



Timothy M. Keller, Mayor

# Cumulative Impacts & Air Quality Permitting



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Presented at the February 1, 2018 Air Quality Coalition meeting



# Cumulative Impacts

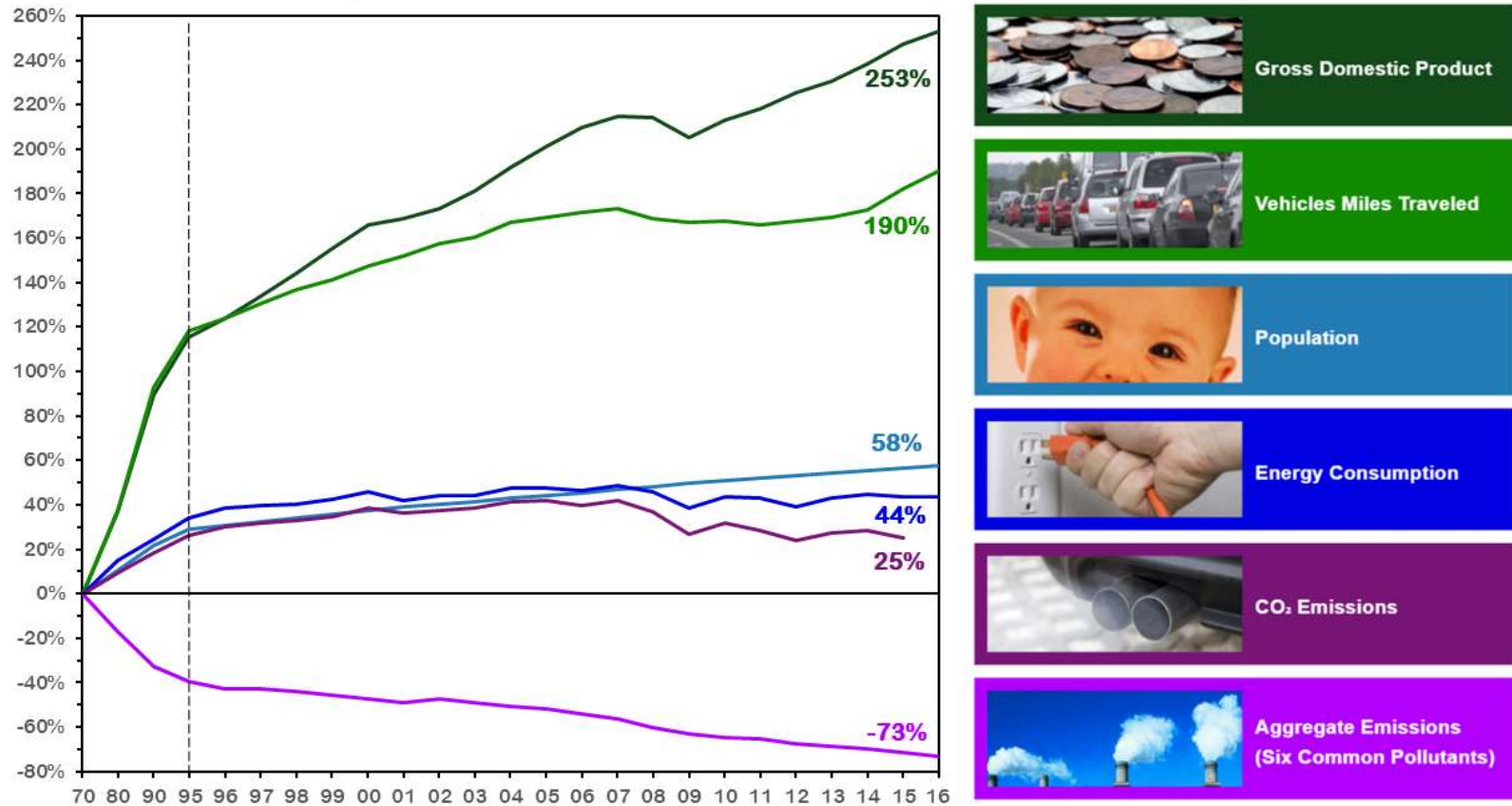
- Recognize community concerns
- Various interpretations
- Cumulative air quality impacts that are evaluated in the permitting process for common pollutants

# Two Approaches

- Common Pollutants -- Allowed levels of air pollution in the form of ambient standards (concentration)
  - carbon monoxide (CO)
  - nitrogen oxides (NO<sub>x</sub>)
  - sulfur dioxide (SO<sub>2</sub>)
  - particulate matter (TSP, PM<sub>10</sub>, & PM<sub>2.5</sub>)
  - Lead (Pb)
  - hydrogen sulfide (H<sub>2</sub>S)
  
- Performance standards & practices
  - Hazardous air pollutants

# Ambient Standards Approach

## Comparison of Growth Areas and Emissions, 1970-2016



Note: CO<sub>2</sub> emissions estimate through 2015 (Source: [2015 US Greenhouse Gas Inventory Report](#))

Gross Domestic Product: [Bureau of Economic Analysis](#)

Vehicle Miles Traveled: [Federal Highway Administration](#)

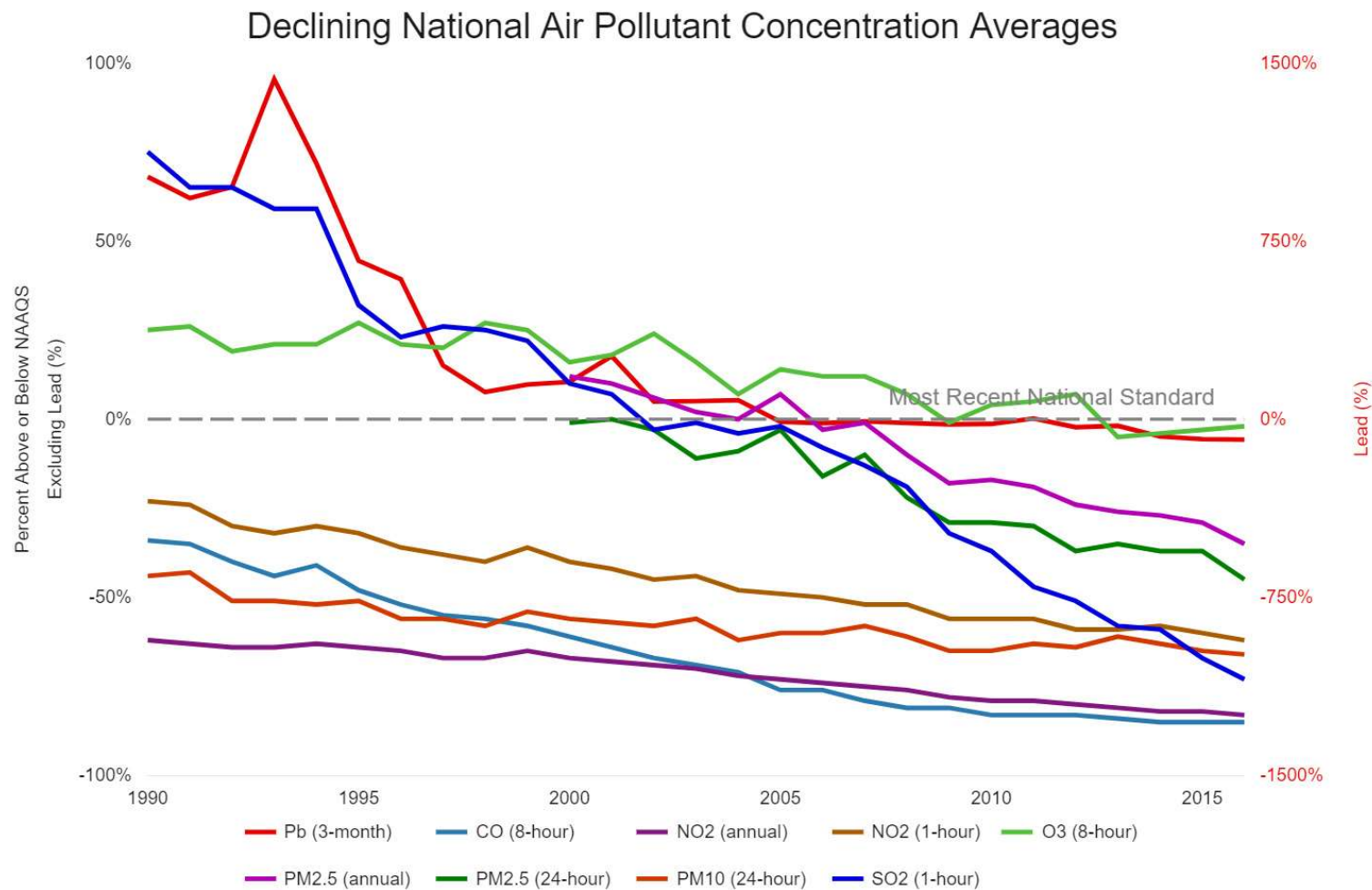
Population: [Census Bureau](#)

Energy Consumption: [Dept. of Energy, Energy Information Administration](#)

Aggregate Emissions: [EPA's Air Pollutant Emissions Trends Data](#)

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# Ambient Standards Approach

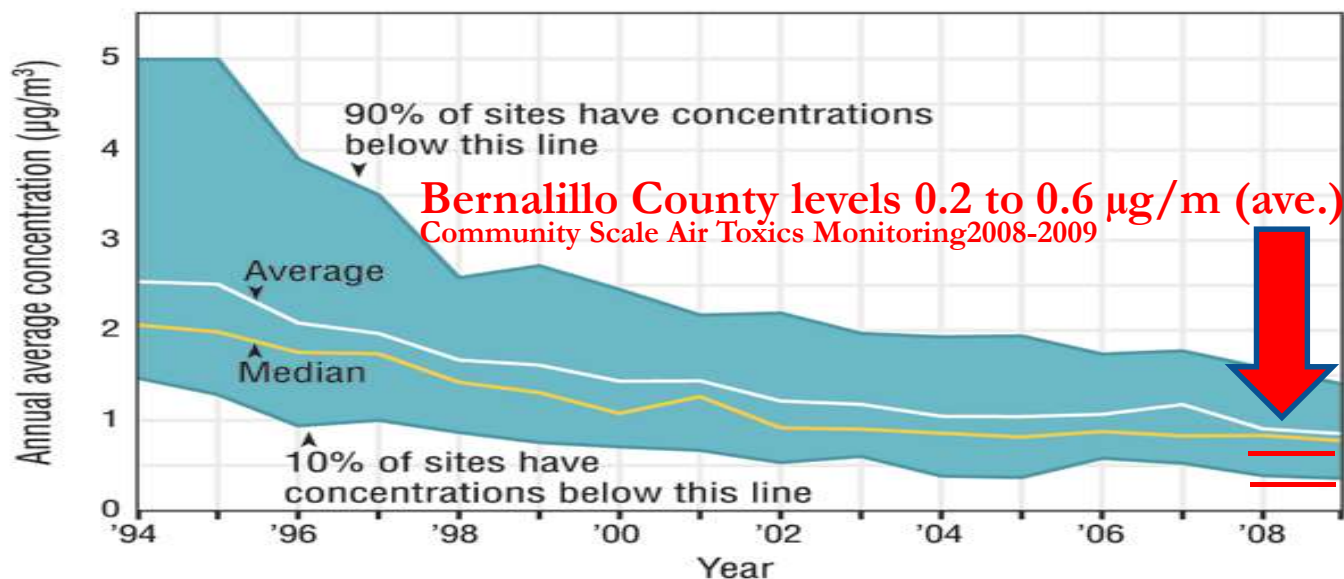


Source US EPA Air Quality System, <https://gispub.epa.gov/air/trendsreport/2017/#highlights>

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# Hazardous Air Pollutants Approach

**Exhibit 2-43. Ambient benzene concentrations in the U.S., 1994-2009<sup>a</sup>**



<sup>a</sup> **Coverage:** 22 monitoring sites nationwide (out of a total of 339 sites measuring benzene in 2009) that have sufficient data to assess benzene trends since 1994.

