emissions have decreased.
- However, the **individual sulfate and total nitrate impacts** from the individual 87 tagged facilities should not change unless a facility has reduced or increased SO_2 and/or NO_x emissions.
- Therefore, the percent contribution (facility sulfate impact/total impact of all point sources of sulfate + nitrate) will increase since the denominator will decrease; however, the order of the rankings from largest impact to smallest impact should not change unless one of those facilities reduced or increased emissions.

PSAT Adjustments (AL, FL, GA)

Facility State	Facility BPO	FACILITY_ID_STD	FACILITY_NAME_STD	SO2 Ratio	NOx Ratio
AL	VISTAS	01057-840811	Akzo Nobel Chemicals Inc	1.000	1.000
AL	VISTAS	01097-1056111	Ala Power - Barry	0.525	1.000
AL	VISTAS	01129-1028711	American Midstream Chatham, LLC	0.000	0.000
AL	VISTAS	01073-1018711	DRUMMOND COMPANY, INC.	1.000	1.000
AL	VISTAS	01053-7460111	Escambia Operating Company LLC	0.788	1.000
AL	VISTAS	01053-9851111	Escambia Operating Company LLC	0.616	0.000
AL	VISTAS	01103-1000111	Nucor Steel Decatur LLC	1.000	1.000
AL	VISTAS	01109-9857111	Sanders Lead Co	1.000	1.000
AL	VISTAS	01097-1061611	Unifon Oil of California - Churchill Gas Plant	0.000	0.000
FL	VISTAS	12123-7524111	BUCKEYE FLORIDA, LIMITED PARTNERSHIP	1.000	1.000
FL	VISTAS	12086-9001111	CEMEX CONSTRUCTION MATERIALS FL, LLC	1.000	0.000
FL	VISTAS	12012-6406111	DUKE ENERGY FLORIDA, INC (DEF)	0.948	0.621
FL	VISTAS	12086-9000111	FLORIDA POWER & LIGHT (PTF)	1.000	1.000
FL	VISTAS	12033-7527111	SULF POWER - Crist	0.211	0.342
FL	VISTAS	12086-3532711	HOMESTEAD CITY UTILITIES	1.000	1.000
FL	VISTAS	12031-6402111	JEK	0.568	1.000
FL	VISTAS	12105-7177111	MOSAIC FERTILIZER LLC	0.568	1.000
FL	VISTAS	12057-7164111	MOSAIC FERTILIZER, LLC	0.191	0.000
FL	VISTAS	12105-9198111	MOSAIC FERTILIZER, LLC	0.972	1.000
FL	VISTAS	12089-8458111	RAYONIER PERFORMANCE FIBERS LLC	1.000	1.000
FL	VISTAS	12089-7937111	ROCK TENN CP, LLC	1.000	1.000
FL	VISTAS	12005-5354111	ROCK TENN CP LLC	1.000	1.000
FL	VISTAS	12129-2731711	TALLAHASSEE CITY PURDUM GENERATING STA.	1.000	1.000
FL	VISTAS	12057-5386111	TAMPA ELECTRIC COMPANY (TEC)	1.000	1.000
FL	VISTAS	12086-8999111	TARIMAC AMERICA LLC	1.000	0.000
FL	VISTAS	12047-7897111	WHITE SPRINGS AGRICULTURAL CHEMICALS, INC	0.447	0.999
GA	VISTAS	13127-3721011	Brunswick Cellulose Inc	1.000	1.000
GA	VISTAS	13015-2813011	Sa Power Company - Plant Bowen	1.000	1.000
GA	VISTAS	13103-5360111	Georgia-Pacific Consumer Products LP (Savannah River Mill)	1.000	1.000
GA	VISTAS	13011-3678111	International Paper - Savannah	1.000	1.000
GA	VISTAS	13112-5393111	TEMPLE INLAND	1.000	1.000

Cohutta Wilderness Area

Table with 9 columns: State, Facility ID, Facility Name, DISTANCE_km, Sulfate AOI %, Original Sulfate PSAT %, Revised Sulfate PSAT %, Nitrate AOI %, Original Nitrate PSAT %, Revised Nitrate PSAT %. Rows include facilities like General James M. Gavin Power Plant and Ga Power Company - Plant Bowen.

Mammoth Cave NP

Table with 9 columns: State, Facility ID, Facility Name, DISTANCE_km, Sulfate AOI %, Original Sulfate PSAT %, Revised Sulfate PSAT %, Nitrate AOI %, Original Nitrate PSAT %, Revised Nitrate PSAT %. Rows include facilities like INDIANA MICHIGAN POWER DBA AEP and Gibson.

