

US EPA ARCHIVE DOCUMENT

**Responses to the 2007 Baseline Sub-Inventory Information and  
Significant Comments for the Final NO<sub>x</sub> SIP Call  
and Proposed Rulemakings for Section 126 Petitions  
and Federal Implementation Plans  
Technical Amendment Version**

**(63 FR 57356, October 27, 1998)**

**(63 FR 56292, October 21, 1998)**

**(63 FR 56394, October 21, 1998)**

A-96-56 : X-C-02  
U.S. Environmental Protection Agency  
December 1999

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# Responses to the 2007 Baseline Sub-Inventory Information and Significant Comments for the Final NOx SIP Call

## INTRODUCTION

By notice dated October 27, 1998 (63 FR 57356) the Environmental Protection Agency (EPA) published the final rulemaking, “Finding of Significant Contribution and Rulemaking for Certain States in the Ozone Transport Assessment Group Region for Purposes of Reducing Regional Transport of Ozone.” The purpose of the final rulemaking is to require certain States to submit State implementation plan (SIP) measures to ensure that emissions reductions are achieved as needed to mitigate transport of ozone (smog) pollution and one of its main precursors--emissions of oxides of nitrogen (NOx)--across State boundaries in the eastern half of the United States (U.S.). This rulemaking is referred to as the NOx SIP Call.

This document, together with the NOx SIP Call notice of final rulemaking (NFR) and “Response to Significant Comments on the Proposed Finding of Significant Contribution and Rulemaking for Certain States in the Ozone Transport Assessment Group (OTAG) Region for Purposes of Reducing Regional Transport of Ozone (62 FR 60318, November 7, 1997 and 63 FR 25902, May 11, 1998), presents EPA’s responses to nearly 300 public comments received on the 2007 baseline sub-inventory information requested in the final NOx SIP Call and Correction and Clarification Notice, 63 FR 71220, December 24, 1998. On January 13, 1999 (64 FR 2415), EPA reopened the comment periods for emissions inventory revisions to the 2007 baseline sub-inventory information for two related proposed rulemakings published October 21, 1998, concerning the section 126 petitions (63 FR 56292) and the Federal implementation plans (FIPs) (63 FR 56394), which are also for the purpose of reducing interstate ozone transport. EPA reopened the comment periods for these actions because the section 126 and FIP proposals rely on the same emissions inventory information as the NOx SIP Call. EPA is responding in this document only to those comments related to the emission inventory revisions for all three rulemakings. All significant issues raised in the public comments and related to the reopened topics for all three rulemakings have been addressed.

As reflected in the text for this document, responses are organized by docket number and relativity to the reopened comment periods, which correspond to a specific section (VIII-B) in the docket for the NOx SIP call rulemaking (A-96-56), as well as in relevant sections IV-G of the Section 126 rulemaking docket ( A-97-43) and III-G of the FIP rulemaking docket (A-98-12).

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

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

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

In many cases, the NFR contains the full response to comments, and such responses are not restated here. In those cases, a reference is made to the appropriate section of the NFR containing relevant responses. This document does contain a restatement of the summary of comments received from the NFR on many issues with the addition of parenthetical references to the specific commenters submitting the comments for ease of identification. In many cases, EPA has listed all of the commenters who made a specific comment. In other instances, the Agency may have identified one or a representative number of commenters.

Subsequent to the publication of the May 14, 1999 technical amendment revising the emission budgets for the NO<sub>x</sub> SIP call, a number of commenters raised concerns about EPA's interpretation of their comments. In addition, new information was also submitted by commenters after May 14, 1999. Further, EPA conducted a thorough review of all the comments received regarding the May 14 technical amendment. This was done in an attempt to identify other mistakes made in incorporating the revision requests. The Agency modified the base inventories and budget calculations in areas where these reviews uncovered incorporation errors or where new data was found to be technically valid. These comments are also identified in this document.

In addition, on August 9, 1999 (64 FR 43124), EPA issued a Notice of Data Availability ("NODA") seeking comment on heat input and electrical output data that could be used to allocate NO<sub>x</sub> allowances under a Federal NO<sub>x</sub> Budget Trading Program. EPA received a number of comments on that Notice (docketed in Docket A-97-43, Category IX-D). In the course of reviewing NODA comment letters applicable to data issues for rulemakings under section 126 of the Act, EPA noted several issues that led to a review of budget issues in the states potentially affected by a section 126 action. In some cases this review has led to changes in the EGU and non-EGU portions of the budget. The NODA comments that raise budget-related issues in the applicable states are addressed in Section IV of this document. Where appropriate, a cross-reference to that section has been added to other sections of this document if a response to a NODA comment supersedes or adds to a response to an earlier comment.

## SECTION I

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

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

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

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

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

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

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

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

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

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

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

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

Comments were also received on heat rate. These values may be used if the Agency determines to use an output-based allocation method in the section 126 or section 110 FIP rulemakings, and the comments will be addressed in that context to the extent necessary based on EPA's determination as to whether an output-based allocation should be pursued. Comments related to overall inventory topics, but not related to the correction of individual data elements are responded to in Part 4 of this document.

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

**LETTERS (Representative List):** American Public Power Association (VIII-B-252), Easton Utilities (VIII-B-46), Illinois EPA (VIII-B-61), Missouri DNR (VIII-B-201)

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

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

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

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

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

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

**LETTERS:** Empire Electric (VIII-B-140), General Electric (VIII-B-61, VIII-B-123), Old Dominion Electric Cooperative (VIII-B-165), Midwest Ozone Group (VIII-B-125), Virginia Power (VIII-B-168), West Virginia Chamber of Commerce (VIII-B-195)

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

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

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

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

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

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

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

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

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

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

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

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

units should be classified. As discussed in the preamble, use of these definitions also avoids reclassifying other existing units.

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

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

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

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

**SUMMARY:** One commenter argued that small cogeneration units should not be treated as EGUs and EPA should continue to apply the exemption from treatment as utility units established under new source performance standards (NSPS) and the Acid Rain Program for cogeneration units that produce an annual amount of electricity for sale less than one-third of their potential

electrical output capacity or equal to or less than 25 MWe. (Note that the regulations implementing title IV converted the annual 25 MWe threshold to 129,000 MWe hrs of electricity which is equivalent to 25 MWe per hour times 8760 hours per year.) The commenter also noted that section 112 of the CAA defines “electricity steam generating unit” excluding cogeneration units using the same thresholds. The commenter made several assertions to support its argument. First, the commenter said the classification of small cogeneration units would be contrary to 20 years of Agency precedent under the NSPS and Acid Rain programs. The CAA encourages cogeneration by exempting small cogenerators below the one-third/25 MWe trigger from the Acid Rain program and from section 112. Deviating from this historical precedent was not a logical outgrowth of the proposed NO<sub>x</sub> SIP call since the proposed NO<sub>x</sub> SIP call did not discuss that EPA would treat small cogeneration units as EGUs or differently than under the NSPS and Acid Rain programs. The commenter's members have been operating under the assumption that they will be treated as non-electric generating units and this assumption is supported by their inclusion in the non-EGU inventory.

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

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

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

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

using the criteria of selling under firm contract to the grid classifies most industrial units that generate small amounts of electricity as non-EGUs rather than EGUs.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Part 3. State Summaries

### I. ALABAMA

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

##### (1) Requested Changes:

! Commenter notes the following units that are not EGUs:

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

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

! Commenter requests addition of EC Gaston Unit Z006.

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

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

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

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

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

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

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

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

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

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

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

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

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

## **II. CONNECTICUT**

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

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

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

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

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

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

### III. Delaware

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

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

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

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

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

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

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

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

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

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

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

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

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

#### **V. Georgia**

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

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

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

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

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

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

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

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

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

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

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

## **VI. Illinois**

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

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

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

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

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

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

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

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

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

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

### **VII. Indiana**

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

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

**(2) Action Taken:** Units have been reclassified as non-EGUs. EPA verified that the heat input requested agreed with the heat input reported to EPA for compliance with the Acid Rain Program and added it. [See further response related to classification of these units under Section IV.]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### **VIII. Kentucky**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### **IX. Massachusetts**

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

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

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

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

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

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

(2) **Action Taken:** These units were not added to the EGU inventory. The EGU inventory includes only fossil fuel-fired boiler and turbine EGUs. These MWC units, because they do have NO<sub>x</sub> emissions, are included as part of the overall non-EGU inventory.

### C. Additional Corrections to MA EGU Inventory

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

## X. Maryland

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

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

(2) **Action Taken:** As noted by the commenters, all of the units at Easton Utilities are IC engines. Thus, none of these units are EGUs for purposes of the NO<sub>x</sub> SIP Call; these units will be classified non-EGUs and will be classified as large or small based on the criteria used for the IC engines (horsepower and/or tons per day basis).

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

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

(2) **Action Taken:** The unit has been moved from the EGU inventory to the non-EGU inventory because of the nature of its operations as documented in the comments. EPA notes that the blast furnace gas used by this unit does qualify as fossil fuel. Process gas derived from fossil fuel combustion is considered a fossil fuel under both Part 96 and Part 97. EPA has previously posted guidance to this effect in response to questions raised concerning the SIP Call. See "Responses to Questions on the Final Rule for the NO<sub>x</sub> SIP Call, Volume 1," dated January 1999, and posted on the Internet at <http://www.epa.gov/ttn/oarpg/otagsip.html>.

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

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

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

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

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

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

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

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

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

### XI. Michigan

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

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

(2) **Action Taken:** All of the requested changes for Midland, T.E.S. Filer, and Wolverine Power have been made as requested based on the comments and supporting documentation received.

For the Detroit Edison units <25 MWe, EPA notes that they remain in the overall EGU inventory, but are not considered controlled for purposes of determining the budget. EPA has added the Detroit Edison CT units as requested, and modified the heat input values for the Beacon Heating Plant as requested. For the Monroe plant, the commenter requested significant increase in 95 and 96 HI for Units 3 and 4 as a result of an EDR error for allocating HI input to these common stack units. The requested revisions are consistent with the 1997 data for these units and are supported by the total HI reported for the stack. The commenter's recommendation to split the HI equally for the two units (and the reference to other units owned by the commenter at which EPA had already taken this approach) further support this requested change. Thus, EPA has made the change as requested. Finally, EPA also revised the MWe capacity for the Marysville units consistent with the comments received.

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

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

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

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

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

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

by increased utilization at another unit. For these reasons, EPA will address these concerns solely as an allowance allocation issue, not a statewide inventory issue.

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

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

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

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

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

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

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

**XII. Missouri**

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

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

(2) **Action Taken:** The changes requested by the state were generally accepted. The requests to change heat input values for Acid Rain units were not accepted. Because no supporting

documentation or explanation was provided as to why the values submitted by the state varied from the values calculated by EPA for these units, no changes were made. In addition, many of the units that the State requested be added to the EGU inventory were in fact IC engines, and thus were not added as requested. Finally, the inventory list provided by Missouri included certain units for Union Electric, KCI Energy Center, and Chillicothe Municipal Utilities that were not added to the inventory. Based on a review of the EIA inventory information, all of the units operated by Union Electric Company are accounted for in the inventory and thus these units appeared to be duplicate entries. Moreover, the data provided for these units and the KCI Energy Center units were insufficient to determine their size, heat input values, or NO<sub>x</sub> rates. The Chillicothe units also appeared to be duplicates and also were lacking certain data elements. The state had identified these as large EGUs, but the heat input values were extremely small. In addition, the EIA inventory data showed no such large EGUs for Chillicothe, and none of these units are identified as part of the Acid Rain Program. Based on those considerations, these units were not added.

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

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

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

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

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

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

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

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

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

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

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

### XIII. New Jersey

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

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

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

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

Third, in the process of matching the units in the EPA inventory and the units in the OTC inventory, EPA carefully reviewed the nameplate capacity of all of the units, especially several units for which nameplate capacity information was missing. Based on the comments received, monitoring plan information available through implementation of the OTC NOx Budget Program

(a copy of the relevant information reviewed is in the docket), and the EIA inventory of power plants, EPA revised or added the nameplate capacity data for several units, especially PSE&G units (see below). [See further reclassification of units based on nameplate capacity changes under Section IV.]

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

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

**(2) Action Taken:** The CT units which the commenter requested to be added were added based on the information provided and a check against the OTC inventory data for the plants operated by this commenter. Because the commenter did not provide nameplate capacity data for some of these units, EPA verified all of the nameplate capacity data for the PSE&G units in New Jersey against comparable data submitted by the commenter as part of its monitoring plan submissions in the OTC NO<sub>x</sub> Budget Program (a copy of the relevant information reviewed is in the docket). Based on that data, EPA updated all of the nameplate capacity data for the PSE&G units, which resulted in some units being reclassified as large units and some being reclassified as small units. For any small PSE&G units that were added to the inventory, EPA used the unit-specific default NO<sub>x</sub> rate to be used for OTC reporting purposes as the NO<sub>x</sub> rate for the unit. In conducting this review, EPA noted that certain other NJ units were also missing nameplate capacity data. For these units, EPA reviewed the available monitoring plan data and EIA inventory data to add a nameplate capacity value and assure proper classification of the units as large or small EGUs. None of the units analyzed by EPA were reclassified as a result of this additional analysis.

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

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

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

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

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

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

(2) **Action Taken:** Based on the comments, and accompanying data and supporting references, these changes have been incorporated in the NJ inventory. [See further response related to Connecticut NJ units under Section IV.]

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

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

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

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

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

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

### **XIV. New York**

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

(1) **Requested Changes:** The state agency provided a complete revised EGU inventory with numerous changes, including units to delete, units to add and MW and heat input changes for a number of units. The revised state inventory incorporated changes requested in the following letters: Orange & Rockland (V-H-11), NYSEG (VIII-B-30), Colonie Cogeneration (VIII-B-41), Project Orange Associates (VIII-B-42), TBG Cogen Partners (VIII-B-92), Kamine Development Corporation (VIII-B-96), Fulton Cogeneration Associates (VIII-B-132), Central Hudson Gas & Electric (VIII-B-182), Niagara Mohawk Power (VIII-B-225), Selkirk Cogen (VIII-B-226 and

227), American Ref-Fuel (VIII-B-234), Saranac Energy (VIII-B-263), LG&E Westmoreland (VIII-B-266), MarketSpan Corporation (VIII-B-267), and Nissequogue Cogen Partners (VIII-B-276). The revised state inventory also contained revisions consistent with those requested by Consolidated Edison (VIII-B-30). ConEd also supplied detailed comments with a significant amount of supporting information.

**(2) Action Taken:** All of the changes requested by the state were included in EPA's revised inventory, except that EPA did not accept any addition of IC units or MWCs to the EGU inventory, and generally did not accept changes to the heat input values for Acid Rain units. The IC engines and MWC units (even if they converted after 1996 to a fossil fuel) are considered non-EGUs for purpose of these rulemakings. For one Acid Rain unit, Astoria 30, the utility commenter provided a detailed explanation for the cause of a discrepancy between the Acid Rain calculated value and the actual heat input for the 1995 ozone season heat input. The commenter provided an updated calculation using the original EDR data together with substitute CO<sub>2</sub> values consistent with Part 75 procedures. Based on these comments, EPA agrees with the commenter's revised calculation for this unit. However, for Acid Rain units at the Bowline, CR Huntley, Danskammer, Greenidge, Jennison, Kintigh, Lovett and Milliken plants, NY DEC and NY utilities requested revisions to the heat input values for these units, some of which increased and some of which decreased heat input values for the plants involved. However no explanation or supporting documentation was provided to explain why the values determined for compliance with the Acid Rain Program were not accurate, thus, none of these changes were made.

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

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

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

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

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

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

### **XV. North Carolina**

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

**(1) Requested Changes:** The state agency provided suggested corrections for several aspects of the EGU inventory. First, the commenter requested that units less than 25 MW and/or emission rates less than 0.15 be removed from the controlled inventory. Second, the state agency also requested significant changes for Cogentrix and LG&E Power plants, and the Panda Rosemary plant. The Cogentrix comment letter also requested the same changes for the Cogentrix plants. Third, the commenter noted one unit that is a non-fossil fuel unit that also does not involve electricity generation. Fourth, the commenter requested that a unit which in 1995 and 1996 did provide electricity for sale but now uses all electricity on-site not be considered an EGU. Fifth, the commenter included corrected data for a R.J. Reynolds facility as well as a request to remove another Reynolds facility. Finally, the commenter requested changes to the 2007 base case NO<sub>x</sub> rates for certain facilities.

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

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

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

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

## XVI. Ohio

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

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

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

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

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

(2) **Action Taken:** The nameplate capacity for the four units was revised as requested (and corroborated through a review of EIA data). These changes result in all units being classified as small EGUs. The heat input corrections and NO<sub>x</sub> emission rate changes for these units were also made based on the information provided.

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

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

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

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

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

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

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

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

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

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

## XVII. Pennsylvania

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

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

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

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

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

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

In another case (Piney Creek), however, EPA used the data provided by ARIPPA instead of the data provided by the source. For this unit, the ARIPPA data suggested a seasonal heat input of approximately 1.3 million mmBtu per ozone season for 1995-1997. In contrast, the Piney Creek comment letter indicated that the heat input in each year was approximately 3.2 million mmBtu. Given the design heat input capacity of the boiler at this facility, the values provided by Piney Creek appear to be annual, not seasonal, values. At full capacity operation, the heat input values suggested by Piney Creek would take over 7,000 operating hours (the ozone season has less than 3,700 available operating hours). This interpretation of the Piney Creek data is supported by the text of their letter which states that no changes to the existing data are required, but rather blank data fields need to be filled in with the data provided in the comment letter. Thus, for this unit, EPA used the ARIPPA data.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## **XVIII. Rhode Island**

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

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

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

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

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

## **XIX. South Carolina**

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

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

**(2) Action Taken:** The heat input revisions for the non-Acid Rain units were accepted based on the supporting data provided. The requested heat input changes were not made for the Acid Rain units because no explanation or supporting documentation of these requested 1995 heat input

changes was made to explain why the data submitted for compliance with the Acid Rain Program was inaccurate. Finally, all of the requested additions have been incorporated as requested.

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

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

## **XX. Tennessee**

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

- (1) **Requested Changes:** Commenter requested the addition of a number of CT units.
- (2) **Action Taken:** Units were added as requested based on the data and supporting documentation provided and as confirmed in the EIA inventory.

## **XXI. Virginia**

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

- (1) **Requested Changes:** Commenter requests the addition of SEI Birchwood and supports the comments submitted by Virginia Power.
- (2) **Action Taken:** The SEI Birchwood facility was added as requested. See the summary for action on Virginia Power's comments below.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

previously to identify as IC engines. In Virginia, this resulted in the removal of 40 IC engine units from the EGU inventory.

## **XXII. West Virginia**

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

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

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

## **XXIII. Wisconsin**

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

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

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

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

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

Based on general comments received about the treatment of IC engines that may produce electricity, EPA evaluated the unit type data for all of the units in the EPA inventory and

identified through EIA databases and comments provided certain units that EPA had failed previously to identify as IC engines. In Wisconsin, this resulted in the removal of 58 IC engine units from the EGU inventory.

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

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

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

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

**RESPONSE:** The commenter has noted a difference between the SIP call inventory and the proposed section 126 allocation methodology. As described in the section 126 NPR (proposed in the Federal Register on October 21, 1998), the applicable parts of the SIP call inventories will be used in the section 126 rulemaking for the purposes of determining the list of covered sources and total emissions from each source category by State, but the methodology for determining the individual unit allocations for purposes of the Federal NOx Budget Trading Program may be different from the methodology used to develop the SIP call inventory. Therefore, the EPA believes that the "Section 126 inventory" the commenter is referring to is not the inventory used to calculate total emissions from source categories in each State in the section 126 proposal, but rather the individual unit allocations proposed in the section 126 rulemaking. The total allocations issued to all sources included in the section 126 remedy in a State will be based on the State budget numbers finalized with this inventory revisions notice. However, the unit specific allocations themselves will be determined in a separate notice that includes the final regulations setting forth the NOx Budget Trading Program under section 126.

As explained in both the SIP Call rulemaking and the section 126 rulemaking, EPA has not found it to be highly cost effective to control small EGUs (boilers and turbines less than 25 MWe). Therefore, in determining the final State budgets, EPA did not assume additional controls on such units. However, because the inventory is supposed to be a complete inventory of all NOx emissions in a State, the units were included in the inventories.

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

**LETTERS:** Arch Coal (III-D-6), Detroit PLD (VIII-B-206), Duquesne Light (VIII-B-144), Hamilton, City of (VIII-B-217), Holland Board of Public Works (VIII-B-198), Illinois EPA

(VIII-B-62), Lansing Board of Water & Light (VIII-B-189), Michigan South Central Power Agency (VIII-B-163), Midwest Ozone Group (VIII-B-125), Niagara Mohawk Power Corp. (VIII-B-225), Utility Air Regulatory Group (VIII-B-197) (III-G-150), Virginia Power (VIII-B-168), West Virginia Chamber of Commerce (VIII-B-195), Wisconsin, State of (VIII-B- ), Wyandotte, City of (VIII-B-116)

**RESPONSE:** Comments related to the development of unit allocations for purposes of the Federal NO<sub>x</sub> Budget Trading Program are not being addressed in the SIP call inventory technical amendment. The Agency will respond to the commenters' concerns when the Agency promulgates the Federal NO<sub>x</sub> Budget Trading Program regulations and associated unit allocations. In the section 126 rulemaking, the Agency committed to promulgating these regulations by July 15, 1999. As of the issuance of today's notice, the Agency has not had sufficient time to properly evaluate comments related to the trading program which were dependent on consideration of the inventory revisions, or to incorporate those inventory revisions into the final trading program. When these Federal NO<sub>x</sub> Budget Trading Program regulations and allocations are promulgated, the Agency will respond to trading program (and allocation) related comments.

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

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

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

## II. Growth

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

**LETTERS:** Allegheny Power (VIII-B-209), Ameren (VIII-B-24) (VIII-B-130), American Electric Power (VIII-B-161), Associated Electric Cooperative, Inc. (VIII-B-153), Carolina Power & Light Company (III-D-79) (IV-D-81) (VIII-B-186), ComEd (VIII-B-274), Connecticut Dept. of Environmental Protection (II-D-39) (IV-D-19), Hamilton, City of (VIII-B-217207), Illinois EPA (III-D-9) (IV-D-5), Illinois Power (VIII-B-172), Indianapolis Power and Light

(VIII-B-31), KY Natural Resources and Environmental Protection Cabinet (VIII-B-158), Midwest Ozone Group (VIII-B-125), New Hampshire Dept. of Environmental Services (III-D-42) (IV-D-36), Niagara Mohawk Power (VIII-B-225), North Carolina DENR (VIII-B-159), Northeast States for Coordinated Air Use Management (III-D-26), Orville, City of (VIII-B-86), Pennsylvania Dept. of Environmental Protection (II-D-26), South Carolina Department of Health and Environmental Control (VIII-B-190), Southern Company (VIII-B-119), Tri-State Industrial Network (III-D-67), Utility Air Regulatory Group (VII-B-197), Virginia Power (III-D-63) (III-D-64) (IV-D-80) (VIII-B-168), West Virginia Chamber of Commerce (III-D-17) (VIII-B-195), WV DEP (VIII-B-173)

**RESPONSE:** Comments related to the use of growth factors in determination of State budgets are not being addressed in the SIP call inventory technical amendment. The Agency has responded to the commenters' growth concerns in the context of the final NOx SIP call (see section III.B. of the preamble to the final NOx SIP call) and in the section 126 rulemaking notice issued on April 30, 1999.

## **Part V. Explanation of Technical Corrections to EGU Inventory Since May 14, 1999**

Certain technical revisions were incorporated into the electric generating unit (EGU) inventory subsequent to the May 14, 1999 technical corrections to the inventory. These revisions were based on follow-up quality assurance reviews to ensure that all comments were fully addressed based on the Agency's rationale used to support the Technical Amendment to the Finding of Significant Contribution and Rulemaking for Certain States for Purposes of Reducing Regional Transport of Ozone, 64 FR 26298, May 14, 1999, (the "May 1999 Corrected EGU Inventory"). See also Section IV of this document for a discussion of changes made as a result of NODA comments.

