Midwest RPO Area Source EL Comparability Project

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EI Comparability

• Origin: Make it easier for states to build 2002 CERR/Modeling Emissions Inventory
• Make sure all states are using most up to date methodologies We want to make better inventories and remove burden from states
• Transparency/Comparability over consistency
Why Comparability and not Consistency

- Consistency projects tend to discourage innovative thinking
- Most states want to build high quality inventories with best available science
- If plausible alternative methods are given, they will tend to adopt them
How it was done

• Report at top 33 categories in the 1999 NEI for NOX, SOX, ROG, PM2.5
• Report covers over 90% of the mass of each pollutant
• Ask each states to submit spreadsheet with their methods, source documents, etc.
• Conference calls to discuss methods
The Four Calls

• One all for Fuel combustions, Solvent Utilization, and Miscellaneous categories
• One Wrap up call
• States agreed that it was a very beneficial project because they could see the likelihood of problems in the future.
• Found problems before inventories were completed and everyone was dug in.
Results

- Often we had 2-4 different methods for the same SCC.
- Created consensus on a fixed set of SCC codes.
- Resulted in 44 categories to be submitted because of need for place holders.
- Sent letter on 10/13 to EPA-Lorang
Nine Questions To EPA

- EPA Suggestions on residential wood combustion?
- Should Industrial Adhesives (2440020000) be treated as an area source?
- What is the correct control efficiency for FIFRA regulated products?
- What wind blown and agricultural tilling dust model?
- What method should we use for waste burning for land clearing?
- Should we expect that NMIM will be released in our time frame?
- Zero Records in NIF for nonexistent categories.
- EGU inventories If EPA will replace with CEM records?
- Submit biogenics inventories?
5 Tiered MV Needs Assessment

- 1. Standard HPMS/CERR/SIP Inventory
- 2. Temporally Enhanced SIP Inventory
- 3. Major Highway Network (Statewide)
- 4. Standard Urban Travel Demand Model Network
- 5. Enhanced Urban Travel Demand Model Network
<table>
<thead>
<tr>
<th>Data Type</th>
<th>Spatial</th>
<th>Temporal</th>
<th>Mobile6 Enhancements</th>
</tr>
</thead>
<tbody>
<tr>
<td>VMT</td>
<td>County Total VMT by Facility Type for collector and non-modeled VMT. VMT by link for arterials and above. Freeway ramps modeled as discrete links.</td>
<td>VMT differs by month by facility type. Day of week variation in VMT is included as well as hour of the day distribution by day of the week.</td>
<td>Average start/stop information included in mobile6 by hour to show hot/cold start distribution.</td>
</tr>
<tr>
<td>Speed</td>
<td>Link specific speeds for all links. Speed should reflect actual speed but often reflects posted speed or un-congested speeds.</td>
<td>Speed variation by hour based on modeled time period. Some smoothing applied. May not reflect weekends</td>
<td></td>
</tr>
<tr>
<td>Fleet Mix</td>
<td>Vehicle mix supplied road types and shows validation technique</td>
<td>Mix of Cars/Trucks by hour of the day and day of the week are included by facility type</td>
<td>Vehicle mix embedded in mobile6</td>
</tr>
</tbody>
</table>