**Data source:** U.S. EPA, 2010

Source US EPA, <https://cfpub.epa.gov/roe/documents/BenzeneConcentrations.pdf>



## **Cumulative Impacts - Air Dispersion Modeling**

- Environmental Protection Agency approved software and guidelines
- Existing pollution, air emissions from the proposed stationary source and weather conditions are used in the model
- Increasing complexity

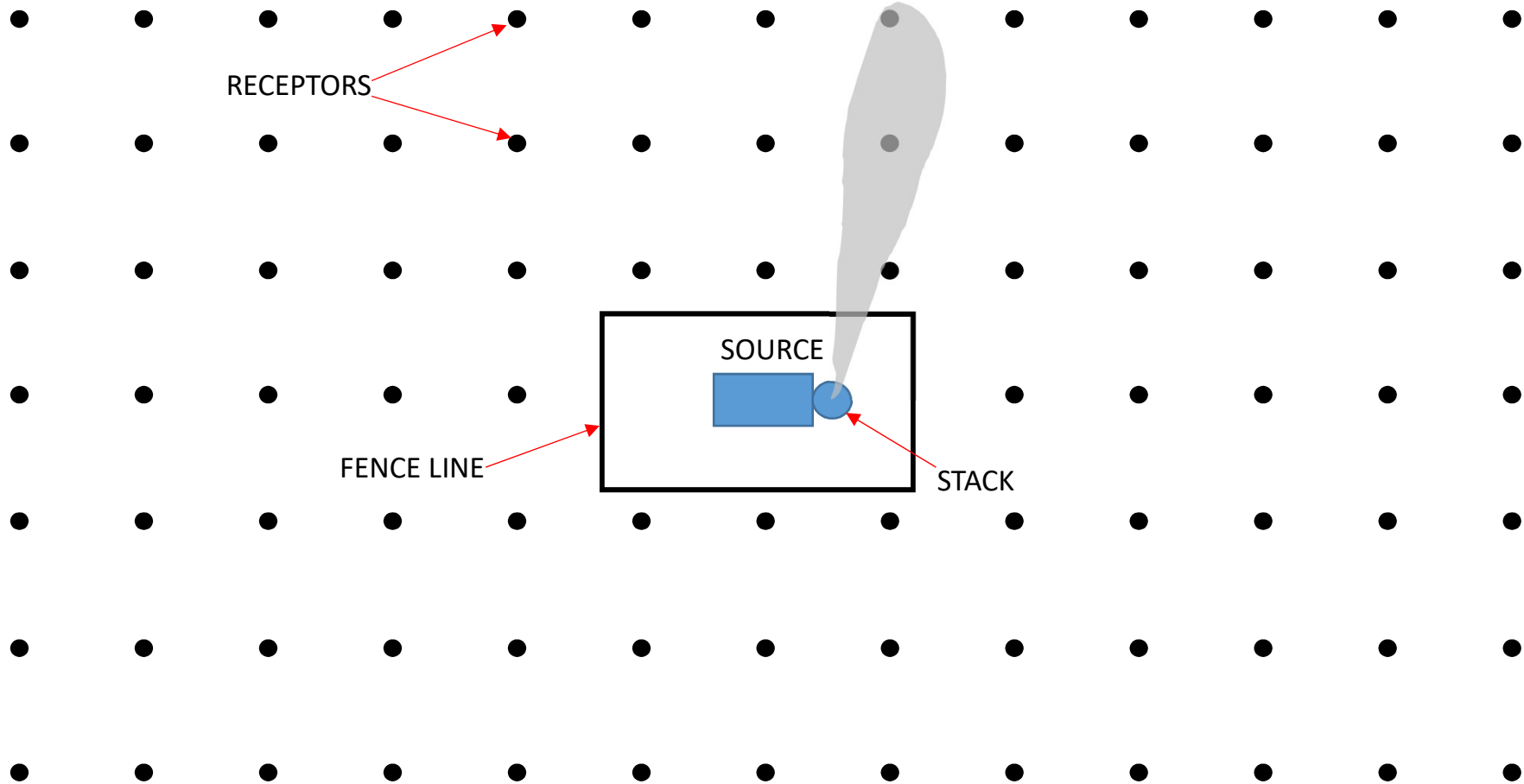
# Over Predicts Impacts - Perfect Storm

## ▪ Highest Impacts

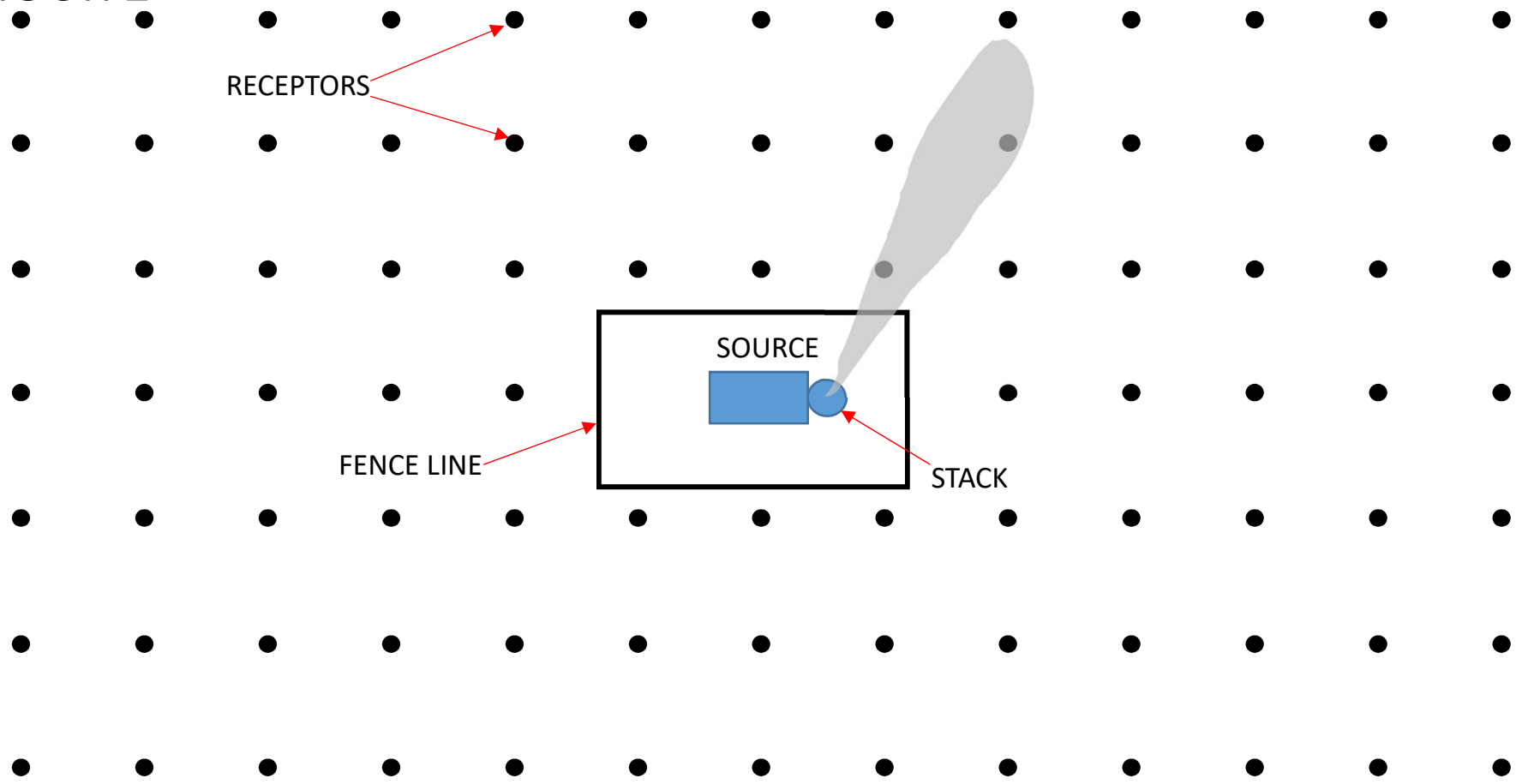
- Weather conditions → pollution accumulates
- Proposed project operating with permitted pollution rates during **all** of the requested operating hours
- Near-by sources operating with permitted pollution rates during **all** of the requested operating hours