### **I. Classification of Acid Rain Units**

**SUMMARY:** The following units were included in the May 1999 Corrected EGU Inventory but were not marked as Acid Rain units. As explained in Part 2 of this document, EPA had reviewed the overall list of Acid Rain units to assure that active units were included and properly identified as Acid Rain units in the May 1999 Corrected EGU Inventory. Upon review of the Acid Rain flag field in the inventory database, the following units should be marked as Acid Rain units:

- ! Havana, IL (units 1 through 9)
- ! Wood River, IL (units 1 through 3)
- ! EW Brown, KY (units 8, 9, and 10, which were previously identified as 5, 6, and 7)
- ! Panda Brandywine, MD (units 1 and 2)
- ! Michigan Power, MI (unit 1)
- ! River Rouge, MI (unit 1)
- ! St. Clair, MI (unit 5)
- ! Columbia, MO (unit 8)
- ! Gilbert, NJ (unit CT9)
- ! Sherman, NJ (unit CT1)
- ! Brooklyn Navy Yard, NY (units 1 and 2)
- ! Goudy, NY (units 11 and 12)
- ! RE Burger, OH (units 1 through 4)

- ! Blount St., WI (unit 6)
- ! West Marinette, WI (B03 (\*\*33))

**RESPONSE:** These units have been flagged as Acid Rain units in the final revised inventory.

## II. Units to Add

**SUMMARY:** As explained in Part 2 of this document, EPA intended to include all existing, active Acid Rain units in the inventory, regardless of whether the units operated in the budget year for a particular state. Based on a further quality check of Acid Rain Program data, there were four Acid Rain units that should have been added to the inventory: Tyrone, KY (Plant ID 1361, Unit ID 2), Perryman, MD (Plant ID 1556, Unit ID 51), and West Springfield, MA (Plant ID 1642, Unit ID 1 and 2).

**RESPONSE:** These units were added to the inventory using the most current Acid Rain Program data. There is no impact to the budgets for KY and MA because the applicable units did not have any heat input in 1995 or 1996. Although Perryman Unit\*\*51 had heat input in 1995, that heat input was not sufficiently large to change the budget year from 1996 in Maryland. Therefore, the addition of this unit does not affect the budget for Maryland.

**SUMMARY:** Burlington (unit 8) and Kearney (unit 9), which are small units operated by PSE&G in NJ, were not added in the May 1999 EGU Inventory since a NO<sub>x</sub> rate was not provided. However, other small PSE&G units were added based on a default NO<sub>x</sub> rate (see, Part 3, Section XIII.B.).

**RESPONSE:** These units were added to the current EGU inventory using the same data source for a default NO<sub>x</sub> rate that was used for other small NJ units. The addition of these units, which have a very low heat input, has had a negligible impact on the overall budget for NJ, and no impact on the budget for controlled sources.

**SUMMARY:** In Indiana, Northeast units 1 and 2 should have been added with a 1995 and 1996 NO<sub>x</sub> rate of 0.10. Although one comment letter failed to include the necessary NO<sub>x</sub> rate for these small units, a similar spreadsheet submitted by a second commenter did include the necessary information.

**RESPONSE:** EPA has added these units to the Indiana EGU inventory. As noted in Part 3, Section VII.E., EPA did not add these units originally because the necessary NO<sub>x</sub> rates were not provided. However, upon review, the NO<sub>x</sub> rates were provided on one version of the spreadsheet, and so these units may be added. The 1995 heat input values for these two units are 6126 mmBtu and 6972 mmBtu, respectively. The 1996 heat input values for these two units are 1174 mmBtu and 856 mmBtu, respectively. Since the budget year for Indiana is 1996, the impact to Indiana's budget by adding these small units is negligible, and there is no impact on the budget for controlled sources.

### III. Heat Input Data (1995 and 1996)

**SUMMARY:** One commenter had requested that the 1995 heat input data for Mt. Storm, Unit 2 (WV), which is an Acid Rain unit, be increased from 13,359,153 mmBtu to 16,404,699 mmBtu. (See Docket A-96-56, Item VIII-B-168). In the Inventory RTC, EPA explained that this change was not made because the commenter provided no documentation or rationale to support the change.

**RESPONSE:** Even though, as a general rule, EPA did not incorporate requested heat input revisions to Acid Rain units, EPA has accepted this change because there was existing documentation in EPA's files that supported the requested change. This change results in an increase to the WV state budget.

**SUMMARY:** The heat input values for River Rouge, MI (Plant ID 1740, Unit 1) and St. Clair, MI (Plant ID 1743, Unit 5) were in EPA's original EGU inventory as part of the final NO<sub>x</sub> SIP Call, and those same values were repeated in comments by Detroit Edison (and incorporated by reference by MI DEQ) (see Docket A-96-56, Items VIII-B-230, 231, and 279). However, upon further investigation of Acid Rain Program data, including electronic data reports submitted under Part 75, these units have been identified as existing Acid Rain units that did not operate during the 1995, 1996 or 1997 ozone seasons, and therefore, should have heat input values of zero in all of those years. Furthermore, upon review of the Detroit Edison comments, the utility identifies the data sources for all of its units except these two units, which further indicates that the utility does not have data that conflicts with the lack of Acid Rain Program data for these units. In addition, heat input data for 1995 and 1996 for RE Burger (OH) - Plant ID 2864, Units 1 through 4 were included in the May 1999 Corrected EGU inventory. However, upon further investigation, EPA has determined that these units are Acid Rain units that did not operate in 1995 and 1996 and should have a heat input of zero. No comments were received on these units.

**RESPONSE:** The 1995 and 1996 heat input values for River Rouge Unit 1, St. Clair Unit 5, and RE Burger, Units 1 through 4 have been changed to zero. These corrections are consistent with the rationale set forth in Part 2 of this document for EPA's approach to the treatment of Acid Rain units.

### IV. NO<sub>x</sub> Rate Data

**SUMMARY:** In Part 1 of this document, EPA indicated that the May 1999 Corrected EGU Inventory included all requested changes to the NO<sub>x</sub> rates for small units. These changes were necessary to calculate NO<sub>x</sub> mass emissions for small units. However, EPA has identified several small units (identified in Table 1) for which the requested changes were not properly entered.

**Table 1: NO<sub>x</sub> Rate Data Corrections**

Plant/Unit	1995 NO <sub>x</sub> Rate		1996 NO <sub>x</sub> Rate		Comment Letter
	Old	New	Old	New	
Beacon Heating - 1 (MI)	0.258	0.275	0.258	0.275	VIII-B-230 & 231

Beacon Heating - 2 (MI)	0.258	0.275	0.258	0.275	VIII-B-230 &231
Beacon Heating - 3 (MI)	0.548	0.275	0.548	0.275	VIII-B-230 &231
Beacon Heating - 4 (MI)	0.258	0.275	0.258	0.275	VIII-B-230 &231
Beacon Heating - 5 (MI)	0.258	0.275	0.258	0.275	VIII-B-230 &231
Chamois - 1 (MO)	0.952	0.986	0.952	0.986	VIII-B-153
James River - 1 (MO)	0.648	0.72	0.648	0.72	VIII-B-201
James River - 2 (MO)	0.648	0.72	0.648	0.72	VIII-B-201
Cape Fear - 1A (NC)	0.102	0.698	0.102	0.698	VIII-B-186
Cape Fear - 1B (NC)	0.102	0.698	0.102	0.698	VIII-B-186
Cape Fear - 2A (NC)	0.102	0.698	0.102	0.698	VIII-B-186
Cape Fear - 2B (NC)	0.102	0.698	0.102	0.698	VIII-B-186
Mercer - 3 (NJ)	0	1	0	1	VIII-B-138
Blount Street - 1 (WI)	0.551	0.18	0.551	[Not Provided]	VIII-B-260

**RESPONSE:** Consistent with the rationale and conclusion set forth in Part 1 of the Inventory RTC, the current inventory reflects the revised NO<sub>x</sub> rates for these units as requested by commenters. These revisions have a negligible effect on the overall budgets for Michigan, Missouri, North Carolina, New Jersey, and Wisconsin, and no effect on the budgets for controlled sources in these States.

**SUMMARY:** Belews Creek (NC) units 1 and 2 should have a basecase NO<sub>x</sub> rate of 0.68 lb/mmBtu instead of 0.46 lb/mmBtu, because these units are cell burner units. This correction has no impact on the NC budget.

**RESPONSE:** These values have been corrected in the inventory to correspond to the proper classification of these units as cell burner units.

**SUMMARY:** A number of commenters requested changes to the 1995 and 1996 NO<sub>x</sub> rates for large units.

**RESPONSE:** These numbers, although included in the inventory data file, were not used by EPA to calculate State budgets or percent reduction obligations. Therefore, EPA took no action on these requests as part of finalizing the budgets in May 1999. In the current inventory, EPA has acted upon these requests in two ways. First, EPA accepted the changes for non-Acid Rain units. Second, for Acid Rain units, EPA generally has updated the NO<sub>x</sub> rate data to be consistent with any applicable ozone season NO<sub>x</sub> rate data available on EPA's website

(<http://www.epa.gov/ardhome.html>). Because EPA has not made 1995 ozone season NO<sub>x</sub> rate data available on the website for oil- and gas-fired units, EPA used the 1996 NO<sub>x</sub> rate data for these units in both 1995 and 1996 in certain States when the May 1999 corrected EGU Inventory appeared to have erroneous 1995 NO<sub>x</sub> rate data for these units. In addition, in a few instances, the data available on the website appear to have internal inconsistencies in which one of the NO<sub>x</sub> rate values is zero in an ozone season for which the heat input value is greater than zero. In these instances, EPA updated the inventory with the NO<sub>x</sub> rate data available in the other year (1995 or 1996, as applicable) for the unit. Finally, for Hamilton Unit 9 (OH), EPA notes that it accepted the 1995 NO<sub>x</sub> rate data from the commenter for the same reasons it accepted the 1995 heat input change requested by the commenter (see Section XVI.C of this document.).

## SECTION II

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

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

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

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

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

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

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

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

**EPA Final Decision:**  
Remove Hamilton Plant from inventory.

Modify inventory for Middletown Works Plant as follows:  
For Points P908 and P925, modify emissions; calculate daily NOx emissions by dividing company-supplied 1995 annual NOx emissions by 365 days.  
For Points B007-B010 and Points P009-P012, modify emissions based on company data supplied under VIII-B-28.

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

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

**EPA Final Decision:**  
Modify inventory as requested. Change STACKID to 001, not POINTID to 001 as requested.

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

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

This unit is a small unit with a maximum rated heat capacity of 92 MMBtu/hr and significantly less than 1 ton/day NOx.  
Requests modification to stack data for these two units.

EPA Final Decision:  
Address comments as provided by the State of VA under VIII-B-127 and VIII-B-184.

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

Requested Modification:  
Requests modification to Ashland Works (Steel and Coke Plants) to reflect the 1995 actual source emissions for NOx, CO, and VOC as reported to the Kentucky Division for Air Quality.

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

EPA Final Decision:  
Remove Sinter facility from inventory.  
For remaining emission points, address comments provided by the State of KY under VIII-B-158.

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

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

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

Requests that EPA modify its database to show that the BIPCO facility is not a large non-utility NOx point source.

EPA Final Decision:  
Address comments provided by the State of VA under VIII-B-127 and VIII-B-184.

**Item Number:** VIII-B-09 and VIII-B-10  
Origin: Naval Surface Warfare Center, Indian Head Division; Michael Dunn  
Category: Non-EGU Point  
States Affected: MD

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

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

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

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

EPA Final Decision:  
Addressed under VIII-B-91.

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

Requested Modification:

Requests removal of multiple sources from inventories and additional of EGU and non-EGU sources. The Maryland inventory of Non-Utility power generators contained one source from the Division. The source was listed under the Plant ID 10483, which corresponds to the Bethlehem, PA facility. The correct Plant ID for the Division is 10485. It is the division's contention that this point refers to the NO. 2 powerhouse located in Bethlehem, PA. The division request the removal of this source from the NOx SIP call inventory. The Maryland inventory of other NOx sources contained two sources from the Division, which were listed as Point ID 8 and 9. These point ID numbers correspond to the B Street Boilers that were removed from operation in 1991. The Division requests the removal of these sources from the NOx SIP call Inventory for the Division.

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

**Item Number:** VIII-B-12  
**Origin:** Chattanooga-Hamilton County Air Pollution Control Bureau, Errol Reksten  
**Category:** Non-EGU Point  
**States Affected:** TN

Requested Modification:

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

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

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

EPA Final Decision:  
Addressed under VIII-B-121.

**Item Number:** VIII-B-13  
**Origin:** Williams Gas Pipeline, Stuart Latham  
**Category:** Non-EGU Point  
**States Affected:** IN, KY

Requested Modification:

Requests non-EGU source corrections. None of Texas Gas' emission units exceeded 1 ton/day of NOx emissions. Additionally, no units have a rated heat input capacity of 250 MMBtu/hr or greater.

EPA Final Decision:  
Modify inventory as requested except as follows:

IN (all plants):	Addressed under VIII-B-269.
KY (21-111-0223):	Addressed under VIII-B-288.
KY (21-027-0022):	Addressed under VIII-B-158, except incorporate stack parameter data provided by company for points 001-01 through 001-04 in stead of data provided under VIII-B-158.
TN (47-131-0101 and 47-167-0067):	Addressed under VIII-B-121.

Modify inventory with stack data provided for above plants if stack data not provided by the States.

**Item Number:** VIII-B-18  
**Origin:** AK Steel Corporation, Stephen Felton  
**Category:** Non-EGU Point  
**States Affected:** KY

Requested Modification:

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

EPA Final Decision:  
Assumed to be FIPS State=21, FIPS County=019, Plant ID=0005.  
Address comments provided by the State of KY under VIII-B-158.

**Item Number:** VIII-B-19  
**Origin:** Bethlehem Steel (Sparrows Point), Brandon Bonanno  
**Category:** Non-EGU Point & EGU  
**States Affected:** MD

**Requested Modification:**

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

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

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

**Requested Modification:**

Correction to A-96-56; VIII-B-11

Requests removal of multiple sources from inventories and additional of EGU and non-EGU sources. The correction addresses incorrect information for the operating days per week for Plant ID #29 ("L" Blast Furnace). The original submittal incorrectly listed the operating schedule as 5 days/week, the correct operating schedule is 7 days/week.

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

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

**Requested Modification:**

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

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

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

**Requested Modification:**

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

**EPA Final Decision:**  
Addressed under VIII-B-222.

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

**Requested Modification:**

Correction to A-96-56; VIII-B-11; VIII-B-19

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

The Maryland inventory of Non-Utility power generators contained one source from the Division. The source was listed under the Plant ID 10483, which corresponds to the Bethlehem, PA facility. The correct Plant ID for the Division is 10485. It is the division's contention that this is point refers to the NO. 2 powerhouse located in Bethlehem, PA. The division request the removal of this source from the NOx SIP call inventory. The Maryland inventory of other NOx sources contained two sources from the Division, which were listed as Point ID 8 and 9. These point ID numbers correspond to the B Street Boilers that were removed from operation in 1991. The Division requests the removal of these sources from the NOx SIP call Inventory for the Division.

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

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

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

EPA Final Decision:  
Modify inventory as requested. Ohio provides same comments as company on capacity and daily NOx emissions under VIII-B-54.

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

**Requested Modification:**  
Requests change to plant name from ARMCO Steel Company to AK Steel Company for Middletown Works facility (State FIPS=39, County FIPS=017, Plant ID=1409010006). Requests modification to 1995 and projected 2007 daily NOx emissions for selected sources. Emissions for points B007-B010, P009-P012, B919, and X005 are same as those provided by State under VIII-B-54, except company provides emissions breakdown by segment.

EPA Final Decision:  
Modify plant name, boiler capacity data, and 1995 daily emissions as requested. For points B007-B010, remove segment number 1 with zero NOx and VOC emissions.  
No change to 2007 growth factor and emissions data as this topic was not open for comment during this period.  
Unit X005 already removed in a prior comment.  
No removal of sources which were operational until Dec. 1995. These remain in the base year inventory.

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

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

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

EPA Final Decision:  
Modify inventory as requested.

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

**Requested Modification:**  
Non-EGU Point-Related Revisions:

Perry K Station (18-097-0034) boilers 11-16 (points 1 through 6) should be considered large non-EGUs. Subsequent comment (VIII-B-122) requests classification of these units as small EGUs.

EPA Final Decision:  
See response under Section IV.

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

Requested Modification:  
Requests revision to unit data at three plants as follows.

39-151-1576000613: Change 1995 daily NOx emissions to zero for Points X001 and X002.  
 39-151-1576001246: Change 1995 daily NOx emissions to 0.012 TPD each for Points P013 and P014.  
 39-151-1576050614: For Point B003, change boiler capacity to 116.6 MMBtu/hr and 1995 daily NOx emissions to 0.096 TPD. For Point X001, change 1995 daily NOx emissions to zero.

EPA Final Decision:  
 39-151-1576000613-X001, X002: Modify 1995 NOx emissions as requested.  
 39-151-1576001246-P013, P014: Modify 1995 NOx emissions as requested.  
 39-151-1576050614-B003: Modify boiler capacity and 1995 NOx emissions as requested.  
 39-151-1576050614-X001: Remove emission point X001 because emissions are zero.

**Item Number:** VIII-B-38  
**Origin:** Champion International; Charles Ayer  
**Category:** Non-EGU Point  
**States Affected:** AL, MI, NC, NY, OH

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

EPA Final Decision:  
Modify inventory to address comments as requested for each facility, except no change to 2007 growth factor and emissions data as this topic was not open for comment during this period. Further details on revisions for some facilities are as follows:

NY facility (36-045-0078): No change plant ID as requested since change would create three separate plant IDs for this facility.

MI facility (26-043-B7192): Company provided county code 022, but this county code does not occur in MI. Assume correct county code is 043 and modify facility data as requested.

NC facility (37-087-0159): Remove one of two segments for point 005. The SCC for the remaining segment is 10200902 and the segment number is 2, per company's comments. State (VIII-B-159) submitted the same comments as company did for points 001-004. Use company-supplied data for segment number, stack height, and temperature for point 005; all other company data for point 005 matches State data.

NC facility (37-083-0007): State requested changes to boiler capacity; NOx, CO, and VOC emissions; and stack flow rate, velocity, and temperature for segment 1, but did not request revisions to segments 2 and 3 under VIII-B-159. Company requested that segments 2 and 3 be combined with segment 1, but segment 1 boiler capacity and emissions reported by State and company match. Final decision is modify inventory to address State comments under VIII-B-159 on boiler capacity and emissions for segment 1, and keep segments 2 and 3 in inventory unmodified.

OH facility (39-017-1409040212): Modify inventory as requested for points B010, B018, B020, B022, and X001. For point B010, Ohio EPA comments (VIII-B-133) on 1995 daily NOx emissions, boiler capacity, and NOx control efficiency same as provided by

company. For point B022, use company data instead of Ohio EPA comments (VIII-B-54) as company provides more detailed information.

**Item Number:** VIII-B-39  
**Origin:** Clark Lima Refinery, Gary Watson  
**Category:** Non-EGU Point  
**States Affected:** OH

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

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

The emissions that are listed (with the exception of point B026) are based on fuel usage, unit feed rates, and AP-42 factors. Point B026 emissions are based on actual stack testing.

A significant concern which Clark has is that EPA substantially modified AP-42 NOx emission factors for natural gas combustion in 1996 by removing the load reduction factor. The emission factor change affected three sources, B004, B006, and B009.

**EPA Final Decision:**  
 Modify inventory based on Ohio EPA comments provided under VIII-B-133. Note that company's comments and Ohio EPA's comments are the same, except as follows: (1) Ohio EPA provides seasonal throughput and operating time data and company does not, and (2) for point P010, Ohio provides daily NOx emissions as 0.8593 TPD and company provides daily NOx emissions as 1.24 TPD.

**Item Number:** VIII-B-45  
**Origin:** BP Oil Company; Linda Wilson  
**Category:** Non-EGU  
**States Affected:** OH

**Requested Modification:**  
 Requests modification of source data for BP Oil Company, Toledo Refinery.

The inventory does not include all of the emission points (i.e., points B004, B006, B014, B015, & B020) in operation on or before 1995 with a capacity greater than 250 MMBtu/hr for BP Oil Company's Toledo Refinery. Company requests addition of these emission points.

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

**EPA Final Decision:**  
 Modify inventory based on comments for emission points B004, B006, B014, B015, and B020. Stack height, diameter, and velocity data provided but not airflow rates. Calculate airflow rates based on stack diameter and velocity data.  
 Do NOT delete point P004 as requested as still part of budget at baseline levels.

**Item Number:** VIII-B-47  
**Origin:** Wheeling-Pittsburgh Steel Corporation; Ronna Topf  
**Category:** Non-EGU  
**States Affected:** OH

**Requested Modification:**  
 Requests addition of emission point B010 at Martins Ferry facility.

**EPA Final Decision:**  
 Modify inventory to add point B010 with 1995 emissions as requested.  
 No change to growth factor information as this topic was not open for comment during this period.

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

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

Facility ID 1483040008  
 Stack IDs 74330, 74331, 74332  
 DVID point B001 rated as 116 MMBtu/hr has been derated to 78 MMBtu/hr

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

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

EPA Final Decision:  
 Change boiler capacity to 78 MMBtu/hr; modify daily NOx emissions based on comments provided by Ohio under VIII-B-54.

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

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

EPA Final Decision:  
 Modify inventory as requested. [See response to requested correction to these revisions under Section IV.]

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

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

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

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

EPA Final Decision:  
 Modify inventory as requested except as follows:

Champion international - Courtland Facility (01-079-0001):	Addressed under VIII-B-38.
Holnam, Inc. (01-097-802):	Addressed under VIII-B-219.
International Paper - Riverdale Mill Facility (01-047-0003):	Addressed under VIII-B-117.
International Paper - Mobile Mill Facility (01-097-2005):	Addressed under VIII-B-117.
Mead Containerboard (01-071-0014):	Addressed under VIII-B-93.
Solutia, Inc. (01-103-0010):	Addressed under VIII-B-247.
Southdown, Inc. (01-091-0002):	Addressed under VIII-B-246. Facility is listed as Medusa-Citadel Cement in AL comments.
Southern Natural Gas Company (01-051-0006):	Comments on point 006 addressed under VIII-B-170.
Transcontinental Gas Pipeline (01-091-0007):	Addressed under VIII-B-107.
Transcontinental Gas Pipeline (01-111-0014):	Addressed under VIII-B-107.

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

Requested Modification:

Requests modification to existing non-EGU emission point B004 (segments 1, 2, & 3); B005 (segments 1, 2, & 3); B006 (segments 1, 2, & 3); B009 (segments 1& 2); and B010 (segments 1& 2). The boiler capacities for these emission points are all under 250 MMBtu/hr.

Requests addition of emission points.

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

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

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

EPA Final Decision:

Modify existing emission points as requested. Interpretation of comments are as follows:

1995 Daily NOx emissions: Incorporate as provided by company.

1995 seasonal NOx emissions: Company calculated daily NOx emissions as follows: (1995 annual emissions x 5 months/12 months) / 150 days. Recalculate daily NOx emissions using 153 days instead of 150 days, and multiply daily NOx emissions by 153 days to calculate NOx emissions for the 5-month (153 day) ozone season.

Latitude and longitude coordinates: Company provides plant-level latitude and longitude coordinates slightly different from those in inventory. Latitude and longitude coordinates in inventory are the same for all emission points and segments. Change latitude and longitude coordinates in inventory to coordinates provided by company for all emission points and segments, including those for which the company did not request revisions to boiler capacity, emissions, or stack parameters.

Stack parameters: Company provided velocity in feet per minute; changed velocity to feet per second for incorporation into inventory. For points B004, B005, & B006, company provided stack flow rates and velocities for segments 1 (residual oil) and 3 (natural gas), but not segment 2 (distillate oil). For segment 2 (distillate oil) at all three points, assume stack flow rate and velocity are same as that provided for segment 1 (residual oil). For emission point N001, incorporate data for SCC 30190003 (natural gas: distillate heaters), recalculate daily NOx emissions using 153 days, and calculate seasonal NOx emissions as daily emissions times 153 days. No segment number provided; add segment number 1 for SCC 30190003 to the inventory. Do not incorporate data for SCC 30190004 (process gas) because 1995 daily NOx emissions are zero.

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

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

Requested Modification:

Requests modification to multiple non-EGU point source inventories.

Requests addition of sources to base year inventory.

EPA Final Decision:

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

NOXINV1 Spreadsheet Data

39-017-140901006-B007-B010	Comments addressed under VIII-B-28.
39-017-140901006-P009-P012	Comments addressed under VIII-B-28.
39-017-140901006-B919, X005	Comments addressed under VIII-B-28.
39-017-140901006-P908, P925	No emission changes made as 1996/1997 emissions data provided. Emissions for these points revised under VIII-B-02.
39-017-1409040212-B022	Comments addressed under VIII-B-202.
39-017-1431010054-P010	No change. Could not find this plant in county FIPS=017. Plant and point IDs appear in county FIPS=061 for same company. Company comments for 39-061-1431010054 addressed under VIII-B-67.
39-061-1431070035-B014	Used company supplied data from VIII-B-268.
39-113-0857190001-B002, B003	Comments addressed under VIII-B-133.
39-151-1576000613-X001, X002:	Used company-supplied emissions data, see VIII-B-35.
39-151-1576000614-B003, X001:	No change as plant ID not found in inventory. Used company-supplied boiler capacity and emissions data for plant and point IDs 1576050614-B003, removed point X001 from inventory because emissions are zero, see VIII-B-35.

