AIR DISPERSION MODELING

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Using Air Dispersion Modeling

- 1. Models estimate impacts of pollution emitted by industry
- 2. Compare the estimated impacts to air quality standards
- 3. Air quality standards limit emissions from industry



Connection to Permitting

- Modeling used to set permit conditions
 - Require control strategies
 - Hours of operation
 - **Emission rates**
 - Distance of equipment from fence



- Sprinkler system surrounded by buckets
- Wind is important in distributing water
- Depth of water in buckets ~ concentrations at receptors







Dispersion Model Inputs

Meteorology

- Wind speed
- Wind direction
- Temperature

Terrain & Land Use

- Rural or urban
- Elevations

Emissions

- Rates
- Hrs of operation

Sources

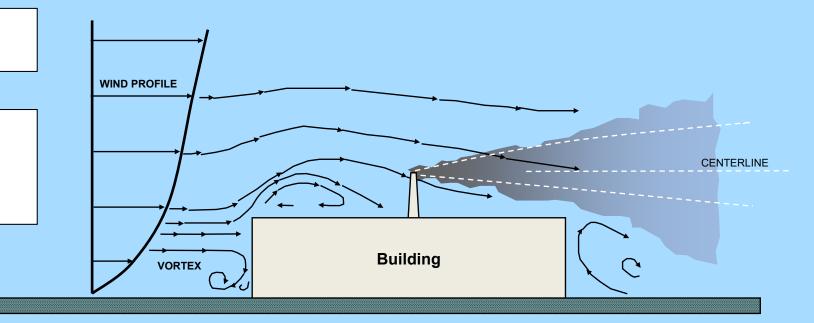
- Source type
- Parameters

Downwash

• Buildings

Gravitational Settling

- Particle Size
- Density



Point Source





Volume Source



Federal, State, & Local Guidelines

Federal: 40 CFR 51, a.k.a. Appendix W

NMED's Air Dispersion Modeling Guidelines

 Air Quality Program's Air Dispersion Modeling Guideline



Cumulative Impacts Modeling

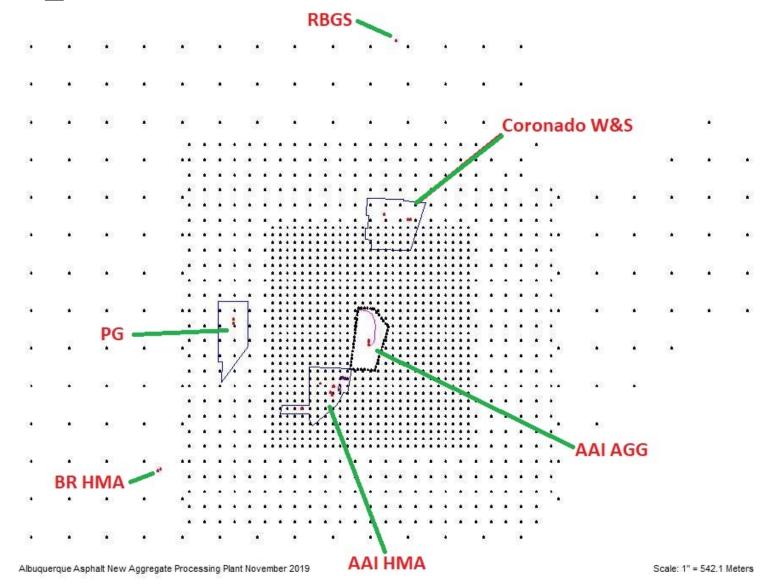
- Background levels are from monitored data
- Background data added to modeled impact
- Inclusion of nearby facilities depends on
 - Distance from applicant's facility
 - Amount of emissions from nearby facilities
 - What the background monitor is sampling



Recent modeling review



NO₂ model for the same facility



More on cumulative modeling

• "...the question of which nearby sources to include in the cumulative modeling is inextricably linked to the question of what the ambient monitoring data represents within the project area." –Section 8.3.3(a), p. 5221

Cumulative impact is compared to air quality standards



COMPLIANCE

Compare to Standards

NAAQS	Modeled Impact (µg/m³)	Background (µg/m³)	Model + Background (µg/m³)	Level of the standard (µg/m³)
NO ₂ 1-hour	117.1	62.8	179.9	188
PM ₁₀ 24- hour	65.7	35	100.7	150

AERMOD

- U.S. EPA's preferred air dispersion model since Nov. 2005
- Standard among all regulatory clean air agencies
- Confidence that AERMOD doesn't underestimate
 - EPA is concerned about underestimation
 - LOWWIND options have not been accepted for regulatory modeling





RELIABILITY

AERMOD Reliability

- EPA SCRAM website
- Databases used to evaluate AERMOD performance
- Documents on AERMOD performance and formulation
- Support Center for Regulatory Atmospheric Modeling (www.epa.gov/scram)



Example of EPA Testing AERMOD

Excerpts from description of EPA experiment:

"...near-surface, non-buoyant tracer release" experiments with "surface sampling arrays positioned 50 meters to 800 meters downwind..."