Okefenokee Wilderness Area

Table with 9 columns: State, Facility ID, Facility Name, DISTANCE_km, Sulfate AOI %, Original Sulfate PSAT %, Revised Sulfate PSAT %, Nitrate AOI %, Original Nitrate PSAT %, Revised Nitrate PSAT %. Rows include facilities like WHITE SPRINGS AGRICULTURAL CHEMICALS, INC and Ga Power Company - Plant Bowen.

Linville Gorge Wilderness Area

Table with 9 columns: State, Facility ID, Facility Name, DISTANCE_km, Sulfate AOI %, Original Sulfate PSAT %, Revised Sulfate PSAT %, Nitrate AOI %, Original Nitrate PSAT %, Revised Nitrate PSAT %. Rows include facilities like EASTMAN CHEMICAL COMPANY and General James M. Gavin Power Plant.

Wolf Island Wilderness

Table with 9 columns: State, Facility ID, Facility Name, DISTANCE_km, Sulfate AOI %, Original Sulfate PSAT %, Revised Sulfate PSAT %, Nitrate AOI %, Original Nitrate PSAT %, Revised Nitrate PSAT %. Rows include facilities like ROCK TENN CP, LLC and Ga Power Company - Plant Bowen.

Shining Rock Wilderness Area

Table with 9 columns: State, Facility ID, Facility Name, DISTANCE_km, Sulfate AOI %, Original Sulfate PSAT %, Revised Sulfate PSAT %, Nitrate AOI %, Original Nitrate PSAT %, Revised Nitrate PSAT %. Rows include facilities like General James M. Gavin Power Plant and Tennessee Valley Authority (TVA) - Shawnee.

Dolly Sods Wilderness

State	Facility ID	Facility Name	DISTANCE_m	Sulfate A01 %	Original Sulfate P501 %	Revised Sulfate P501 %	Nitrate A01 %	Original Nitrate P501 %	Revised Nitrate P501 %	
WV	54033-6271711	ALLEGHENY ENERGY SUPPLY CO, LLC-HARRISON	83.6	13.98%	4.94%	3.07%	1.36%	0.26%	0.22%	
OH	39053-8148511	General James M. Gavin Power Plant (062701005)	233.8	7.62%	6.56%	3.45%	0.10%	0.03%	0.03%	
WV	54079-4782811	MONONGAHELA POWER CO-PLEASANTS POWER STA	163.9	4.64%	4.32%	2.96%	0.16%	0.07%	0.07%	
OH	39081-8115711	Cardinal Power Plant (Cardinal Operating Company) (064105002)	163.9	1.36%	2.14%	2.84%	0.03%	0.01%	0.02%	
OH	39025-8294311	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	416.9	1.40%	2.25%	1.05%	0.02%	0.04%	0.04%	
WV	54051-6902311	MITCHELL PLANT	144.2	1.83%	1.28%	1.01%	0.07%	0.02%	0.03%	
Facilities Who Dropped Off/After Revision										
PA	42005-3866111	GENON NE MGMT CO/KEYSTONE STA	172.8	4.12%	2.43%	0.90%	0.01%	0.00%	0.00%	
WV	54079-6789111	APPALACHIAN POWER COMPANY - JOHN E AMOS PLANT	219.8	3.56%	1.45%	0.81%	0.11%	0.01%	0.02%	
WV	54061-6773611	MONONGAHELA POWER CO - FORT MARTIN POWER	79.8	6.53%	1.27%	0.79%	1.07%	0.18%	0.16%	
IN	18051-7363111	Gibson	729.5	0.04%	0.24%	0.70%	0.02%	0.04%	0.03%	
IN	18147-8017211	INDIANA MICHIGAN POWER DBA AEP ROCKPORT	676.3	0.44%	1.93%	0.68%	0.01%	0.02%	0.02%	
IN	18125-7362411	INDIANAPOLIS POWER & LIGHT PETERSBURG	682.5	0.18%	1.05%	0.54%	0.02%	0.04%	0.02%	
OH	39011-8010811	Coneville Power Plant (061600000)	242.3	0.71%	1.09%	0.00%	0.12%	0.08%	0.00%	