39-151-1576000614-P013, P014: No change as plant ID not found in inventory. Used company-supplied emissions data for plant and point IDs 1576001246-P013, P014, see VIII-B-35.  
 39-165-1483060110-X001 No change as supporting information for requested change not provided. Keep emission point in inventory as needed for air quality modeling.

NOXINV2 Spreadsheet Data

39-113-0448020007-B004, B006, B014, B015, B020 County FIPS code 113 (Montgomery Co.) Ohio provided for BP Oil Refinery assumed to be incorrect. Emission points for which Ohio provided comments found in inventory at BP Oil-Toledo Refinery in county FIPS code 095 (Lucas Co.). Comments addressed under VIII-B-45.  
 39-113-0857041124-B006 Modify inventory to incorporate comments, except use daily NOx emissions provided in Ohio's NOXINV1 spreadsheet.  
 39-153-1677010193-B101 (B001) and B102 (B002) Addressed under VIII-B-137.

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

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

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

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

**EPA Final Decision:**  
 No action taken as EPA could not match to any facility found in EPA data.  
 No change to growth factors as not open for comment during this period.

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

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

Point B029 Emission point is a process unit heater with design capacity of 234 MMBtu/hr. Provides 1995 daily NOx emissions, stack parameters, latitude and longitude coordinates, and control efficiency data.

Point P002 Emission point is a is an FCC Regenerator Unit which does not have the potential to emit greater than 1 ton/day NOx. Provides 1995 daily NOx emissions, stack parameters, , latitude and longitude coordinates, and control efficiency data.

Canton facility has no other heaters with a design duty over 250 MMBtu/hr and the most recent 1997 emissions inventory for the facility indicates no other NOx emission sources that approach the 1 ton/day cutoff number.

**EPA Final Decision:**  
 Modify inventory based on comments. Stack height, diameter, and flow rates provided, but not stack velocity data. Calculate velocity based on stack diameter and flow rate provided. Latitude and longitude coordinates provided for the two emission points are the same, and very close to the coordinates in inventory for all of the plant's emission sources. Change coordinates for all points at plant to coordinates provided in comments to make coordinates consistent. Note that prior to this change, coordinates for all points at the plant were the same.

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

Requested Modification:

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

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

EPA Final Decision:

Address comments provided by Ohio under VIII-B-133. Ohio and company provide same data for boiler capacity (158 MMBtu/hr), daily NO<sub>x</sub> emissions, and NO<sub>x</sub> control efficiency for all three boilers. Modify inventory to incorporate stack parameter data provided by USEC.

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

Requested Modification:

Requests modification of inventory for multiple sources.

EPA Final Decision:

Modify inventory as requested with the following exceptions:

IL (17-081-081804AAA): Addressed IL State comments under VIII-B-62.  
 WV (four facilities): Addressed WV State comments under VIII-B-173.

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

Requested Modification:

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

EPA Final Decision:

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

AL: Cannot match data to comment. Point ID's and SCCs do not match EPA data. State comment addresses the large unit.  
 IN: Cannot match EPA data to comment. No such FIPS county.  
 IL: Comment addressed by IL State comment (VIII-B-62).  
 KY: Comment addressed by Jefferson Co., KY data submitted (VIII-B-288).  
 MA: Large units deleted from non-EGU inventory.  
 NY: Comment addressed by NY state comment (VIII-B-222).  
 OH: State FIPS/County FIPS/Plant ID=63-031-0616010029: For points B001 and B002, modify boiler capacities as requested. For point B004, comments addressed under VIII-B-133 to incorporate same boiler capacity as provided by company, and 1995 daily NO<sub>x</sub> emissions supplied by Ohio EPA. Could not address comments to revise the boiler capacity for point B005 to 3.1 MMBtu/hr and point B006 to 10.3 MMBtu/hr because could not find points in inventory. Company did not provide stack parameter, seasonal throughput, operating time, or base year daily NO<sub>x</sub> emissions and control efficiency data needed to add the two points to the inventory.  
 OH: State FIPS/County FIPS/Plant ID=63-035-1318200203: No change made to points B005-B008 as plant could not be identified in inventory. Original inventory contained this plant with points B001 and B002. These points and the plant were removed from inventory because company indicates that points B001 and B002 were permanently shut-down May 31, 1994.  
 PA: Modify point IDs 1, 2, 5, and 9 per industry comment for 42-049-0009. Revise emissions for point ID # 2 to 0 to indicate seasonal shutdown (GE is currently prohibited from operating stack ID 32 during the months of May to October.) Modified other boiler capacities as requested.

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

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

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

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

EPA Final Decision:

Non-EGU: Replace EPA inventory with new IL EPA unit data. [See further response under Section IV.]  
Replace growth as requested.  
No modification to future year control factors as not open to comment during this period.  
Revisions submitted by Lafarge Corp., VIII-B-157, for 17-127-127855AAA addressed under this comment.

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

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

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

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

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

EPA Final Decision:  
Same requests submitted under VIII-B-38. Comments addressed under VIII-B-38.

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

Requested Modification:  
Requests modification of boiler capacity for emission points B002 and B004. Requests that plant name be changed to Atlas Roofing Corporation Felt Plant.

EPA Final Decision:  
Change plant name to reflect ownership of plant by Atlas Roofing Corporation. Modify capacity for emission point B002. Capacity and 1995 daily NOx emissions for point B004 addressed under VIII-B-54 (Ohio comments). Ohio provides same capacity as provided by company for point B004.

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

Requested Modification:  
Requests redefining as non-fossil unit.

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

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

Requested Modification:  
Requests changes to boiler capacity and 1995 daily NOx emissions for 5 emission points (B002, B003, B004, B006, & B007) with multiple segments.

Requests the addition of emission points B001, B005, and TOX to the inventory. Boiler capacities and 1995 daily NOx emissions are provided for these units.

EPA Final Decision:  
Modify inventory as requested. Override data modified under VIII-B-133 with these data except where noted below. Note that stack airflow rates provided by company appear to be in cubic feet per second, but were not changed to cubic feet per minute for incorporation into inventory because company did not request that airflow rates be changed. Stack airflow rates in inventory match those in company-supplied data.

- 39-061-1431010054-B001: Use company-supplied boiler capacity and 1995 daily NOx emissions. Use seasonal throughput values supplied by Ohio as company did not provide them, see VIII-B-133. No stack or operating parameter data provided by company or Ohio. Apply default operating schedule to this unit.
- 39-061-1431010054-B005: Use company-supplied boiler capacity and 1995 daily NOx emissions. Use stack parameters and seasonal throughput values supplied by Ohio as company did not provide values, see VIII-B-133. Apply default operating schedule to this unit.
- 39-061-1431010054-TOX: Use company-supplied 1995 daily NOx emissions. Use boiler capacity, stack parameters and seasonal throughput values supplied by Ohio as company did not provide values, see VIII-B-133. Apply default operating schedule to this unit.

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

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

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

Boiler output and therefore heat input varies throughout the year.

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

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

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

B002	0.602
B004	0.663

EPA Final Decision:

Modify boiler capacity, 1995 daily NOx emissions, and NOx control efficiency as provided under State comments, VIII-B-133. Company submitted same data as State, except that State supplied boiler capacity of 135 MMBtu/hr for point B002 and company supplied no capacity data for B002.

No change to 2007 daily NOx emissions as this topic was not open for comment during this public comment period.

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

**Requested Modification:**  
 Requests revision to facility information for BP Chemicals.  
 The Absorber Off Gas Incinerator (AOGI) is the only source (point P035) with is subject to the NOx SIP rulemaking. The AOGI has less than 250 MMBtu/hr rated heat input, but has the potential to emit (PTE) of greater than 1 ton/day NOx (3.31 tons NOx per day).

It should be noted that in the data sent by the Ohio EPA (see VIII-B-133), the data show that BP Chemicals Inc., and BP Oil emission numbers are summed together. They should be separated. Also, PCS Nitrogen's emissions (B001, B002, B003, and P030) are included in the BP Chemicals, Inc. emissions inventory. PCS Nitrogen, LP submitted separate comments on these points under VIII-B-77.

**EPA Final Decision:**  
 Modify inventory to incorporate all data for point P035, except emissions. Emissions provided are based on potential-to-emit, and inventory is based on actual emissions. Daily and seasonal NOx emissions for point P035 are based on the original values (i.e., zero) in the inventory. The original inventory contains emissions for VOC and CO for point P035, so this point was left in the inventory as VOC and CO emissions are used for air quality modeling.

**Item Number:** VIII-B-72  
**Origin:** Anheuser-Busch Companies; Dean Pusch  
**Category:** Non-EGU  
**States Affected:** OH, NJ, NY

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

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

Referenced industrial boilers (units 1 and 2) at Newark that have been permanently shut down.

**EPA Final Decision:**  
 NJ: No change to emission point units 1 and 2 at NJ facility; both units on-line in May 1995.  
 NY: Modify inventory as requested. Delete existing data and enter new point IDs 001A, 001B, 002A, 002B, each with 3 segments and 3 SCCs (10200601, 10200401, and 10200799, respectively). Keep stack parameters and throughput data for 001 and 002. Replace emissions, control, boiler capacity, and SCC information.  
 OH: Modify inventory per comments provided by Ohio EPA under VIII-B-133. Note that Ohio's and company's comments are the same.

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

**Requested Modification:**  
 Requests modification of inventory for Chesapeake Paperboard facility.  
 Identical request to VIII-B-100 and VIII-B-110, except additional information provided under VIII-B-110.

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

Boiler 002

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

EPA Final Decision:

Addressed under VIII-B-110 which provides same information as provided under VIII-B-73/100, except point ID information is provided under VIII-B-110.

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

Requested Modification:

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

EPA Final Decision:

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

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

Requested Modification:

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

B003 631 MMBtu/hr maximum rated heat capacity

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

B001 227 MMBtu/hr  
B002 227 MMBtu/hr

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

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

EPA Final Decision:

Modify inventory based on Ohio EPA comments provided under VIII-B-133. For points B001, B002, and B003, change plant name from BP Chemicals to PCS Nitrogen, L.P. and change plant identification number as requested by Ohio EPA.

Remove point B030 from inventory as Ohio EPA provided capacity and 1995 NOx emissions as zero for this point, and inventory contains zero VOC and CO emissions for this point. PCS Nitrogen indicates that this point has been shut down and replaced by point P070, but PCS Nitrogen did not provide any information to include point P070 in inventory for modeling purposes. Ohio did not provide any comments on point P070.

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

Requested Modification:

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

Company requests changes to boiler capacity and 1995 NOx emissions for Points B001-B007, B009, P046, P047, P048, P903, P904, and P905.

Company requests addition of Points B212, P049, P050, P071, P205, P206, P207, P265, P266, P923, and P925. Capacity for each point is zero, and daily NOx emissions are less than 1 TPD. Company does not provide any stack, seasonal throughput, or operating parameter data for these points.

**EPA Final Decision:**

For Points B001-B004, B007, and P905, modify inventory as requested. Interpret company comments as follows:

Point B001: Inventory contains records for segment 1 (SCC=10200401), segment 2 (SCC=10200601), and segment 3 (SCC=10200707). Company did not provide segment numbers. Company requests changes to SCCs 10200401, 10200601, 10200704, and 10200799. Change SCC 10200707 to SCC 10200704. Add segment 4 for SCC 10200799; use stack parameter, seasonal throughput, and operating time data from segment 3; and set daily and seasonal VOC and CO emissions to zero since company did not provide VOC and CO data.

Points B002 and B003: For each point, inventory contains records for segment 1 (SCC=10200401), segment 2 (SCC=10200601), segment 3 (SCC=10200704), and segment 4 (SCC=10200707). Company did not provide segment numbers. Company requests changes to SCCs 10200401, 10200601, and 10200704 for each point, but provided no information for segment 4. Modify inventory to address company changes for segments 1, 2, and 3, and remove segment 4 (SCC=10200707) from inventory.

Point B004: Inventory contains records for segment 1 (SCC=10200202), segment 2 (SCC=10200601), segment 3 (SCC=10200704), and segment 4 (SCC=10200707). Company did not provide segment numbers. Modify inventory to address company changes for segments 1, 2, and 3, and remove segment 4 (SCC=10200707) from inventory.

Point B007: Inventory contains records for segment 1 (SCC=10200202), segment 2 (SCC=10200704), and segment 3 (SCC=10200707). Company did not provide segment numbers. Company requests changes to SCCs 10200202, 10200704, and 10200601. Change SCC 10200707 to SCC 10200601, and modify inventory to address company changes for segments 1, 2, and 3.

For Points B005, B006, B009, P046, P047, P048, P903, and P904, address comments as provided by State under VIII-B-133.

Do not add new Points B212, P049, P050, P071, P205, P206, P207, P265, P266, P923, and P925 to inventory because no stack parameter data provided.

See further response affecting this facility under Section IV.

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

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

**EPA Final Decision:**  
 Modify inventory as requested. Assumed to be plant ID 0165010009 based on Ohio comments (VIII-B-133). Ohio provided same data as company for boiler capacity, daily NOx emissions, and NOx control efficiency.

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

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

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

EPA Final Decision:

Modify inventory as requested. Also addressed under Ohio's comments (VIII-B-133) which provide same data as company.

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

Requested Modification:

Requests revision to Akron facility unit information for Goodyear Tire & Rubber Company.

- B001 requests revision to several parameters
- B002 requests revision to several parameters

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

EPA Final Decision:

Address comments provided by Goodyear under VIII-B-137.

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

**Item Number:** VIII-B-82  
**Origin:** Procter & Gamble Company; P. C. Edward Burcham  
**Category:** Non-EGU  
**States Affected:** OH

Requested Modification:

Requests revision to boiler capacity and 1995 daily NOx emissions for Procter & Gamble Company (39-061-1431390903-B021 and B022.

- B021 277 MMBtu/hr
- B022 450 MMBtu/hr

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

EPA Final Decision:

Modify inventory as requested.

**Item Number:** VIII-B-83  
**Origin:** Wheeling Pittsburgh Steel Corporation; Harold Strohmeyer  
**Category:** Non-EGU  
**States Affected:** OH

Requested Modification:

Requests revision to Wheeling-Pittsburgh Steel facility information. Requests correction to the reporting of boiler capacities, consolidating the facility identification number for the Steubenville South and North facilities, correcting emission point ID numbers at the Steubenville North facility, and adding an additional small boiler at the Martins Ferry Facility. Requests revision to SCCs for some emission points.

EPA Final Decision:

39-081-1741090010 (Steubenville South Facility)

Modify inventory for all emission points based on comments provided by company except for point B004. Modify emissions for point B004, segment 2, per State comments provided under VIII-B-133.

39-081-1741150011 (Steubenville North Facility)

Modify inventory for all emission points based on comments provided by company except for point B106. Change plant ID from 1741150011 to 1741090010, and point IDs as requested. Remove point P902 because NOx, VOC, and CO emissions for this point (and 3 segments) are zero. Modify emissions for point B106, segment 2, per State comments provided under VIII-B-133 for plant ID 1741150011 and point ID B006.

39-081-1741120012 (Yorkville Facility)

Modify inventory for emission points B011 and B012 based on comments.

39-013-1707090013 (Martins Ferry Facility)

Modify inventory for emission points B001-B004, B006, B007, and P901-P903 based on comments.

39-099-0250030020-K001 (Pittsburgh-Canfield Corporation Facility)  
 Modify inventory for emission point K001 based on comments.

**Item Number:** VIII-B-85  
**Origin:** Sunoco MidAmerica Marketing & Refining; Elaine Moore  
**Category:** Non-EGU  
**States Affected:** OH

**Requested Modification:**  
 Requests addition units and unit modification at Sun Refining, Toledo Refinery.

**Revised data:**  
 Plant ID 0448010246  
 SCC 30600201  
 Unit ID P011  
 1995 Actual Daily NOx emissions 1.764 ton/day

**Additional Sources to be added:**  
 Plant ID 0448010246  
 Unit ID B025  
 SCC 30600104  
 Max rated heat capacity 482 MMBtu/hr  
 1995 Actual Daily NOx emissions 0.485 ton/day

Plant ID 0448010246  
 Unit ID B044  
 SCC 10200401, 10200701  
 Max rated heat capacity 296 MMBtu/hr  
 1995 Actual Daily NOx emissions 0.483 ton/day

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

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

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

**EPA Final Decision:**  
 Modify inventory as requested.  
 Note that new units requested by facility are in existing data set and modified as requested.  
 Use primary SCC when single segment data provided.  
 Address Ohio comments for point B015 under VIII-B-54.

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

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

**Data to add:**  
 Pickle Line #2 Boiler

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

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

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

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

**MISSING EXISTING CONTROL EFFICIENCIES**

FIPS State Code: 18  
 FIPS County Code: 107  
 Plant name: Nucor Steel  
 Plant ID number: 0038  
 Unit/Stack ID number: 002/002; 002/003; 002/004; 003/007; 004/005; 005/008; 007/009; 007/010; 007/011; 012/017; 012/018

1995 existing NOx control: 30%

EPA Final Decision:  
 Addressed under Indiana State comments (VIII-B-269).

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

**Requested Modification:**

Requests unit modification to Mehoopany facility for Procter & Gamble Paper Products Company.

Source 035 listed= 575 MMBtu/hr, actual rated heat input = 644 MMBtu/hr  
 During the 1995 ozone season RACT NOx control was installed on this source.

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

EPA Final Decision:  
 Modify inventory as requested. [See further response affecting Source 035 in Section IV.]  
 RACT control efficiency not modified as uncontrolled emissions were provided.

**Item Number:** VIII-B-91  
**Origin:** Naval Surface Warfare Center, Indian Head Division; Michael Dunn



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

EPA Final Decision:  
 Addressed under VIII-B-127 and VIII-B-184.  
 Future year data not open to comment during this period.

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

Addressed under VIII-B-128.

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

**Requested Modification:**  
 Requests redesignation of data from EGU to non-EGU sources.  
 Alcoa Warrick Power Plant Units 1, 2, and 3 supply electricity solely for consumption by Alcoa Warrick Smelting and Fabricating Operations.  
 EPA has incorrectly estimated the seasonal heat inputs for Warrick Power Plant Units 1, 2, and 3.  
 EPA incorrectly calculates the NOx budget by utilizing 0.17 lb/MMBtu as the non-EGU emission rate given that the SIP call, FIP call, and 126 petitions require a 60% reduction from 1995 actuals.

EPA Final Decision:  
 Addressed under Indiana State comments (VIII-B-269). [See further response for Warrick facility in Section IV.]

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

**Requested Modification:**  
 Requests modification of data for multiple units at Narrow's Virginia facility.

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

1995 ozone season daily NOx emissions rates need to be corrected for Point ID 002, 003, 004, 006, and 007.  
 Updated stack parameter information is supplied for all point sources.  
 Updated operating parameter information is supplied for all point sources.

EPA Final Decision:  
 Addressed under VIII-B-127 and VIII-B-184.

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

**Requested Modification:**  
 Requests modification of inventory for Chesapeake Paperboard facility.  
 Identical request to VIII-B-73 and VIII-B-110, except additional information provided under VIII-B-110.

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

Boiler 002

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

EPA Final Decision:

Addressed under VIII-B-110 which provides same information as provided under VIII-B-73/100, except point ID information is provided under VIII-B-110.

**Item Number:** VIII-B-101

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

Requested Modification :

Requests revision to five kilns operated at Roanoke Cement Facility

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

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

EPA Final Decision:

Addressed under VIII-B-127 and VIII-B-184.  
 No change in growth or control as these topics not open for comment during this period.

**Item Number:** VIII-B-102

**Origin:** Mead Paper Company, Sonja Olendorf  
**Category:** Non-EGU Point  
**States Affected:** MI

Requested Modification:

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

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

EPA Final Decision:

Modify 1995 base year inventory as requested.  
 No change to 2007 projection year data as these data were not open for comment during this period.

**Item Number:** VIII-B-103

**Origin:** Metropolitan Nashville and Davidson County Air Pollution Control Division, Rob Raney  
**Category:** Non-EGU point

States Affected: TN

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

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

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

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

EPA Final Decision:  
Modify inventory as requested.

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

Requested Modification:  
 For Points B005 and B007, requests modification of boiler capacity to 243 MMBtu/hr, 1995 daily NOx emissions for segments 1-3, and SCC for segment 3.  
 For Point B009, requests modification of boiler capacity to 211 MMBtu/hr.  
 Requests removal of Point P003 which is replaced by Point P010, and removal of Point X001.  
 Requests addition of Points B008, P009-P013, P015, and Z006; complete stack and throughput data are provided for Points P009-P011, P013, and Z006.

EPA Final Decision:  
Modify inventory based on comments.

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

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

International Paper Co./Thilmany.  
 unit B11 504.1 tons

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

Requests modification of boiler capacity for several companies.

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

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

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

Requests correction of point identification for several Point IDs.  
 Consolidated Papers/Biron  
 Consolidated Papers/Kraft  
 Georgia-Pacific/Nekoosa

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

Requests addition of boiler units for several companies.

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

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

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

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

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

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

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

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

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

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

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

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

EPA Final Decision:



Reviews of all 'large' sources as indicated in EPA's inventory.

EPA Final Decision:

Modify inventory as requested except as follows:

Southdown, Inc. (13-153-0003):	For point 006, use company-supplied NOx control efficiency for all three segments provided under VIII-B-246.
Georgia-Pacific (13-127-0003):	Addressed under VIII-B-202.
International Paper (13-245-0006):	Addressed under VIII-B-117.
Transcontinental Gas - Station 120 (13-151-0025):	Addressed under VIII-B-107.
Transcontinental Gas - Station 130 (13-195-0015):	Addressed under VIII-B-107.

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

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

EPA Final Decision:

Modify non-EGU operating data as requested except as follows:

Lehigh Portland Cement (24-013-0012 & 24-021-003):	Addressed under VIII-B-162.
Duke Energy Corporation (24-023-0081):	Addressed under VIII-B-108.
Transcontinental Gas Pipeline (24-027-0223):	Addressed under VIII-B-107.

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

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

EPA Final Decision:

Modify inventory as requested.

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

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

EPA Final Decision:

Modify inventory as requested, except no change to 2007 growth factor and emissions data as this topic was not open for comment during this period. [See further response for PA facility in Section IV.] For all facilities, modify NOx, VOC, and CO seasonal emissions in original inventory by multiplying daily emissions provided by company by 153 days per ozone season. Further details on revisions for some facilities are as follows:

13-245-0006 (Agusta Mill)  
 For points 007 and 008, number segments sequentially to eliminate duplication of same segment number.

36-031-105 (Ticonderoga Mill Facility) and 36-091-145 (Hudson River Mill Facility)

Addressed under NY State comments (VIII-B-222); except modify inventory to add daily VOC and NOx emissions and VOC rule effectiveness values provided by company as NY State did not comment on VOC and NOx emissions. For 36-091-0145, point 007, SCC 10200401, do not add daily VOC or CO emissions since seasonal operating schedule data indicate that the point is only operated during the winter season.

45-043-0002 (Georgetown Facility)

Modify inventory as requested for all emission points except for point 004. Add point 004 as requested by State of SC (VIII-B-190); company did not provide any comments for point 004. SC did not provide weeks per year operating time for point 004; assume value of 52 weeks per year based on data for other points at facility.

55-087-445031180 (Thilmany Facility)

Replace B11 with industry data (this overwrites WI State data). Seasonal throughput fields only designated to hold 2 characters; IP indicates 100% for Fall throughput for point ID B07, segment 2, so entered value as 99% and applied 1% to the Spring throughput.

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

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

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

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

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

**EPA Final Decision:**  
 Modify inventory as requested except for plants in the following States:

IL: Addressed under VIII-B-62  
 KY: Addressed under VIII-B-158  
 MO: Addressed under VIII-B-201

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

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

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

AIRS-AFS ID	Action
47-011-0014	Removed reported base year control efficiency of 100% as unit is not controlled to 0 tons.
47-031-0010	No classification change made as unit SCC indicates boiler
47-037-0002	Addressed under VIII-B-215.
47-157-****	No change as new data not submitted for any of these facilities
47-163-0003	No sources removed as all units are included in total State budget

47-163-1007 No change as no data submitted for this facility  
 47-163-1009 No change as no data submitted for this facility  
 47-165-0014 Do not add units 003, 004 as no information provided for their addition  
 47-189-0093 Address comments provided by Duke Energy under VIII-B-108.

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

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

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

EPA Final Decision:  
 Supplemental information for VIII-B-61; addressed under VIII-B-61

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

Requested Modification:  
 Request modification to MOBILE input parameters.

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

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

Requested Modification:  
 Modification to multiple facilities in the State.

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

Roanoke Cement (51-023-0003): Do not add unit 052 as this unit came on-line in 1996.  
 Bear Island (51-085-0042): Do not add new units as the units came on-line after 1995.  
 Union Camp (51-093-0006): For points 003, 004, and 017, use company data (see VIII-B-210).