 Empire Abo, NM field study mentioned in March 1, 2011 EPA clarification memo



Furthering the Margin of Safety

Rural dispersion coefficients

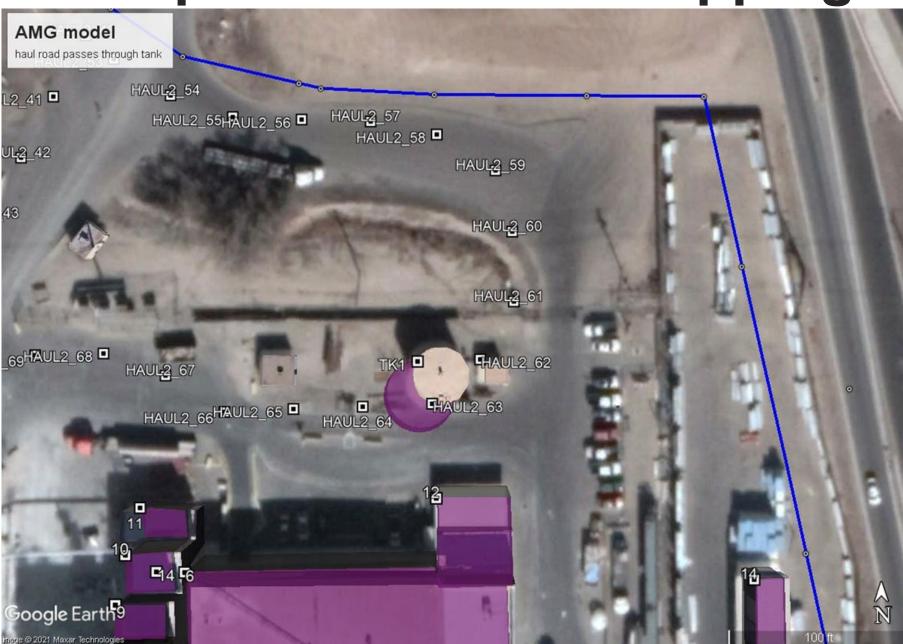
Continuous full bore operations for all sources on property

 Lack of NO2/NOX data □ often results in worstcase assumptions

Reasons EHD Rejects Modeling

- Discrepancy between model & application
 - E.g. Application requests operations 7 days/wk; only modeled 6 days a week
- Inappropriate modeling techniques
 - Outdated downwash algorithm
 - Inappropriate use of urban dispersion
- Incorrect modeling
 - Sources, roads, fence don't match up with aerial imagery

Example of Incorrect Mapping



In Conclusion

- AQP uses checklists for protocol reviews, preliminary reviews, final reviews, and peer reviews as a matter of quality assurance and quality control.
- AERMOD- a reliable tool for keeping Bernalillo County within the standards for particulates, H₂S, lead, NO₂, SO₂, and CO

QUESTIONS?



- AERMOD User's Guide, <u>https://gaftp.epa.gov/Air/aqmg/SCRAM/models/p</u> <u>referred/aermod/aermod_userguide.pdf</u>
- AERMOD: Latest Features and Evaluation Results, EPA-454/R-03-003, June 2003, https://gaftp.epa.gov/Air/aqmg/SCRAM/models/p referred/aermod/aermod mep.pdf
- Guideline on Air Quality Models (aka Appendix W),

https://www.epa.gov/sites/production/files/2020-09/documents/appw 17.pdf

J REZ C

 Additional Clarification Regarding **Applicability of Appendix W Modeling Guidance for the 1-hour NO2 NAAQS** (EPA Clarification Memo, 01Mar2011), https://www.epa.gov/sites/production/fi les/2020-10/documents/additional clarifications appendixw hourly-no2naaqs final 03-01-2011.pdf

 City of Albuquerque Environmental Health Department Air Dispersion Modeling Guidelines, https://documents.cabq.gov/environmental-
 https:

 New Mexico Environment Department Air Dispersion Modeling Guidelines, https://www.env.nm.gov/air-quality/modeling-publications/