HOUR 1



HOUR 2



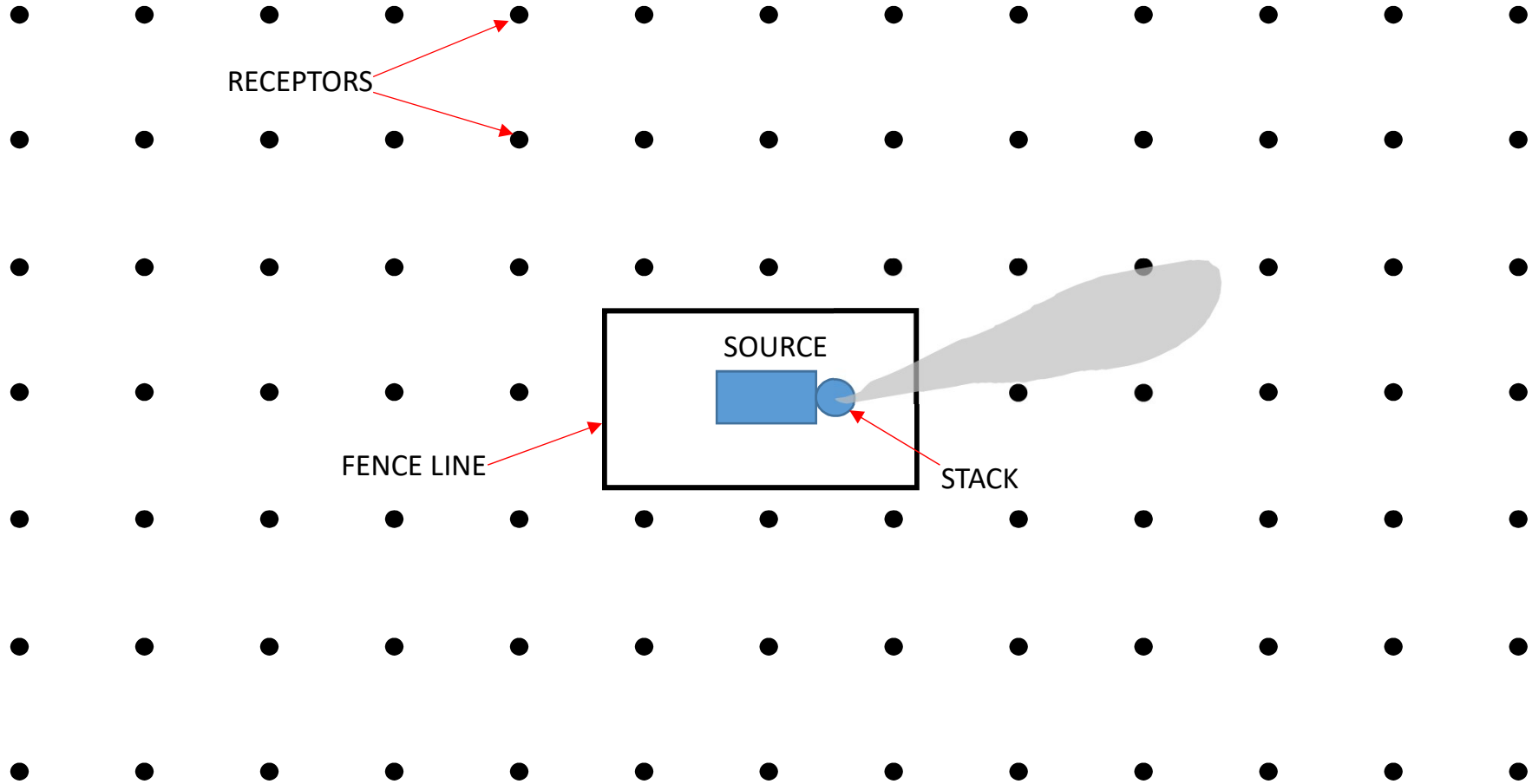
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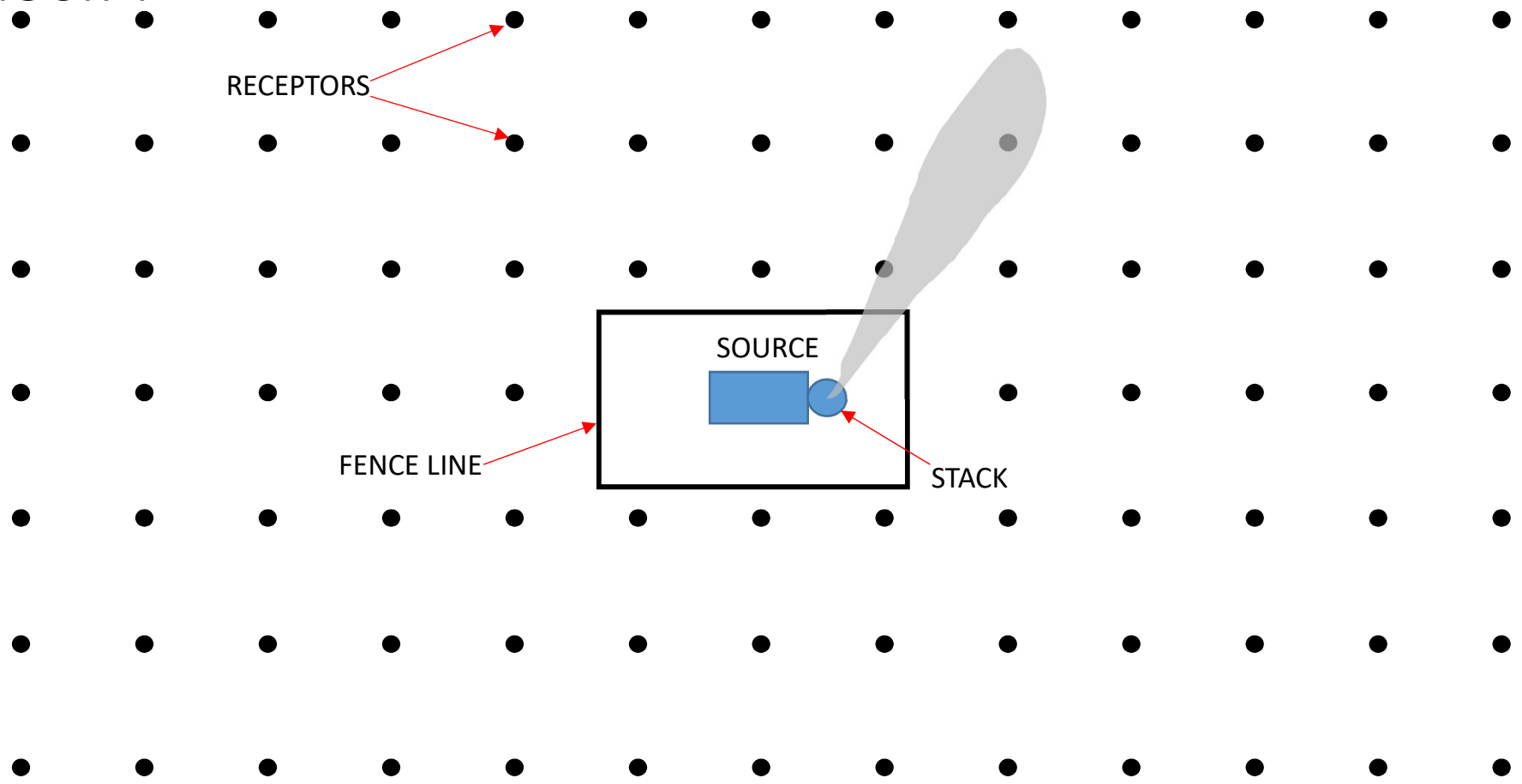
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HOUR 4