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VISTAS Facilities ≥ 1%

Facility State	FACILITY_ID_STD	FACILITY_NAME_STD	IMPACTED CLASS I AREAS
FL	12123-752411	BUCKEYE-FLORIDA, LIMITED PARTNERSHIP	OKEF
FL	12017-640611	DUKE ENERGY FLORIDA, INC. (DEF)	CHAS
FL	12105-717711	MOSAIC FERTILIZER LLC	EVER
FL	12105-919811	MOSAIC FERTILIZER, LLC	EVER
FL	12085-753711	ROCK TENN CP LLC	OKEF, WOLF
FL	12005-535411	ROCKTENN CP LLC	SAMA
FL	12057-538611	TAMPA ELECTRIC COMPANY (TEC)	EVER
FL	12085-899911	TARMAC AMERICA LLC	EVER
FL	12047-769711	WHITE SPRINGS AGRICULTURAL CHEMICALS,INC	OKEF
GA	13127-3721011	Brunswick Cellulose Inc	WOLF
GA	13015-2813011	Ga Power Company - Plant Bowen	CHAS, COHU, OKEF, ROMA, SAMA, WOLF
GA	13051-3679811	International Paper - Savannah	WOLF
KY	21183-5561611	Big Rivers Electric Corp - Wilson Station	MACA
KY	21145-6037011	Tennessee Valley Authority (TVA) - Shawnee Fossil Plant	COHU, HEGI, MING, SHRO, SIPS
NC	37015-8479111	PCS Phosphate Company, Inc. - Aurora	SWAN
SC	45015-4834511	ALUMAX OF SOUTH CAROLINA	ROMA
SC	45042-5698011	INTERNATIONAL PAPER GEORGETOWN MILL	ROMA
SC	45019-4973611	RAPOSTONE CHARLESTON KEAT LLC	ROMA
SC	45015-4120411	SANTEE COOPER CROSS GENERATING STATION	ROMA
SC	45043-6652811	SANTEE COOPER WINYAH GENERATING STATION	ROMA
TN	47163-3982311	EASTMAN CHEMICAL COMPANY	LIGO
TN	47161-4979311	TVA CUMBERLAND FOSSIL PLANT	SIPS
VA	51586-5787111	Meadwestvaco Packaging Resource Group	JARI
WV	54033-6271711	ALLEGHENY ENERGY SUPPLY CO, LLC-HARRISON	DOSO, JARI, OTCR, SHEN, SWAN
WV	54079-6789111	APPALACHIAN POWER COMPANY - JOHN E AMOS PLANT	JARI
WV	54051-6902311	MITCHELL PLANT	DOSO, OTCR
WV	54073-4782811	MONONGAHELA POWER CO-PLEASANTS POWER STA	DOSO, JARI, OTCR, SHEN

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Otter Creek Wilderness

State	Facility ID	Facility Name	DISTANCE_m	Sulfate A01 %	Original Sulfate P501 %	Revised Sulfate P501 %	Nitrate A01 %	Original Nitrate P501 %	Revised Nitrate P501 %	
WV	54033-6271711	ALLEGHENY ENERGY SUPPLY CO, LLC-HARRISON	72.8	17.37%	4.49%	4.61%	1.81%	0.26%	0.22%	
OH	39053-8148511	General James M. Gavin Power Plant (062701005)	214.2	10.46%	7.08%	3.72%	0.18%	0.04%	0.04%	
WV	54079-4782811	MONONGAHELA POWER CO-PLEASANTS POWER STA	148.3	8.19%	4.39%	3.00%	0.30%	0.08%	0.09%	
OH	39081-8115711	Cardinal Power Plant (Cardinal Operating Company) (064105002)	162.7	1.94%	2.03%	2.70%	0.05%	0.02%	0.03%	
OH	39025-8294311	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	397.5	1.12%	2.40%	1.12%	0.02%	0.06%	0.05%	
WV	54051-6902311	MITCHELL PLANT	136.8	1.56%	1.40%	1.10%	0.06%	0.03%	0.04%	
Facilities Who Dropped Off/After Revision										
WV	54079-6789111	APPALACHIAN POWER COMPANY - JOHN E AMOS PLANT	198.0	4.36%	1.67%	0.93%	0.12%	0.02%	0.03%	
IN	18051-7363111	Gibson	709.7	0.24%	1.27%	0.72%	0.01%	0.05%	0.03%	
WV	54061-6773611	MONONGAHELA POWER CO - FORT MARTIN POWER	82.7	4.98%	1.14%	0.71%	0.92%	0.20%	0.17%	
IN	18147-8017211	INDIANA MICHIGAN POWER DBA AEP ROCKPORT	655.7	0.64%	2.01%	0.71%	0.01%	0.03%	0.03%	
PA	42005-3866111	GENON NE MGMT CO/KEYSTONE STA	186.5	3.73%	1.91%	0.71%	0.03%	0.00%	0.00%	
IN	18125-7362411	INDIANAPOLIS POWER & LIGHT PETERSBURG	693.0	0.23%	1.07%	0.56%	0.01%	0.04%	0.02%	
OH	39011-8010811	Coneville Power Plant (061600000)	232.8	1.12%	1.07%	0.00%	0.17%	0.08%	0.00%	