For the following facilities, State provided same comments as company.

Consolidated Coal (51-027-0009; 0011; 0046; 0047; & 0081): Addressed under VIII-B-58.  
 DuPont (51-041-0001): Addressed under VIII-B-205.  
 DuPont (51-089-0006): Addressed under VIII-B-205.  
 Georgia Pacific (51-019-0003): Addressed under VIII-B-202.  
 Transcontinental Gas (51-011-0011): Addressed under VIII-B-107.  
 Transcontinental Gas (51-065-0016): Addressed under VIII-B-107.  
 Transcontinental Gas (51-117-0050): Addressed under VIII-B-107.  
 Transcontinental Gas (51-137-0027): Addressed under VIII-B-107.  
 Transcontinental Gas (51-143-0120): Addressed under VIII-B-107.  
 Transcontinental Gas (51-153-0086): Addressed under VIII-B-107.

**Item Number:** VIII-B-128  
 Origin: State of Connecticut; Christopher Nelson

Category: EGU & Non-EGU  
States Affected: CT

Requested Modification:

Any additions made to the Connecticut Department of Environmental Protection (CTDEP) EGU budget as a result of the January 29 comments will need to be apportioned to each of the three states' revised MOU budgets. A copy of the MOU is enclosed.

CTDEP's VIII-B-128 comments note that several corrections to the non-EGU portion of the budget have been made by EPA as a result of comments, but the need for some additional corrections still remains. CTDEP provides a list of the large non-EGU sources currently contained in EPA's NOx SIP Call budget for Connecticut and an explanation of which sources should be removed from this portion of the inventory.

- V. Capitol District Energy Center (09-003-3666, point P64) and Dexter Nonwovens Division (09-003-8601, point P29) need to be removed from the non-EGU inventory. These sources are EGUs and are included in the EGU portion of the inventory.
- VI. CTDEP's VIII-B-95 comments note that EPA's proposed budget includes numerous test cells (see "largcomp.xls"). These units are not traditional pieces of fuel-burning equipment and for that reason were not included in the OTC NOx Budget. They should be excluded from EPA's budget as well. CTDEP's VIII-B-128 comments note that Pratt & Whitney (09-003-1509, point 039) is a test cell and should not be included as a large non-EGU. CTDEP also states that based on its earlier comments submitted to the docket, all test cells except for this source were removed from the large non-EGU portion of CTDEP's inventory.
- VII. Simkins Industries Inc. (09-009-3764, point 673) and Pfizer Inc.-Chemicals (09-011-0606, points 009 and 010) should be removed from the large non-EGU portion of CTDEP's inventory because they do not meet the criteria for being large non-EGU sources.
4. In its comments submitted to the docket on January 29, 1999 regarding the EGU portion of CTDEP's inventory (VIII-B-95), the CTDEP noted that Exeter Energy (Oxford) was not an EGU source and should thus be moved to the non-EGU point source portion of the budget. VIII-B-128 reiterates these comments and notes that this source should be classified as a small non-EGU source since it does not meet the criteria for being a large source (i.e., it does not combust fossil fuel).
5. American Ref-Fuel Co. of SE CT (ARD ORISPL #10646, points 105 & 106) and Riley Energy Systems of Lisbon (ARD ORISPL #54758, Boilers 1 & 2) are missing from the small non-EGU portion of CTDEP's inventory. Both of these facilities are municipal waste combustors.
6. Change "Federal Paper Board Co" (09-11-3102) to International Paper Company. The 1990 NOx TPD value for point 003 should be 0.92 rather than 0.75.
7. Five marine boilers at Pratt & Whitney Willgoos Lab should be added to the budget. Stack info, etc. needed for modeling purposes are included for these sources.
8. CTDEP's VIII-B-95 comments include detailed info regarding MWCs and tire burning facilities in CT. The data include stack parameters and other information necessary for modeling.

EPA Final Decision:

1. Remove sources for Capitol District Energy Center (09-003-3666, point P64) and Dexter Nonwovens Division (09-003-8601, point P29) from non-EGU inventory.
2. No removal of emission points from inventory as budget comprised of all NOx emitting sources and emissions for all sources required for air quality modeling. No change to daily NOx emissions as daily NOx emissions provided by CTDEP appear to be for 1990, and daily NOx emissions in inventory are for 1995. No change to boiler capacities in inventory as capacities supplied by CTDEP match capacities in inventory for all emission points.
3. For Simkins Industries Inc. (09-009-3764, point 673), do not modify inventory as CTDEP did not provide information or data to support claim that these units do not meet the criteria for being large non-EGU sources. Daily NOx emissions in inventory match emissions provided by CTDEP. For Pfizer Inc.-Chemicals (09-011-0604, points 009 and 010), modify boiler capacities as requested. No change to emissions as no data provided by CTDEP.

4. Remove Exeter Energy (Oxford) (09-009-50736, point st\_rd) from EGU inventory and place in non-EGU inventory. Change county FIPS code to 015, plant ID to 2305, and point ID to 001. Add data for points P01 and P02 as requested to 09-015-2305.
5. Modify inventory to address comments for American Ref-Fuel Co. of SE CT as requested. Do not add Riley Energy Systems of Lisbon (09-011-1314, points P08/P09) as facility went on-line after September 1995.
6. For Federal Paper Board Co (09-011-3102), address comments provided by International Paper Company under VIII-B-117.
7. Add Pratt & Whitney Willgoos Lab sources (09-003-1510, points 163/164/166/167/168) to inventory with 1990 emissions data as requested.
8. Address comments as provided except as noted in number 5 above for Riley Energy Systems of Lisbon.

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

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

**EPA Final Decision:**

**KY Facilities:** Addressed under Kentucky State comments (see VIII-B-158).  
**TN Facilities:** Addressed under Tennessee State comments (see VIII-B-121).  
**WV Facilities:** Addressed under West Virginia State comments (see VIII-B-173).

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

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

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

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

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

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

**NOXINV3 Spreadsheet Data**

- 39-003-0302020012-P010 Retain segment SCC 30600201. Remove all other segments at this unit.
- 39-003-0302020015-B001, B002 Change plant name from BP Chemicals to PCS Nitrogen, L.P. and change plant ID to 0302020308. Change boiler capacities and emissions as provided.
- 39-003-0302020015-B003 Change plant name from BP Chemicals to PCS Nitrogen, L.P. and change plant ID to 0302020308. Address comments provided in NOXINV4 file for same plant and point.
- 39-003-0302020015-P030 Remove point from inventory as Ohio indicates that capacity and 1995 NOx emissions are zero, and inventory contains zero VOC and CO emissions for this point.
- 39-009-0605000008 Addressed under VIII-B-108.
- 39-017-1409010043-B001 Retain segment SCC 10200202. Remove all other segments at this unit.

- 39-031-0616010029-B004 Retain segment SCC 10200601, change SCC to 10200501, and change boiler capacity and 1995 daily NOx emissions as requested. Remove all other segments at this unit.
- 39-035-1318001613-B005 Retain segment SCC 10200704 and modify boiler capacity and daily NOx emissions as requested. Remove all other segments at this emission point.
- 39-035-1318001613-B006 Retain segment SCC 10200704 and modify boiler capacity and daily NOx emissions as requested. Remove all other segments at this emission point.
- 39-035-1318001613-B009 Retain segment SCC 10200704 and modify boiler capacity and daily NOx emissions as requested. Remove all other segments at this emission point.
- 39-035-1318200203-B002 Remove emission point from inventory. Ohio provides 1995 daily NOx emissions as zero for this point; under VIII-B-61, company indicates that point B002 was permanently shut-down May 31, 1994.
- 39-049-0125040554-B001-B004, X001 Add points B001-B004 to inventory, with points B001, B003, and B004 each having two segments, and incorporate capacity, daily NOx emissions, and control efficiencies as supplied by Ohio. Use stack and operating parameter information from existing point X001 to generate data for B001-B004. Revised capacity and emissions for point X001 (SCC=10200601), and remove segment with SCCs 10200401.
- 39-061-1431010054-B002-B007 Addressed under VIII-B-67.
- 39-081-1741090010-B004 State and company (see VIII-B-83) provided the same boiler capacity and NOx control efficiency values for this point. This point has 3 segments; State provided 1995 daily NOx emissions as 0.2400 TPD total for point (not by segment). To incorporate State-supplied emissions, change segment 2 (SCC=10200704) emissions from 0.2355 TPD to 0.2257 TPD so emissions for point sum to 0.24 TPD. Emissions for segments 1 and 2 remain unchanged at 0.0006 and 0.0137 TPD, respectively. Company did not request revisions to emissions for this point.
- 39-081-1741150011-B006 Addressed under VIII-B-83. Change plant ID from 1741150011 to 1741090010, and point ID from B006 to B106 per company's request (see VIII-B-83). State and company provided the same boiler capacity and NOx control efficiency values for this point. This point has 3 segments; State provided 1995 daily NOx emissions as 0.3400 TPD total for point (not by segment). To incorporate State-supplied emissions, change segment 2 (SCC=10200704) emissions from 0.2857 TPD to 0.2751 TPD so emissions for point sum to 0.34 TPD. Emissions for segments 1 and 2 remain unchanged at 0.0014 and 0.0635 TPD, respectively. Company did not request revisions to emissions for this point.
- 39-125-0363000002-P014, P015 Addressed under VIII-B-157.
- 39-151-1576000301 Assume latitude and longitude coordinates company provides for points P002 and B029 are plant coordinates; change latitude and longitude coordinates for all points at plant from 40.7686 and 81.4158, respectively, to 40.7722 and 81.4183, respectively, to make coordinates consistent for all points.
- 39-153-1677010192-B001, B002 Addressed under VIII-B-137.
- 39-167-0684010011-B005, B007 Addressed under VIII-B-105.

NOXINV4 Spreadsheet Data

- 39-061-1431010054-B001 Use company-supplied boiler capacity and 1995 daily NOx emissions, see VIII-B-67. Use seasonal throughput values supplied by Ohio as company did not provide values. Ohio and company did not provide stack parameters.
- 39-061-1431010054-B005 Use company-supplied boiler capacity and 1995 daily NOx emissions, see VIII-B-67. Use stack parameters and seasonal throughput values supplied by Ohio as company did not provide values. Ohio provides stack velocity in feet per minute; change velocity to feet per second for incorporation into inventory. Apply default operating schedule to this unit.
- 39-061-1431010054-TOX Use company-supplied 1995 daily NOx emissions, see VIII-B-67. Use stack parameters and seasonal throughput values supplied by Ohio as company did not provide values. Ohio provides stack velocity in feet per minute; change velocity to feet per second for incorporation into inventory. Apply default operating schedule to this unit.
- 39-145-0773000080-N001 Use company-supplied data, see VIII-B-53, except use operating time and seasonal throughput provided by Ohio because not provided by company. State- and company-supplied data are the same.

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

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

Modifications to information for three plants:

South Works (IL)

Plant ID 031600ALZ, Point ID 82010044014, Stack ID 0008:

Change design capacity from 876 to 1,210 MMBtu/hr

Plant ID 031600ALZ, Point ID 82010044013, Stack ID 0013:

Change design capacity from 575 to 533 MMBtu/hr

Fairless Works (PA)

Plant ID 0055, Point IDs 043, 045, and 046:

Not owned by U.S. Steel, owned by PECO.

Gary Works (IN)

"Detailed corrections submitted through IDEM."

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

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

EPA Final Decision:

IL (South Works) (17-031-031600ALZ):

Comments addressed under VIII-B-62.

IN (Gary Works) (18-089-0121):

Comments addressed under VIII-B-269.

PA (Fairless Works) (42-017-0055):

Change plant name to PECO for points for which U.S. Steel makes this request. For permitting reasons, do not change plant name for points for which U.S. Steel does not request the plant name be changed to PECO.

No change per comment on NOx budget program as this topic was not open for comment during this period.

For the following plants, do not add the information provided for emission points. U.S. Steel indicates that the emission points are not in the inventory, but does not provide emissions, stack parameter, or operating parameter data needed to add the points to the inventory:

AL (Fairfield Works) (01-073-0370; Note: For point 105, address comments provided under VIII-B-283).

PA (Clairton Works) (42-003-0011)

PA (Edgar Thomson Plant) (42-003-0009)

**Item Number:**

**VIII-B-137**

Origin:

Goodyear Tire & Rubber Company, M.G. Trembly

Category:

Non-EGU point

States Affected:

AL, IL, OH, SC, TN, VA

Requested Modification:

AL Correction of SIC code for Gadsden plant.

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

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

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

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

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

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

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

**EPA Final Decision:**

No change to growth as this topic was not open for comment during this period.  
 Modify inventory based on comments except as follows:

IL (17-031-031186AGK): Addressed under VIII-B-62  
 TN (47-131-0012): Addressed under VIII-B-121

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

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

**EPA Final Decision:**  
 Modify inventory as requested. For point 001, SCC provided by company for one segment is 10200700, which does not exist. Assume SCC is 10200701.

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

**Requested Modification:**  
 Requests modification of the NOx emissions inventory for Zinc Corporation of America.

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

Plant ID	32	
Point ID	34	
Segment	1 & 2	
Boilcap	600 MMBtu/hr	modified from 251 MMBtu/hr
Plant ID	32	
Point ID	35	
Segment	1 & 2	
Boilcap	600 MMBtu/hr	modified from 251 MMBtu/hr

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

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

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

1995-2007 growth factor modify to 1.12

EPA Final Decision:

Modify inventory as requested.

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

**Item Number:** VIII-B-143  
**Origin:** Westvaco Corporation, Thomas G. Botkins, Jr.  
**Category:** Non-EGU Point  
**States Affected:** VA

Requested Modification:

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

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

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

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

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

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

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

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

EPA Final Decision:

Addressed under VIII-B-127.

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

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

Requested Modification:

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

EPA Final Decision:

Addressed under VIII-B-222.

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

Requested Modification:

Requests modification to VMT and MOBILE input parameters.

EPA Final Decision:

Modify as requested.

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

**Requested Modification:**

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

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

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

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

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

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

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

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

**EPA Final Decision:**

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

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

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

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

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

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

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

No change in VMT growth as only Statewide factor provided.

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

States Affected: MI, WI

Requested Modification:

Requests modification of the NOx emissions inventory for Great Lakes Gas Transmission Company.

Eight Great Lake sources were improperly classified as "large" Non-EGU sources.

The maximum rated heat capacity of each source was incorrect.

The stack diameter and/or height were incorrectly identified for nine sources.

Average exhaust gas temperature, flowrate, and velocity were incorrect for virtually every one of the Great Lake sources subject to the proposed rule.

The SIC code was incorrect in three cases.

The corrected daily average of uncontrolled NOx emissions during the 1995 ozone season was incorrect in all 21 cases.

EPA Final Decision:

Modify inventory as requested.

**Item Number: VIII-B-151**

Origin: Blue Circle Cement, Lorraine Roberts

Category: Non-EGU Point

States Affected: NY

Requested Modification:

Requests modification of inventory data for Blue Circle Cement.

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

Requests that corrections are made for

stack temperature	Data from 1997 stack test
stack flow	Max flow was measured
stack velocity	Corrected based on flow
1995 NOx Control Efficiency	As reported in 1994 NOx RACT
1995 Typical Ozone Season Daily NOx emissions	As reported in 1994 NOx RACT
2007 Ozone Season Weekday NOx emissions	Adjusted from corrected baseline
2007 Ozone Season Saturday NOx emissions	Adjusted from corrected baseline

EPA Final Decision:

Comments on base year inventory addressed under VIII-B-222.

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

**Item Number: VIII-B-152**

Origin: Continental Cement Company, Gregory Haug, PE

Category: Non-EGU Point

States Affected: MO

Requested Modification:

Requests modification of NOx baseline emissions for Continental Cement Company to 11.38 tons NOx/day during the ozone season.

The agency's use of 1995 EIQ data is not representative of baseline NOx emissions for Continental Cement Company as alternate control technologies were in place. CCC had previously installed an alternate control technology using a substitute fuel firing system.

Baseline Coal only	11.38 tons NOx/day
NOx emissions with alternative control technology 1995	5.97 tons NOx/day
NOx emissions with alternative control technology 1996	6.69 tons NOx/day
NOx emissions with alternative control technology 1997	6.69 tons NOx/day

EPA Final Decision:

Addressed under MO State comments (VIII-B-201).

**Item Number:** VIII-B-154  
**Origin:** J.A. Story, Division Administrator, Federal Highway Administration, U.S. Department of Transportation, Frankfort, KY  
**Category:** Mobile  
**States Affected:** KY

Addressed under VIII-B-113.

**Item Number:** VIII-B-155  
**Origin:** Union Camp Corporation, James R. Baker  
**Category:** Non-EGU point  
**States Affected:** GA

**Requested Modification:**  
 Lists following information for Union Camp Corporation's pulp and paper mill in Savannah:

Power Boiler 10	852 MMBtu/hr; 1995 NOx emissions - 59.3 tons
Power Boiler 11	890 MMBtu/hr; 1995 NOx emissions - 131 tons
Power Boiler 12	1,120 MMBtu/hr; 1995 NOx emissions - 173 tons
Power Boiler 13	1,390.6 MMBtu/hr; 1995 NOx emissions - 1,104 tons

**EPA Final Decision:**  
 Addressed under Georgia State comments (VIII-B-111).

**Item Number:** VIII-B-156  
**Origin:** J. Stathyelich, Site Environmental Manager, Procter & Gamble Paper Products Company, Cape Girardeau, MO  
**Category:** Non-EGU  
**States Affected:** MO

**Requested Modification:**  
 Unit revision request for facility at Cape Girardeau, MO.

**EPA Final Decision:**  
 Addressed under MO State comments (VIII-B-201).  
 No change to growth factor information as this topic was not open for comment during this period.

**Item Number:** VIII-B-157  
**Origin:** Lafarge Corporation, Michael Pelan  
**Category:** Non-EGU Point  
**States Affected:** MI, IL, OH, MO, PA

**Requested Modification:**  
 Requests modifications to the NOX SIP call inventory for several sources located in Alpena, Michigan; Grand Chain (Joppa), Illinois; Paulding, Ohio; Sugar Creek, Missouri; and Whitehall, Pennsylvania.

**EPA Final Decision:**  
 No change to growth factor information as this topic was not open for comment during this period.  
 Same comment as submitted by Lafarge Corp., VIII-B-248.  
 Modify inventory based on comments, except as follows:

IL sources addressed under comment submitted by Illinois EPA, VIII-B-62.

MI sources addressed under MI State submittal, VIII-B-279. Data submitted by Lafarge is identical to State data for 26-007-B1477; revised the NOx data but comments did not contain VOC or CO data.

MO sources addressed under comment submitted by MO Dept. of Natural Resources, VIII-B-201.

OH: 39-125-0363000002, points P014 and P015. Modify inventory as requested. Ohio EPA provided same 1995 daily NOx emissions and control efficiency data as supplied by company (see VIII-B-133). SCCs supplied by Ohio and company are the same for both points indicating that the points are cement kilns. However, Ohio supplied boiler capacity of 250 MMBtu/hr for both points and company indicated the boiler capacity for both points is zero since they are kilns, and provided stack height as 250 feet. Assume 250 is the stack height and not boiler capacity.

PA: Replace points 101 and 114 with industry data. Delete point 102 (comment states that 102 shut down).

**Item Number:** VIII-B-158  
**Origin:** J.E. Hornback, Director, Kentucky Natural Resources and Environmental Protection Cabinet, Frankfort, KY  
**States Affected:** KY

**EPA Final Decision:**  
 Modify inventory as requested except as follows:

KY (21-027-0022): Modify inventory as requested, except incorporate stack parameter data provided by company under VIII-B-13 for points 001-01 through 001-04.

**Item Number:** VIII-B-159  
**Origin:** A.W. Klimek, Director, North Carolina Department of Environment and Natural Resources, Division of Air Quality, Raleigh, NC  
**Category:** Non-EGU  
**States Affected:** NC

**Requested Modification:**  
 Revision requests to multiple facilities in the State. Revision request for 2007 VMT.

**EPA Final Decision:**  
 Modify VMT as requested.  
 Modify non-EGU inventory as requested except as follows:

International Paper (37-047-0036, points 003 and 004):	Addressed under VIII-B-117. Use company data for 1995 daily NOx emissions; otherwise State data matches company data.
Transcontinental (37-057-0300, points 1 through 9):	Addressed under VIII-B-107 (State's comments match comments submitted by Transcontinental).
Transcontinental (37-097-0225, points 1 through 23):	Addressed under VIII-B-107 (State's comments match comments submitted by Transcontinental).
Transcontinental (37-157-0103, points 1 through 21):	Addressed under VIII-B-107 (State's comments match comments submitted by Transcontinental).
Champion International (37-087-0159):	Addressed under VIII-B-38.
Champion International (37-083-0007):	State requested changes to boiler capacity; NOx, CO, and VOC emissions; and stack flow rate, velocity, and temperature for segment 1, but did not request revisions to segments 2 and 3. Under VIII-B-159, company requested that segments 2 and 3 be combined with segment 1, but segment 1 boiler capacity and emissions reported by State and company match. Final decision is modify inventory to address State comments on boiler capacity and emissions for segment 1, and keep segments 2 and 3 in inventory unmodified.

**Item Number:** VIII-B-160  
**Origin:** Consolidated Edison Company of New York, Inc., Alan Homyk  
**Category:** Non-EGU Point  
**States Affected:** NY

**Requested Modification:**  
 Requests modification of the NOx emissions inventory for non-EGU point sources for Con Edison Company. Most notable is a complete absence of generator nameplate ratings and modeling parameters for the company's 96 combustion-turbine powered electric generators.

Changes for several units in the inventory are requested.

EPA Final Decision:  
 Modify inventory as requested.

**Item Number:** VIII-B-162  
**Origin:** Lehigh Portland Cement Company, Timothy Matz  
**Category:** Non-EGU Point  
**States Affected:** AL, IN, MD, NY, PA

**Requested Modification:**  
 Requests modification of the source specific data used in each of Lehigh Portland Cement Company's relevant state budgets.

Requests modification of the growth factor used for the cement industry, particularly as outlined for Lehigh's facilities in the baseline budget. The Portland Cement Association predicts a much higher growth in our industry than what is currently in the budget.

EPA Final Decision:  
 Modify inventory as requested for all facilities except NY. For NY facility, address New York State comments under VIII-B-222.  
 No change to growth factor information as this topic was not open for comment during this period.

**Item Number:** VIII-B-164  
**Origin:** B.H. Brothers, Transportation Manager II, Tennessee Department of Transportation, Nashville, TN  
**Category:** Mobile  
**States Affected:** TN

**Requested Modification:**  
 Expresses concerns with EPA VMT allocation and projection methodologies.

EPA Final Decision:  
 No inventory modification made as no modification request made.

**Item Number:** VIII-B-166  
**Origin:** Trigen-Boston Energy Corporation, Thomas J. Gorham  
**Category:** Non-EGU point  
**States Affected:** MA

**Requested Modification:**  
 Notes that they have four units, not the three units listed by EPA. States that they can not identify the units EPA has listed because the EPA numbers do not correspond to their numbers. Suggests contacting the commenter for questions/additional information.

EPA Final Decision:  
 No action taken as no data provided.

**Item Number:** VIII-B-169  
**Origin:** J. Merrill, Principal Engineer/President, Air/ Compliance Consultants, Inc. (ACCI), Pittsburgh, PA  
**Category:** Non-EGU  
**States Affected:** PA

**Requested Modification:**  
 Requests revisions to heat input data for Shenango Neville Island Facility (Plant ID 0050, Point ID 06 & 09, Stack ID 033 & 034).

Boiler 9	699,641 MMBtu, should be 4.5 times higher than the EPA value
Boiler 10	162,682MMBtu, should be 1.3 times higher than the EPA value

The heat input data is based on fuel records at the facility.

EPA Final Decision:

Modify inventory as requested.

**Item Number:** VIII-B-170  
**Origin:** Southern Natural Gas Company, John Seymour, PE  
**Category:** Non-EGU Point  
**States Affected:** AL, GA

**Requested Modification:**  
 Requests modification of affected sources in Alabama and Georgia for Southern Natural Gas (SNG).

Georgia affected units No engines qualify as affected

Alabama affected units Engine No. 9 at the Elmore station  
 Engines No. 8 and 9 at the Gallion station

These units were added to the list by Alabama because EPA did not initially identify these units to be affected.

Do not qualify as affected Engine No. 3 at the Elmore station  
 Engine No. 1 at the Gallion station  
 Engine No. 19 at the Reform station

Additionally, nine 1,350 hp engines at the Reform station are not affected because individually the engines do not meet the 1 ton NOx per day threshold.

SNG believes that a re-evaluation of the determinations made by Alabama was warranted because stack testing conducted since 1995 has provided more accurate emission factors than those previously used to calculate baseline 1995 actual emissions and because SNG suspected that certain units were inaccurately determined to be "affected."

