

Midwest RPO Area Source EI 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 release 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



| Data Type | Spatial | Temporal | Mobile6 Enhancements |
|-----------|--|---|---|
| VMT | 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. | 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. | Average start/stop information included in mobile6 by hour to show hot/cold start distribution. |
| Speed | Link specific speeds for all links. Speed should reflect actual speed but often reflects posted speed or un-congested speeds. | Speed variation by hour based on modeled time period. Some smoothing applied. May not reflect weekends | |
| Fleet Mix | Vehicle mix supplied road types and shows validation technique | Mix of Cars/Trucks by hour of the day and day of the week are included by facility type | Vehicle mix embedded in mobile6 |