

# Resolving Potential Modeling Problems

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## We're not in Kansas anymore...

- ▶ Models have significantly changed
- ▶ Revised, more restrictive NAAQS
- ▶ Accounting for secondary reactions
- ▶ Are we asking the models to do too much?



# The Line-Up Includes:

- ❖ Short Term NAAQS Issues
- ❖ Model Revisions- Alpha/Beta
- ❖ Appropriate Guideline Models
- ❖ Secondary Formation/MERPS
- ❖ Actual versus Allowable Emissions
- ❖ Coordination with Federal Agencies

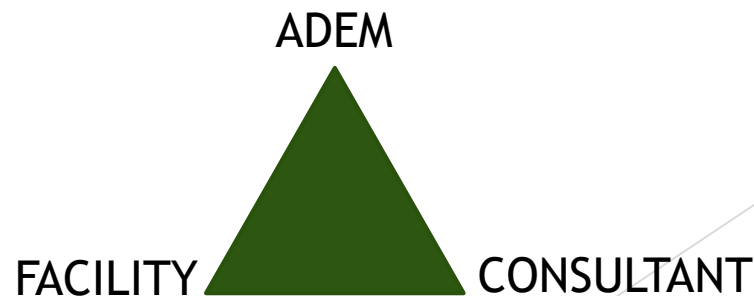


# An Example, Please...

- ▶ Facility submits PSD application with modeling
  - ▶ Model predicts violations
- ▶ Facility demonstrates they don't cause or contribute to predicted violations
- ▶ State is responsible for resolving predicted violations
  - ▶ Not as easy as it sounds - can lead to considerable additional time and resources
- ▶ Problems Must be resolved before the new source can begin operation

# Talking Points

- ❖ PSD Permit Timelines could be extended
  - ❖ Modeled violations are expected
  - ❖ Resolution of the violations will take time
  - ❖ Developing actual emissions and better stack information = more modeling
- ❖ Communication is key



# QUESTIONS??

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