**EPA Final Decision:**

Do not remove any AL or GA source from inventory as they are used for air quality modeling. Revisions to capacities and emissions will determine if sources are affected. Modify inventory to address source-specific data provided for AL sources only as follows:

- Southern Natural Gas Company, AL (01-051-0006): Modify inventory as requested for point 006.
- Southern Natural Gas Company, AL (01-065-0003): Revisions to points 001, 007, and 008 addressed under AL State comments (VIII-B-52).
- Southern Natural Gas Company, AL (01-107-0009): Revisions to points 001 through 005 addressed under AL State comments (VIII-B-52).

**Item Number:** VIII-B-171  
**Origin:** Celanese Acetate, Donna MacInnis  
**Category:** Non-EGU Point  
**States Affected:** SC

**Requested Modification:**  
 Requests modification of point sources for Celanese Acetate's Rock Hill, South Carolina facility.

Five point sources were incorrectly identified as "large" point sources.  
 001, 002, 003, 004, 005 All boilers have maximum design heat capacities below 250 MMBtu/hr.  
 Maximum rated heat capacities for six point sources need to be corrected.

	Corrected maximum heat design input
001	183.3 MMBtu/hr
002	183.3 MMBtu/hr
003	183.3 MMBtu/hr
004	244.4 MMBtu/hr
005	244.4 MMBtu/hr
006	325.0 MMBtu/hr

Six point sources are listed twice with different SCC codes. EPA's database needs to be corrected to list each of the point sources once with the SCC code for the primary fuel. These boilers are primarily coal-fired with fuel oil used only during start up. The repeat listing of ID numbers 001, 002, 003, 004, 005, 006 with SCC code 10200501 should be deleted. In addition, the stack parameters listed with ID numbers 001, 002, 003, 004, 005, 006 for SCC code 10200501 are incorrect.

EPA Final Decision:  
 Modify inventory as requested.

**Item Number:** VIII-B-173  
**Origin:** E.L. Kropp, Chief, Office of Air Quality, West Virginia Division of Environmental Protection (DEP), Office of Air Quality (WVOAQ), Charleston, WV  
**Category:** Non-EGU  
**States Affected:** WV

**Requested Modification:**  
 State requests complete replacement of non-EGU data.

EPA Final Decision:  
 Modify inventory as requested. [See further response to non-EGU classifications in Section IV.]

**Item Number:** VIII-B-174  
**Origin:** C.O. Russell, Director of Environmental Compliance, Lone Star Industries, Inc., Indianapolis, IN  
**Category:** Non-EGU  
**States Affected:** IN, IL, MO

**Requested Modification:**  
 ID 21232, State 17, County 99  
 Total emissions changed to: 779 tons NOx/season for 1995  
 5 lbs NOx/ozone season day for 1995.  
 With growth factor change to 1.42 (see section below on growth factors):  
 2007 uncontrolled emissions = 1106.18 tons NOx/season,  
 2007 controlled emissions = 774.33 tons NOx/season → 5.06 lb NOx/OSD.

ID 77475, state 29, county 31, plant 21  
 Total emissions changed to: 1,172 tons NOx/season for 1995  
 7.66 lbs NOx/ozone season day for 1995.  
 With growth factor change to 1.42 (IL EPA):  
 2007 uncontrolled emissions = 1664.24 tons NOx/season,  
 2007 controlled emissions = 1164.97 tons NOx/season → 7.61 lb NOx/OSD.

ID 31488, state 18, county 133, plant 2  
 Total emissions changed to: "daily ozone" of 10.9639 tons NOX for 1995.  
 With growth factor change to 1.4:  
 2007 uncontrolled emissions = 15.3495 tons NOx/OSD,  
 2007 controlled emissions = 10.7446 tons NOx/OSD

EPA Final Decision:  
 No change to growth factor information as this topic was not open for comment during this period.  
 IL Facility (17-099-099816AAF): Addressed under VIII-B-62.  
 IN Facility (18-133-31488): Modify emissions as requested.  
 MO Facility (29-031-0021): Addressed under VIII-B-201.

**Item Number:** VIII-B-175  
**Origin:** Consumers Energy, Richard Savoie  
**Category:** Non-EGU Point  
**States Affected:** MI

**Requested Modification:**  
 Requests a reclassification of these sources based on the 1995 and 1996 ozone season NOX emissions data provided.  
 Because the Michigan Air Pollution Reporting System allowed reporting of identical units as a single point, EPA incorporated these identical units as a single source into the NOX budget determination. As a result, a number of these sources were classified as large and a 90% reduction factor was applied to them. The data supplied show that all of the engines operated below the one ton per day threshold for classification as "large" and requiring controls.

Requests a change to the determination of ozone season emissions for the following 4 points based on actual brake horsepower hours, and test or AP-42 emission factors:

Plant ID N1099, Point ID 1, Unit ID 1, and SCC 20300201

1995 actual ozone season emissions: 0 tons  
 1996 actual ozone season emissions: 0 tons

Plant ID N1099, Point ID 1, Unit ID 2, and SCC 20300201

1995 actual ozone season emissions: 0 tons  
 1996 actual ozone season emissions: 0 tons

Plant ID N1099, Point ID 1, Unit ID 3, and SCC 20300201

1995 actual ozone season emissions: 18.48 tons  
 1996 actual ozone season emissions: 23.36 tons

Plant ID N1099, Point ID 1, Unit ID 4, and SCC 20300201

1995 actual ozone season emissions: 7.8 tons  
 1996 actual ozone season emissions: 9.05 tons

Requests an increase in the IPM growth factor of 1.13 to that of the 1998 total system ozone season heat input increase over the 1995 total system ozone season heat input (1.27), or that of Proscreen II projected 2007 total system ozone season heat input increase over 1995's total system ozone season heat input (1.32).

EPA Final Decision:  
 Modify inventory as requested.  
 No change to growth factor information as this topic was not open for comment during this period.

**Item Number:** VIII-B-177  
**Origin:** W. Shackelford, Commissioner, Georgia Department of Transportation, Atlanta, GA  
**Category:** Mobile  
**States Affected:** GA

Requested Modification:  
 Requests VMT and VMT growth rate changes for Jones and Peach Counties.

EPA Final Decision:  
 Modify inventory as requested.

**Item Number:** VIII-B-178  
**Origin:** St. Laurent Paper Products, Darius Rogers  
**Category:** Non-EGU Point  
**States Affected:** VA

Requested Modification:  
 Requests numerous changes be made to 1995 stack parameters and operating conditions.

Requests that the following sources be added that began operation in 1992:

ID Code 1, Point ID 13, Segment 1, SCC 30700110

953 MMBtu/hr capacity  
 1995 emissions of 149.4 tons/yr

ID Code 1, Point ID 14, Segment 1, SCC 30700105

capacity N/A (smelt dissolving tank)  
 1995 emissions of 461 tons/yr

Requests that the following sources be removed that ceased operation in 1992:

ID Code 1, Point ID 5, Segment 1, SCC 30700104

352 MMBtu/hr capacity

ID Code 1, Point ID 7, Segment 1, SCC 30700105

capacity N/A (smelt dissolving tank)

Note: St. Laurent Paper Products Corp. acquired the West Point mill from Chesapeake Corp. in May 1997

EPA Final Decision:

Modify inventory as requested.

Calculate daily NOX emissions from annual values by dividing annual values by 365 days. Calculate seasonal NOX emissions as 153 days times daily emissions.

**Item Number:** VIII-B-179  
**Origin:** Earth Tech, Inc., George Lipka on behalf of Medical Area Total Energy Plant (MATEP)  
**Category:** Non-EGU Point  
**States Affected:** MA

Requested Modification:

Requests modification of inventory data for Medical Area Total Energy Plant.

For Zurn Heat Recovery Steam Generator units 004, 005, the approved maximum heat input rating for these two units is only 225 MMBtu/hr after conversion to natural gas firing in 1991/1992 which is documented by the Massachusetts Department of Environmental Protection. The two units are listed in the inventory at their original heat input rating of 263 MMBtu/hr.

Units 004 & 005 Change the entry for "NEWSIZE" from "L" (large) to "S" (small)  
Remove all emissions reductions from "SBNOX" (the 2007 NOX Budget)  
Change the "SCC" from 1200501 to 10200601 for each unit  
Change the "POD" (Source Category Association) from 16 to 17 for each unit

Requests modification of the 1995 NOX baseline emission values for each emission unit be updated to reflect the actual 1995 ozone season fuel use by unit and the allocation of actual recorded (CEMS) NOx emissions.

EPA Final Decision:

Modify inventory as requested.

Size and affected status will be revised per the inventory modifications.

**Item Number:** VIII-B-181  
**Origin:** K.A. Colburn, Director, Air Resources Division, New Hampshire Department of Environmental Services (NHDES), Concord, NH  
**Category:** Mobile  
**States Affected:** NH

Requested Modification:

Requests modification to MOBILE model input files.

EPA Final Decision:

Revise MOBILE input files regarding I/M programs as per the commenter's suggestion.

Do not accept commenter's suggestion to use August minimum and maximum average daily temperatures. Retain the use of average monthly temperature ranges for each month, to retain consistency with EPA modeling approach for other states.

**Item Number:** VIII-B-184  
**Origin:** T.R. Ballou, Office of Air Data Analysis, Virginia Department of Environmental Quality (VDEQ), Richmond, VA  
**Category:** Non-EGU  
**States Affected:** VA

Addressed under VIII-B-127.

**Item Number:** VIII-B-187  
**Origin:** J.M. Salvaggio, Director, Pennsylvania Department of Environmental Protection (DEP), Harrisburg, PA  
**Category:** Non-EGU, Mobile  
**States Affected:** PA

**Requested Modification:**  
 Requests revision to MOBILE input files.  
 Requests EPA state-wide 1995 VMT be replaced by PA state-wide VMT.  
 Requests reallocation of county VMT. Requests EPA VMT growth rates be replaced by PA county-specific growth rates.

**EPA Final Decision:**  
 Revise MOBILE input files as per the commenter's suggestion.  
 Keep EPA 1995 state-wide VMT since the foundation of EPA's methodology is the HPMS data Pennsylvania submitted to the FHWA, it seems that the discrepancy, if any, is due to differences in methodology rather than inconsistency with HPMS.  
 Use PA county-specific allocation factors to distribute EPA state-wide VMT.  
 Use PA county-specific VMT growth rates.

**Item Number:** VIII-B-188  
**Origin:** St. Lawrence Cement , Victoria Mock  
**Category:** Non-EGU Point  
**States Affected:** MD

**Requested Modification:**  
 Requests modification of NOX emissions inventory for St. Lawrence Cement.

<b>Requested Corrections</b>	<b>Present Database</b>
St. Lawrence Cement	St. Lawrence/Independent
7 days per week	5 days/week
52 weeks per year	2 weeks/year
10.55 tons/day 1995 NOX emissions	3.3874 tons/day 1995 NOX emissions

The data submitted indicates that on an annual basis average NOX emissions are 9.59 tons/day. This is a controlled level since the plant was subject to RACT in 1995. Using a conservative 10% reduction the plant's uncontrolled emissions level was 10.55 tons/day in 1995.

**EPA Final Decision:**  
 Modify inventory as requested.  
 Use controlled value and RACT estimate in base year.

**Item Number:** VIII-B-190  
**Origin:** South Carolina Department of Health and Environmental Control, R. Lewis Shaw  
**Category:** EGU, Non-EGU Point, Mobile  
**States Affected:** SC

**Requested Modification:**

**Non-EGU:** Requests revision and addition of multiple non-EGU facilities.  
 Requests reclassification of non-EGU source to EGU.

**Mobile:** Requests that 1995 VMT by county and road type be replaced with annual 1995 VMT provided by SCDOT.

Requests use of speeds developed from actual 1995 speed study performed by SCDOT. These speeds are compared with the speeds used in the SIP Call budgets in the attached file SCSPEEDS.XLS.

**EPA Final Decision:**  
 Reallocate VMT among remaining SCCs.  
 Use SC county-specific VMT and speeds.

Modify non-EGU point source inventory as requested except as follows:

Carolina Eastman (45-063-0008): No change to point ID "N02" as could not match data supplied by South Carolina for one segment to three segments in inventory.

Sonoco, Hartsville (45-031-0004): Assume Plant ID=0012.  
 Georgia Pacific, Holly Hill (45-075-0038): Addressed under VIII-B-202.  
 Transcontinental Pipeline (45-083-0179): Delete from inventory per Transcontinental comments provided under VIII-B-107.

Celanese Acetate LLC (45-091-0010): Addressed under VIII-B-171.  
 International Paper: Georgetown (45-043-0002): Use company data (VIII-B-117) for points 001, 002, 003, 005, and 006. Point 004 was added to the inventory per South Carolina's directions. South Carolina did not provide weeks per year operating time for point 004; assume value of 52 weeks per year based on data for other points at facility.

**Item Number:** VIII-B-193  
**Origin:** West Virginia Manufacturers Association, John K. Pitner  
**Category:** Non-EGU point  
**States Affected:** WV

**Requested Modification:**  
 Endorses the corrected data submitted to EPA by the West Virginia Office of Air Quality for non-EGU sources. Notes that EPA has both overestimated NOX from this category and incorrectly identified many units as "large" that are not greater than 250 MMBtu heat capacity.

**EPA Final Decision:**  
 No action taken as no emissions data provided.

**Item Number:** VIII-B-194  
**Origin:** J.E. Olashuk, Manager, Environmental Affairs, National Steel Corporation, Mishawaka, IN  
**Category:** Non-EGU  
**States Affected:** IN

**Requested Modification:**  
 Requests modification to Great Lakes Division facility of National Steel Corporation.

**EPA Final Decision:**  
 No modifications made as data indicated as provided not submitted to docket.

**Item Number:** VIII-B-196  
**Origin:** Rohm and Haas Company, Patrick J. Moran  
**Category:** Non-EGU Point  
**States Affected:** KY

**Requested Modification:**  
 FIPST 13, FIPSCNTY 111, Plant ID 0189, Unit ID 10201301:  
 Design capacity of 242 MMBtu/hr  
 (Also notes that ozone season NOX emissions listed by EPA are too high because unit is operated on a limited basis, although they don't list their estimated emissions.)

FIPSST 13, FIPSCNTY 111, Plant ID 0189, Unit ID 10200202:  
 Design capacity of 248 MMBtu/hr  
 1995 Ozone season NOX emissions of 45 tons based on CEM data (1996 emissions were 36 tons; EPA estimated 569+ tons).  
 NOX control is Low-NOX burners with Flue Gas Recirculation (no control efficiency is listed)

**EPA Final Decision:**  
 Do not modify inventory as cannot find plant in inventory. Comment appears to be incorrect in stating that Kentucky plants are in FIPS State 13 (KY is FIPS State 18); three searches were used to locate the plants in question--a search of the FIPS State 13 and FIPS State 18 with the identified FIPS County Code and a plant name search in FIPS State 18 for "Rohm"--these did not find any records matching the commenter's submittal.

**Item Number:** VIII-B-201  
**Origin:** R.D. Randolph, Director, Missouri Department of Natural Resources (MDNR), Jefferson City, MO

Category: Non-EGU, Mobile  
States Affected: MO

Requested Modification:  
Replacement of non-EGU and mobile source inventory data with submitted files.

EPA Final Decision:  
Modify inventory as requested.

**Item Number:** VIII-B-202  
**Origin:** Georgia-Pacific Corporation, W. Samuel Adams, Jr.  
**Category:** Non-EGU Point  
**States Affected:** WI, WV, VA, TN, SC, OH, NC, NY, NJ, MI, GA, AL

Requested Modification:  
Requests changes to stack parameters, plant operating information, coordinates, SIC, SCC, capacity and emissions for numerous plants and points.

Plattsburgh Mill and South Boston Particleboard/MDF were permanently shut down in October 1994 and October 1996, respectively.

Requests that several points be added to the inventory.

This commenter notes that certain data necessary for updating the inventory is still not available (indicated in red on spreadsheets).

EPA Final Decision:  
Modify inventory as requested except as specified below.  
Plants not updated where commenter indicates necessary data not available for plants.

#### AL Plants

- 01-099-S008: Replace point 015 in inventory with data supplied for point E-001, based on matching of SCCs for point 015 with point E-001. Apply SIC code 2436 provided for point E-001 to other points (001-005, 014) for which SIC code was not specified in inventory. For all points in inventory, change latitude and longitude coordinates from 31.5284 and 87.3368, respectively, specified in inventory to 31.5694 and 87.2811, respectively, based on coordinates provided for point E-001.
- 01-121-S002: Replace point 013 in inventory with data supplied for point E-001, based on matching of SCCs for point 013 with point E-001. Apply SIC code 2436 provided for point E-001 to other points (001-003, 010-012) for which SIC code was not specified in inventory. For all points in inventory, change latitude and longitude coordinates from 33.3912 and 86.1476, respectively, specified in inventory to 33.4453 and 86.0611, respectively, based on coordinates provided for point E-001.

#### GA Plants

- 13-051-0132: Modify inventory as requested for points 001 and 007. Company did not provide data to revise NOX, VOC, or CO emissions for the two emission points; do not change emissions in inventory for these points.
- 13-093-0022: Modify inventory as requested for points 005 and 006. Change SIC code to 2821 provided for points 005 and 006 for all points (0016 and 017) in inventory. For all points in inventory, change latitude and longitude coordinates from 32.0775 and 81.7906, respectively, specified in inventory to 32.0761 and 83.7944, respectively, based on coordinates provided for points 005 and 006. Company did not provide data to revise NOX, VOC, or CO emissions for these two points; do not change emissions in inventory for these points.
- 13-127-0027: Modify inventory for points 001, 002, and E508 as requested. Change SIC code to 3275 for points. For all points in inventory, change latitude and longitude coordinates from 31.2756 and 81.58, respectively, specified in inventory to 31.4656 and 81.9667, respectively, based on coordinates provided by company for all points. For points 001 and 002, company did not provide data to revise NOX, VOC, or CO emissions; do not change emissions in inventory for these points.

13-159-0011: Modify inventory as requested. Assume plant ID is 0011 and not 00011 as provided by company. Replace points 003 and 004 with point 044.

#### MI Plants

26-137-N0197: Modify inventory as requested for all points. Remove segment at point 0001 and point 0022 for which company did not provide any data. Stack flowrate and velocity not provided for point 0003; use stack flowrate and velocity data for point 0001 with same stack height, diameter, and temperature as reported for point 0003.

#### NY Plant

36-071-0122: Addressed under VIII-B-222.

36-019-0027: Addressed under VIII-B-222.

#### NJ Plants

34-007-50003: Modify as requested.

#### NC Plants

37-077-??? No change; plant could not be found in inventory because plant ID not provided. None of the plants in State FIPS 37 and County FIPS 077 in original or final inventory has a plant name that matches or is similar to the facility name provided by commenter. Need plant ID to locate plant in inventory.

37-131-0015: For points 001 and 002, and point 025 (SCC=10200402), do not change NOX, VOC, or CO emissions; seasonal fuel throughput; or heat input as it appears that emissions are calculated incorrectly (i.e., seasonal fuel throughput looks like it should be divided by 1,000 when used with the emission factor provided by the company to calculate seasonal emissions. Add point 025 (SCC=39000989), as requested because emissions calculated correctly. Company did not provide stack parameter, operating time, or seasonal operating schedule data for point 025 (SCC=39000989); use data for point 025 (SCC=10200402). Company did not provide boiler capacity for either SCC for point 025; leave boiler capacity as zero (unchanged) for both SCCs.

37-145-0052 Replaced point 002 with point ES-5D from GP's comments; modify SCC and SIC; changed stack parameters to 0 because GP lists information as "n/a"; changed latitude and longitude data, but the numbers now conflict with the latitude and longitude of the other three point IDs; changed VOC and CO emissions.

37-191-0058 Excel file lists plant ID as 0058A and 0058B. Boiler capacity for point ID 007 lists "120 (all 3)" so entered 120; changed latitude and longitude data; entered fuel input, heat content, and heat input for points 007 and B001.

37-047-0040 Replace point 012 with data from GP's comments regarding points ES-B1.

#### OH Plants

39-049-0125040904 Change VOC emissions data for points P001 and P003 but GP did not provide data for point P002; change CO data for points P001 and P003.

39-165-1483040158 Plant owned by Atlas Roofing; addressed under VIII-B-65.

#### SC Plants

45-015-0005 NOX emissions for point B001 are not provided; change CO and VOC emissions for point B001. GP provides comments for point 003 and plant ID 0003 with same plant name as plant 45-015-0005. Plant 45-015-0003 does not exist in inventory; assume plant ID is 0005 instead of 0003 and address comments; no change to emissions as GP provided no comments on NOX, VOC, or CO emissions.

45-027-0003 Change latitude and longitude coordinates for all points as provided for point 001; no change to emissions as not provided by GP.

- 45-075-0038 Change emissions for point WB 20; no change to NOX, VOC, and CO emissions for point 001 as emissions not provided by GP.
- 45-091-0026 Modify SIC, weeks data, and latitude and longitude coordinates for all points; no change to emissions as not provided by GP; also, use EPA boiler capacity data because GP does not provide boiler capacity data; changed SCC number for point 001, segment 5.

TN Plants

- 47-157-0252 Replaced point 005 with GP's comments. Stack data not changed as "fugitive" listed by GP for stack data.

VA Plants

- 51-019-0003 Replace with new GP data. Stack information only listed for first segment of each point. Segment numbers not listed in the spreadsheet. Delete Point ID 01 (SIC 5171). For point 0005, do not add Information provided by GP for GP did not provide NOX, VOC, and CO emissions for this point.
- 51-031-0163 Plant is not in the original inventory; do not add plant to inventory because GP does not provide NOX, VOC, and CO emissions for this plant.
- 51-081-0020 Replace plant with GP data. Do not change boilcap, weeks, and SIC as GP lists as "???". Heat input and 1995 VOC, NOX, and CO emissions not changed as GP does not provide data.
- 51-081-0037 Change latitude and longitude coordinates for the two emission points for which data are provided. SICs also differ for the two points at this plant; GP did not revise the SIC for point WW-B1.
- 51-083-0002 Boilcap and heat input unchanged as GP lists as "unknown". 1995 VOC, NOx, and CO emissions not updated as they are not listed in the GP's spreadsheet. GP's comments note that all points were permanently shut down on October 29, 1996.

WV Plants

- 54-019-00034 Addressed under VIII-B-173.

WI Plants

- 55-141-772010580 Address comments as requested.
- 55-141-772010690 Address comments as requested.

**Item Number:** VIII-B-203  
**Origin:** Holnam, Inc., Jerry Epperson  
**Category:** Non-EGU Point  
**States Affected:** MO

**Requested Modification:**  
 Requests changes in 1995 emissions based on baseline operational emission levels which reflect actual conditions, rather than levels which were derived from emission factors.

Plant ID 0001, Point ID 014, SCC 30500706

Requests change in stack parameters, control efficiency and coordinates.  
 Requests change in 1995 ozone season daily emissions (DNOx) to 40.1 tons/day

**EPA Final Decision:**  
 Addressed under VIII-B-201.

**Item Number:** VIII-B-205  
**Origin:** DuPont, John A. Dege  
**Category:** Non-EGU Point  
**States Affected:** DE, KY, LA, MS, NJ, NC, SC, TN, TX, VA, WV

**Requested Modification:**

Requests changes to numerous facilities and units. Changes include revisions to emissions, heat input capacities, stack parameters, design capacities, plant operating data, SCCs, coordinates and fuel use.

DuPont lists several sources that have been taken out of service or sold.

EPA Final Decision:

No change to growth factor information as this topic was not open for comment during this period.  
Modify inventory as requested except as specified below.

DE: 10-003-0125 and 10-005-0002

Addressed under VIII-B-51.

KY: 21-111-0062

Addressed under VIII-B-288.

LA: 22-095-0001

Replace points 083 and 084 with industry data. DuPont's stack flow and stack velocity data seem very high, so do not change original data in inventory.

NJ: 34-033-65074

Delete points 009 and 010; comment states that the units have been out of service for at least 10 years.

NJ: 34-033-65075

Delete point 010; comment states that the unit has been out of service for at least 10 years.

NJ: 34-033-65076

Delete point 007; comment states that DuPont has not record of point 007.

SC: 45-055-0003

Addressed under VIII-B-190.

VA: 51-015-0009

Addressed under VIII-B-127.

VA: 51-041-0001

Delete points 004, 005, 006, 007, 008, 021, 024, and replace points 25, 28, 33, 36 with industry data.

VA: 51-089-0006

Replace state data with industry data for points 001, 004, and 005.

WV: 54-039-0001 and 54-107-0001

Addressed under VIII-B-173.

**Item Number:**

**VIII-B-207**

Origin:

L. Siebenberger, Manager- Environmental Technology, National Steel Corporation,  
Granite City, IL

Category:

Non-EGU

States Affected:

IL

Requested Modification:

Requests the following changes to the heat utilization rates for 10 boilers, and that these boilers be classified as non-regulated (i.e., with a heat capacity less than 250 MMBtu/hr).