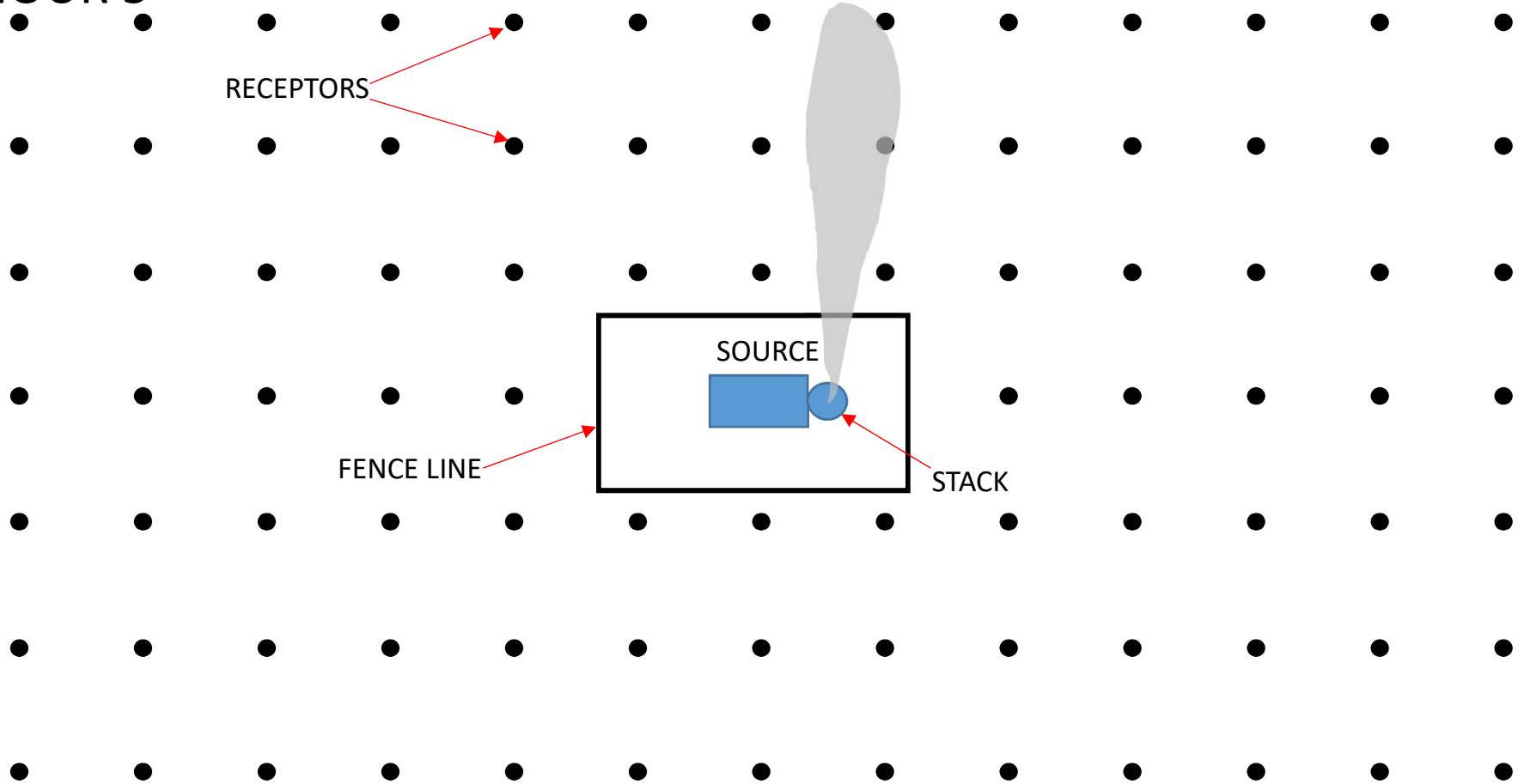
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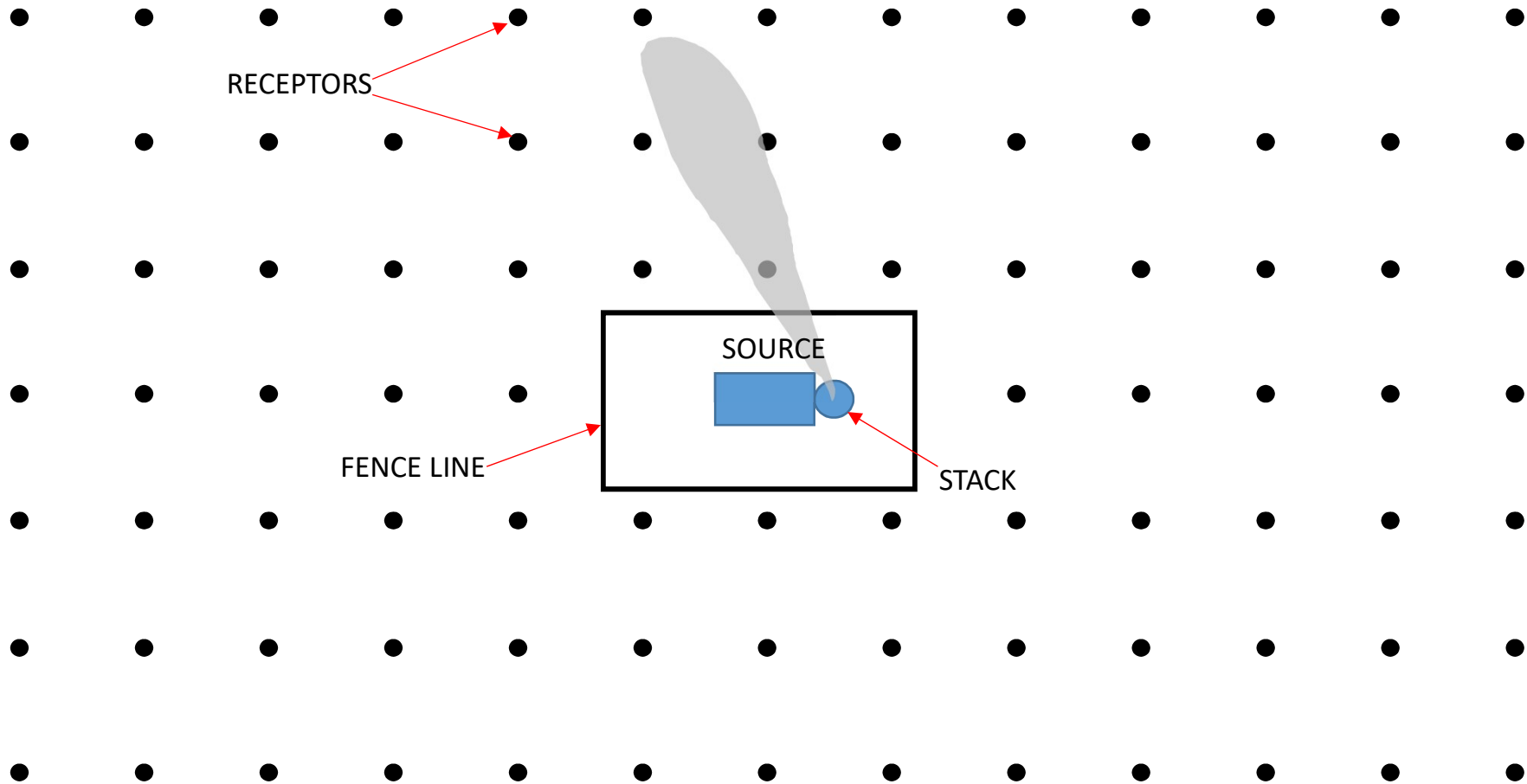
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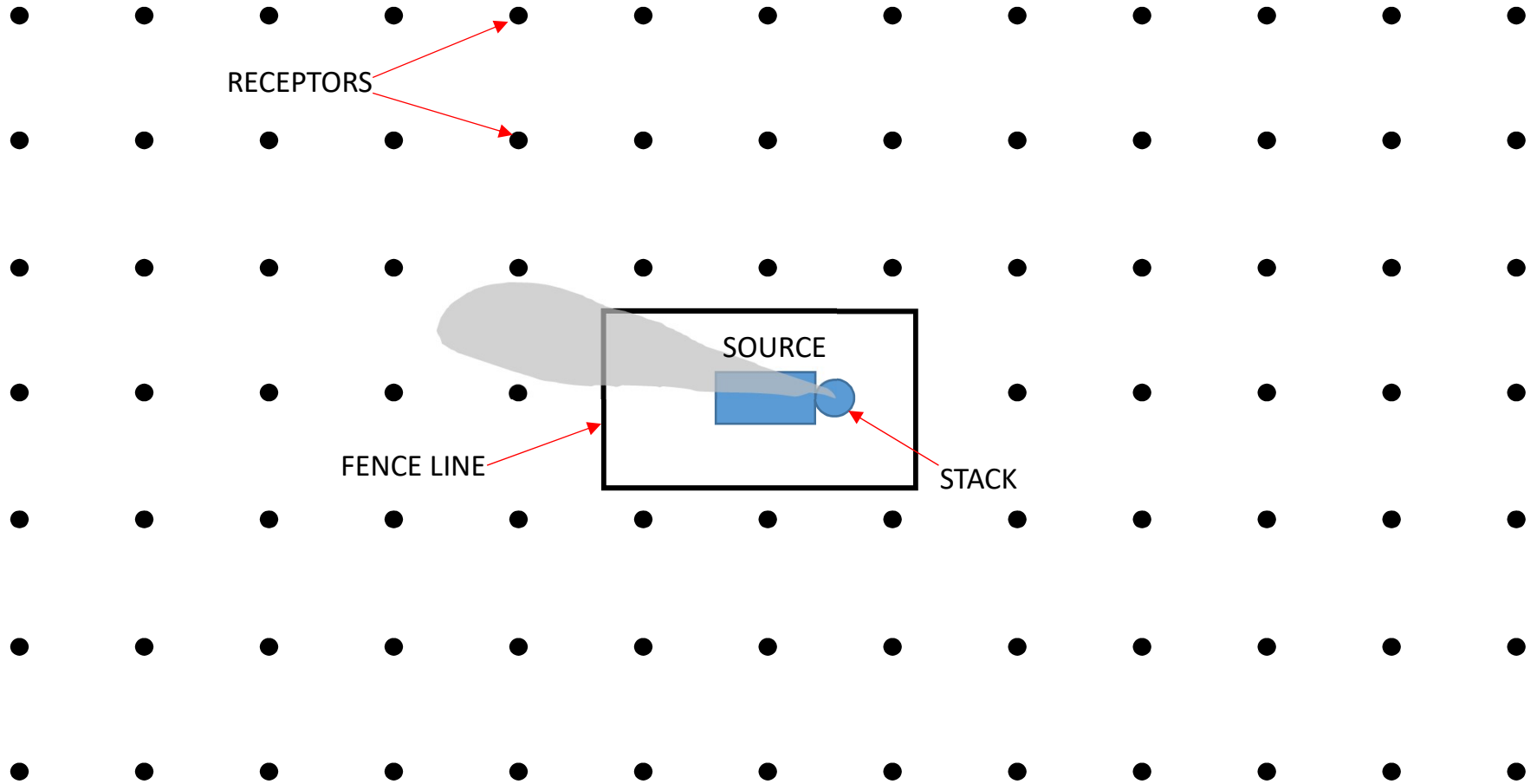
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HOUR 6



