Modeling Guidelines for Air Quality Impact Assessments

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1. Introduction

This document explains the requirements for performing air quality impact assessments for the Santa Barbara County Air Pollution Control District (District) using AERMOD. It is assumed that the reader has some modeling experience with this program; therefore, this document is not intended as a user’s guide for AERMOD. The AERMOD user’s guide, written by U.S. Environmental Protection Agency (EPA), is noted in the References section of this document and should be consulted for troubleshooting or when background information is needed.

1.1 Applicability

An air quality impact assessment (AQIA) must be completed for any of the following situations:

1. An AQIA is required as part of the District’s New Source Review (NSR) permitting program according to District Rule 802.F. for any new or modified stationary source that meets at least one of the following criteria:
   a. The source has a potential to emit of any pollutant or its precursors which is equal to or greater than any threshold shown in Table 4 of District Rule 802; or
   b. The Control Officer determined that the new or modified stationary source has the potential to cause or contribute to a violation of any ambient air quality standard or increment; or
   c. The new or modified stationary source has the potential to emit more than 20 pounds per hour of any attainment pollutant or total suspended particulates (TSP).

2. An AQIA is necessary as part of the California Environmental Quality Act (CEQA) process.

An AQIA can consist of modeling one or multiple pollutants and averaging periods for an increment analysis, ambient air quality standard (AAQS) analysis, or both. Typically, both an increment analysis and an AAQS analysis are required for the District’s NSR permitting program, while only an AAQS analysis is required for the CEQA process. Confirm the modeling requirements with the District before submitting the AQIA.

1.2 Prevention of Significant Deterioration Modeling for Major Sources

Please contact the District prior to performing Prevention of Significant Deterioration (PSD) modeling for a major source. Information on PSD modeling is provided at EPA’s Clean Air Act Permit Modeling Guidance webpage, noted in the References section of this document.

EPA Guidance Documents regarding PSD modeling are listed below:

2. Emissions

2.1 Pollutants and Averaging Periods

2.1.1 Criteria Pollutants

Table 2.1.1-1 displays the criteria pollutant\(^1\) and averaging period combinations that may be required to be modeled in the AQIA. The state and national ambient air quality standards are displayed for reference; for most pollutants and averaging periods, modeling is only required for one of the standards. However, \(\text{SO}_2\) and \(\text{NO}_2\) must be modeled for comparison to both the 1-hour state standard and 1-hour national standard. See Section 4.1 of this document for more information. Contact the District to confirm which pollutants and averaging periods should be included in the AQIA.

<table>
<thead>
<tr>
<th>Pollutant:</th>
<th>Averaging Period</th>
<th>Maximum Allowable Increase – Increments ((\mu\text{g/m}^3))</th>
<th>Ambient Air Quality Standard ((\mu\text{g/m}^3))</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Class I Area(^1)</td>
<td>Class II Area(^2)</td>
</tr>
<tr>
<td>Total Suspended Particulates:</td>
<td>Annual Average</td>
<td>5</td>
<td>19</td>
</tr>
<tr>
<td></td>
<td>24-Hour Maximum</td>
<td>10</td>
<td>37</td>
</tr>
<tr>
<td>Sulfur Dioxide:</td>
<td>Annual Average</td>
<td>2</td>
<td>20</td>
</tr>
<tr>
<td></td>
<td>24-Hour Maximum</td>
<td>5</td>
<td>91</td>
</tr>
<tr>
<td></td>
<td>3-Hour Maximum</td>
<td>25</td>
<td>512</td>
</tr>
<tr>
<td></td>
<td>1-Hour Maximum</td>
<td>—</td>
<td>—</td>
</tr>
<tr>
<td>Nitrogen Dioxide:</td>
<td>Annual Average</td>
<td>2.5</td>
<td>25</td>
</tr>
<tr>
<td></td>
<td>1-Hour Maximum</td>
<td>10</td>
<td>100-188</td>
</tr>
<tr>
<td>Carbon Monoxide:</td>
<td>8-Hour Maximum</td>
<td>200</td>
<td>2,500</td>
</tr>
<tr>
<td></td>
<td>1-Hour Maximum</td>
<td>800</td>
<td>10,000</td>
</tr>
<tr>
<td>Reactive Organic Compounds:</td>
<td>3-Hour Maximum</td>
<td>3</td>
<td>40-160</td>
</tr>
<tr>
<td>Particulate Matter (&lt; 10 (\mu\text{m})):</td>
<td>Annual Average</td>
<td>4</td>
<td>17</td>
</tr>
<tr>
<td></td>
<td>24-Hour Maximum</td>
<td>8</td>
<td>12-30</td>
</tr>
<tr>
<td>Particulate Matter (&lt; 2.5 (\mu\text{m})):</td>
<td>Annual Average</td>
<td>1</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>24-Hour Maximum</td>
<td>2</td>
<td>9</td>
</tr>
</tbody>
</table>

\(^1\) “Class I Area” means any area having air quality or air quality related values requiring special protection, and which has been designated Class I by a federal or state authority empowered to make such designation.

\(^2\) “Class II Area” means any area not designated as a Class I or Class III Area pursuant to 40 CFR 51.166(e).

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1 Although lead is a criteria pollutant, it is addressed below in Section 2.1.2, Other Pollutants.
2.1.2 Other Pollutants

Table 4, Air Quality Impact Analysis Thresholds, in the District’s Rule 802 includes criteria and non-criteria pollutants. District Rule 805 contains standards and increments for only the pollutants shown in Table 2.1.1-1. Other pollutants with a State or Federal Air Quality Standard are listed in Table 2.1.2-1. If a health risk assessment (HRA) is also being performed, then a separate analysis for H2S is not required. The AAQS for H2S is equal to the acute reference exposure level for H2S. Furthermore, if a HRA is performed, then a separate analysis for vinyl chloride is not required.

For toxic air contaminants included in Table 4 of District Rule 802, but not included in Table 2.1.2-1 below, a health risk assessment is required in lieu of an AAQS analysis. For other pollutants that are not toxics, the AQIA is required for informational purposes only.

Table 2.1.2-1: Air Quality Standards for Other Pollutants

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Averaging Period</th>
<th>Air Quality Standard (μg/m$^3$)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead</td>
<td>30-Day Average</td>
<td>1.5</td>
</tr>
<tr>
<td>Beryllium</td>
<td>30-Day Average</td>
<td>0.01</td>
</tr>
<tr>
<td>Vinyl Chloride</td>
<td>24-Hour</td>
<td>26</td>
</tr>
<tr>
<td>Hydrogen Sulfide</td>
<td>1-Hour</td>
<td>42</td>
</tr>
</tbody>
</table>

Please contact the District for the applicable requirements for municipal waste combustors.

2.2 Emission Sources

Contact the District to confirm which emission sources should be included in the AQIA. Sections 2.2.1 through 2.2.3 below explain the requirements for different types of AQIAs.

2.2.1 NSR AQIA with Only New Equipment

An AQIA for an NSR project at a stationary source with no existing equipment must include all permitted emitting equipment at its maximum potential to emit (PTE), which is calculated as part of the NSR permitting process. Emissions from permit-exempt equipment are not included in NSR AQIAs. Both an increment analysis and an AAQS analysis are required.

2.2.2 NSR AQIA with Existing Equipment

For an NSR project at a stationary source with existing equipment, an increment analysis and an AAQS analysis are required. The entire project emissions must be evaluated in the AQIA. The project emissions include the PTE for the newly-permitted equipment, as well as emissions from any equipment that is already under a District permit, if the District determines that those emissions are also part of the project. Any increase in emissions from the existing operating conditions (averaged over the three consecutive years immediately preceding the date of application) is considered part of the project and must be included in the AQIA for existing equipment that will emit more air pollution as a result of the project. Other existing equipment emissions may also be required to be included in the AQIA if the District determines that they are related to the new project (e.g., a steam generator installed within the past three years that the District understands to be part of the project).

Existing equipment at the stationary source that is determined by the District to not be part of the project should not be included in the AAQS analysis or the increment analysis. The air quality impacts of
existing equipment not related to the project are accounted for in the background concentration in the AAQS analysis.