Plant ID 119813 AAI, Point ID 73031119041

Requests the heat input capacity be changed to 60 MMBtu/hr for these 7 boilers.

Plant ID 119813 AAI, Point ID 73031119042

Requests the heat input capacity be changed to 60 MMBtu/hr for these 3 boilers.

EPA Final Decision:

Addressed under Illinois State comments (VIII-B-62).

**Item Number:**

**VIII-B-210**

Origin:

Union Camp Corporation, Sheryl S. Raulston

Category: Non-EGU Point  
 States Affected: VA

Requested Modification:

For VA facility at 51-093-0006, several sources should be removed from the EPA NOx SIP Call Emission Inventory.

- Point Source ID numbers 006, 007, and 008 are recovery furnaces at our facility.
- Point Source ID numbers 009, 010, and 011 are recovery furnace smelt dissolving tanks at our facility.
- Point Source ID numbers 012, 013, and 014 are lime kilns at our facility.
- Point Source ID number 005 (No. 5 Power Boiler) should be removed from the inventory.
- Point Source ID number 016 (No. 3 Recovery Boiler) should be removed from the inventory.

Several revision/addition request revisions to the NOx SIP call emission inventory for the remaining point sources at the facility not previously addressed above.

The sources remaining on the inventory are Point Source ID number 003 (No. 6 Power Boiler), Point Source ID number 004 (No. 7 Power Boiler), and Point Source ID number 017 (No. 8 Power Boiler).

Also, one new source needs to be added to the NOx SIP emission inventory for our facility. The 910 Gas Turbine started up in 1998 at our facility. The Point Source ID number for the 910 Gas Turbine is 029.

EPA Final Decision:

Modify inventory as requested for points 003, 004, and 017. Do not add point 029 to inventory as this point was placed into operation after 1995. Do not remove any emission points from inventory as all points are needed in inventory to support air quality modeling. For points 005 and 016, address comments provided by State under VIII-B-127.

**Item Number:** VIII-B-212  
**Origin:** Procter & Gamble Paper Products Company, Janna Stathyelich  
**Category:** Non-EGU Point  
**States Affected:** MO

Requested Modification:  
 Provided corroborating documents for previous docket number VIII-B-156.

EPA Final Decision:  
 Addressed in VIII-B-156.

**Item Number:** VIII-B-213  
**Origin:** V.C. Holton, Environmental Manager, Tenneco Packaging, Valdosta, GA  
**Category:** Non-EGU  
**States Affected:** GA

Requested Modification:  
 Requests modification to capacities, emissions, stack parameter data for multiple facilities.

EPA Final Decision:  
 Addressed by VIII-B-111.

**Item Number:** VIII-B-214  
**Origin:** Union Camp Corporation, James Witkowski  
**Category:** Non-EGU Point  
**States Affected:** SC

Requested Modification:  
 Requests modification to NOx Inventory for Union Camp Corporation.

No. 1 Power Boiler  
 FIPS State Code 47  
 FIPS County Code 79  
 Plant Name Union Camp: Eastover  
 State Agency Tracking # 1900-0046  
 Unit ID 001/No. 1 Power Boiler



Point ID 006  
SCC 39000201  
BOILCAP N/A  
DNOx 95 9.266 tons  
NOxCE95 0

Emissions are based on AP-42 emission factor of 4.2 lbs/NOx per ton of clinker produced.

**EPA Final Decision:**

Modify inventory as requested.

As unit operated 283 days for the year, modify days/week to 5 to account for this schedule.

Calculate seasonal emissions by multiplying daily emissions by 109 days (i.e., all of the weekdays in the summer season; 5 days a week for the 5 month ozone season).

**Item Number: VIII-B-220**

Origin: Jefferson Smurfit Corporation, Richard Palicki  
Category: Non-EGU Point  
States Affected: PA

**Requested Modification:**

Requests modifications to the NOx SIP Call Inventory for Jefferson Smurfit Corporation.

Number 1 Boiler	240 MMBtu/hr incorrectly listed as 273 MMBtu/hr
Number 2 Boiler	225 MMBtu/hr incorrectly listed as 273 MMBtu/hr

The City of Philadelphia has submitted its own comments in reference to Jefferson Smurfit Corporation (VIII-B-218). This comment is addressed by City of Philadelphia.

**EPA Final Decision:**

Modify inventory as requested.

**Item Number: VIII-B-222**

Origin: D.J. Shaw, Assistant Director, Division of Air Resources, New York State Department of Environmental Conservation, Albany, NY  
Category: EGU, nonEGU, Mobile  
States Affected: NY

**Requested Modification:**

Requests replacement of existing data set with State provided data.

**EPA Final Decision:**

Nonroad: Modify as requested.  
Mobile: Revise the MOBILE input files as requested.  
Retain the use of average monthly temperature ranges for each month, to retain consistency with EPA modeling approach for other states.  
Non-EGU: Modify as requested except as follows:

Anheuser-Bush (36-067-0971):	Addressed under VIII-B-72.
Champion International - Deferiet Facility (36-045-0078):	Addressed under VIII-B-38.
Consolidated Edison Company of New York (36-061-CE03):	Addressed under VIII-B-160.
Duke Energy Corporation (36-087-0731 & 0731):	Addressed under VIII-B-108.
International Paper - Ticonderoga Mill Facility (36-031-0105):	Used State instead of company data for revisions to 1995 daily NOx, stack parameter, operating time, and boiler capacity data. NY did not provide daily VOC and CO emissions, so added 1995 daily VOC and CO emissions and VOC RE provided by IP under VIII-B-117.
International Paper - Hudson River Mill Facility (36-091-0145):	Used State instead of company data for revisions to 1995 daily NOx, stack parameter, operating time, and boiler capacity data. NY did not provide daily VOC and CO emissions, so added 1995 daily VOC and CO emissions and VOC RE provided by IP under VIII-B-117.

**Item Number: VIII-B-223**

Origin: Indiana Department of Environmental Management, Ken Ritter  
 Category: Non-EGU Point  
 States Affected: IN

Requested Modification:

Requests revision to SCC for multiple units located at INLAND STEEL COMPANY and as submitted in previous comments.

EPA Final Decision:  
 Addressed under VIII-B-269.

**Item Number: VIII-B-224**  
 Origin: Lone Star Industries, Inc., Christa Russell  
 Category: Non-EGU Point  
 States Affected: IN

Requested Modification:  
 Requests modifications to the growth factors used in the inventories for Indiana.

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

**Item Number: VIII-B-229**  
 Origin: G.M. Roberts, Transportation Director, Alabama Department of Transportation, Montgomery, AL  
 Category: Mobile  
 States Affected: AL

Same comments provided under VIII-B-148; addressed in VIII-B-148.

**Item Number: VIII-B-232**  
 Origin: L. Eagan, State of Wisconsin, Madison, WI  
 Category: Non-EGU  
 States Affected: WI

Requested Modification:  
 Numerous changes to non-EGU inventory.

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

**Item Number: VIII-B-235**  
 Origin: T. J. Bach, QEP, Manager, Environmental Services, Natural Gas Pipeline Company of America, KN Energy, Lakewood, CO  
 Category: Non-EGU  
 States Affected: IL, MO

Requested Modification:  
 Requests unit modification to KN Energy facilities.

EPA Final Decision:  
 No change as facility could not be matched to existing inventory.

**Item Number: VIII-B-239**  
 Origin: T.G. Botkins, Jr., Environmental Manager, Westvaco, Covington, VA  
 Category: Non-EGU  
 States Affected: VA

Requested Modification:  
 Requests unit level modifications to Westvaco facility.

EPA Final Decision:  
 Addressed under VIII-B-127.

**Item Number:** VIII-B-240  
**Origin:** Great Lakes Gas Transmission Company, Douglas S. Andrews  
**Category:** Non-EGU Point  
**States Affected:** MI, MN, WI

**Requested Modification:**

Requests capacity changes resulting in reclassification from "large" Non-EGU to "small" Non-EGU for 8 sources.  
 Requests stack parameter changes for all 21 units.  
 Requests SIC changes for 3 units.  
 Requests changes to 1995 daily average uncontrolled ozone season NOx emissions for all of Great Lakes' 21 units.

**EPA Final Decision:**  
 Addressed under VIII-B-150

**Item Number:** VIII-B-242  
**Origin:** R.P. Berube, Acting Director, Office of Environmental Policy and Assistance, Department of Energy, Washington, DC  
**Category:** Non-EGU  
**States Affected:** TN

**Requested Modification:**  
 Requests modification to multiple boilers at the Oak Ridge Y-12 plant.

**EPA Final Decision:**  
 Modify inventory as requested.  
 Change natural gas SCC to 10200601.

**Item Number:** VIII-B-243  
**Origin:** F. George, Sr. Environmental Engineer, Tennessee Gas Pipeline, El Paso Energy, Houston, TX  
**Category:** point  
**States Affected:** AL, KY, IL, IN, MA, MS, NJ, NY, OH, PA, TN

**Requested Modification:**  
 Requests modification to multiple TGP facilities.

**EPA Final Decision:**  
 No change as data submitted can not be matched to existing data set using identifiers supplied.

**Item Number:** VIII-B-246  
**Origin:** Ruth Arisman, Southdown, Inc.  
**Category:** Non-EGU  
**States Affected:** AL, GA, OH, PA

**Requested Modification:**  
 Requests emission modification to multiple Southdown facilities.

**EPA Final Decision:**  
 Modify inventory as requested with following exceptions:

GA (13-153-0003): Address comments for point 006 provided by GA State under VIII-B-111, except change NOx control efficiency to 25.2% for all three segments per company comments; GA provides NOx control efficiency as 25% for two segments. The one SCC company provides for point 006 does not match SCCs GA provides for each of 3 segments for point 006; use State-supplied SCCs. Daily NOx emissions provided by State and company are the same for point 006. Per GA comments, remove point 008.

OH (39-057-829700165): Addressed Ohio State comment on daily NOx emissions provided for point P003 under VIII-B-54.

**Item Number:** VIII-B-247  
**Origin:** Solutia, Inc., Charles Chen, PE  
**Category:** Non-EGU Point

States Affected: AL

**Requested Modification:**

Requests modifications to the NOx SIP call inventory for Solutia Inc., Decatur Plant.

	Heat Input Corrections	1995 Summer HI	Unit Allocations by HI
Point ID 013 (Boiler #4)	290 MMBtu/hr	1064880 MMBtu	90.5 tons/season
Point ID 014 (Boiler #5)	290 MMBtu/hr	1064880 MMBtu	90.5 tons/season
Point ID 015 (Boiler #6)	320 MMBtu/hr	1175040 MMBtu	99.9 tons/season
Point ID 016 (Coker #1)	384 MMBtu/hr	1410048 MMBtu	119.9 tons/season

**Requests addition of points to inventory:**

Boiler #7	536.1 MMBtu/hr	1968559 MMBtu	167.3 tons/season
Coker #2	384 MMBtu/hr	1410048 MMBtu	119.9 tons/season

Coker #1 and #2 were built and are being run to produce coke from coal. The coke is sold as a commercial product which makes the units chemical production units not boilers. Heat, in the form of steam, is recovered from the combustion of the volatile removed from the coal. Solutia believes that Coker #1 and #2 should be removed from the list of industrial boilers.

**EPA Final Decision:**

Modify capacity and heat input information as provided in comment with following associations as provided by AL (VIII-B-52):

Boiler #7 = Point ID 009

Coker #2 = Point ID 017

Coker units #1 and #2 were classified based on the information provided to modify the inventory. As this information indicated that the units were coke-fired (considered fossil fuel), they still remain as affected sources.

**Item Number:** VIII-B-248  
**Origin:** Lafarge Corporation, Michael Pelan  
**Category:** Non-EGU Point  
**States Affected:** MI, IL, OH, MO, PA

**Requested Modification:**

Requests modifications to the NOX SIP call inventory for several sources located in Alpena, Michigan; Grand Chain (Joppa), Illinois; Paulding, Ohio; Sugar Creek, Missouri; and Whitehall, Pennsylvania.

**EPA Final Decision:**

Same comment as submitted by Lafarge Corp., VIII-B-157.

**Item Number:** VIII-B-249  
**Origin:** General Services Administration West Heating Plant; Steven Williford  
**Category:** Non-EGU  
**States Affected:** DC

**Requested Modification:**

Requests boiler capacity and emissions revisions to the General Services Administration West Heating Plant in Washington, DC.

**EPA Final Decision:**

Modify inventory as requested.

**Item Number:** VIII-B-251  
**Origin:** APCA (American Portland Cement Alliance), Tom Carter  
**Category:** Non-EGU Point  
**States Affected:** AL, IL, IN, MD, MI, MO, NY, OH, PA

**Requested Modification:**

Requests changes to 1995 typical ozone season daily NOx, stack parameters, operating information, growth factors, and more for numerous plants.

Requests the addition of the LaFarge - Sugar Creek Plant to the inventory.

EPA Final Decision:

No change to growth factor information as this topic was not open for comment during this period.  
 Modify base year inventory as follows:

Glens Falls Cement, NY (36-113-0127):	Addressed under VIII-B-222.
LaFarge (several plants, multi-State):	Addressed under VIII-B-157 and VIII-B-248.
St Lawrence Cement, MD (24-043-0008):	Addressed under VIII-B-188.
Lehigh (several plants, multi-State):	Addressed under VIII-B-162.
Blue Circle, NY (36-001-0040):	Addressed under VIII-B-222.
Holnam, MO (29-163-0001):	Addressed under VIII-B-201.

**Item Number:** VIII-B-253  
**Origin:** J. S. Lane, AICP, CAMPO Administrator, Capital Area Metropolitan Planning Organization, Raleigh, NC  
**Category:** Mobile  
**States Affected:** NC

**Requested Modification:**  
 Does not agree with the EPA estimate for VMT growth for Wake County.

EPA Final Decision:  
 As the State of NC provided 2007 VMT for the State, this comment is addressed in VIII-B-179.

**Item Number:** VIII-B-256  
**Origin:** M.R. Poole, Ph.D., P.E., Manager, Statewide Planning Branch, North Carolina Department of Transportation, Raleigh, NC  
**Category:** Mobile  
**States Affected:** NC

**Requested Modification:**  
 Requests modification to State VMT to reflect historical growth rates.

EPA Final Decision:  
 No modification made as NC DNR supplied VMT for inventory modification.  
 Addressed under VIII-B-159.

**Item Number:** VIII-B-258  
**Origin:** State of New Jersey, Department of Environmental Protection, Chris N. Salmi, Manager  
**Category:** Non-EGU  
**States Affected:** NJ

**Requested Modification:**  
 Requests review of possible errors and double counting in non-EGU point source inventory.

EPA Final Decision:  
 No changes for reclassifying units made as modifying data not provided. List of units suspected of double counting identified and removed from non-EGU inventory.

**Item Number:** VIII-B-260  
**Origin:** T. Karman, Wisconsin Department of Natural Resources, Madison, WI  
**Category:** Non-EGU, Mobile  
**States Affected:** WI

**Requested Modification:**  
 Requests capacity changes to multiple sources.  
 Requests changes to mobile input files, VMT, VMT growth, speeds, use of MOBILE5b, and updated vehicle registration.

Requests use of speeds developed by SEWRPC for its seven counties and speeds developed by WDOT for the remaining 65 counties. The attached table, WISPEEDS.XLS, compares the speeds by road type and vehicle type for the 65 counties developed by WDOT to those used to model the SIP Call budgets. Speeds for the remaining seven counties were modeled in increments of 5 mph for standard arterials and freeways and non-arterials were modeled at 15 mph and 40 mph. Emission factors modeled at each of these speeds were then multiplied by the fraction of VMT estimated to occur at each of these speeds.

EPA Final Decision:

Mobile: Modify mobile input files, VMT, VMT mix, modeling month as requested.  
 Speed fractionization not used by EPA as EPA was unable to duplicate the emission factor modeling by using speed fraction calculation for VMT.

Non-EGU: Modify boiler capacities as requested except as follows:

ANR Pipeline (55-087-445031180): Addressed under VIII-B-120.  
 Georgia Pacific (55-141-772010690): Addressed under VIII-B-202.  
 Great Lakes Gas Transmission CS 6 (55-007-804041810): Addressed under VIII-B-150.  
 International Paper - Thilmany Facility (55-087-445031180): For point B11, address comments provided by IP under VIII-B-117.

**Item Number:** VIII-B-261  
**Origin:** T.J. Bach, Manager, Environmental Services, Natural Gas Pipeline Company of America, a KN Energy, Inc. Company, Lakewood, CO  
**Category:** Non-EGU  
**States Affected:** IL, MO

Addressed under VIII-B-235

**Item Number:** VIII-B-262  
**Origin:** R.F. Hodanbosi, Chief, Division of Air Pollution Control, Ohio Environmental Protection Agency (EPA), Columbus, OH  
**Category:**  
**States Affected:** OH

**Requested Modification:**  
 Requests modification to MOBILE model input files and MOBILE model NLEV implementation schedule be modified.

EPA Final Decision:  
 Modify inventory as requested.

**Item Number:** VIII-B-265  
**Origin:** Daimler Chrysler Corporation, Patricia Strabbing  
**Category:** Non-EGU Point  
**States Affected:** DE, MO

**Requested Modification:**  
 Requests modification to the NOx SIP call inventory for DaimlerChrysler Newark Assembly Plant in Delaware, and the St. Louis North Assembly Plant in Missouri.

As DaimlerChrysler does not have "large" combustion sources in either plant, therefore EPA should remove both facilities from the proposed list of section 126 sources.

EPA Final Decision:  
 Addressed by VIII-B-51.

**Item Number:** VIII-B-268  
**Origin:** K. Singleton, Henkel Corporation  
**Category:** Non-EGU Point  
**States Affected:** OH

**Requested Modification:**  
 Modifications to Henkel Corporation - Cincinnati Plant (39-061-1431070035).

Addition of emission points B001, B004, B007, B009, B013, B018, B019, and B031. Stack parameters, seasonal throughput, and operating schedules are provided for these points. These are small units not included in the original data set.

Correction of source classification codes (SCCs), boiler capacities, base year NOx control efficiencies and daily NOx emissions, and seasonal throughput for points B014 and B015.

B014 154 MMBtu/hr 60% NOx  
B015 250 MMBtu/hr 60% NOx

Correction of boiler capacities, base year daily NOx emissions, and seasonal throughput for points B002, B027, and B028. Correction to days/week and weeks/year for point B002. Correction to stack height for point B028.

Removal of units P007, P045, P048, and P053 as they are not NOx emitting sources.

EPA Final Decision:

Modify inventory as requested.

Do not remove any source from inventory as they are used to model the VOC and CO data for ozone formation.

**Item Number:** VIII-B-269  
**Origin:** Indiana Department of Environmental Management, Janet G. McCabe  
**Category:** Non-EGU  
**States Affected:** IN

Requested Modification:

Requests numerous changes to large Non-EGUs.

Also requests changes to many "sources not listed in any budget categories."

EPA Final Decision:

Where provided, no change to growth factor or 2007 emissions data as this topic was not open for comment during this period.

Modify inventory as requested except as follows:

Lehigh Portland Cement (18-093-0002): Addressed under VIII-B-162.  
IP&L (18-097-0034): Addressed under VIII-B-31.  
Colgate-Palmolive (18-019-0003): Modify inventory as requested. Stack velocity not given by State; calculate stack velocity from stack diameter and flowrate values given.  
Philadelphia Quartz (18-019-0018): Modify inventory as requested. Stack velocity not given by State; calculate stack velocity from stack diameter and flowrate values given.  
LTV Steel Company (18-089-0318): For point 008, stack ID 031, segment 10, stack velocity not given by State; calculate stack velocity from stack diameter and flowrate values given.  
New Energy Corp. (18-141-0033): For points 013, 014, and 015, stack velocity not given by State; calculate stack velocity from stack diameter and flowrate values given.  
Eli Lilly & Co. (18-097-0074). No correction made to summer throughput from 25 to 24 because throughput would add to 99 instead of 100.

**Item Number:** VIII-B-270  
**Origin:** Essroc Italcementi Group, F. L. Streitman  
**Category:** Non-EGU Point  
**States Affected:** PA

Requested Modification:

Requests modification to the NOx SIP call inventory for Essroc Cement Corp. plants located in Pennsylvania - Bessmer Plant (ID 42-73-26), Nazareth I Plant (ID 42-95-45) and Nazareth III Plant (ID 42-95-49).

EPA Final Decision:

Modify inventory as requested.

**Item Number:** VIII-B-271  
**Origin:** Essroc - Italcementi Group, F.L. Streitman  
**Category:** Non-EGU Point  
**States Affected:** IN

Requested Modification:

Plant ID 5, Point ID 401, Segment 1, SCC 30500706  
Plant ID 5, Point ID 413, Segment 1, SCC 30500706

Requests change in operating period to 52 weeks per year for the above two points.

Requests change in plant name to Essroc Cement Corp.

Plant ID 8, Point ID 011, Segment 1, SCC 30500706  
 Plant ID 8, Point ID 012, Segment 1, SCC 30500706

Requests change in operating period to 52 weeks per year for the above two points.  
 Requests change in plant name to Essroc Cement Corp for the above two points.  
 Requests change in 1995 typical day NOx emissions to 2.4165 tons ( Point 011) and 5.2505 tons (Point 012)

Note - emissions changes are based on CEM data.

Plant ID 8, Point ID 011, Segment 1, 2, and 4

This commenter requests the deletion of the three Segments above and the replacement of them with Plant ID 8, Point ID 011, Segment 1's revised information (see changes above).

Plant ID 8, Point ID 012, Segment 1, 2 and 4, and  
 Plant ID 8, Point ID 013, Segment 1

This commenter requests the deletion of the four Segments above and the replacement of them with Plant ID 8, Point ID 012, Segment 1's revised information (see changes above).

EPA Final Decision:  
 Addressed under Indiana State comments (VIII-B-269).

**Item Number:** VIII-B-272  
**Origin:** Essroc - Italcementi Group, F.L. Streitman  
**Category:** Non-EGU Point  
**States Affected:** MD

Requested Modification:  
 Plant ID 13, Point ID 3, Segment 1  
 Plant ID 13, Point ID 4, Segment 1

Requests changes to plant name, stack parameters, plant operating data, and limited emissions data.

For emissions, specifically requests that the "2007 Typical Ozone Season Saturday NOx Emissions (tons)" category and the "2007 Typical Ozone Season Sunday NOx Emissions (tons)" category indicate emissions equal to the 2007 typical ozone season weekday NOx emissions.

Requests a change in the 1995-2007 growth factor to at least 1.0.

EPA Final Decision:  
 Modify base year inventory as requested.  
 No change to growth factor information as this topic was not open for comment during this period.

**Item Number:** VIII-B-279  
**Origin:** Michigan Department of Environmental Quality, Dennis Drake  
**Category:** Non-EGU, Mobile  
**States Affected:** MI

Requested Modification:

1. Michigan State University - Partial revision
2. Great Lakes Gas Transmission - Partial revision
3. Steelcase Inc. - Partial revision
4. MEAD Paper Company - Complete replacement
5. National Steel Great Lakes Division - Partial revision  
 Plant # 11 not found—not added because seasonal NOx=0
6. Lafarge Corp. - Partial Revision
7. Consumers Energy - Michigan Gas Storage - Partial revision for multiple facilities.

Mobile source revision requests for:

Supplied five MOBILE5a input files each for 1995 and 2007.  
Michigan provided electronic speed files for 1995 and 2007.  
VMT and VMT mixes by vehicle type provided.

EPA Final Decision:  
Revise MOBILE input files as requested.  
Modify VMT, VMT mix as requested.

Modify non-EGU point source inventory as requested except as follows:  
Great Lakes Gas Transmission (26-035-N5581): Addressed under VIII-B-150.  
Lafarge (26-007-B1477): Addressed under VIII-B-157.  
Michigan Gas Storage (26-035-N2901): Addressed under VIII-B-175.  
Consumers Energy (26-005-N5792, 26-099-B6636, 26-147-B6637, 26-149-N5573-N5576, 26-161-N3920, and 26-163-N1099): Addressed under VIII-B-175.

**Item Number:** VIII-B-280  
**Origin:** P.J. Maciejewski, North American Operations, Worldwide Facilities Group, Detroit, MI  
**Category:** Non-EGU  
**States Affected:** IN, NY, MI

**Requested Modification:**  
Requests removal of facilities from list of sources identified in Section 126 petitions as these sources do not meet either the source classification definitions, provided in the petitions, or the criteria for applicability in the proposed rule.

EPA Final Decision:  
No modification made to the inventory as information supporting the requested change was not provided.