HOUR 7



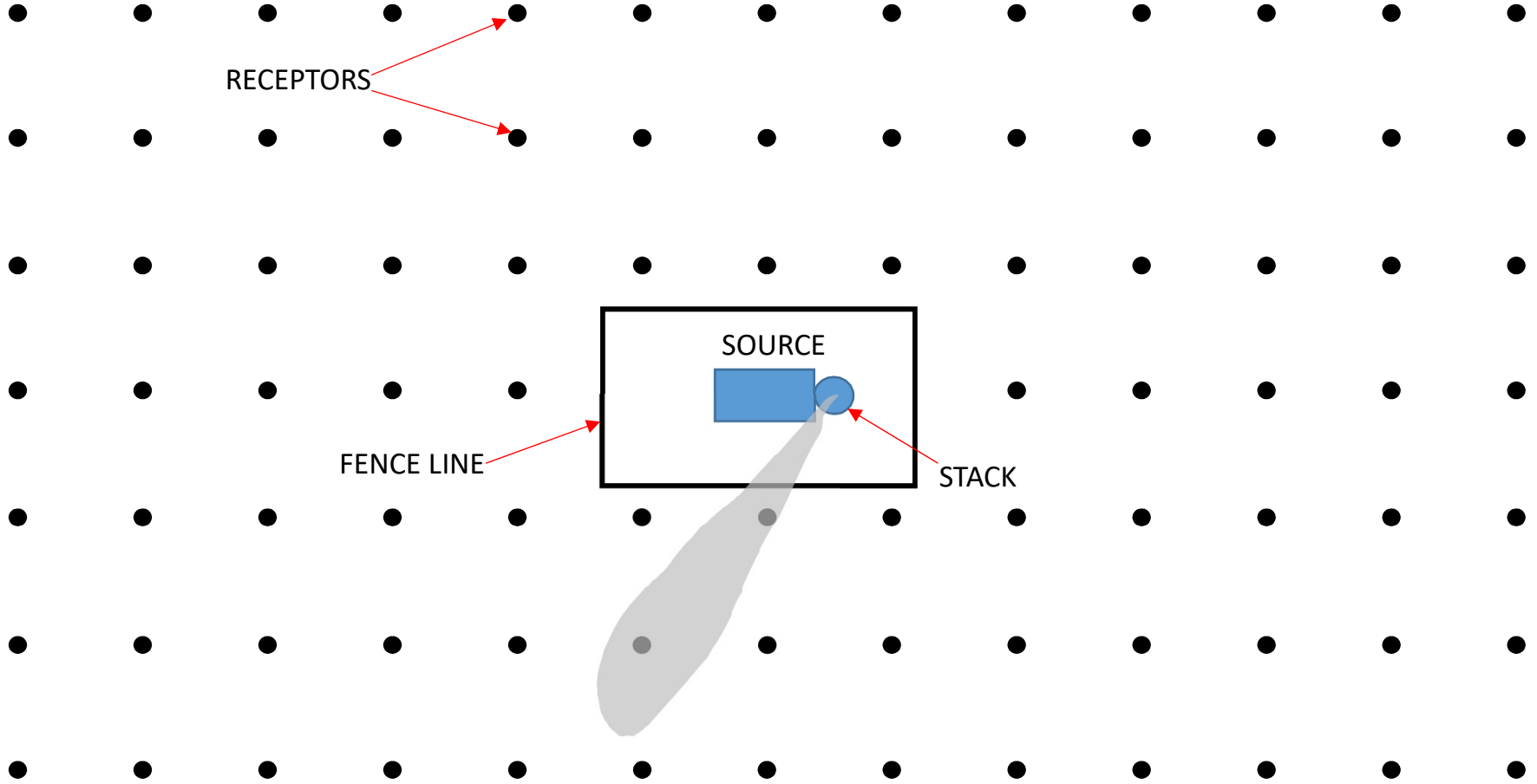
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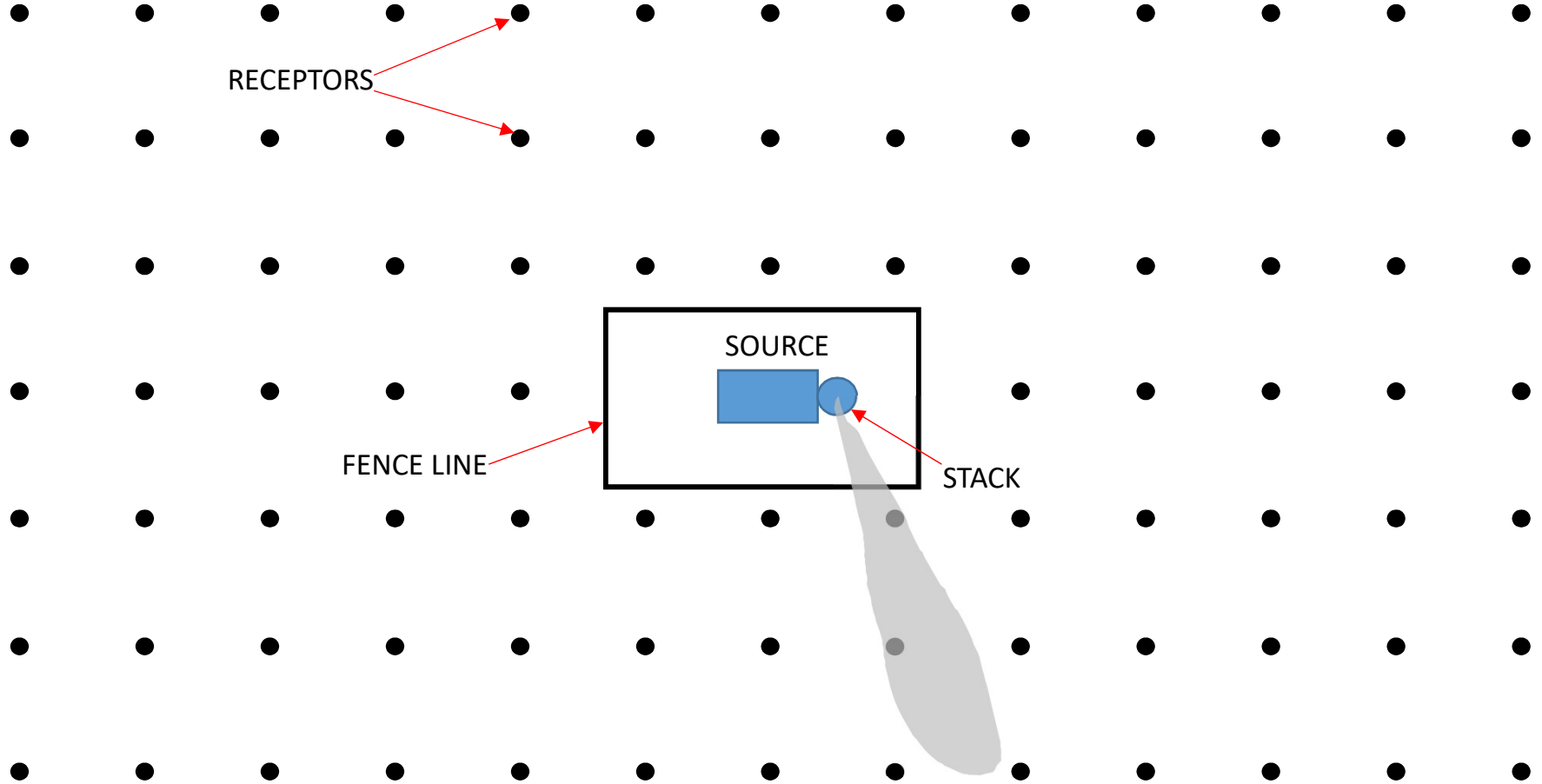
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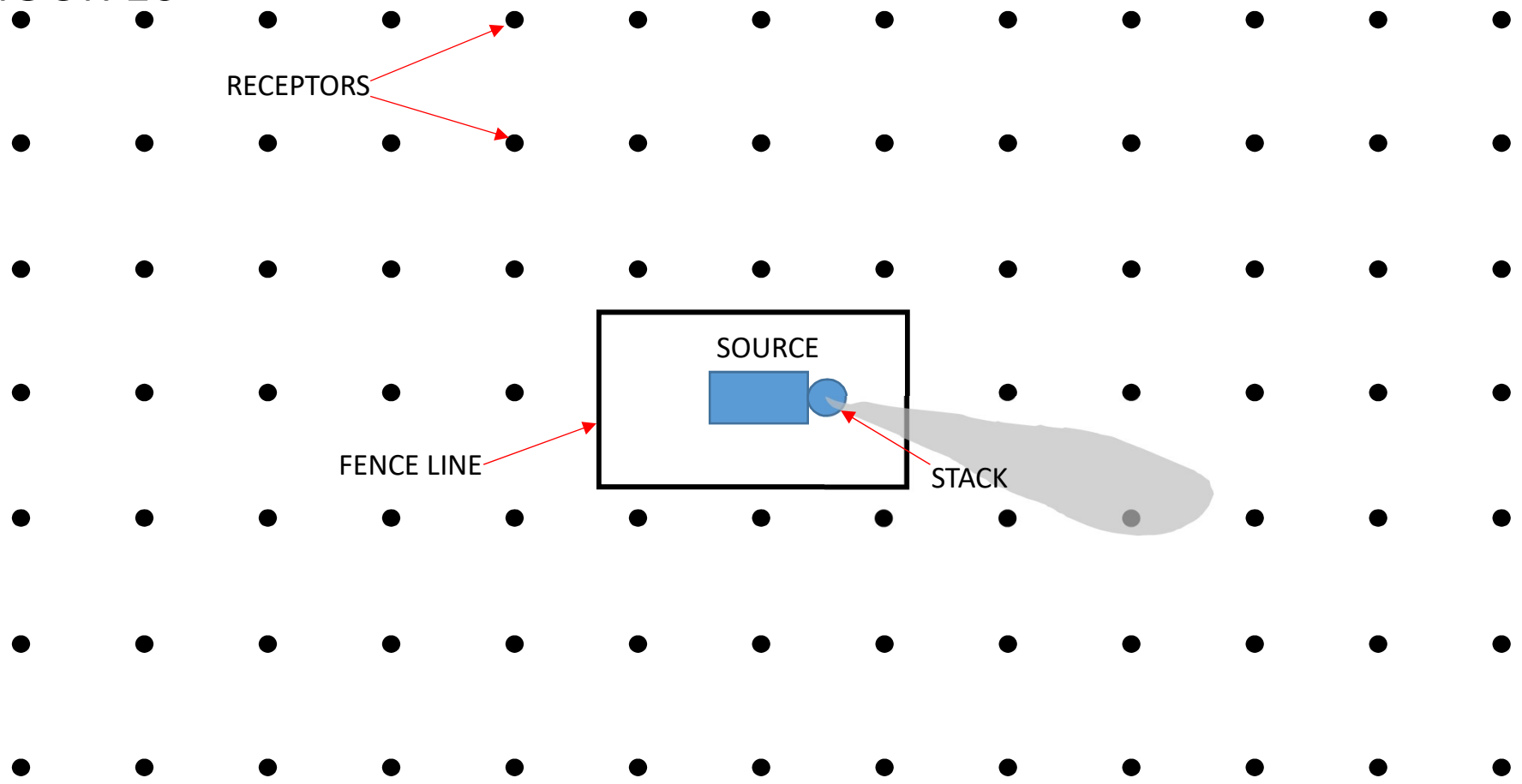