2.2.3 CEQA AQIA

Increment analyses are not required for CEQA AQIAs; only AAQS analyses are required for CEQA. For the CEQA AAQS analysis, all emissions from the NSR AAQS analysis must be included. Just as for District NSR AQIAs, emissions from existing equipment at the stationary source beyond the historical baseline level must be included in the CEQA AAQS analysis. In addition, ongoing unpermitted emissions (i.e., not construction-related) must be included. For example, ongoing fugitive dust emissions (e.g., from driving on unpaved roads), combustion emissions from vehicles, and combustion emissions from drill rigs (e.g., at an oil and gas lease) must be included in the CEQA AAQS analysis. Additionally, all operational mobile emissions in a 1,000-foot line extending outside the property boundary must be modeled. An AQIA for CEQA should not include emissions from site grading, paving, welding, or other activities associated with construction. Emissions from oil and gas well drilling must be included in the CEQA analysis; the District does not consider drilling wells on an oil and gas lease to be a construction activity because it occurs over the life of the project.

2.3 Emission Calculations

Once the applicant has determined which emission sources, pollutants and averaging periods must be evaluated in the AQIA, the emissions must be calculated. Detailed emission calculation spreadsheets, containing all calculation assumptions, for each pollutant and averaging period must be submitted to the District with the AQIA. All calculations within spreadsheets must contain formulas (i.e., spreadsheets showing only values in the cells will be returned to the applicant for revision).

Because AERMOD requires the emission rates to be entered in units of grams per second (g/s), it is useful to first calculate the emissions on an annual, 24-hour, 8-hour, 3-hour or 1-hour basis, and then convert to g/s. The maximum possible emissions during each averaging period should be used to model the impacts. For example, an emergency flare is installed at an oilfield, resulting in SO2 emission higher than normal during certain short term operations. The worst case short term flaring scenario is when produced sour gas is routed to the emergency flare for a maximum of 5 minutes in a day. For modeling purposes, the 24-hour, the 3-hour and the 1 hour-SO2 mass emissions from the flare are all equal (e.g., 1 lb) because the flaring event occurs within 5 minutes. However, the emission rate (g/s) varies for each averaging period.

If the ratio of PM2.5 to PM10 is not known, all PM10 can be assumed to be PM2.5. This is a conservative assumption that should be refined if the PM2.5 impacts exceed an AAQS or increment threshold. The use of a PM2.5/PM10 ratio less than 1 requires justification from the applicant and is subject to approval by the District.

3. Air Dispersion Model

The District requires that EPA’s AERMOD be used to perform the air dispersion modeling for AQIAs, except for offshore platforms. The current version of AERMOD at the time of writing this document is dated 18081. The AERMOD executable is available for free from EPA. There are also many software options that incorporate AERMOD in a more user-friendly interface, such as Lakes Environmental’s (Lake’s) AERMOD View and Providence/Oris’ BEEST. While the District does not recommend any one particular software product, the District primarily uses Lakes’ AERMOD View. The use of Lakes’ AERMOD View by the applicant may help with the ease of review and sharing of files. Furthermore, the District will not accept AQIAs performed using HARP 2.
Because there are multiple pollutants and averaging periods required for AQIAs, it is helpful to create a separate AERMOD project file for each pollutant and averaging period. However, if the maximum g/s emission rate for a pollutant on an annual and 24-hour basis were the same, for example, it would save time to run the two averaging periods within the same AERMOD project file.

### 3.1 Offshore Platforms

In general, the District requires the OCD model for offshore platforms. The Offshore and Coastal Dispersion Model (OCD) is a straight line Gaussian model developed by EPA to determine the impact of offshore emissions from point, area or line sources on the air quality of coastal regions. OCD incorporates overwater plume transport and dispersion as well as changes that occur as the plume crosses the shoreline. Hourly meteorological data are needed from both offshore and onshore locations. Applicants should contact the District if they have a project that requires the use of the OCD model.

### 3.2 Control Options

AERMOD contains several regulatory options, which are set by default, as well as non-regulatory options. The District requires that the regulatory options are used. The use of any non-regulatory default options must be justified with a discussion in the AQIA report and approved by the District.

#### 3.2.1 Conversion of NOX to NO2

Although the NO2 National Ambient Air Quality Standard (NAAQS) is based on NO2 concentrations, the majority of nitrogen oxides (NOX) emissions are in the form of nitric oxide (NO) rather than NO2. The resultant NO2 concentrations are largely driven by the ambient chemical environment (i.e., the reaction of NO with ambient ozone to form NO2) and the initial NO2/NOX ratio of the emissions (i.e., the in-stack ratio). The EPA outlines a three tiered approach to estimating modeled NO2 concentrations.

For most projects, the District recommends using the Tier 2 Ambient Ratio Method Version 2 (ARM2), which uses the EPA polynomial equation to predict NO2/NOX ratios and does not require additional site-specific information. Please contact the District for approval prior to using any other Tier or method.

EPA provides additional clarification on the conversion of NOX species to NO2 in the following document:


The California Air Pollution Control Officers Association (CAPCOA) provides guidance on demonstrating compliance with the 1-hour NAAQS, but does not discuss the new Tier 2 ARM2 or Tier 3 PVMRM2:


The methods available in AERMOD to account for the conversion of NOX species to NO2 are described in Sections 3.2.1.1 through 3.2.1.4 below.
3.2.1.1 Tier 1

Tier 1 assumes full conversion of NOX species to NO2 (i.e., 100 percent of NOX emissions = NO2 emissions). This method is the most conservative. No special parameters or options are required to be selected.

3.2.1.2 Tier 2 ARM2 (Recommended by the District)

The Tier 2 Ambient Ratio Method Version 2 (ARM2) must be selected prior to running AERMOD. This option may only be selected if the user specifies that NO2 is the pollutant being modeled in AERMOD. The ARM2 applies a 6th order polynomial equation to predict the NO2/NOX ratio.

For more information on the Tier 2 ARM2, see EPA’s Technical support document (TSD) for NO2-related AERMOD modifications and Section 3.2.4, Input parameters for NO2 conversion options, of the AERMOD user’s guide, noted in the References section of this document.

The ARM2 options in AERMOD have the following parameters:

- Minimum NO2/NOX Ratio: Use the default value of 0.50.
- Maximum NO2/NOX Ratio: Use the default value of 0.90.

3.2.1.3 Tier 3

The two Tier 3 methods for estimating the conversion of NOX to NO2 are the Ozone Limiting Method (OLM) and the Plume Volume Molar Ratio Method Version 2 (PVMRM2).

The Tier 3 methods require background ozone concentrations. Other parameters for the Tier 3 methods are:

- Equilibrium NO2/NOX Ratio: The default value used by the model is 0.90. A user-specified value can be defined here between 0.10 and 1.00.
- Default In-Stack NO2/NOX Ratio: A default value of 0.50 will be used for all sources unless a user-specified value is provided for the source in the NO2 Ratios screen of the Source Pathway dialog. The default value specified will also be used if the user did not specify a value for a specific source in Source Pathway - NO2 Ratios.

3.2.2 Special Processing Options for the AAQS Analysis for NO2

To meet the 1-hour NAAQS, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations must not exceed 100 ppb (188 µg/m³). If Lakes’ AERMOD View is used to complete the AQIA, select the option for 1-hour NO2 NAAQS processing in the Control pathway, which will prompt the model to display the 8th Highest High (98th percentile) of the maximum daily 1-hour results. If Lakes’ AERMO View is not used, the user may directly enter the appropriate keywords/parameters in the AERMOD input file. See Section 3.2.15, Processing for 1-hour NO2 and SO2 NAAQS, of the AERMOD user’s guide for more information on the NO2 processing in AERMOD.

3.2.3 Special Processing Options for the AAQS Analysis for SO2

To meet the 1-hour NAAQS, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations must not exceed 75 ppb (196 µg/m³). If Lakes’ AERMOD View is used to complete the AQIA, select the option for 1-hour SO2 NAAQS processing in the Control pathway, which will prompt the model to display the 4th Highest High (99th percentile) of the maximum daily 1-hour results. If Lakes’ AERMOD View is not used, the user may directly enter the appropriate
keywords/parameters in the AERMOD input file. For more information on specific modeling guidance for the 1-hour SO2 NAAQS, see EPA’s Memorandum, Applicability of Appendix W Modeling Guidance for the 1-hour SO2 National Ambient Air Quality Standard, noted in the References section of this document. See Section 3.2.15, Processing for 1-hour NO2 and SO2 NAAQS, of the AERMOD user’s guide for more information on the SO2 processing in AERMOD.