**Item Number:** VIII-B-281  
**Origin:** M. James, Manager of Transportation Analysis, East Gateway Coordinating Council, St. Louis, MO  
**Category:** Mobile  
**States Affected:** MO

**Requested Modification:**  
Modifications to MOBILE input files.

EPA Final Decision:  
RVP changed from 7.8 psi to 7.0 psi in St. Louis area, and from 8.7 to 7.2 in Kansas City area as requested.  
Modified I/M program inputs, oxygenated fuel input changes in St. Louis area as requested.

**Item Number:** VIII-B-283  
**Origin:** Jefferson County Department of Health, Henry U. Burnett  
**Category:** Non-EGU Point  
**States Affected:** AL

**Requested Modification:**  
Requests changes in emissions for the following three points:

Drummond Company, Inc. - change emissions to 1.085 tons per day.

Lehigh Portland Cement Co. - change emissions to 2.234 tons per day.

U.S. Steel Fairfield, Point Source #105 - change emissions to 1.112 tons per day.

Requests that only the Lehigh Portland Cement Co. be included in the SIP Call point inventory, as only the Lehigh Portland Cement Co. is among the RACT control groups specified by the U.S. EPA.

EPA Final Decision:  
Modify U.S. Steel Fairfield, Unit #105 emissions as requested. Lehigh Portland Cement Co. sources addressed under comment submitted by Lehigh Portland Cement Co., VIII-B-162.

As Drummond Co. and Lehigh comments are based on review of large source inventory only and tonnage change request reflects the entire facilities' sources, EPA did not modify the inventory for these sources as the Agency could not determine which of the facilities' sources (large or small) were included or excluded from this change.

**Item Number:** VIII-B-285  
**Origin:** Ohio EPA, Robert F. Hodanbosi  
**Category:** Non-EGU Point  
**States Affected:** OH

Requested Modification:

Plant ID 1431390903, Point ID B001  
Requests the modification of maximum heat input capacity to 164 MMBtu/hr.

EPA Final Decision:  
Modify inventory as requested.

**Item Number:** VIII-B-288  
**Origin:** Jackson County  
**Category:** Area, Nonroad, Non-EGU Point  
**States Affected:** KY

Requested Modification:  
Provides area, nonroad, and non-EGU data.

EPA Final Decision:  
Modify inventory as requested.

## SECTION III

### RESPONSE TO COMMENTS NOT RELATED TO EMISSION INVENTORY MODIFICATION REQUESTS

By notice dated October 27, 1998, EPA published, "Finding of Significant Contribution and Rulemaking for Certain States in the Ozone Transport Assessment Group Region for Purposes of Reducing Regional Transport of Ozone" (63 FR 57356), which may be referred to as the NO<sub>x</sub> SIP call. The final NO<sub>x</sub> SIP call provided that the opportunity for comment on 2007 baseline sub-inventory revisions would be available for 60 days after signature of the NO<sub>x</sub> SIP call. The EPA received numerous requests to allow more time to accept revisions to source-specific inventory data used to establish each State's base and budget in the NO<sub>x</sub> SIP call and to also allow revisions to VMT projections. Therefore, by notice dated December 24, 1998, EPA published, "Correction and Clarification to the Finding of Significant Contribution and Rulemaking for Purposes of Reducing Regional Transport of Ozone" (63 FR 71220), which may be referred to as the correction notice.

In these notices, EPA reopened and extended the comment period on emissions inventory revisions to 2007 baseline sub-inventory information used to establish each State's budget in the NO<sub>x</sub> SIP call. This included source-specific emission inventory data, data on VMT and nonroad mobile growth rates, VMT distribution by vehicle class, average speed by roadway type, inspection and maintenance program parameters, and other input parameters used in the calculation of highway vehicle emissions. The EPA extended this time period for additional comment to February 22, 1999 in the correction notice.

The EPA believes that the comments indicated below do not request emission inventory revisions to the 1995 base or sub-inventory information necessary for estimating each State's budget. For this reason, these comments are beyond the scope of this rulemaking and therefore the Agency is not responding to these comments in this document.

**Letters:** VIII-B-49, 50, 194, 195, 236, 237, 238, 245, 254, 255, 264, 273

**SUMMARY:** Some commenters generally expressed concern regarding the accuracy of the data included in the EGU inventory. Another commenter requested that EPA perform a quality control on its inventory. One commenter generally noted that EPA has flawed heat input data, and may have incorrect heat rate data, for many units. This same commenter noted that EPA had failed to include numerous combustion turbine units in the EGU inventory. Some commenters noted that the documentation for the data contained in the emissions inventory is insufficient.

**LETTERS:** Consumers Energy (III-D-77), Illinois EPA (III-D-9) (IV-D-5), Indiana Dept. of Environmental Management (IV-D-72), Utility Air Regulatory Group (III-D-71 and VIII-B-197) (inc. by ref. to section 126 docket), West Virginia DEP (VIII-B-173)

**RESPONSE:** As EPA explained in the SIP Call NFR, EPA used the final OTAG version of the inventory for the emission estimates in that November 1997 NPR. EPA then improved the inventory with data supplied by commenters including States and industry through the public comment period. As a result, the revised emissions inventory was the most accurate available for modeling, strategy analyses, and budget calculation purposes. The inventory has been through

numerous versions, each version reviewed and extensively commented on by States, industry, and the public. These inventory data are more accurate than any other data used in the past as the basis for the various State-specific SIP revisions (such as rate-of progress SIP revisions or attainment demonstrations). The EPA considered the inventory data sufficiently accurate for purposes of determining the budgets in the SIP Call Final Rule (63 FR 57356 Oct. 27, 1998). Nonetheless, EPA provided the public including States and sources the opportunity to further comment on the inventories used to calculate the budgets. Initially EPA provided a comment period to November 23, 1998 (63 FR 57356). Later, in response to requests for more time to comment, EPA extended the comment period to February 22, 1999 (63 FR 71220). EPA believes that collectively, the processes described above have given the public ample opportunity to comment on specific data concerns.

**SUMMARY:** Some commenters expressed concern regarding the use of "typical ozone season daily emissions" as listed in the inventory for EGUs. One commenter requested that EPA confirm that the daily NO<sub>x</sub> tons attributed to individual units in the Oct 1998 inventory are not final and that they do not have any particular relevance outside the context of the OTAG modeling. Others noted that there is considerable confusion as to just how these estimates were calculated, objected to the use of these "daily" estimates, and suggested that EPA provide a more detailed explanation of its estimation methodology and allow the opportunity for review and comment on these estimates.

**LETTERS:** Utility Air Regulatory Group (VIII-B-197) (III-G-150), VA Power (VIII-B-168), Old Dominion Electric Cooperative (VIII-B-165)

**RESPONSE:** For EGUs the data at issue is not relevant to the calculation of the 2007 baselines or the SIP Call budgets. Therefore, these comments are beyond the scope of this rulemaking and the Agency is not responding to the comments.

**SUMMARY:** One commenter noted generally that the numerous errors in the inventory call into question the validity of the NO<sub>x</sub> SIP Call as well as the 126 and FIP rulemakings. This commenter added that seeking emissions inventory input three months after using the inventory to support the final SIP call rule and as part of the rulemaking process in the proposed section 126 rule and the proposed FIP rule violates the statutory requirements of the rulemaking process. This commenter also noted that the Agency violated procedures to publish proposed rules as established under the CAA and the APA, and that EPA's approach does not allow affected entities to adequately verify data and methodologies.

**LETTERS:** Council of Industrial Boiler Owners (VIII-B-134) (IV-G-98)

**RESPONSE:** As stated in the preamble to this rule, EPA believes it has complied with the procedural requirements that apply to this rulemaking. The EPA effectively reopened for reconsideration only a very narrow aspect of the SIP Call rule and comments on any other aspect of the SIP Call are not germane to this rulemaking. Further, comments on the Section 126 and FIP rulemakings fall outside the scope of this rule.

**SUMMARY:** One commenter asserted that EPA has inappropriately imposed its burden of accurately analyzing data in the inventory on affected entities, and that the CAA and the APA do not require affected entities to redo the work of the Agency.

**LETTERS:** Council of Industrial Boiler Owners (VIII-B-134) (IV-G-98)

**RESPONSE:** The EPA disagrees with the commenter's characterization of events. The inventories were a topic for comment in the SIP call rulemaking, for which the final rule was published October 1998. In the current rulemaking, EPA provided an additional opportunity to comment on inventory data. In both rulemakings, EPA engaged in the ordinary procedures for rulemaking with respect to the inventory data, allowing the public an opportunity to comment on the inventory data on which EPA proposed to rely.

**SUMMARY:** One commenter noted that the CAA and the APA require that the underlying data and assumptions be sufficiently transparent for the regulated community to make sense of the rule, and that the budget allocation process and the documents and computer databases associated with the process is extremely confusing.

**LETTERS:** Council of Industrial Boiler Owners (VIII-B-134) (IV-G-98)

**RESPONSE:** As stated in the preamble to this rule, EPA believes it has complied with the procedural requirements that apply to this rulemaking. The underlying data were made available to the public and EPA staff were available to answer questions from the public concerning the data. Further, in light of the complexity of the data and requests from the public, EPA extended the period of opportunity to comment.

**SUMMARY:** One commenter specifically requested that EPA postpone the SIP submittal deadline to April 27, 2000 as allowed under the CAA, since States do not have adequate time to implement the budget allocations to individual sources. This commenter added that many States cannot adopt permanent rules to comply with the SIP call in time to prevent EPA from invoking a FIP.

**LETTERS:** WV DEP (VIII-B-173)

**RESPONSE:** This comment is beyond the scope of this rulemaking and therefore the Agency is not responding to the comment.

## SECTION IV

### RESPONSE TO NODA COMMENTS RELATED TO EMISSION INVENTORY MODIFICATION REQUESTS

This section presents the responses of the Environmental Protection Agency (EPA) to the public comments received on EPA's notice of data availability and request for comment, 64 FR 43123, August 8, 1999 (the "NODA") that could affect the emission inventories. On September 15, 1999 (64 FR 500411), EPA reopened the comment period and further clarified that commenters may comment on all data in the files mentioned by the NODA. The NODA made the following data available:

- ! Electric generation data from May through September for the years 1995 through 1998, for electric generating units (EGUs)
- ! Heat input data from May through September for the years 1997 and 1998 for all EGUs greater than 25 MW, and heat rate data for EGUs greater than 25 MW.
- ! Heat input data from May through September for the year 1995 for non-electric generating units (non-EGUs) with a maximum rated heat input capacity of greater than 250 mmBtu/hour. EPA also requested non-EGU heat input data for 1996-1998 if a commenter believed that 1995 did not represent typical operations for a particular non-EGU.

None of these data elements should affect the emission inventories. However, the Agency received comments in response to this notice that request modifications that would affect the emission inventories. This section addresses those comments. For a complete response to the comments received on the NODA, see the Agency's response to those comments filed under Docket A-97-43.

## A. EGUs

### 1. MassPower (IX-D-122) (MA)

**Requested Changes:** The commenter requested changes in the 1997 and 1998 heat input for the non-Acid Rain units currently listed in the inventory as four units at three plants: MassPower 1 (CC\_r1), MassPower 2 (CC\_r2), and MassPower (Monsanto) (CC\_to and CW\_to). The commenter notes that there should only be two combustion units at one plant listed for MassPower (CT1, CT2) and that there is no association with Monsanto. The commenter notes that there is also a steam turbine without heat input that produces electricity.

Commenter lists all three units (including the steam turbine) with Plant ID 10726. Only the two units listed as MassPower (Monsanto) are listed with this Plant ID (the other two MassPower units have a plant ID of n89 and n90). In the EPA inventory all four units were listed with zero heat input in 1997 and 1998. Commenter notes that heat input was derived from fuel use apportioned by percent gross unit generation. Supporting documentation for heat input was not provided.

**Action Taken:** The 1997 or 1998 heat input data issues are not relevant to calculating the statewide emissions budget. Also, although the commenter identifies some unit identification and segmenting discrepancies, the commenter does not dispute the 1995 and 1996 heat input values at the facility level. Thus, the comments do not require EPA to reconsider the statewide emissions budget for MA.

### 2. Kansas City Power and Light (IX-D-44) (MO)

**Requested Changes:** Commenter requested the addition of a new electric generating unit, Hawthorn (6), which went into operation in the third quarter of 1997.

**Action Taken:** Hawthorn (6) would be considered a new unit by EPA, and thus this unit does not affect the statewide emissions budget for MO.

### 3. St. Joseph Light and Power (IX-D-138) (MO)

**Requested Changes:** Commenter requested the removal of the units listed as Lake Road (4, 5) from the list of large EGUs, since these units supply steam under a common header system to three turbine generators less than 25 MW.

**Action Taken:** EPA identified units 4 and 5 as large units in the inventory released for comment during the extension period. The commenter did not submit comments at that time. However, the Missouri DNR did submit extension period comments that included a complete inventory for the state that requested numerous revisions (see A-96-56-VIII-B-186). The state agency's inventory classified these units as large units. In addition, the 1998 Inventory of U.S. Power Plants compiled by the Energy Information Administration identifies these units as having nameplate capacity greater than 25 MW. Finally, the commenter does not provide supporting documentation that identifies the nameplate capacities of the generators served by these boilers. For all of these reasons, EPA has not reclassified these units for purposes of calculating the MO

statewide emissions budget or for identifying units potentially affected by a Federal NO<sub>x</sub> Budget Trading Program.

#### **4. Empire District Electric Company (IX-D-140) (MO)**

**Requested Changes:** Commenter requested changes to the 1995, 1996, 1997, and 1998, heat input for Empire Energy Center (--1, --2) and State Line (--1). Commenter provides a table listing 1995 through 1998 "calculated" heat input and compares this value to "actual" heat input. It appears that the commenter intended to request that the "actual" data should be incorporated into the inventory. The heat input data for the Empire Energy Center are only listed at the plant level.

**Action Taken:** The 1997 or 1998 heat input data issues are not relevant to calculating the statewide emissions budget. For the 1995 and 1996 data, the existing EGU inventory values are based on comments submitted by the commenter during the extension comment period. The data provided during the NODA comment period would reduce the total heat input from all three units by only about 4,000 mmBtu in 1995 and 2,000 mmBtu in 1996. The commenter provided no explanation for the basis of this small revision, and thus EPA did not accept the requested revisions for purposes of calculating the statewide emissions budget for MO.

#### **5. Conectiv (IX-D-116 and IX-D-141) (NJ)**

**Requested Changes:** Commenter listed Carll's Corner (1, 2) as 41MW each and Cedar Station (IE&W) as 41.9 MW, which are currently included in the inventory as small EGUs (25 MW or less).

**Action Taken:** EPA has revised the nameplate capacity for Cedar Station (IE&W) and Carll's Corner (1,2) as requested by the commenter and as supported by a review of the Energy Information Administration (EIA) inventory of U.S. power plants (DOE/EIA-0095(98), December 1998).

#### **6. R. J. Reynolds Tobacco Company (IX-D-67) (NC)**

**Requested Changes:** For units listed as Tobacoville (1, 2, 3, 4), which are not subject to the Acid rain Program, the commenter provided corrections to the 1995 and 1996 heat input as previously submitted. The commenter notes that they previously provided 1995 and 1996 ozone season heat input based on a six month ozone season. Monthly fuel use data was provided as supporting documentation.

**Action Taken:** The requested 1995 and 1996 heat input revisions were incorporated since it is clear based on the commenter's request that the commenter previously provided inaccurate data that was relied on by the state agency and EPA. Although as a general rule EPA has not accepted comments on 1995 and 1996 data, these comments constitute a technical correction to data provided in the extension comment period. If EPA did not accept these comments on 1995 and 1996 data, the commenter would benefit significantly from having mistakenly submitted inaccurate data in a prior comment period.

## 7. Cinergy (IX-D-04 and IX-D-105) (OH)

**Requested Changes:** Commenter noted that the NODA failed to identify Dicks Creek Station, Unit 1, as a large EGU. The unit is a 100 MW multi-engine unit (each jet engine is under 50 MW). No data or supporting documentation were provided for this unit; however, the unit is listed in the 1998 EIA inventory of U.S. power plants as one 100 MW jet engine (simple cycle turbine) generator. The current inventory includes Dicks Creek Unit 1 as a 2 MW unit.

**Action Taken:** Dicks Creek is currently listed in the EGU inventory as a small unit and has been revised to reflect the combined nameplate capacity as listed by the commenter (100 MW) and verified by the EIA inventory.

## 8. Dayton Power and Light (IX-D-121) (OH)

**Requested Changes:** Commenter requested that EPA allocate allowances to a large EGU, OH Hutchings GT, although the commenter suggests that the unit should not be subject to controls because of its infrequent operation. The unit is a simple cycle combustion turbine greater than 25 MW. The commenter provided monthly fuel use information as supporting documentation for the heat input values for this unit. Heat input data for OH Hutchings GT were provided for 1995 through 1998. The OH Hutchings GT is listed as unit 7 in the 1998 EIA inventory with a nameplate capacity of 32.6 MW.

**Action Taken:** The OH Hutchings GT unit was added to the EGU inventory as a large EGU and as a unit eligible to receive allocations based on the data provided and the corroborating information in the EIA inventory. Contrary to the commenter's suggestion, this unit is considered an affected unit under the Federal NO<sub>x</sub> Trading Program as a large EGU. (The Agency notes that the final rule does provide an exemption for certain units that are subject to a permit condition that restricts operation to a certain number of hours during the ozone season.)

## 9. Mead Corporation (IX-D-26) (OH)

**Requested Changes:** Commenter requests that the non-Acid Rain unit listed as Mead - Fine Paper Division be removed from the EGU inventory. Commenter notes that there is no combustion turbine at this facility.

**Action Taken:** This unit was removed from the EGU inventory based on the information provided by the commenter. The Agency also notes that the non-EGU inventory contains a number of units at this facility, including a number of large boilers that are identified as large boilers subject to the Federal NO<sub>x</sub> Budget Trading Program.

## 10. Pennsylvania DEP (IX-D-24) (PA)

**Requested Changes:** Commenter requested that Penntech Paper be removed from the large EGU inventory because the facility does not have firm contracts for sale to the grid and the applicable unit is already represented in the non-EGU inventory.

In addition, the commenter noted that the EGUs listed as Mountain (1,2) and Tolna (1,2) each have a summer nameplate capacity of 20 MW; and suggested that all small EGUs should appear in the small stationary source inventory rather than the EGU inventory.

**Action Taken:** The Penntech Paper unit was removed from the EGU inventory as requested because the unit is already represented under the non-EGU inventory and because of the operational information provided by the commenter. The units listed as Mountain (1,2) and Tolna (1,2) were not reclassified as small since the nameplate design capacity for these units is greater than 25 MW. Net summertime capability is not the criterion used to determine applicability. EPA also notes that the utility owner of these units has not disputed EPA's classification of these units as affected units under the Federal NO<sub>x</sub> Budget Trading Program. Finally, EPA has not moved the small EGUs from the EGU inventory. These units are not subject to controls merely because they are in the EGU inventory. The inventory includes both large units affected by the Federal NO<sub>x</sub> Budget Trading Program and unaffected, small EGUs.

#### 11. Cinergy (IX-D-124) (PA)

**Requested Changes:** Commenter requested changes to the 1995 and 1996 heat input for the Westwood Generating Station. The plant was taken off-line on June 26, 1997, and closed. Revisions to the 1995 and 1996 data are significant (95 HI would decrease from approximately 15.5 million to 1.4 million and 96 HI would decrease from approximately 9.5 million to 1.2 million).

**Action Taken:** The requested revisions to the 1995 and 1996 heat input data were incorporated because it appears that the existing data, which had never been commented on in prior comment periods, were substantially in error. In addition, EPA notes that the existing data were not from Acid Rain CEM data, so that there is no conflict with existing Federal data sources. Moreover, the commenter's request for a substantial reduction for this plant will avoid a potential windfall of excess credits associated with the originally over-reported heat input for this retired facility. For all of these reasons, EPA has accepted this comment on 1995 and 1996 data even though as a general rule EPA has not considered comments on these data elements that were submitted in response to the NODA.

#### 12. City of Philadelphia (IX-D-55) (PA)

**Requested Changes:** Commenter identified units that may be large EGUs, but are not listed in the large EGU inventory. The units include two units at Grays Ferry (NEDS ID 54785, units 25 and CT.HRSG) used principally for district heating, and three units at the Trigen facility (NEDS ID 4942, units 23, 24, 26). Gray's Ferry is a new facility in 1997, which commenter previously recommended be removed from the EGU inventory. There were no data provided on the Trigen units.

**Action Taken:** No action was necessary or appropriate for these units. The Gray's Ferry units are considered new units and would be eligible to receive allocations under the new source set-aside since they began operations in 1997. The Trigen units are included in the current

inventory as Schuylkill Station (plant ID 50607). No data were provided that would enable EPA to segment this facility into multiple units.

### 13. Sunoco (IX-D-09) (PA)

**Requested Changes:** Commenter requests that the unit currently listed as Sun Refining and Marketing Co., Plant ID 0025, Point 090 in the non-EGU inventory be moved to the EGU inventory and notes that this unit is now owned by Florida Power & Light. Commenter does not indicate whether this unit is a large or small EGU and does not provide data with the exception of average 95/96 heat input. No supporting documentation was provided.

**Action Taken:** This unit was not added to the EGU inventory, but instead was retained in the non-EGU inventory. The unit's status in 1995 is the key consideration of whether the unit is considered an EGU or non-EGU. The commenter provided no data to suggest that the unit was operated as an EGU in 1995.

### 14. PEI Power Corporation (IX-D-28) (PA)

**Requested Changes:** Commenter notes that they are the owner of the Archbald Power Station. Commenter adds that this unit went into commercial operation in 1990 and is allocated credits by the PA DEP as an electric generator under the OTC NO<sub>x</sub> Budget Program. Commenter provides EIA 867 Forms to document the unit's operation from 1995 to 1997, but does not provide heat input data and does not specifically request the addition of this unit. PA DEP lists this unit as a small EGU (23.3 MW).

**Action Taken:** This unit was not added to the list of large EGUs affected by the section 126 final rule. Although the boiler at this facility is greater than 250 mmBtu/hr, the boiler serves a generator that is less than 25 MW. Thus, this unit is not an affected EGU under the Federal NO<sub>x</sub> Budget Trading Program. The unit is listed in the overall NO<sub>x</sub> SIP Call inventory for purposes of establishing the overall statewide emissions budget for PA.

## B. Non-EGUs

### 1. Solutia (IX-D-29) (AL)

**Requested Changes:** Commenter notes that coker #1 and #2 at their Decatur Plant are production facilities and should not be included as potentially affected non-EGUs. Commenter notes that this revision was requested in response to the correction notice and that the Inventory RTC issued in April 1999 notes that these units "will be reclassified based on the information modified in the inventory." Commenter also notes that these production facilities are less than 250 mmBtu/hour when evaluated on a Btu basis for the steam produced in the heat recovery unit. Commenter also reiterates their request that boiler #7 be included in the non-EGU inventory. No supporting documentation is provided.

**Action Taken:** The Coker #1 and #2 units have been classified based on the information provided in the comment. As this information indicated that these units were coke-fired (derived from fossil fuel), they are still considered affected sources for purposes of calculating statewide emissions budgets. Boiler #7 is included in the database, but is identified as a non-affected boiler because it has a liquid waste SCC code.

## 2. International Paper (IX-D-46) (AL)

**Requested Changes:** Commenter requests that EPA classify unit 014 at IP Mobile Mill (rated at 772 mmBtu/hr) and units 013 and 014 at IP Prattville Mill (rated at 640 and 534 mmBtu/hr, respectively) as large non-EGUs potentially subject to controls. Commenter provides 1995 operating statistics reports and 1995 fuel consumption reports as supporting documentation.

**Action Taken:** The data provided for unit 014 at the Mobile Mill does not document clearly that the unit combusted more than 50 percent fossil fuel in 1995, and the reported SCCs indicate that this unit is in an unaffected category. Thus, this unit was not reclassified as a unit subject to controls for purposes of statewide emission budget calculation or potential applicability under the Federal NO<sub>x</sub> Budget Trading Program. The SCC codes for the Prattville units also indicate that this unit is in an unaffected category.

## 3. Jefferson Smurfit Corporation (IX-D-99) (AL)

**Requested Changes:** Commenter requests that Jefferson Smurfit, Unit ID 008 be removed from the list of potentially affected large non-EGUs because it is not a fossil unit. Commenter also noted that Jefferson Smurfit, Units 011 and 012 should be added to the list of potentially affected units because they are fossil units greater than 250 mmBtu/hour. No supporting documentation is provided.

**Action Taken:** No action was taken on this comment because the commenter failed to provide any supporting documentation for the changes requested. The SCC code indicates that Unit 008 is an oil-fired boiler. EPA also notes that unit 011 is currently identified in the non-EGU inventory as a process heater without 1995 seasonal emissions. EPA has no existing data for Unit 012.

## 4. Gulf States Paper Corporation (IX-D-139) (AL)

**Requested Changes:** Commenter requests the addition of point ID 013. Commenter provides facility records on fuel use, emission factors and emission rates as supporting documentation.