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HOUR 10



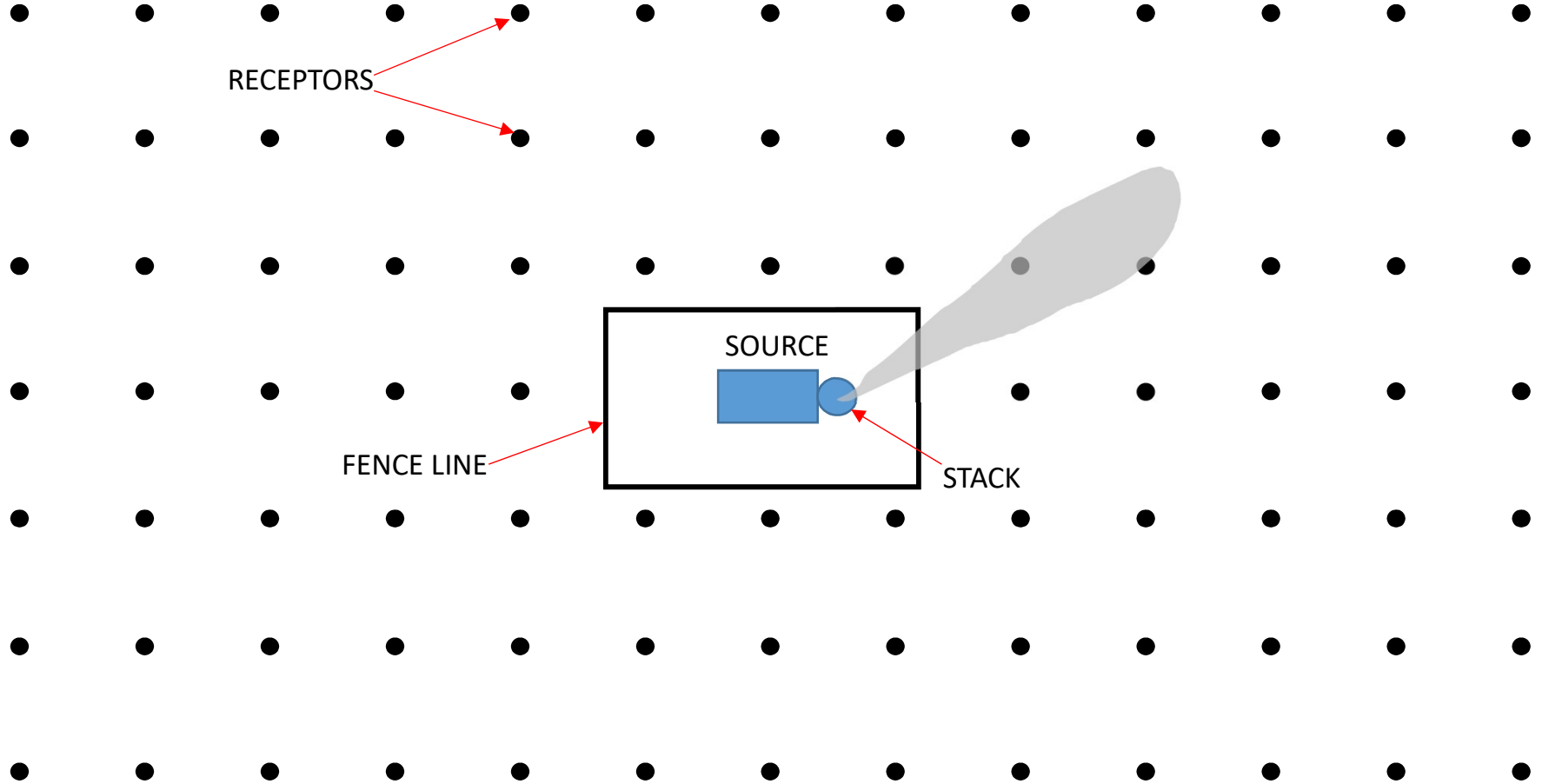
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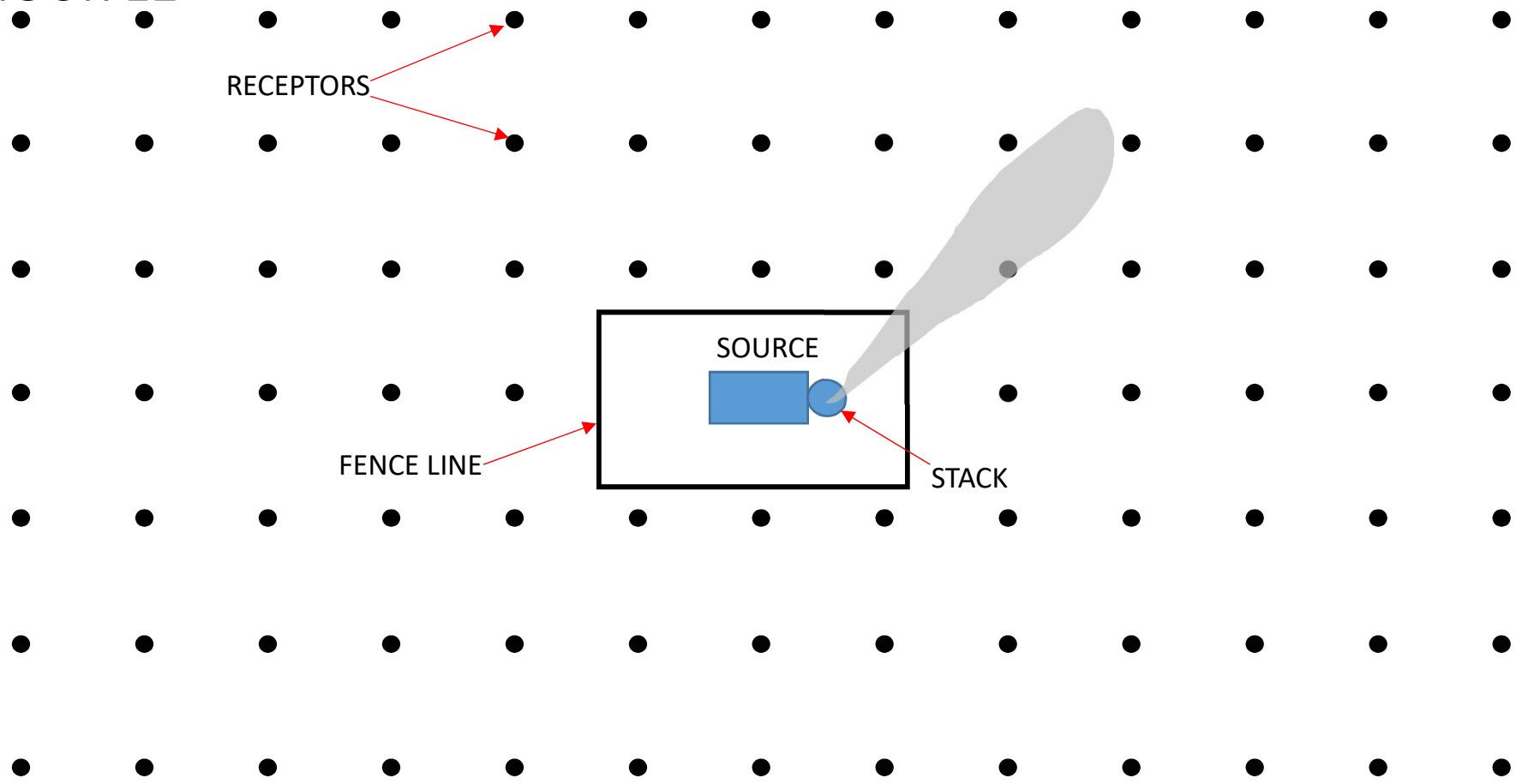
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HOUR 12



