Changes in PM2.5 SIP Document Based On Public Comments (February 21, 2008)

Changes Based On VDEQ Comments On Virginia Emissions Inventory Changes

Chapter 1 (Executive Summary)

- 1. Updated Section 1.9 (Base Year 2002 Emission Inventories and Future Year 2009 Emissions Inventories) text to reflect updated 2002 and 2009 emissions.
- 2. Updated Figure 1-2 to reflect updated 2002 and 2009 PM2.5 emissions in the graph.

Chapter 3 (2002 Base Year Inventory)

1. Updated Tables 3-1 and 3-6 to reflect updated BY 2002 PM2.5 and PM10 emissions changes.

Chapter 4 (2009 Projected Uncontrolled and Controlled Inventories)

1. Updated Tables 4-2 and 4-7 to reflect updated 2009 PM2.5 and PM10 emissions changes.

Appendices

<u>Appendix B</u>

1. Updated Appendix B (BY 2002 EI document) and Attachment C1 (BY 2002 Area & nonroad source emissions inventory) to reflect updated BY 2002 PM2.5 and PM10 emissions changes.

<u>Appendix D</u>

1. Updated Appendix D (2009 Area & nonroad source emissions inventory) to reflect updated 2009 PM2.5 and PM10 emissions changes.

<u>Changes Based On EPA Comments On Addressing both Annual & 24-Hour PM2.5</u> <u>Standards</u>

- 1. Based on the EPA comment, modified texts in chapters 1 through 4 and appendices B, D, and E1 (2009 Mobile EI document) to reflect the fact that the plan addresses 24-hour PM2.5 standard in addition to the annual standard.
- 2. Updated Section 1.12 (Attainment Modeling Demonstration) to add text for 24hour PM2.5 design value trend. Added Figure 1-6 for 24-hour PM2.5 design value trend. Added Fig. 1-6 to include 24-hour PM2.5 design value trend.

3. Corrected the annual PM2.5 standard from 15 ug/m3 to 15.0 ug/m3 in all chapters and graphs.

<u>Changes Based On EPA Comment On Virginia CAIR Cap Being State-Specific</u> <u>Measure Only</u>

1. Added on page 5-3 (Virginia CAIR and New Source Review Permitting section) the VDEQ language regarding Virginia CAIR cap being a state-specific measure only and not a part of the federal CAIR program.

Changes Based On Flint Webb's Comments

Chapter 2 (Fine Particles)

- 1. Included data in Figure 2-5 through December 2005 as requested and also to be consistent with other graphs in chapter 2.
- 2. Updated Figure 2-6 to replace ammonium ion data with ammonium nitrate and ammonium sulfate and section 2.2 4) to provide information on ammonium nitrate and ammonium sulfate as requested.
- 3. Updated Figure 2-10 title to better explain the content and terms of the figure as requested.

Chapter 3 (2002 Base Year Inventory)

- 1. Updated Section 3.2.2 to explain the difference between area "non-stationary" sources and mobile sources by providing a few examples.
- 2. Updated Section 3.2.2 1st line, 2nd paragraph to delete the term "countyequivalent". Since MWAQC area inventory is calculated at county level, the term "county-equivalent" is not relevant in the discussion in this paragraph and therefore is being deleted.
- Updated Section 3.2.3 (Onroad mobile sources) by adding a line in the 1st paragraph to define what constitute mobile sources. Area source section (Section 3.2.2) provides details about area sources. Discussions in these two sections make distinctions between area and mobile sources very clear.

General Changes

Chapter 2 (Fine Particles)

- 1. Updated Section 2.3 (Seasonal Variation of PM2.5 Concentrations and Constituents)
 - a. Updated titles and graph legends for Figures 2-2 through 2-6 to better reflect graph contents and data sources.
 - b. Updated Section 2.9 with discussion on 24-hour PM2.5 standard and design value.
 - c. Added Figure 2-12 for the 24-hour PM2.5 design value trend.
- 2. Updated Section 2.2 (Health and Environmental Effects) to include some health related figures from American Lung Association for the Washington, DC region.
- 3. Updated Chapter 5 and Appendix G to include local voluntary programs being implemented in the City of Alexandria.