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| **WRAP Regional Haze Planning Workgroup** |  |
| **Emissions Inventory & Modeling Protocol Subcommittee** |
| **Guidance for Point Source Representativeness** |
| WORKING DRAFT – 2/26/2019 |

The Regional Haze Planning Work Group Emissions Inventory and Modeling Protocol (RHPWG EI & MP) Subcommittee is providing this guidance to States & Locals for determining point-source representativeness, to be used as the basis for projecting future emissions scenarios. The photochemical modeling scenarios for Regional Haze Planning include the base case v1 and v2 (actual 2014 emissions with iterative changes/corrections), representative baseline (2013-17 averaging or more representative data for planning purposes), future “on the books/on the way” case (2028 OTB/OTW), and future “controls” case (2028). The 2028 OTB/OTW case is used to characterize conditions as-if no emissions controls would be used other than what is already planned, assuming any necessary activity or operations increases or growth, projected from the representative baseline data. The future “controls” case is used to characterize conditions with emissions controls that are already planned plus additional activity growth and/or controls that states identify as necessary to consider for the Reasonable Progress analysis requirements of the Regional Haze Program. In order to accurately project facility emissions for the future 2028 planning scenarios, a “representative baseline” dataset is used as the starting point. In contrast, for mobile, fire, and other non-point sources, including all emissions from Mexico, Canada, and off-shore sources, the WRAP modeling contractor will vet and process projection data available from EPA, such as the MOVES model, as well as from WRAP Work Groups for selected sectors, for use in the 2028 modeling scenarios.

It is up to States & Locals to determine the “representative” emissions that will be used as the starting point when forecasting future point source emissions. The simplest solution would be to take 2014 emissions as-is, but this could be problematic for a variety of reasons:

1. a source may not have had a normal operating schedule in 2014;
2. a source has been controlled within the 2015-17 timeframe as required by rule or permit;
3. a source may have permanent modifications (or plans to do so) since 2014 as required in rule or permit that changes the existing 2014 actual emissions profile;
4. a source may shut down completely but not demolished or removed (discretion of the state air program where a source is mothballed or is for sale);
5. a new source may not be represented in the WRAP 2014v2 base case modeling inventory, but for 2028 projections should be assumed, so emissions estimates are needed for the representative baseline modeling inventory.

The WRAP RHPWG EI & MP Subcommittee recommends that each state/local provide a “representative” emissions dataset for all point source facilities that will then be the basis of 2028 OTB/OTW projections to be prepared by the WRAP modeling contractor and would then be modeled in the future case scenarios. We suggest that for most sources, a simple average of 2013 to 2017 emissions be used as the “representative” dataset. If the source had some years with atypical emissions during that time, states should select the most “representative” year(s) of emissions. The [EGU Emissions Analysis project](http://www.wrapair2.org/EGU.aspx) has done this for traditional fossil-fueled EGUs and the OGWG has a [task](http://www.wrapair2.org/pdf/11162017_WRAPO&GWorkgroup_RoadMapSOW.pdf) to do this for [O&G sources](http://www.wrapair2.org/pdf/10172017_WRAPO&GWorkgroup_EmissionsSources.pdf). If there is a new source or if a source has undergone permanent modifications (or plans to do so) since 2014, then the state should identify or create an emissions profile that best represents their understanding of the source’s future emissions. For sources that will be completely shut down by 2028, we need to have this noted so that the source can be excluded from modeling. The WRAP RHPWG EI & MP Subcommittee will use 2014 emissions (as characterized in v2 of the base-case modeling inventory) as the “representative baseline” data for any source that is not characterized differently by the corresponding state/local, in response to this outreach effort.