The 3-hour NAAQS for SO2 is not to be exceeded more than once a year. For that reason, report the 2nd Highest High for the 3-hour SO2 value. In Lakes’ AERMOD View, the 2nd Highest High can be selected under the Output Options, Tabular Outputs Screen. If Lakes’ AERMOD View is not used, the user may directly enter the appropriate keywords/parameters in the AERMOD input file.

In addition to the special processing options noted above, AERMOD will automatically apply a 4-hour half-life decay coefficient for urban SO2 sources.

3.2.4 Special Processing Options for the AAQS Analysis for PM2.5

To meet the 24-hour NAAQS for PM2.5, the 3-year average of the annual 98th percentile of the 24-hour concentration must be equal to or less than 35 μg/m³. If Lakes’ AERMOD View is used to complete the AQIA, select the option for 24-hour PM2.5 NAAQS processing in the Control pathway, which will prompt the model to display the 8th Highest High (98th percentile) of the 24-hour results averaged over 5 years (assuming a 5-year meteorological data set is used). If Lakes’ AERMOD View is not used, the user may directly enter the appropriate keywords/parameters in the AERMOD input file. See Section 3.2.14.1, Processing for fine particulate matter (PM-2.5), of the AERMOD user’s guide for more information on the PM2.5 processing in AERMOD.

3.2.5 Annual Averaging Period Options

The annual standards listed in Table 1 of District Rule 805 for “Annual Arithmetic Mean” must be compared to the annual average concentration from each individual year of met data. Run the annual averaging period by selecting the ANNUAL averaging time options. In addition, select the “Report Maximum Annual Average for Each Met Year” that is available in Lakes’ AERMOD View (or use the appropriate AERMOD keywords if a different interface is used to run AERMOD). This option will allow the modeler to compare the highest annual average from an individual year to the annual standards in Table 1 of District Rule 805. Do not select the PERIOD option in AERMOD, which computes a single multi-year average concentration. The PERIOD option may give slightly different results than the multi-year average of individual ANNUAL mean concentrations due to differences in the number of calms and/or missing data from year to year. The ANNUAL average output is based on the average of the ANNUAL values across the years of meteorological data processed.

3.3 Defining Urban and Rural Conditions

The Auer method for classifying a site as urban or rural is specified in EPA’s 40 CFR Part 51 Appendix W, noted in the References section of this document. Follow the Auer method, explained below, for the selection of either urban or rural dispersion coefficients:

1. Draw a circle with a radius of 3 km from the center of the emission source or centroid of the polygon formed by the facility emission sources.
2. If the industrial, commercial, dense single/multi-family, and multi-family two-story land use types account for 50% or more of the area within the circle, then the area is classified as urban; otherwise, the area is classified as rural.
3. To verify if the area within the 3 km circle is predominantly rural or urban, overlay a grid on top of the circle and identify each square as primarily urban or rural. If more than 50% of the total
number of squares is urban, then the area is classified as urban; otherwise, the area is rural. See Figure 3.3-1 for an example of this grid method.

![Figure 3.3-1: Auer Method for Determining Urban or Rural Dispersion](image)

From the Auer method, areas typically defined as rural include:

- Residences with large grass lawns and trees
- Large estates
- Metropolitan parks and golf courses
- Agricultural areas
- Undeveloped land
- Water surfaces

Auer defines an area as urban if it has less than 35% vegetation coverage or if the area falls into one of the land use types described in Table 3.3-1.

<table>
<thead>
<tr>
<th>Use and Structures</th>
<th>Vegetation Coverage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heavy industrial</td>
<td>Less than 5%</td>
</tr>
<tr>
<td>Light/moderate industrial</td>
<td>Less than 5%</td>
</tr>
<tr>
<td>Commercial</td>
<td>Less than 15%</td>
</tr>
<tr>
<td>Dense single/multi-family</td>
<td>Less than 30%</td>
</tr>
<tr>
<td>Multi-family two-story</td>
<td>Less than 35%</td>
</tr>
</tbody>
</table>

After the site classification has been determined, apply it to all sources (i.e., do not model some sources as rural and other sources as urban). If the urban option is selected, enter the population of the city where the project is located. If the facility is located in an unincorporated area, use the closest city listed in Table 3.3-2. The default value of 1 meter for urban surface roughness length is appropriate for most urban sites. Use of any value other than 1 meter for the urban surface roughness is considered a non-regulatory option, and requires appropriate documentation and justification.
Table 3.3-2: Population Data for Urban Dispersion Modeling

<table>
<thead>
<tr>
<th>City Name</th>
<th>Population in 2010</th>
</tr>
</thead>
<tbody>
<tr>
<td>Buellton</td>
<td>4,828</td>
</tr>
<tr>
<td>Carpinteria</td>
<td>13,040</td>
</tr>
<tr>
<td>Goleta</td>
<td>29,888</td>
</tr>
<tr>
<td>Guadalupe</td>
<td>7,080</td>
</tr>
<tr>
<td>Lompoc</td>
<td>42,434</td>
</tr>
<tr>
<td>New Cuyama</td>
<td>517</td>
</tr>
<tr>
<td>Santa Barbara</td>
<td>88,410</td>
</tr>
<tr>
<td>Santa Maria</td>
<td>99,553</td>
</tr>
<tr>
<td>Solvang</td>
<td>5,245</td>
</tr>
</tbody>
</table>

3.4 UTM Coordinate System

The coordinate system that should be used in AERMOD is Universal Transverse Mercator (UTM). Ensure all modeled sources, buildings, and receptors are defined in the same datum. In the AQIA report, state the datum used in the model.

3.5 Source Parameters

The primary source types and their input requirements are outlined in Sections 3.5.1 through 3.5.5. Detailed descriptions of the input fields are found in the AERMOD user’s guide, noted in the References section of this document. All source parameter units specified in brackets are the default units in the AERMOD executable.

After entering all the source information into AERMOD, the user should create a separate source group for each source, as well as including a source group containing all the sources in the model. The source group of all sources will allow the impact from all sources to be easily identified. The separate source groups for each source will help identify the air quality impact driving devices.

3.5.1 Point Sources – POINT, POINTCAP, POINTHOR

A point source is the most common type of release and is characterized by a traditional stack or isolated vent. Examples of point sources include combustion equipment with stacks and closed fixed roof tanks. AERMOD includes three options for point sources: the POINT source is used for a non-capped vertical stack; the POINTCAP source is used for a vertical stack with a rain cap; and the POINTHOR source is used for a horizontal stack.

The point source parameter inputs are:

- X Coordinate [m]: Easting UTM at the center of the point source.
- Y Coordinate [m]: Northing UTM at the center of the point source.
- Release Height [m]: Source release height (or stack height) above the ground.
- Stack Diameter [m]: Inner diameter of the stack.
- Exit Velocity [m/s]: Stack gas exit velocity.
- Stack Temperature [K]: Stack gas exit temperature.
- Emission Rate [g/s]: Pollutant emission rate.
3.5.2 Area Sources – AREA, AREAPOLY, AREACIRC

Area sources are used to model releases that occur over an area. Examples of area sources include landfills, open tanks, slag dumps and lagoons. AERMOD includes three options for specifying the shape of an area source: the AREA source is used to specify rectangular areas that may also have a rotation angle specified relative to a north-south orientation; the AREAPOLY source is used to specify an area source as an irregularly-shaped polygon; and the AREACIRC source is used to specify a circular-shaped area source. All three of the area source types use the same calculations for estimating impacts from area sources, and are merely different options for specifying the shape of the area source.

The source parameter inputs for each of the area source types are described in Sections 3.5.2.1 through 3.5.2.3 below.