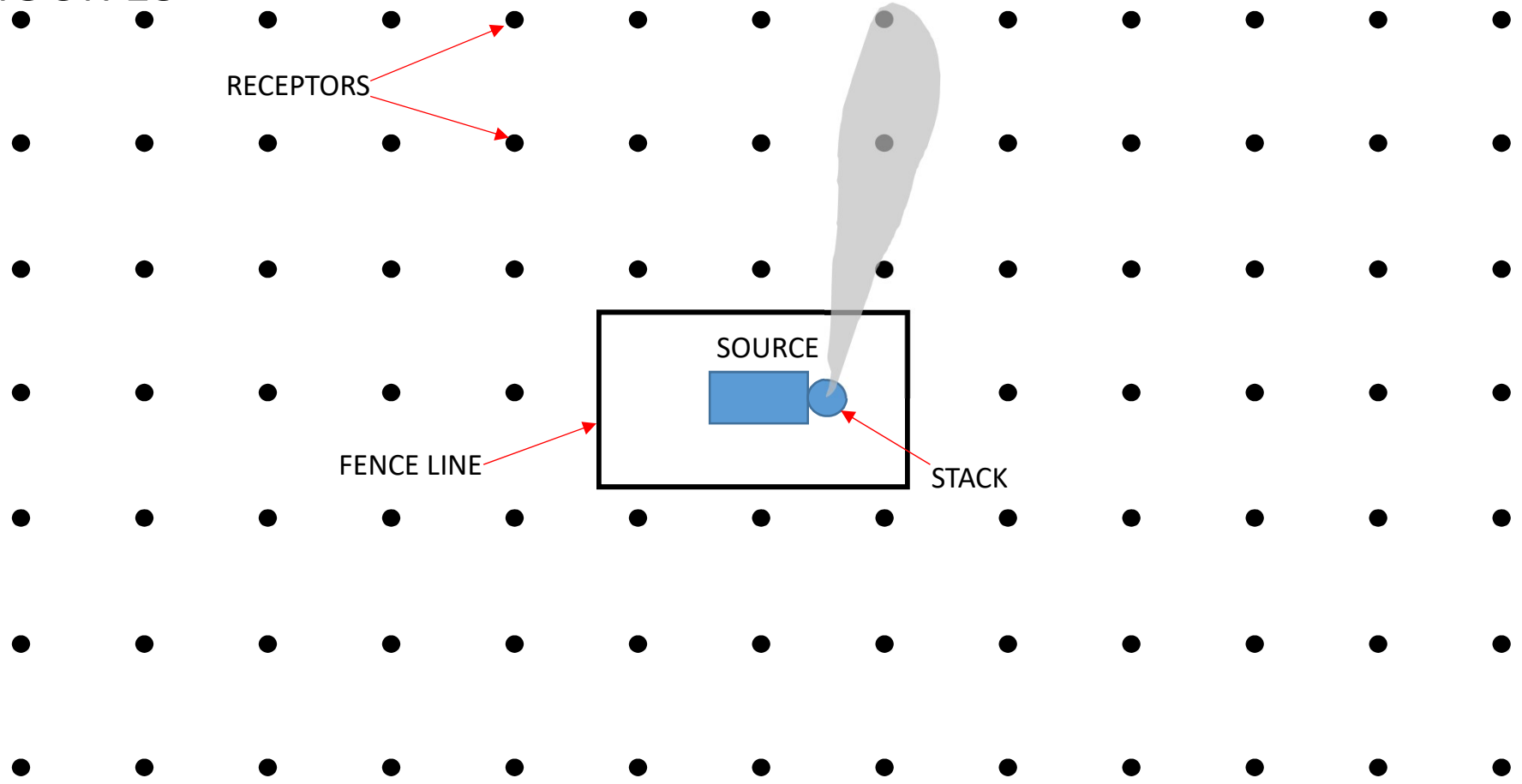
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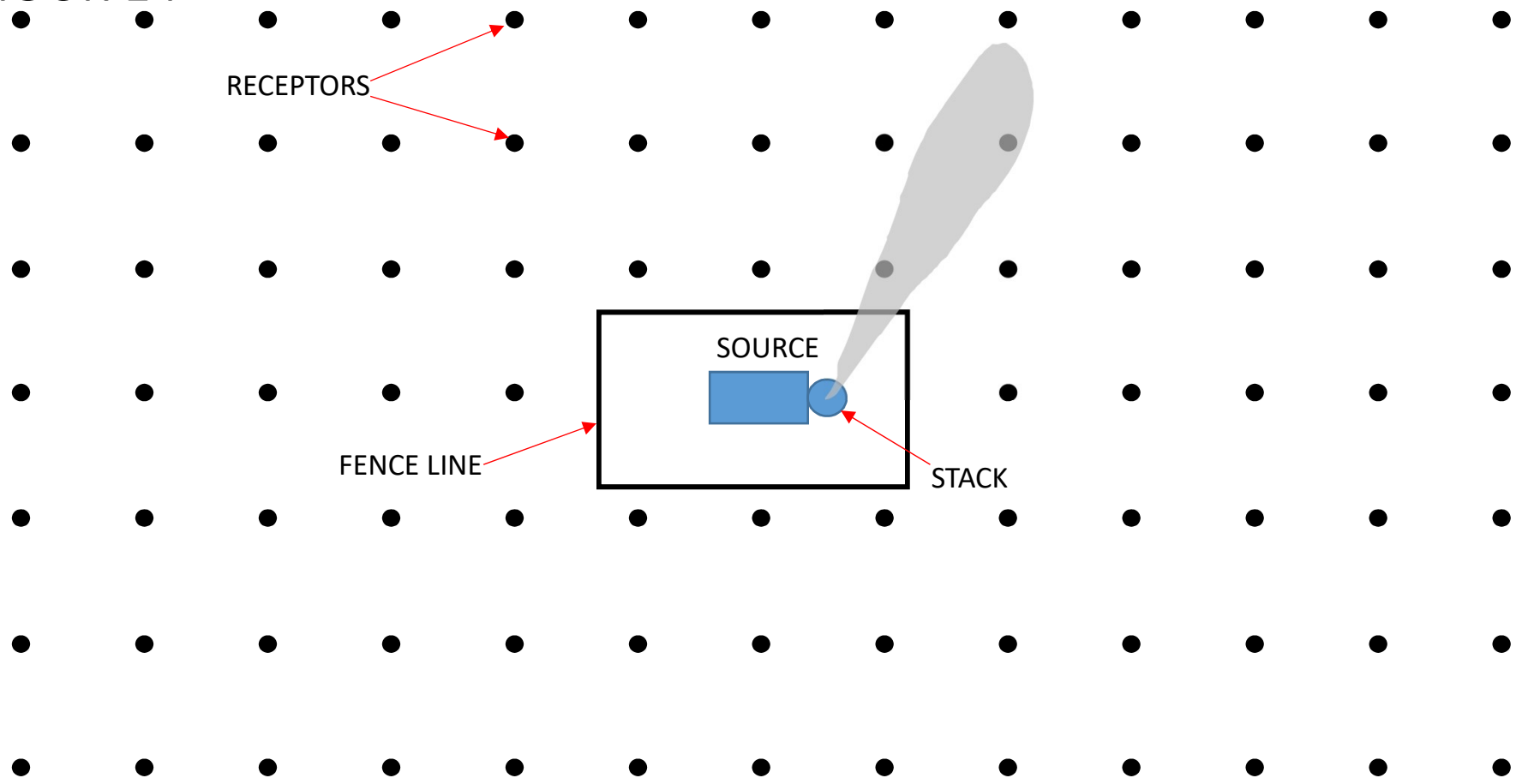
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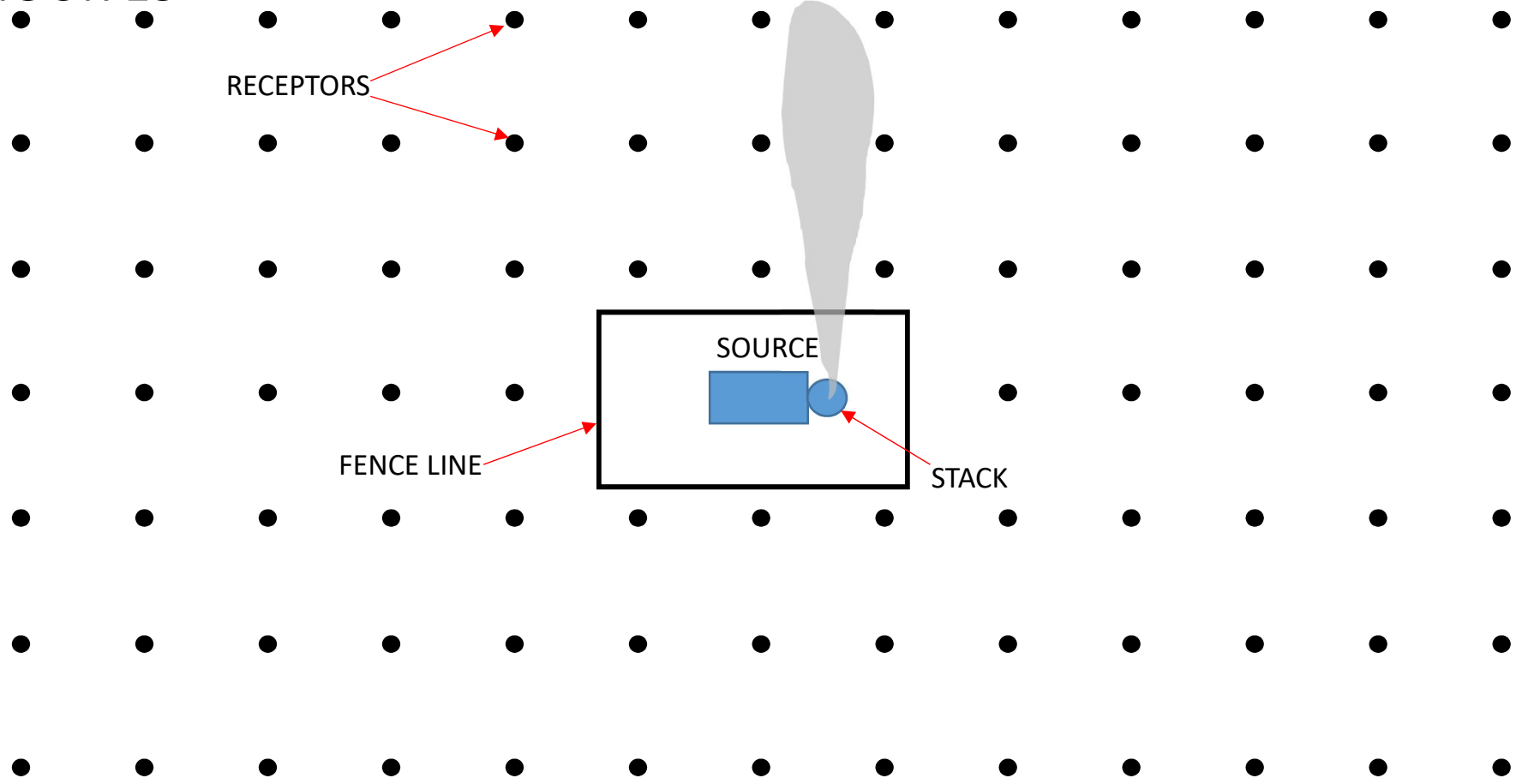
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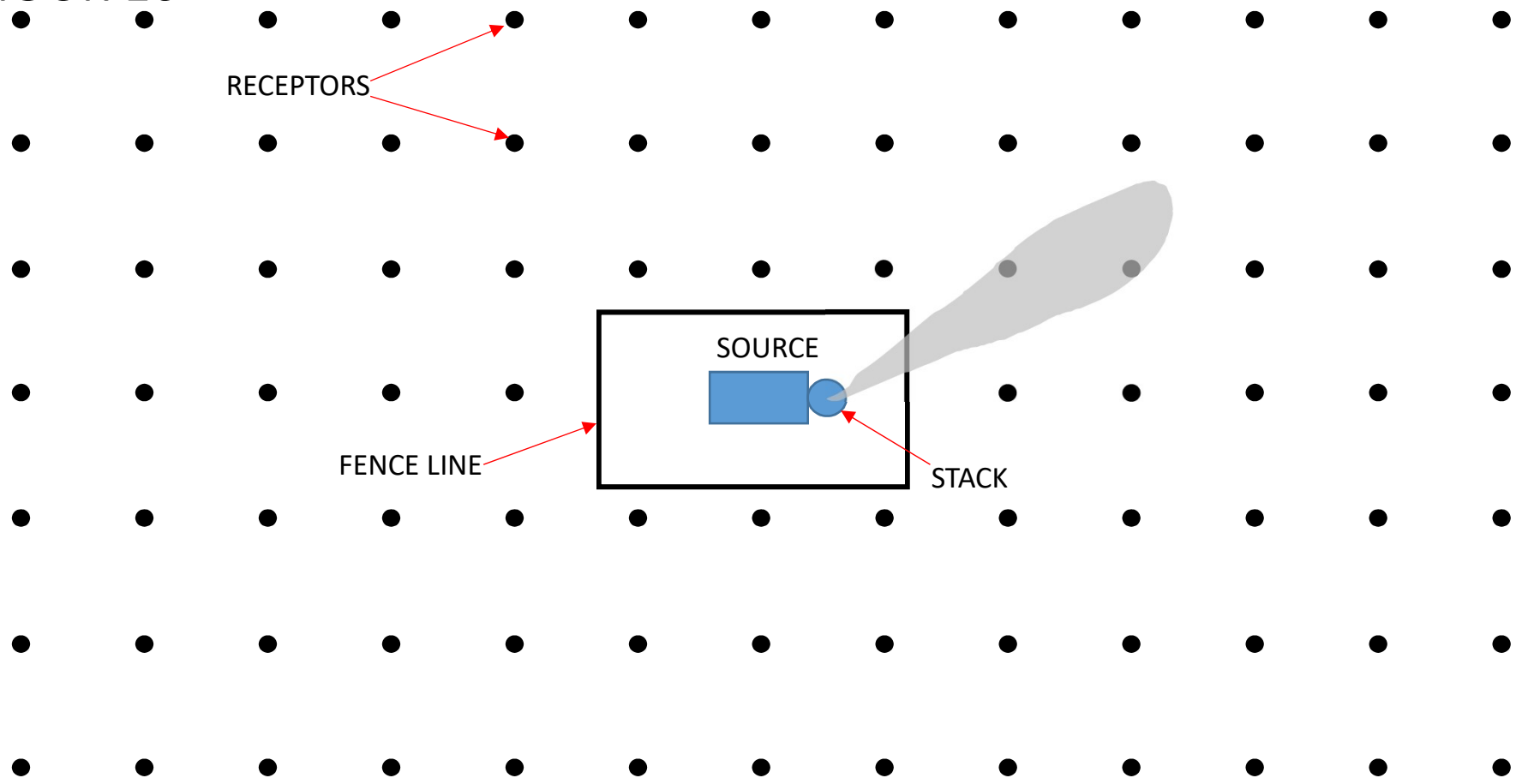
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HOUR 16



