From: Dalby, Shellie H
To: Sue Kemball-Cook; jmathews@mandf.com; Aldredge, Tim; JKillingsworth@westlake.com; Doug Boyer (Doug.Boyer@tceq.texas.gov); Julie Burnfield (mailto:Julie.Burnfield@etcog.org); Greg Yarwood; mark.mcmahon@fhr.com
Subject: Ozone Advance Action Plan Feedback
Date: Thursday, May 5, 2016 4:01:47 PM

Sue,

Below are a few comments on the Ozone Advance Action Plan:

I do not find a comparison in the Ozone Advance Action Plan of how the 2015/2012 SOF data when used in the ozone model compares to actual ozone measurements at CAMS 19. I had requested that this information be included in the ozone action plan update and in presentation of the SOF study results to NETAC in my e-mail dated April 14, 2016 (attached). Below, is an excerpt from the Ozone Action Plan:

"The purpose of the 2012 and 2015 NETAC SOF studies was to improve the characterization of emissions from the SID to further our understanding of ozone formation and to increase the accuracy of the HRVOC emissions inventories used for ozone modeling. The lack of agreement between the 2015 SOF study emission rates and the emissions inventory indicates that our understanding of SID facility emission rates and their characterization in NETAC's modeling is not complete. Further work is needed to understand and reconcile the differences between the SOF measurements and the emissions inventory."

Given that the ultimate purpose of the SOF studies is to improve ozone modeling, it would seem logical to include a comparison of the ozone values predicted by the model using both the AEI and the SOF input values, to the ozone measurements at CAMS 19 for the SOF study period. Specifically, if we input ethylene emissions that are four times higher than the AEI and propylene emissions that are 5 times higher than AEI (NOTE 1), how does the predicted ozone compare to CAMS 19 measurements? What are plans to include that information? We believe that providing this information will be both informative to NETAC and is necessary to present an unbiased report.

4.2.3 (correction needed in both Table of Contents and in document) – "Eastman Chemical Company" should be removed from the title of this section – The correct header is "Sabine Industrial District."

4.2.3 This wording is now outdated. I've requested an update from our Cogeneration department environmental coordinator on this project.

The focus and resources being devoted to studying the Sabine Industrial Districts seems at odds with the following wording in the ozone action plan: "Northeast Texas's NOx emission inventory is dominated by emissions from power plants, motor vehicles, and oil and gas exploration and production. The contribution to VOC emissions from biogenic sources such as trees far exceeds the contribution from human activities. The abundance of biogenic VOC ensures that there is always enough VOC available to form ozone so that the amount of ozone formed from local emissions is determined by the amount of NOx emissions." We do not propose that this statement be changed. Rather, we request that NETAC reevaluate the prioritization of their efforts and funding based on this information.

Page 8 – Haynesville – not Hayesville

Section 2.1.1 & 2.1.2 – Shouldn't these numbers be updated from 2012 data values to 2015?

Would you please send us a copy of the test plan for the controlled ethane release study for review? We do not find that information on the NETAC website.

Daily emissions comparisons section – How was the time period for excluding SOF data (due to plant upsets) determined?

Thank you.

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