3.5.2.1 AREA Sources Options

AERMOD accepts rectangular areas that may have a rotational angle specified relative to a north-south orientation. The AREA source parameter inputs are:

- X Coordinate [m]: Easting UTM for the southwest corner of the area source.
- Y Coordinate [m]: Northing UTM for the southwest corner of the area source.
- Release Height [m]: Release height above ground. For example, a tank open to the atmosphere would have a release height equal to the tank height.
- Xinit [m]: Length of X side of the area (in the east-west direction if Angle is 0 degrees).
- Yinit [m]: Length of Y side of the area (in the north-south direction if Angle is 0 degrees). This parameter is optional; if no value is entered, AERMOD sets Yinit equal to Xinit.
- Szinit [m]: Initial vertical dimension of the area source plume. For more passive area source emissions, such as evaporation or wind erosion, the Szinit parameter is typically omitted, which is equivalent to using a Szinit of 0 meters.
- Angle [degrees]: Orientation angle for the rectangular area from North, measured positive in the clockwise direction. If the Angle is not zero, the model will rotate the AREA source clockwise around the southwest corner.
- Emission Rate [g/s/m²]: Pollutant emission rate. Note that the g/s emission rate must be divided by the area of the area source to calculate the emission rate in units of g/s/m².

The only option for defining the area is a rectangle or square. The maximum length/width aspect ratio for area sources is 10 to 1. If the aspect ratio is greater than 10, use the AREAPOLY source type. See Section 3.3.2.4, AREA source inputs, of the AERMOD user’s guide for more information on the AREA source inputs.

3.5.2.2 AREAPOLY Sources Options

The AREAPOLY source type is used to specify an area source as an arbitrarily-shaped polygon with between 3 and 20 sides. This source type option provides the user with flexibility for specifying the shape of an area source. The AREAPOLY source parameter inputs are:

- X Coordinate [m]: Easting UTM for the first vertex point of the area source.
- Y Coordinate [m]: Northing UTM for the first vertex point of the area source.
• Release Height [m]: Release height above ground. For example, a tank open to the atmosphere would have a release height equal to the tank height.

• Number of Vertices: Number of vertices (or sides) of the area source polygon.

• Xv(1), Xv(2) … Xv(i) [m]: Easting UTM values of the vertices of the area source polygon. Xv(1) must match the X coordinate identified for the source.

• Yv(1), Yv(2) … Yv(i) [m]: Northing UTM values of the vertices of the area source polygon. Yv(1) must match the Y coordinate identified for the source.

• Szinit [m]: Initial vertical dimension of the area source plume. For more passive area source emissions, such as evaporation or wind erosion, the Szinit parameter is typically omitted, which is equivalent to using a Szinit of 0 meters.

• Emission Rate [g/s/m²]: Pollutant emission rate. Note that the g/s emission rate must be divided by the area of the area source to calculate the emission rate in units of g/s/m².

3.5.2.3 AREACIRC Sources Options

The AREACIRC source type is used to specify an area source as a circular shape. AERMOD will automatically generate a regular polygon of up to 20 sides to approximate the circular area source. The polygon will have the same area as that specified for the circle. The AREACIRC source parameter inputs are:

• X Coordinate [m]: Easting UTM at the center of the area source.

• Y Coordinate [m]: Northing UTM at the center of the area source.

• Release Height [m]: Release height above ground. For example, a tank open to the atmosphere would have a release height equal to the tank height.

• Radius [m]: Radius of the circular area source.

• Number of Vertices: Number of vertices (or sides) of the area source polygon. This parameter is optional; if no value is entered, AERMOD will generate a polygon with 20 sides.

• Szinit [m]: Initial vertical dimension of the area source plume. For more passive area source emissions, such as evaporation or wind erosion, the Szinit parameter is typically omitted, which is equivalent to using a Szinit of 0 meters.

• Emission Rate [g/s/m²]: Pollutant emission rate. Note that the g/s emission rate must be divided by the area of the area source to calculate the emission rate in units of g/s/m².

3.5.3 OPENPIT Sources

The OPENPIT algorithm uses an effective area for modeling emissions from open pits, based on meteorological conditions. AERMOD then treats the effective area as an area source to determine the impact of emissions. The OPENPIT source parameter inputs are:

• X Coordinate [m]: Easting UTM for the southwest corner of the open pit.

• Y Coordinate [m]: Northing UTM for the southwest corner of the open pit.

• Release Height [m]: Average release height above the base of the pit. The release height cannot exceed the effective depth of the pit, which is calculated by the model based on the length, width and volume of the pit. A release height of 0 indicates emissions that are released from the base of the pit. For example, an asphalt holding pit that is 1 meter in depth, filled with an average height of 0.6 meters of asphalt, would have a release height of 0.6 m.
• Xinit [m]: Length of X side of the open pit (in the east-west direction if Angle is 0 degrees).
• Yinit [m]: Length of Y side of the open pit (in the north-south direction if Angle is 0 degrees).
• Pitvol [m³]: Volume of the open pit.
• Angle: Orientation angle for the rectangular area from North, measured positive in the clockwise direction. If the Angle is not zero, the model will rotate the OPENPIT source clockwise around the southwest corner.
• Emission Rate [g/s/m²]: Pollutant emission rate. Note that the g/s emission rate must be divided by the area of the open pit source to calculate the emission rate in units of g/s/m².

The only option for defining the open pit is a rectangle or square. The maximum length/width aspect ratio for open pit sources is 10 to 1. Because the open pit algorithm generates an effective area for modeling emissions from the pit, and the size, shape and location of the effective area is a function of wind direction, an open pit cannot be divided into a series of smaller sources. If the aspect ratio is greater than 10, the user should model the pit as a rectangular shape of equal area. See Section 3.3.2.7, OPENPIT source inputs, of the AERMOD user’s guide for more information on the OPENPIT source inputs.

3.5.4 VOLUME Sources

The VOLUME source type is used to model releases that occur over a three-dimensional volume. Examples of volume sources include fugitive leaks, multiple vents, sloped conveyor belts, wipe cleaning and general solvent usage. The VOLUME source parameters inputs are:
• X Coordinate [m]: Easting UTM at the center of the volume source.
• Y Coordinate [m]: Northing UTM at the center of the volume source.
• Release Height [m]: Release height above ground at the center of volume. For example, a building with solvent releases from various open windows and doors should be modeled as a volume source with a release height equal to half the building height.
• Length of Side [m]: Length of the side of the volume source. The volume source cannot be rotated, and the X side is equal to the Y side (i.e., a square surface area).
• Syinit [m]: The initial lateral dimension is calculated by dividing the Length of Side in meters by 4.3.
• Szinit [m]: The initial vertical dimension is calculated differently for different types of volume sources, explained in Table 3.5.4-1.
• Emission Rate [g/s]: Pollutant emission rate.

An irregularly-shaped volume can be represented by dividing the volume source into multiple smaller volume sources. The user should create volume sources that cover approximately the same area where the emissions actually occur.
Table 3.5.4-1: Summary of Suggested Procedures for Estimating Initial Lateral Dimensions and Initial Vertical Dimensions for Volume Sources

<table>
<thead>
<tr>
<th>Type of Source</th>
<th>Procedure for Obtaining Initial Vertical Dimension</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface-Based Source ((h_e \sim 0))</td>
<td>((\text{vertical dimension of source in meters})) 2.15</td>
</tr>
<tr>
<td>Elevated Source ((h_e &gt; 0)) on or adjacent to a building</td>
<td>((\text{building height in meters})) 2.15</td>
</tr>
<tr>
<td>Elevated Source ((h_e &gt; 0)) NOT on or adjacent to a building</td>
<td>((\text{vertical dimension of source in meters})) 4.3</td>
</tr>
</tbody>
</table>

3.5.5 LINE Sources

The LINE source type is used to model releases from a variety of sources, such as horizontal conveyor belts, roads and rail lines. AERMOD allows a LINE source to be entered by specifying one line segment with a start point, end point and width. AERMOD uses the same algorithms for LINE sources that are used for AREA sources, and will give identical results for equivalent source parameter inputs. The LINE source parameter inputs are:

- X Coordinate [m]: Easting UTM for the start of the line source.
- Y Coordinate [m]: Northing UTM for the start of the line source.
- X End [m]: Easting UTM for the end of the line source.
- Y End [m]: Northing UTM for the end of the line source.
- Width [m]: Width of the source (minimum width is 1 m).
- Szinit [m]: Initial vertical dimension of the line source.
- Emission Rate [g/s/m²]: Pollutant emission rate. Note that the g/s emission rate must be divided by the area of the line source to calculate the emission rate in units of g/s/m².