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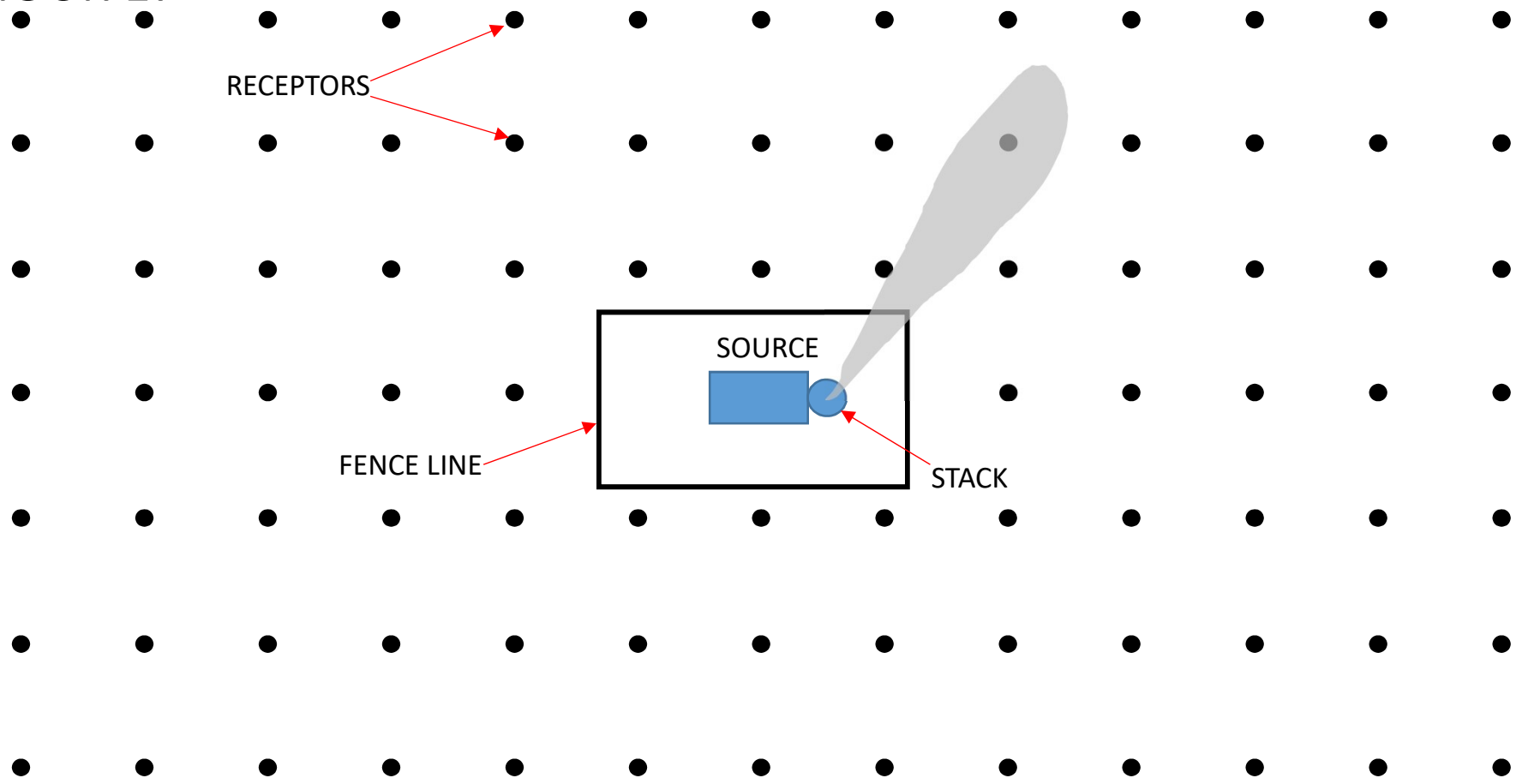
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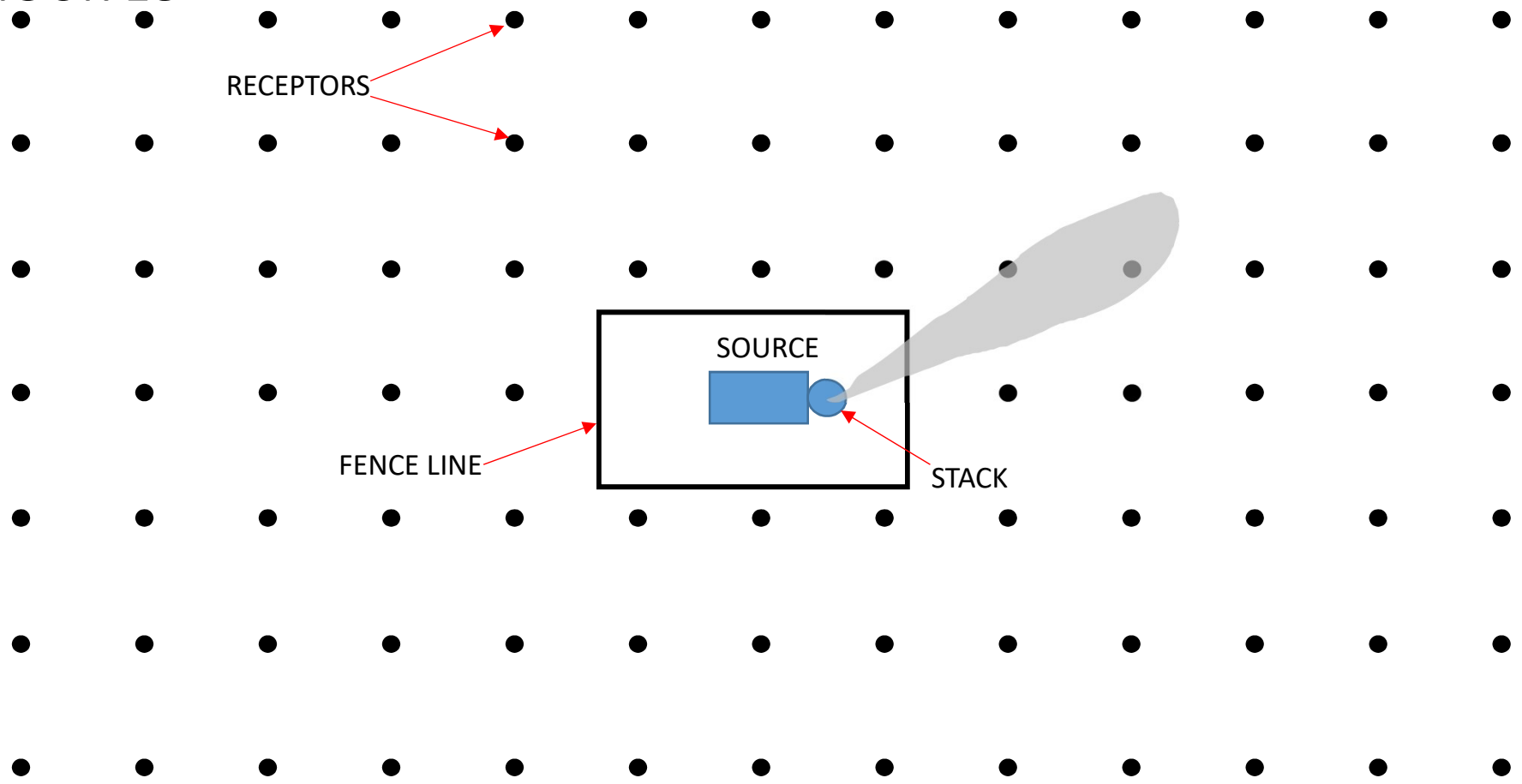
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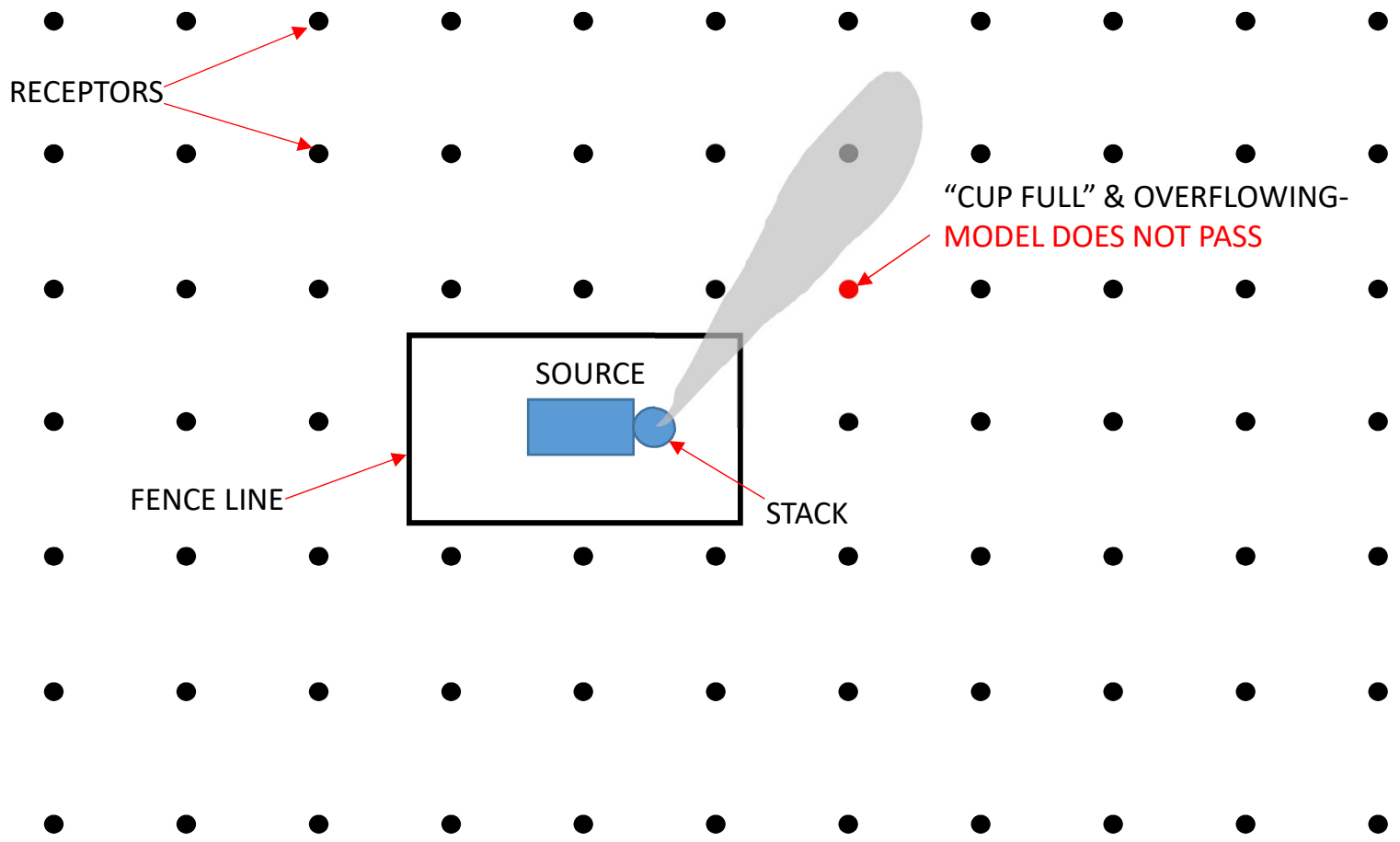
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HOUR 19





## Wrap Up

- Cumulative Impacts – Common Pollutants
  - Existing air pollution measured at monitors
  - Proposed air pollution
  - Near-by large near-by air pollution
  - Perfect storm maximizes air quality protection
  
- Approaches for common pollutants & hazardous air pollutants have been effective
  
- Further discussion of hazardous air pollutants is needed



# QUESTIONS?