**Action Taken:** In order to add a unit to the non-EGU inventory, EPA requires full source data (stack parameters, throughput, emissions, etc.). See the correction and clarification notice associated with the extension comment period (December 24, 1998, 63 FR 71220). The

commenter provided some, but not all, of these data elements. Thus, no action was taken on this request.

#### 5. Delaware DNR (IX-D-82) (DE)

**Requested Changes:** Commenter notes that the non-EGUs listed as FMC Corporation, Units 031 and 033 are small non-EGUs (process spray dryers) with a heat input rating of 14 and 25 mmBtu/hour, respectively. Commenter requests that these units be removed from the list of affected sources.

**Action Taken:** EPA has reclassified these units as small non-EGUs based on the SCC code and capacity data provided. These sources had been added to the non-EGU inventory using data provided in the Delaware DNR comments during the extension period; these comments correct erroneous information in those prior comments.

#### 6. Illinois EPA (IX-D-119) (IL)

**Requested Changes:** Commenter requested that Shell Oil Wood River Mfg., Plant ID 119090AA, Unit 721106330821 be classified as a large non-EGU potentially affected by the trading program. The agency indicated that they had requested this same change during the extension comment period.

**Action Taken:** EPA has revised the primary SCC code for this unit as requested. The effect of this change is to classify the boiler as a large non-EGU potentially affected by the Federal NOx Budget Trading Program.

#### 7. Indianapolis Power & Light (IX-D-50 and IX-D-114) (IN)

**Requested Changes:** Commenter noted that IPL Perry K (11-18) should be treated as small EGUs and removed from the non-EGU inventory, based on EPA's clarification of EGUs versus non-EGUs. The commenter previously requested this change for Perry K (11-18) in their comment letter as docketed under A-96-56.

**Action Taken:** The Perry K boilers (11 through 18) were included in the EGU inventory released in May 1999 as units 11, 12, and 14. However, the unit identifiers in that version of the EGU inventory were not accurately listed to reflect the fact that the heat input for the three units listed in the EGU inventory represents the entire plant (i.e. boilers 11 through 18). Because of the unit identifier issue, some of the units at the Perry K plant were mistakenly included in both the non-EGU and EGU inventories. EPA has removed the Perry K facility from the non-EGU inventory and has revised the unit identifiers in the EGU inventory to accurately reflect the fact that the total facility heat input and emissions data are representative of the combined data for the three stacks that serve boilers 11 through 18 (Unit 11 represents boilers 13 and 14, Unit 12 represents boilers 11 and 12, and Unit 14 represents boilers 15 through 18).

## 8. Southern Indiana Gas & Electric Company (IX-D-110) (IN)

**Requested Changes:** Commenter notes that EPA has listed SIGECO A.B. Brown units 1 and 2, F.B. Culley unit 3, and Warrick Power Plant unit 4 in both the EGU and the non-EGU lists. All of these units should be listed only in the EGU inventory. Commenter notes that F.B. Culley units 1 and 2 should remain listed as EGUs. No supporting documentation is provided.

**Action Taken:** All of these units are currently listed in the EGU inventory and have been removed from the non-EGU inventory.

## 9. Aluminum Company of America - Warrick Operations (IX-D-87 and 143) (IN)

**Requested Changes:** Commenter notes that EPA has incorrectly removed their Warrick Power Plant Units 1, 2, and 3 (Plant ID 6705) from the non-EGU inventory. Commenter adds that EPA had previously agreed in the Inventory RTC document issued in April 1999 that these units should be classified as large non-EGUs.

**Action Taken:** The commenter is correct regarding the previous comments, and the units have been included in the large non-EGU inventory.

## 10. U.S. Steel (IX-D-133) (IN)

**Requested Changes:** Commenter generally states that they cannot reconcile their plant sources with the U.S. Steel sources listed in the non-EGU database and lists the following point IDs for which further clarification is requested: 405, 701-OT6271, 701-OT6272, 701-OT6273, 701-OT6275, 701-OT6276, 720-O46268, 720-O46269, and 720-O46270.

**Action Taken:** No action was taken in response to this comment because the commenter failed to specify what changes to the inventory are appropriate. Moreover, the facility information in the non-EGU inventory for this facility is based on comments received from the Indiana DEM (VIII-B-269). The commenter specifically requested that EPA adopt those comments during comments received during the extension comment period (see VIII-B-135).

## 11. Marathon Ashland (IX-D-131) (KY)

**Requested Changes:** Commenter requests that unit 061 at the Catlettsburg, Kentucky refinery (identified as Ashland Oil, Inc., unit 061) not be included in the non-EGU inventory as an affected unit, since fossil fuels provide less than 50% of the unit heat input. The unit is a fluid catalytic cracking unit (FCCU) carbon monoxide boiler. No supporting documentation is provided.

**Action Taken:** It is EPA's understanding that the fuel the unit combusts is process gas. Process gas derived from fossil fuel combustion is considered a fossil fuel under both Part 96 and Part 97. EPA has previously posted guidance to this effect in response to questions raised

concerning the NO<sub>x</sub> SIP Call. See "Responses to Questions on the Final Rule for the NO<sub>x</sub> SIP Call, Volume 1," dated January 1999, and posted on the Internet at <http://www.epa.gov/ttn/oarpg/otagsip.html>. Therefore, this unit remains in the inventory as a unit affected by the section 126 rulemaking.

#### **12. Bethlehem Steel Corporation - Sparrows Point (IX-D-16) (MD)**

**Requested Changes:** Commenter requests that the four non-EGUs identified as Bethlehem Steel, Sparrows Point (MD), units 016, 017, 018, and 019 should be eliminated as affected units since they use greater than 50% non-fossil fuels (blast furnace gas). Commenter notes that the removal of these units was previously requested in their comments submitted in response to the NO<sub>x</sub> SIP Call and provides 1998 fuel usage data as supporting documentation.

**Action Taken:** Process gas derived from fossil fuel combustion is considered a fossil fuel under both Part 96 and Part 97. This includes blast furnace gas. EPA has previously posted guidance to this effect in response to questions raised concerning the NO<sub>x</sub> SIP Call. See "Responses to Questions on the Final Rule for the NO<sub>x</sub> SIP Call, Volume 1," dated January 1999, and posted on the Internet at <http://www.epa.gov/ttn/oarpg/otagsip.html>. EPA categorizes blast furnace gas as a fossil fuel, as it is derived from fossil fuels. Therefore, units 016, 017, 018, 019 remain in the inventory as affected units.

#### **13. Rock-Tenn Company (IX-D-109) (MI)**

**Requested Changes:** Commenter requests that the units at their facility (identified in the MI non-EGU inventory as Rock Tenn Company, Units 0001 and 0002) should be removed from the list of affected sources since these units are each rated at less than 250 mmBtu/hour. Commenter provides supporting documentation in the form of boiler inspection and equipment identification forms as submitted to the State.

**Action Taken:** The boiler capacity data for Units 0001 and 0002 have been modified based on the data provided by the commenter and the unit is no longer identified as a unit affected by the section 126 rulemaking.

#### **14. Trigen Energy Corporation (IX-D-98) (MO)**

**Requested Changes:** Commenter states that the Trigen-St. Louis units (3, 5, 6) were not included in the inventory.

**Action Taken:** The St. Louis facility is in the inventory under "Ashley Street Station."

#### **15. Ohio EPA (IX-D-32) (OH)**

**Requested Changes:** Commenter provides a list of all the non-EGUs that are included in their database as having a source ID that begin with "B" and the rated capacity of these units (1995 heat input data is not provided for these units). Commenter generally notes that there may some process sources in their list but that they did not intentionally provide a listing of these types of units. Commenter also notes that if EPA intends to include process heaters and furnaces, the non-EGU inventory is incomplete. Commenter does not specifically request the addition or deletion of any particular unit.

**Action Taken:** The EPA does not intend to include process heaters and furnaces in the non-EGU inventory. EPA identified several of the units on this list as process heaters and furnaces based on the SCC codes contained in the overall NO<sub>x</sub> SIP call inventory. These units include BP Oil (Unit B015), all of the Clark Refining units, and Marathon Ashland (B029). EPA was able to match the remaining large non-EGUs on OH EPA's list to affected boilers in EPA's inventory, with the exception of Mead Fine Paper (B013) and WCI Steel (B002). The data for the Mead boiler in EPA's inventory indicates that this unit is primarily a wood/bark boiler; only boilers that use primarily fossil fuels are affected sources under the Federal NO<sub>x</sub> Trading Program. The WCI Steel boiler is in EPA's inventory, but the inventory has no value for emissions for the 1995 baseline period. Therefore, while the unit may be affected, it would not be allocated allowances.. Also, in comments submitted by WCI Steel, the company did not request that this boiler be considered an affected unit under the Federal NO<sub>x</sub> Budget Trading Program. Thus, no action appears necessary to address this unit. EPA also used Ohio EPA's list of large non-EGUs to confirm comments from affected industry commenters in Ohio (see below) that argued that particular units should be reclassified as small boilers or that EPA's inventory included unidentified units that should not be classified as large.

#### 16. Morton Salt (IX-D-36) (OH)

**Requested Changes:** Commenter notes that the non-EGUs identified as Morton Salt Div of Morton International, units B002 and B003, should be removed from the list of affected sources since they are rated at less than 250 mmBtu/hr. Commenter provides copies of their State (OH EPA) operating permits as supporting documentation.

**Action Taken:** EPA has modified the boiler capacity data for units B002 and B003 from the non-EGU inventory as requested based on the information supplied by the commenter. The fact that Ohio EPA does not list these boilers as large boilers is further corroboration for this revision. These units are no longer identified as affected under the Federal NO<sub>x</sub> Budget Trading Program.

#### 17. Republic Technologies International (IX-D-48 and 52) (OH)

**Requested Changes:** In their letter docketed as IX-D-48, commenter requests that the non-EGU identified as Republic Engineered Steels, Facility ID 576050694, unit X001 be removed from the list of affected sources since this facility consists of two natural gas fired steel billet reheat furnaces and are neither industrial boilers nor turbines and are each rated at 131 mmBtu/hr. Commenter provides OH EPA Title V permit application forms as supporting documentation.

In their letter docketed as IX-D-52, commenter requests revisions to the non-EGUs identified as USS/Kobe Steel Company - Lorain Works, Facility ID 0247080229, units B007, B008, B009, and B013. Commenter notes that these units are now owned by Republic Technologies International and that only one of these units (B013) is a large non-EGU -- units B007, B008, and B009 have a heat input capacity of 225 mmBtu/hr and unit B013 has a heat input capacity of 380 mmBtu/hour. Commenter provides revised heat input data for these units. Commenter provides OH EPA Source Data Sheets as supporting documentation.

**Action Taken:** For Facility ID 576050694, EPA has reclassified the two reheat furnaces identified as unit X001 as small non-EGUs based on the information provided by the commenter and as corroborated by the fact that the unit is not identified in OH EPA's list of large boilers. For Facility ID 0247080229, EPA had not identified Unit B008 as a large non-EGU, so no revision was necessary for that unit. The boiler capacities for B007 and B009 at this facility were modified based on the data provided and as corroborated by the fact that the units are not identified in OH EPA's list of large boilers.

#### 18. BP Oil (IX-D-74) (OH)

**Requested Changes:** Commenter notes that some of their non-EGUs that are rated at greater than 250 mmBtu are not included in the inventory and should be added. Commenter requests that for the BP Oil Company, Toledo Refinery (currently listed with two large units B004 and B020), EPA should add units B006, B014, B015, and P007. Commenter provides revised 1995 heat input data for units B004 and B020 and provides new data for the units to be added. Commenter notes that the information provided has been submitted to the State in Fee Emission Reports.

**Action Taken:** The additional units (B006, B014, B015, and P007) are identified in EPA's inventory as process heaters, and were not added to the inventory.

#### 19. LTV Steel (IX-D-89) (OH)

**Requested Changes:** Commenter provides revisions to the plant IDs, unit IDs and heat input data for units at its Cleveland, OH facility which has the effect of eliminating some boilers as duplicates and reclassifying some units as unaffected boilers.

**Action Taken:** Based on this comment, the OH EPA list of large non-EGUs in Ohio, and the commenter's prior comments on the NO<sub>x</sub> SIP Call, EPA has eliminated the units associated with an old facility ID for this plant (ID 1318000078). The remaining affected boilers are all listed under the 1318001613 facility ID (units B001-B004, B007, and B905). The commenter did not provide any data for B905. The format of the comments suggest that the commenter may believe that this unit did not operate during the 1995 period or may be an unidentified unit. However, the commenter did not specify how EPA should address this unit and provided no supporting documentation concerning this unit. Therefore, EPA has not adjusted the inventory data for this unit based on the comments.

## 20. Canton Drop Forge (IX-D-111) (OH)

**Requested Changes:** Commenter requests that their facility be removed from the list of sources with units affected under the Federal NO<sub>x</sub> Trading Program. The commenter states that it does not have any unit that exceeds 250 mmBtu/hr. Commenter notes that this request was previously submitted in January 1999 in response to the NO<sub>x</sub> SIP Call. Commenter provides fuel use data and a detailed list of all the small non-EGUs at the Canton Drop Forge facility.

**Action Taken:** EPA has revised the boiler capacities for the applicable unit as requested based on the information provided by the commenter. With this modification, none of the units at this facility is identified as affected under the Federal NO<sub>x</sub> Trading Program.

## 21. Pennsylvania DEP (IX-D-24) (PA)

**Requested Changes:** Commenter provides data for several non-EGUs that should be added to the inventory. Commenter notes that it is not possible to obtain an accurate match for the non-EGUs labeled Texas Eastern Gas Pipeline Company and Bethlehem Steel Corporation and requests that EPA provide additional information on these sources so that the appropriate data may be provided and included in the inventory.

**Action Taken:** Most of the requested non-EGU additions are addressed in comments submitted by the affected facilities (see below). For the General Electric units identified as units to be added (Plant ID 009, Unit IDs 032 and 039), EPA added Unit 032 as requested. However, Unit 039 (which PA DEP also identified as Boiler #9) was not added because General Electric in extension period comments (A-96-56-VIII-B-61) documented that Boiler #9 (which GE referred to as unit 035) has a design capacity of 241 mmBtu/hr. For the PECO Fairless Hills facility, PA DEP's comments indicated that unit 44, not unit 46, was the third unit in operation in 1995. EPA has modified the Unit ID information at this facility to reflect this comment.

With respect to PA DEP's concerns about identifying Bethlehem Steel units, EPA has acted on comments as received from the company to address those units (see below). No action was taken with respect to the Texas Eastern units mentioned by PA DEP because the comment did not provide sufficient information to revise the existing data for this facility.

## 22. Sunoco (IX-D-09) (PA)

**Requested Changes:** Commenter notes that the data for the Philadelphia and Marcus Hook Pennsylvania refineries should be the same as that included in the PA DEP inventory. Commenter includes data for five boilers and two process heaters and implies that these units are all above 250 mmBtu/hour. Heat input data are provided but commenter does not provide specific data on maximum rated heat input capacity for each of these units. Commenter notes that one of the units at the Marcus Hook refinery (unit 090) is now owned by Florida Power and Light and should be classified as an EGU (this unit is the non-EGU currently identified as Sun Refining & Marketing, unit 090).

Commenter also provides comments on the non-EGU sources identified as Allied Chemical Corp., units 050 and 051. Commenter notes that these units are now owned by Sunoco and that units 050 and 051 should not be included in the list of affected sources since their heat load is 51% or greater supplied by phenol residue, a non-fossil fuel.

**Action Taken:** EPA has revised the SCC for units 050 and 051 to indicate that these units use phenol residue as their primary fuel. Thus, these units are not identified in the inventory as affected units. EPA notes that the City of Philadelphia had also requested removal of these units on the same basis in comments in response to the NODA (IX-D-55) and the extension public notice (VIII-B-218).

For the two process heaters identified in Sunoco's comments, no revision is necessary because these units are not affected under the Federal NO<sub>x</sub> Trading Program. For the unit identified as unit 90 at the Marcus Hook refinery, this unit remains classified as a non-EGU based on its operating status in 1995.

The remaining Sunoco comments request the addition of Unit 89 at the Marcus Hook refinery and the addition of Boilers 37-40 at the Philadelphia Refinery. EPA has modified the inventory to change the boiler capacity and SCC code for Unit 089 based on Sunoco's and PA DEP's comments. This unit is now identified as an affected unit. Boilers 37-40 are also identified as Units 020-023. The City of Philadelphia had previously requested that these units be added to the inventory, but had failed to provide stack and operating data. However, Units 020 and 021 were already included in the inventory, although only unit 021 had been identified as a large, affected boiler. Based on OTC monitoring plan data, these four boilers emit to a common stack. With that information, and the comments from the City of Philadelphia agency and Sunoco, EPA has revised the inventory to include all four boilers with the same stack and operating data. Each of the boilers is identified as a large, affected unit. The 1995 heat input data provided by Sunoco was used for purposes of determining allocations to these units and Unit 089.

### 23. P.H. Glatfelter Company (IX-D-18) (PA)

**Requested Changes:** Commenter requested that the non-EGU listed as Glatfelter, P.H. Company, unit 031 should be removed since it was shut down in January 1994. Commenter requests that P.H. Glatfelter, units 034 and 035 be added to the non-EGU inventory since they are boilers rated above 250 mmBtu/hr. The commenter suggests that unit 036 should be added as well, but as an EGU. The state agency (see below) indicates that this unit should be classified as a non-EGU. Commenter requests that for these additional units, an average heat input value based on 1995 through 1998 data should be used since it would be more representative of typical operations. Commenter provides fuel use data and PA DEP AIMS reports as supporting documentation.

**Action Taken:** Units 034, 035, and 036 have been added to the non-EGU inventory. The heat input for each of the units is based on the average of the two highest heat input years in the 1995 through 1998 period as provided by the commenter. Unit 036 was added as a non-EGU rather than an EGU based on the comments provided by the state agency and a lack of information that the unit provides electricity for sale to the grid under a firm contract. The 1995 emissions and

heat input for Unit 031 have been reset to zero based on the information provided concerning the 1994 shutdown. This information was corroborated by the state agency.

#### **24. International Paper (IX-D-46) (PA and IN)**

**Requested Changes:** The commenter requests that International Paper Erie Mill, unit 037 be added to the list of affected units since it has a design heat input of 326 mmBtu/hr, and has combusted less than 50 percent wood/bark fuel in at least on a year since 1995. Commenter provides 1995 operating statistics reports and 1995 emissions statements as supporting documentation. In addition, the commenter requests that the non-EGU identified as Weston Paper & Mfg in Indiana be removed from the listed of affected sources since it has a design heat input capacity of 177 mmBtu/hour. The appropriate Title V application section that indicates capacity is included as supporting documentation.

**Action Taken:** Erie Mill unit 037 was not added to the list of affected units. The data provided by the commenter documented that, in 1995, this unit used wood/bark as its primary fuel. The 1995 baseline year is the basis for determining whether a non-EGU is fossil fuel-fired. For the Weston Paper unit in Indiana, EPA has reclassified the boiler as a small non-EGU based on the design capacity data and supporting documentation provided.

#### **25. Tosco Refining (IX-D-57) (PA)**

**Requested Changes:** Commenter notes that the non-EGU currently identified in the inventory as BP Oil, unit 033 is now owned by Tosco Refining. Commenter requests that the heat input data for this unit be revised and that four additional units at this facility be added to the non-EGU inventory. In addition to unit 033 (identified as No. 8 boiler), the commenter requests that unit 032 (No. 7 boiler), unit 038 (platformer heater), unit 044 (543 crude heater), and unit 045 (544 crude heater) be added.

**Action Taken:** Process heaters (units 038, 044, 045) are not affected units under the Federal NO<sub>x</sub> Budget Trading Program, and thus no revision was necessary for these units. The inventory has been revised so that Unit 032 (No. 7 boiler) is identified as an affected unit.

#### **26. Merck Manufacturing (IX-D-58) (PA)**

**Requested Changes:** Commenter requests that the non-EGU identified as Merck Sharp & Dohme, unit 034 be removed from the list of affected sources since it is below 250 mmBtu/hour. Commenter provides State emissions statements as supporting documentation.

**Action Taken:** EPA has removed unit 034 from the non-EGU inventory as requested, and as corroborated by PA DEP's comments.

#### **27. Bethlehem Steel Corporation (IX-D-71) (PA)**

**Requested Changes:** Commenter requests that all six of their non-EGUs be removed from the non-EGU inventory. Commenter notes that units 051, 147, 041, 042 and 067 are fired primarily with non-fossil fuel, that units 147 and 132 are process units, and that unit 132 was shut down in 1994. Commenter adds that Bethlehem's operations in Bethlehem, PA have been shutdown. Commenter provides the 1995 emission certification reports and fuel use data as supporting documentation.

**Action Taken:** EPA has removed units 051, 132, and 147 from the list of affected units. The commenter documents that Unit 051 has a maximum rated heat input of 95 mmBtu/hr, and that Unit 147 is a process unit not covered by the Federal NO<sub>x</sub> Trading Program. In addition, Bethlehem Steel and PA DEP both indicate that Point 132 represents a coal dryer that was shutdown in 1994. This unit has been removed completely from the inventory. Units 041, 042, and 067, which burn primarily coke oven gas, will remain in the inventory as affected units. Process gas derived from fossil fuel combustion is considered a fossil fuel under both Part 96 and Part 97. This includes coke oven gas. EPA has previously posted guidance to this effect in response to questions raised concerning the SIP Call. See "Responses to Questions on the Final Rule for the NO<sub>x</sub> SIP Call, Volume 1," dated January 1999, and posted on the Internet at <http://www.epa.gov/ttn/oarpg/otagsip.html>.

## 28. Proctor & Gamble (IX-D-129) (PA)

**Requested Changes:** Commenter requests that the Proctor & Gamble Paper Products Company - Mehoopany Site, unit 035 be included as a large non-EGU since it is a natural gas fired cogeneration turbine with a rated heat input of 644 mmBtu/hr.

**Action Taken:** The SCC code for this unit in the non-EGU inventory was revised from SCC 20200601 to SCC 10200601. Based on that revision, the unit is identified as a large non-EGU and an affected unit.

## 29. International Paper (IX-D-46) (SC)

**Requested Changes:** Commenter requested removal of International Paper (IP) Georgetown (004) from the inventory. The unit represent two boilers which each burn greater than 50% bark. Commenter also requested a change in owner identification for Union Camp Eastover to IP Eastover. South Carolina NO<sub>x</sub> SIP Call Non-EGU Budget Certification forms were provided as supporting documentation.

**Action Taken:** The SCC reported for Unit 004 indicates that this unit is a bituminous coal-fired boiler. The commenter did not provide a revised SCC code for this unit, and thus no change was made. The owner identification has not been modified in the non-EGU inventory at this time, but EPA will retain this information and modify the identification as the inventory is updated over time.

## 30. Eastman Chemical (IX-D-107) (SC)

**Requested Changes:** Commenter requested removal of Unit 006 at the Carolina Eastman plant as a potentially affected large non-EGU. The commenter states that the unit has a maximum rated heat input less than 250 mmBtu/hr.

**Action Taken:** The commenter provided no documentation related to the maximum nameplate capacity of unit 006, and thus no change to the non-EGU inventory was made for this unit. However, the unit is not identified as a large non-EGU in the current inventory, so no change is necessary.

### 31. West Virginia Department of Environmental Protection (IX-D-65) (WV)

**Requested Changes:** Commenter requested changes in the 1995 heat inputs for a number of non-EGU units in West Virginia, including the data for two units not previously identified by EPA as potentially affected under the Federal NO<sub>x</sub> Budget Trading Program.

**Action Taken:** The WV DEP comment identified two units in addition to those identified in the data released as part of the NODA that the agency believed should be considered large non-EGUs. First, the agency provided 1995 heat input for the North Branch Power Station (Plant ID 00014, Unit ID 018). The EPA had identified this unit as a large, affected non-EGU but without NO<sub>x</sub> emissions in 1995. Given the small amount of heat input identified by WV DEP (less than 5,000 mmBtu), EPA has added heat input only for this unit as requested by the state agency. The second unit is Weirton Steel (Plant ID 00001, Point ID 030). EPA had included boiler segments for this unit but had not identified the boiler segments as the primary segments for this point. Based on this comment, EPA has added this unit to the list of large affected non-EGUs, and modified the heat input as provided by the WV DEP (which the agency states was verified by the source).

### 32. Wisconsin Department of Natural Resources (IX-D-81) (WI)

**Requested Changes:** Commenter requested classification of Consolidated Papers Kraft Division (B21) as a potentially affected large non-EGU.

**Action Taken:** The Consolidated Papers unit is listed at 93 mmBtu/hr capacity and specific documentation of a different capacity was not provided. Thus, this unit has not been reclassified for purposes of calculating the statewide emissions budget for WI.