UTM coordinates for the start and end points should reflect the center of the width of the line. The Szinit parameter may be important for a line source that is meant to represent mechanically generated emission sources, such as mobile sources. In these cases, the emissions may be turbulently mixed near the source by the process that is generating the emissions, and therefore occupy some initial vertical depth. For more passive line source emissions, such as a horizontal conveyor belt, the Szinit parameter is typically omitted, which is equivalent to using a Szinit of 0 m.

3.6 Building Impacts

Buildings and other structures near a relatively short stack can have a substantial effect on plume transport and dispersion, and on the resulting ground-level concentrations. Building downwash for point sources that are within the area of influence of a building must be considered when running AERMOD. A building is considered sufficiently close to a stack to cause wake effects when the distance between the stack and the nearest part of the building is less than or equal to five times the lesser of the building height or the projected building width (PBW), as described in Equation 3.6-1.
\textbf{D \leq 5L} \quad \text{Eq. 3.6-1}

where: \( D \) = shortest distance from the exhaust stack to the building
\( L \) = lesser of the building height and projected building width (PBW)
\( \text{PBW} = \text{maximum cross-sectional length of the building; for rectangular buildings, } \text{PBW} = \sqrt{(length^2 + width^2)} \)

The PBW is the maximum length of a building that could affect air flow around and over the structure. For more information on building downwash and PBW, see EPA’s \textit{Guideline for Determination of Good Engineering Practice Stack Height (Technical Support Document For the Stack Height Regulations)}, noted in the References section of this document.

AERMOD requires the user to input the UTM coordinates for all building corners and the height of each building. For buildings with more than one height or roofline, the UTM coordinates and height are required for each building tier.

\section*{3.7 Terrain}

All sources, buildings and receptors are required to have a base elevation, which is affected by the terrain of the site. Terrain elevations can have a large impact on the air dispersion modeling results. Elevation data can be obtained from digital elevation map (DEM) files by running AERMAP in AERMOD.

Alternatively, if the site will be graded and post-grading elevations are known, those elevations should be entered when defining the source parameters and building information in AERMOD. Do not import source and building elevation data from the DEM file(s) when running AERMAP if graded elevations are used. Furthermore, the AQIA report must clearly identify that graded elevations were used, and include a spreadsheet with the graded elevations. The preferred format for submitting these graded elevations to the District is the Lakes’ AERMOD View source file (*.Sources.xlsx) and the building file (*.Buildings.xlsx) that are generated when the user exports the source data and the building data from AERMOD View. If Lakes’ AERMOD View was not used for the AQIA, spreadsheets should be submitted to the District that show the graded elevations for each source and building with the corresponding Source IDs and Building IDs.

\section*{3.8 Meteorological Data}

District-processed AERMOD meteorological data should be used, and is available online at the District’s \textit{Meteorological Data} webpage, noted in the References section of this document, as well as in Table 3.8-1 below. All years of data should be used when running AERMOD. Please contact the District if you have any questions about which data to use or if you wish to use alternative meteorological data. For approval to use alternative meteorological data, submit a justification for the data use, including information regarding representativeness and quality assurance, along with the meteorological data to the District for review.

The \textsc{PROFBASE} parameter is used to specify the base elevation above mean sea level of the primary met tower. The elevations of the Santa Barbara County sites are displayed in Table 3.8-1. All coordinates in Table 3.8-1 are in the NAD83 datum.
### Table 3.8-1: Meteorological Data Sets in Santa Barbara County

<table>
<thead>
<tr>
<th>Met Data Set Name</th>
<th>Latitude (degrees)</th>
<th>Longitude (degrees)</th>
<th>Elevation (m)</th>
<th>Met Data Files</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carpinteria</td>
<td>34.403</td>
<td>-119.459</td>
<td>137.0</td>
<td>Carp12-16.zip</td>
</tr>
<tr>
<td>El Capitan</td>
<td>34.462</td>
<td>-120.026</td>
<td>42.0</td>
<td>ElCap12-16.zip</td>
</tr>
<tr>
<td>Ellwood</td>
<td>34.430</td>
<td>-119.911</td>
<td>20.0</td>
<td>Ellwood12-16.zip</td>
</tr>
<tr>
<td>Goleta</td>
<td>34.446</td>
<td>-119.828</td>
<td>14.0</td>
<td>Goleta12-16.zip</td>
</tr>
<tr>
<td>Las Flores Canyon</td>
<td>34.490</td>
<td>-120.047</td>
<td>184.0</td>
<td>LFC12-16.zip</td>
</tr>
<tr>
<td>Lompoc H Street</td>
<td>34.638</td>
<td>-120.457</td>
<td>41.0</td>
<td>Lompoc12-16.zip</td>
</tr>
<tr>
<td>Lompoc Watt Rd</td>
<td>34.781</td>
<td>-120.607</td>
<td>48.0</td>
<td>WattRd93-96.zip</td>
</tr>
<tr>
<td>Nojoqui Pass</td>
<td>34.527</td>
<td>-120.196</td>
<td>303.0</td>
<td>Nojoqui12-16.zip</td>
</tr>
<tr>
<td>Paradise Road</td>
<td>34.542</td>
<td>-119.791</td>
<td>371.0</td>
<td>Paradise12-16.zip</td>
</tr>
<tr>
<td>Santa Barbara Airport¹</td>
<td>34.426</td>
<td>-119.842</td>
<td>4.0</td>
<td>SBA12-16Ustar.zip</td>
</tr>
<tr>
<td>SB National Guard</td>
<td>34.428</td>
<td>-119.691</td>
<td>20.0</td>
<td>SBNG12-16.zip</td>
</tr>
<tr>
<td>Santa Maria Airport¹</td>
<td>34.899</td>
<td>-120.448</td>
<td>79.6</td>
<td>SMX12-16Ustar.zip</td>
</tr>
<tr>
<td>Santa Maria Broadway</td>
<td>34.949</td>
<td>-120.438</td>
<td>76.0</td>
<td>SMBroadway12-16.zip</td>
</tr>
<tr>
<td>UCSB West Campus</td>
<td>34.415</td>
<td>-119.879</td>
<td>9.0</td>
<td>UCSB12-16.zip</td>
</tr>
<tr>
<td>VAFB South</td>
<td>34.596</td>
<td>-120.631</td>
<td>104.0</td>
<td>VAFB12-16.zip</td>
</tr>
</tbody>
</table>

¹ The Santa Barbara Airport and Santa Maria Airport meteorological data sets were processed using the U star adjustment option (ADJ_U*). The ADJ_U* option was used for these data sets because they do not include turbulence, or sigma-theta, measurements. AERMOD automatically detects that the meteorological data was processed using the ADJ_U* option.

### 3.9 Receptors

The receptor network must provide adequate coverage to capture the maximum pollutant concentrations. The receptor network shall include a Cartesian grid, property boundary receptors and Class I receptors (if applicable). The flagpole height of all receptors shall be set to 0 meters.

#### 3.9.1 Cartesian Receptor Grids

AERMOD can create grids of Cartesian receptors that are defined by an origin with receptor points in x and y directions. The following grid spacing is required for most projects:

- 25-meter spacing on the property boundary
- 25-meter spacing from property boundary out to 200 meters
- 50-meter spacing from 200 meters to 500 meters
- 100-meter spacing from 500 meters to 2000 meters

If it appears that the grid receptors are not close enough to capture the maximum pollutant concentrations, the District may require the AQIA to be rerun with a finer grid. For facilities with a large number of emitting sources and a large property boundary, fine grid spacing will significantly impede the model run time. It may be necessary to run the AQIA with a coarse grid to determine the areas of highest concentration and then rerun the AQIA with finer grids in those areas. If this method is used, finer grids shall be used for all areas with high concentrations, not just the single area with the highest concentration. AERMOD allows for multiple grids to be included in one dispersion run.
3.9.2 Class I Receptors

If the project is in a Class I Impact Area\(^1\), or if the District determines the project has the potential to impact a Class I Area, the NSR increment analysis must include an evaluation of the Class I Area impacts; therefore, the applicant must include receptors in the Class I Area in the model. Contact the District to confirm whether or not a Class I Area increment analysis is required.