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Non-VISTAS Facilities ≥ 1%

Facility State	FACILITY_ID_STD	FACILITY_NAME_STD	IMPACTED CLASS I AREAS
IN	18051-7363111	Gibson	MACA, SIPS
IN	18147-8017211	INDIANA MICHIGAN POWER DBA AEP ROCKPORT	COHU, MACA, SIPS
IN	18125-7362411	INDIANAPOLIS POWER & LIGHT PETERSBURG	SIPS
MD	24001-7763811	Luke Paper Company	SWAN
OH	39081-8115711	Cardinal Power Plant (Cardinal Operating Company) (064105002)	DOSO, JARI, OTCR, SHEN, SWAN
OH	39025-8294311	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	DOSO, OTCR
OH	39053-8148511	General James M. Gavin Power Plant (062701005)	COHU, DOSO, GRSM, JARI, KSR, LIGO, OKEF, OTCR, ROMA, SHEN, SHRO, SIPS, SWAN, WOLF
PA	42005-3866111	GENON NE MGMT CO/KEYSTONE STA	JARI, LIGO, ROMA, SHEN, SWAN
PA	42063-3005211	HOMER CITY GEN LF/ CENTER TWP	SHEN

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Non-VISTAS Class I Areas

- Only one VISTAS facility has a contribution ≥ 1% at any non-VISTAS Class I Area
- **Tennessee Valley Authority (TVA) - Shawnee Fossil Plant**
 - Hercules-Glades Wilderness Area (1.35% sulfate)
 - Mingo Wilderness Area (1.08% sulfate)

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Effective Emission Control Technology

- For the purpose of SO₂ control measures, an EGU that has add-on flue gas desulfurization (FGD) and that meets the applicable alternative SO₂ emission limit of the 2012 Mercury Air Toxics Standards (MATS) rule for power plants. The two limits in the rule (0.2 lb/MMBtu for coal-fired EGUs or 0.3 lb/MMBtu for EGUs fired with oil-derived solid fuel) are low enough that it is unlikely that an analysis of control measures for a source already equipped with a scrubber and meeting one of these limits would conclude that even more stringent control of SO₂ is necessary to make reasonable progress.
- For the purposes of SO₂ and NO_x control measures, a combustion source (e.g., an EGU or industrial boiler or process heater) that, during the first implementation period, installed a FGD system that operates year-round with an effectiveness of at least 90 percent or by the installation of a selective catalytic reduction system that operates year-round with an overall effectiveness of at least 90 percent (in both cases calculating the effectiveness as the total for the system, including any bypassed flue gas), on a pollutant-specific basis.

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Additional Considerations

- The final list of four-factor analysis sources will be determined in consultation with the FLMs, EPA, other states, and stakeholders.
- Some states may perform additional four-factor analyses for sources not listed on Slide 106.
- Some states may allow their facilities to take a permit limit that will result in adjusted PSAT impacts below the 1% threshold in lieu of performing a four-factor analysis.
- The large number of coal-fired EGU retirements and fuel switching from coal to natural gas needs to be considered along with the sources selected for the four-factor analysis. States should not be penalized for early action.

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Contacts for Further Information

- For general, technical, and SIP-related questions, contact the TAWG and CC Chairs:
 - TAWG – Randy Strait (randy.strait@ncdenr.gov)
 - CC – Jim Boylan (james.boyland@dnr.ga.gov)
- For general, contract, and funding questions, contact the Project Manager:
 - John Hornback (hornback@metro4-sesarm.org)



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Next Steps and Schedule

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Remaining VISTAS Work Schedule

Task	Schedule
2028 Point Emissions Updates	Completed
2028 Emissions Processing	Late April, 2020
2028 CAMx Modeling	Late June, 2020
2028 Visibility Projections	Mid-July, 2020
2028 Deposition Projections	Mid-July, 2020
Final reports and documentation	Late July, 2020
Website updates and postings	Late July, 2020
End of Contract	September 30, 2020
Regional Haze SIPs Due to EPA	July 31, 2021

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