Summary of Proposed Modeling Guidance Updates

Proposed Method	Current Method	Impact	Affected Documents
1. Trigger modeling on a averaging period basis for each pollutant	Trigger on a pollutant basis	• Reduces modeling of annual PM2.5 and NO2 (~50%) • Reduces modeling of 1-hour SO2 by allowing for the exclusion of intermittent sources	• Internal procedures and guidance • Form MD • Checklist
2. Update site-specific background data annually and remove data influenced by wild fires and fireworks.	Rely on annual design value reports (includes influence of wildfires and does not include PM10, CO, annual NO2, 3-hour SO2, or seasonal PM2.5 data)	• More accurate data used in Section 2 of Form MD and modeling analyses • Reduces background by removing impact from fires	• Site Specific Background Guidance • NEW: Wildfire TSD • AAR Summary Template
3. Provide current site-specific background on AAR Summary if previous justification exists	Use current default background unless applicant provides justification for non-default background when completing Form MD	• Eliminates repetitive justification of site-specific background concentrations	• Internal procedures and guidance • AAR Summary Template • Checklist
4. Refine modeling when possible if doing so would reduce predicted impact below MDT without additional permit requirements (or with additional requirements if desired by applicant)	If modeling passes save time by not further refining analysis	• Reduce modeling required due to AAR	• Internal procedures and guidance
5. Screen out neighboring facilities if their PTE is less than the applicable ton per year Significant Emission Rate	Model neighboring facilities by default (screen out on a case by case basis)	• Reduces likelihood of very small facilities causing an area to trigger future modeling due to availability of air resources • Objective criterion for when nearby sources are modeled	• Internal procedures and guidance • Non-PSD Guidelines • PSD Guidelines
6. Don't model combined impact on shared ambient boundaries where public access is precluded	Impacts from neighboring facilities are combined along all shared boundaries	• Reduces impact in areas where model generally predicts high concentrations, but are not ambient air	• Internal procedures and guidance • Non-PSD Guidelines • PSD Guidelines • Checklist
7. Provide Availability of Air Resource (AAR) Summary upon request to ensure applicants have current data (continue to provide automatically to adjacent facilities when they are included in a neighbor's modeling analysis)	Provide AAR Summary upon request, with permits, and to adjacent facilities when they are included in a neighbor's modeling analysis	• Reduces likelihood an applicant will unnecessarily submit modeling by using an outdated background on Form MD since the background concentrations will be updated annually	• Internal procedures and guidance • AAR Summary Template