Class I Areas include national parks, national wilderness areas, and national monuments. These areas are granted special air quality protections under Section 162(a) of the federal Clean Air Act. The only Class I Area in Santa Barbara County is the San Rafael Wilderness in the northeastern section of the county. The Class I Impact Area extends 10 kilometers from the wilderness in all directions, as shown in Figure 3.9.2-1.

The District has generated Class I receptors 25 meters apart around the entire San Rafael Wilderness boundary in UTM coordinates, in the NAD83 datum. The list of Class I receptors is available in Zone 10 and Zone 11, in a simple .xlsx format and in a .csv format compatible with Lakes’ AERMOD View. Table 3.9.2-1 contains links to download the receptor lists. This information is also available online at the District’s AQIA: Class I Area webpage, noted in the References section of this document.

\(^1\)“Class I Impact Area” means all lands outside of a Class I Area but within 10 kilometers (6.2 miles) of the boundary of a Class I Area, or other areas established by the Control Officer based on standard meteorological techniques such as hourly wind roses, frequency distribution of atmospheric wind classes, morning and afternoon mixing depths and any other meteorological or geographical considerations needed to establish the Class I Impact Area.
Table 3.9.2-1: Class I Receptor Lists

<table>
<thead>
<tr>
<th>Format</th>
<th>Zone</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>10</td>
</tr>
<tr>
<td>Excel spreadsheet</td>
<td>Class_I_Receptors_Zone10.xlsx</td>
</tr>
<tr>
<td>Lakes’ receptor file</td>
<td>Class_I_Receptors_Zone10.csv</td>
</tr>
</tbody>
</table>

4. Results

Once all the AERMOD runs are complete, the results should be compiled into tables for ease of review. Explanations of how each concentration was determined from the AERMOD output files should be included in the AQIA report.

4.1 Ambient Air Quality Standard Analysis

For an ambient air quality standard (AAQS) analysis, the reportable concentration for each pollutant and averaging period modeled by AERMOD should be added to the background concentration for that pollutant and averaging period. This sum is then compared to the AAQS. The form, or reportable concentration, for the standards that must be analyzed are shown in Table 4.1-1.

The highest modeled result (i.e., 1st Highest High) is not required to be compared to the NAAQS for all averaging periods and pollutants. For example, the reportable concentration for the 24-hour averaging period for PM$_{2.5}$ is the 98th percentile, multi-year average. This means that the 8th Highest High can be reported and compared to the NAAQS for PM$_{2.5}$ for the 24-hour averaging period. California Ambient Air Quality Standards (CAAQS) for CO, SO$_2$ (1-hour and 24-hour), NO$_2$, and particulate matter (PM$_{10}$ and PM$_{2.5}$), are values that are not to be exceeded. This means that the 1st Highest High is reported and compared to the CAAQS. Because the form, or reportable concentration, of the CAAQS is different from the NAAQS for 1-hour SO$_2$ and 1-hour NO$_2$, the concentration for the NAAQS is lower than the CAAQS, it is possible for the 1-hour SO$_2$ or 1-hour NO$_2$ to meet either one of the standards but exceed the other. Therefore, SO$_2$ and NO$_2$ must be modeled for comparison to both the 1-hour CAAQS and the 1-hour NAAQS.

The NAAQS for PM$_{2.5}$ is based on the annual mean, averaged over 3 years. The NAAQS for SO$_2$ and NO$_2$ are based on the highest annual average from an individual year, rather than an average across the years modeled.

For convenience, the modeler may choose to report the most conservative result, the highest modeled concentration (i.e., 1st Highest High) for the specified averaging period. This option may be preferable in situations with very low concentrations, as it will avoid the requirement of multiple runs for the same pollutant and averaging period (e.g., 1 hour SO$_2$ is run only once and the 1st Highest High is compared to the lowest AAQS, 196 µg/m$^3$). When this option is used, the result must be clearly presented as the 1st Highest High, with language explaining that performing separate runs for the NAAQS and CAAQS is not necessary due to the low concentration.
### Table 4.1-1: Reporting Results for the AAQS Analysis

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Averaging Period</th>
<th>CAAQS (µg/m³)</th>
<th>NAAQS¹ (µg/m³)</th>
<th>Form Description</th>
<th>Form (Reportable Concentration)</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>1-hour</td>
<td>655</td>
<td>196</td>
<td>CAAQS: Not to be exceeded</td>
<td>1st Highest High</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>NAAQS: 99th percentile of 1-hour daily maximum concentrations, multi-year average</td>
<td>4th Highest High²</td>
</tr>
<tr>
<td></td>
<td>3-hour</td>
<td>—</td>
<td>1,300</td>
<td>NAAQS: Not to be exceeded more than once per year</td>
<td>2nd Highest High</td>
</tr>
<tr>
<td></td>
<td>24-hour</td>
<td>105</td>
<td>—</td>
<td>CAAQS: Not to be exceeded</td>
<td>1st Highest High</td>
</tr>
<tr>
<td></td>
<td>Annual</td>
<td>—</td>
<td>80</td>
<td>NAAQS: Annual average for individual year</td>
<td>1st Highest High</td>
</tr>
<tr>
<td>NO₂</td>
<td>1-hour</td>
<td>339</td>
<td>188</td>
<td>CAAQS: Not to be exceeded</td>
<td>1st Highest High</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>NAAQS: 98th percentile of 1-hour daily maximum concentrations, multi-year average</td>
<td>8th Highest High³</td>
</tr>
<tr>
<td></td>
<td>Annual</td>
<td>57</td>
<td>NA</td>
<td>CAAQS: Annual average for individual year</td>
<td>1st Highest High</td>
</tr>
<tr>
<td>CO</td>
<td>1-hour</td>
<td>23,000</td>
<td>NA</td>
<td>CAAQS: Not to be exceeded</td>
<td>1st Highest High</td>
</tr>
<tr>
<td></td>
<td>8-hour</td>
<td>10,000</td>
<td>NA</td>
<td>CAAQS: Not to be exceeded</td>
<td>1st Highest High</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>24-hour</td>
<td>50</td>
<td>NA</td>
<td>CAAQS: Not to be exceeded</td>
<td>1st Highest High</td>
</tr>
<tr>
<td></td>
<td>Annual</td>
<td>20</td>
<td>—</td>
<td>CAAQS: Annual average for individual year</td>
<td>1st Highest High</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>24-hour</td>
<td>—</td>
<td>35</td>
<td>NAAQS: 98th percentile, multi-year average</td>
<td>8th Highest High⁴</td>
</tr>
<tr>
<td></td>
<td>Annual</td>
<td>12</td>
<td>NA</td>
<td>CAAQS: Annual average for individual year</td>
<td>1st Highest High</td>
</tr>
</tbody>
</table>

¹ “NA” is shown if a lower or equivalent state standard exists for that pollutant and averaging period. “—” is shown if no federal standard exists for that pollutant and averaging period.

² For more information about the reportable concentration for the 1-hour SO₂ NAAQS and method to obtain it, see Section 3.2.3 of this document.

³ For more information about the reportable concentration for the 1-hour NO₂ NAAQS and method to obtain it, see Section 3.2.2 of this document.

⁴ For more information about the reportable concentration for the 24-hour PM₂.₅ NAAQS and method to obtain it, see Section 3.2.4 of this document.

Santa Barbara County is currently in nonattainment status for PM₁₀ on both an annual and 24-hour basis. Because the background concentrations for annual PM₁₀ and 24-hour PM₁₀ are above the AAQS, all projects emitting PM₁₀ will result in a PM₁₀ concentration in exceedance of the AAQS. The District has determined that projects will not contribute significantly to an exceedance of an AAQS if the project’s contribution is less than ten percent of the AAQS. Therefore, the District typically approves projects with annual and 24-hour PM₁₀ impacts less than ten percent of the AAQS.

The background concentrations of each pollutant in ambient air can be obtained by analyzing data from sources such as CARB’s Air Quality Data Statistics, the District’s Annual Air Quality Reports, and the EPA’s Air Data, all of which are noted in the References section of this document. The methods by
which the background concentrations were determined should be clearly explained and the sources should be referenced in the AQIA report, with supporting documentation submitted to the District. The background concentrations for different AAQS are not all determined in the same manner. Table 4.1-2 describes the appropriate methodology to determine the background concentration for each AAQS. However, for convenience, the modeler may choose to use the more conservative method of reporting the background concentration as the highest recorded concentration (i.e., 1st Highest High) for the most recent three years of data for the specified averaging period.

**Table 4.1-2: Background Concentrations for the AAQS Analysis**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Averaging Period</th>
<th>Form Description</th>
<th>Background Concentration</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>1-hour CAAQS: Not to be exceeded</td>
<td>Highest recorded hourly concentration from the most recent three years of data</td>
<td></td>
</tr>
<tr>
<td></td>
<td>3-hour NAAQS: 99th percentile of 1-hour daily maximum concentrations, multi-year average</td>
<td>Average of the 4th highest hourly concentrations for the most recent three years of data</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Annual NAAQS: Not to be exceeded more than once per year</td>
<td>Maximum of the second highest recorded 3-hour concentration for the most recent three years of data</td>
<td></td>
</tr>
<tr>
<td></td>
<td>24-hour CAAQS: Not to be exceeded</td>
<td>Highest recorded daily concentration from the most recent three years of data</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Annual NAAQS: Annual average for individual year</td>
<td>Maximum average annual concentration from the most recent three years of data</td>
<td></td>
</tr>
<tr>
<td>NO₂</td>
<td>1-hour CAAQS: Not to be exceeded</td>
<td>Highest recorded hourly concentration from the most recent three years of data</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Annual CAAQS: Annual average for individual year</td>
<td>Maximum average annual concentration from the most recent three years of data</td>
<td></td>
</tr>
<tr>
<td>CO</td>
<td>1-hour CAAQS: Not to be exceeded</td>
<td>Highest recorded hourly concentration from the most recent three years of data</td>
<td></td>
</tr>
<tr>
<td></td>
<td>8-hour CAAQS: Not to be exceeded</td>
<td>Highest recorded 8-hour concentration from the most recent three years of data</td>
<td></td>
</tr>
<tr>
<td>PM₁₀</td>
<td>24-hour CAAQS: Not to be exceeded</td>
<td>Highest recorded daily concentration from the most recent three years of data</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Annual CAAQS: Annual average for individual year</td>
<td>Maximum average annual concentration from the most recent three years of data</td>
<td></td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>24-hour NAAQS: 98th percentile, multi-year average</td>
<td>Average of the 8th highest daily concentrations for the most recent three years of data</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Annual CAAQS: Annual average for individual year</td>
<td>Maximum average annual concentration from the most recent three years of data</td>
<td></td>
</tr>
</tbody>
</table>
## 4.2 Increment Analysis

The increment analysis is only required for the District’s NSR permitting program, not the CEQA process. The reportable concentration modeled by AERMOD for each pollutant and averaging period in the Class I and Class II Impact Areas should be compared to the maximum allowable increase or “increment” threshold for the corresponding class. The forms or reportable concentrations for the increment analysis, with the applicable increment threshold, are described in Table 4.2-1. For increments based on EPA’s current thresholds, the 2nd Highest High may be reported for short term averaging periods. For all other increments, the 1st Highest High must be reported.

The applicant may consume the full increment range for 1-hour NO2, 3-hour ROC and 24-hour PM10; mitigation fees for consuming part or all of the increment are required and discussed in Section F.3 of the District’s Rule 805, noted in the References section of this document.

### Table 4.2-1: Reporting Results for the Increment Analysis

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Averaging Period</th>
<th>Class I Increment (µg/m³)</th>
<th>Class II Increment (µg/m³)</th>
<th>Form Description</th>
<th>Form (Reportable Concentration)</th>
</tr>
</thead>
<tbody>
<tr>
<td>TSP</td>
<td>24-hour</td>
<td>10</td>
<td>37</td>
<td>Not to be exceeded</td>
<td>1st Highest High</td>
</tr>
<tr>
<td></td>
<td>Annual¹</td>
<td>5</td>
<td>19</td>
<td>Annual average for individual year</td>
<td>1st Highest High</td>
</tr>
<tr>
<td>SO₂</td>
<td>3-hour</td>
<td>25</td>
<td>512</td>
<td>Not to be exceeded more than once per year</td>
<td>2nd Highest High</td>
</tr>
<tr>
<td></td>
<td>24-hour</td>
<td>5</td>
<td>91</td>
<td>Not to be exceeded more than once per year</td>
<td>2nd Highest High</td>
</tr>
<tr>
<td></td>
<td>Annual</td>
<td>2</td>
<td>20</td>
<td>Annual average for individual year</td>
<td>1st Highest High</td>
</tr>
<tr>
<td>NO₂</td>
<td>1-hour</td>
<td>10</td>
<td>100-188</td>
<td>Not to be exceeded</td>
<td>1st Highest High</td>
</tr>
<tr>
<td></td>
<td>Annual</td>
<td>2.5</td>
<td>25</td>
<td>Not to be exceeded</td>
<td>1st Highest High</td>
</tr>
<tr>
<td>CO</td>
<td>1-hour</td>
<td>800</td>
<td>10,000</td>
<td>Not to be exceeded</td>
<td>1st Highest High</td>
</tr>
<tr>
<td></td>
<td>8-hour</td>
<td>200</td>
<td>2,500</td>
<td>Not to be exceeded</td>
<td>1st Highest High</td>
</tr>
<tr>
<td>ROC</td>
<td>3-hour</td>
<td>3</td>
<td>40-160</td>
<td>Not to be exceeded</td>
<td>1st Highest High</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>24-hour</td>
<td>8</td>
<td>12-30</td>
<td>Not to be exceeded more than once per year</td>
<td>2nd Highest High</td>
</tr>
<tr>
<td></td>
<td>Annual</td>
<td>4</td>
<td>17</td>
<td>Annual average for individual year</td>
<td>1st Highest High</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>24-hour</td>
<td>2</td>
<td>9</td>
<td>Not to be exceeded more than once per year</td>
<td>2nd Highest High</td>
</tr>
<tr>
<td></td>
<td>Annual</td>
<td>1</td>
<td>4</td>
<td>Annual average for individual year</td>
<td>1st Highest High</td>
</tr>
</tbody>
</table>

¹ The form of the annual increment threshold for TSP is the “Annual Geometric Mean.” AERMOD calculates the annual arithmetic mean, not the annual geometric mean. However, the District will accept the annual arithmetic mean as an approximation of the annual geometric mean.

¹ Section 163(a) of the Clean Air Act stipulates that EPA’s short-term increments “can be exceeded during one such period per year.”
5. **Air Quality Impact Assessment Report**

The applicant is required to perform the AQIA and submit the AQIA report and electronic files for the District’s review. The District will assess fees for the AQIA review on the cost reimbursement basis specified in Section I.C of the District’s Rule 210.

The required elements of the AQIA report are discussed in Sections 5.1 through 5.7 below.

5.1 **Facility Information**

Report the following information regarding the facility and its surroundings:

- Facility name
- Stationary source identification number (SSID)
- Location (street address and UTM coordinates, including datum)
- Description of facility operations and a list identifying emitted substances, including a table of the emissions for the modeled pollutants and averaging periods

5.2 **Source and Emission Inventory Information**

Report the following information for each emission source in table format:

- Source identification number
- Source name
- Source type (point, area, open pit, volume, line)
- Device identification number(s) for any devices emitting at this source (use District device identification numbers when available)
- Source UTM coordinates
- Source parameters

The description and operating schedule for each device should be reported in table format including the following information:

- Device name and identification number
- Number of operating hours per day and per year, including which hours the device operates in a 24-hour day
- Number of operating days per week, including which days the device operates in a 7-day week
- Number of operating days or weeks per year
- Source identification number(s) for the AERMOD sources where emissions are released

5.3 **Emission Quantification**

Report the following information for each device in table format:

- Emission control equipment and efficiency by source and by pollutant, if efficiency varies by pollutant
- Emission rates for each pollutant, grouped by source, including the following information:
5.4 Air Dispersion Information

The following information must be identified:

- Name and version number of the software used to run AERMOD
- Selected control options
- Urban/rural dispersion (including the values entered for roughness length and population, if the urban option was selected)
- Building information (UTM coordinates and tier heights)
- Terrain information (which DEM files were used, graded elevations)
- Meteorological data (which station and years were used in the air dispersion model)
- Receptor placement discussion and justification:
  - Modeling domain
  - Spacing of receptor grid(s)
  - Property boundary receptor spacing
  - Location (UTM coordinates) of any Class I Impact Area receptors

5.5 Summary of Results

5.5.1 Results of the AAQS Analysis

Present the AAQS results in table format, including the following information:

- Reportable concentrations modeled by AERMOD for the project for each appropriate pollutant and averaging period reported according to Table 4.1-1 of this document
- Receptor numbers corresponding to where the reported concentrations occur
- Location (UTM coordinates) of receptors where the reported concentrations occur (may be included in separate table)
- Background concentrations for each appropriate pollutant and averaging period
- Sum of the background concentration and modeled project impacts
- AAQS for each appropriate pollutant and averaging period
An example AAQS results table is shown below (Table 5.5.1-1).

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Averaging Period</th>
<th>Receptor Number</th>
<th>Modeled Impact Conc. 1 (µg/m³)</th>
<th>Ambient Background (µg/m³)</th>
<th>Total Conc. (µg/m³)</th>
<th>AAQS (µg/m³)</th>
<th>Percent of AAQS</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>1-hour</td>
<td>565</td>
<td>24.8</td>
<td>16.3</td>
<td>41.1</td>
<td>655</td>
<td>6.3%</td>
</tr>
<tr>
<td></td>
<td>1-hour ²</td>
<td>567</td>
<td>20.4</td>
<td>13.1</td>
<td>33.5</td>
<td>196</td>
<td>17%</td>
</tr>
<tr>
<td></td>
<td>3-hour ³</td>
<td>1121</td>
<td>13.1</td>
<td>8.0</td>
<td>21.1</td>
<td>1,300</td>
<td>1.6%</td>
</tr>
<tr>
<td></td>
<td>24-hour</td>
<td>2356</td>
<td>1.97</td>
<td>5.2</td>
<td>7.2</td>
<td>105</td>
<td>6.9%</td>
</tr>
<tr>
<td></td>
<td>Annual</td>
<td>2725</td>
<td>0.29</td>
<td>2.6</td>
<td>2.9</td>
<td>80</td>
<td>3.6%</td>
</tr>
<tr>
<td>NO₂⁴</td>
<td>1-hour</td>
<td>743</td>
<td>92.7</td>
<td>98.0</td>
<td>190.7</td>
<td>339</td>
<td>56%</td>
</tr>
<tr>
<td></td>
<td>1-hour ⁵</td>
<td>689</td>
<td>81.5</td>
<td>92.1</td>
<td>173.6</td>
<td>188</td>
<td>92%</td>
</tr>
<tr>
<td></td>
<td>Annual</td>
<td>2725</td>
<td>1.84</td>
<td>14.4</td>
<td>16.2</td>
<td>57</td>
<td>28%</td>
</tr>
<tr>
<td>CO</td>
<td>1-hour</td>
<td>784</td>
<td>443.5</td>
<td>3565</td>
<td>4009</td>
<td>23,000</td>
<td>17%</td>
</tr>
<tr>
<td></td>
<td>8-hour</td>
<td>653</td>
<td>212.9</td>
<td>1311</td>
<td>1524</td>
<td>10,000</td>
<td>15%</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>24-hour</td>
<td>845</td>
<td>7.86</td>
<td>76.2</td>
<td>84.0</td>
<td>50</td>
<td>168%</td>
</tr>
<tr>
<td></td>
<td>Annual</td>
<td>365</td>
<td>1.76</td>
<td>24.2</td>
<td>26.0</td>
<td>20</td>
<td>130%</td>
</tr>
<tr>
<td>PM₂.⁵</td>
<td>24-hour ⁶</td>
<td>448</td>
<td>1.71</td>
<td>17.3</td>
<td>19.0</td>
<td>35</td>
<td>54%</td>
</tr>
<tr>
<td></td>
<td>Annual</td>
<td>365</td>
<td>0.27</td>
<td>7.0</td>
<td>7.3</td>
<td>12</td>
<td>61%</td>
</tr>
</tbody>
</table>

1 Unless otherwise noted, all values reported are the 1st Highest High.
2 This 1-hour SO₂ concentration is reported as the 4th Highest High (i.e., the 99th percentile, five-year average) for the NAAQS analysis.
3 The 3-hour SO₂ concentration is reported as the 2nd Highest High (i.e., standard shall not be exceeded more than once per year).
4 The 1-hour and annual NO₂ concentrations were determined using the ARM2.
5 This 1-hour NO₂ concentration is reported as the 8th Highest High (i.e., the 98th percentile, five-year average) for the NAAQS analysis.
6 The 24-hour PM₂.⁵ concentration is reported as the 8th Highest High (i.e., the 98th percentile, five-year average).

5.5.2 Results of the Increment Analysis

Present the increment results in table format, including the following information:

- Reportable concentrations modeled by AERMOD for the project for each appropriate pollutant and averaging period reported according to Table 4.2-1 of this document
- If required, the reportable concentrations modeled by AERMOD for the project for each appropriate pollutant and averaging period in the Class I Impact Area
- Receptor numbers corresponding to where the reported concentrations occur
- Location (UTM coordinates) of receptors where the reported concentrations occur (may be included in separate table)
- Increment threshold for each appropriate pollutant and averaging period
An example increment analysis results table is shown below (Table 5.5.2-1).

### Table 5.5.2-1: Example Increment Analysis Modeling Results for Class II Impacts

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Averaging Period</th>
<th>Receptor Number</th>
<th>Modeled Impact Concentration</th>
<th>Class II Increment</th>
<th>Percent of Maximum Increment</th>
</tr>
</thead>
<tbody>
<tr>
<td>TSP</td>
<td>24-hour</td>
<td>845</td>
<td>7.86 (µg/m³)</td>
<td>37</td>
<td>21%</td>
</tr>
<tr>
<td></td>
<td>Annual</td>
<td>365</td>
<td>1.76 (µg/m³)</td>
<td>19</td>
<td>9%</td>
</tr>
<tr>
<td>SO₂</td>
<td>3-hour</td>
<td>1121</td>
<td>13.1 (µg/m³)</td>
<td>512</td>
<td>3%</td>
</tr>
<tr>
<td></td>
<td>24-hour</td>
<td>3546</td>
<td>1.23 (µg/m³)</td>
<td>91</td>
<td>1%</td>
</tr>
<tr>
<td></td>
<td>Annual</td>
<td>2725</td>
<td>0.29 (µg/m³)</td>
<td>20</td>
<td>1%</td>
</tr>
<tr>
<td>NO₂³</td>
<td>1-hour</td>
<td>853</td>
<td>98.1 (µg/m³)</td>
<td>100-188³</td>
<td>52%</td>
</tr>
<tr>
<td></td>
<td>Annual</td>
<td>2725</td>
<td>1.84 (µg/m³)</td>
<td>25</td>
<td>7%</td>
</tr>
<tr>
<td>CO</td>
<td>1-hour</td>
<td>784</td>
<td>443.5 (µg/m³)</td>
<td>10,000</td>
<td>4%</td>
</tr>
<tr>
<td></td>
<td>8-hour</td>
<td>653</td>
<td>212.9 (µg/m³)</td>
<td>2,500</td>
<td>9%</td>
</tr>
<tr>
<td>ROC</td>
<td>3-hour</td>
<td>986</td>
<td>152.3 (µg/m³)</td>
<td>40-160³</td>
<td>95%</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>24-hour</td>
<td>778</td>
<td>6.8 (µg/m³)</td>
<td>12-30³</td>
<td>23%</td>
</tr>
<tr>
<td></td>
<td>Annual</td>
<td>365</td>
<td>1.76 (µg/m³)</td>
<td>17</td>
<td>10%</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>24-hour</td>
<td>778</td>
<td>1.93 (µg/m³)</td>
<td>9</td>
<td>21%</td>
</tr>
<tr>
<td></td>
<td>Annual</td>
<td>365</td>
<td>0.27 (µg/m³)</td>
<td>4</td>
<td>7%</td>
</tr>
</tbody>
</table>

1 Unless otherwise noted, all values reported are the 1st Highest High.  
2 The modeled concentration reported is the 2nd Highest High.  
3 The 1-hour and annual NO₂ concentrations were determined using the ARM2.  
4 The applicant may consume the full increment range pursuant to the requirements of Rule 805, Section F.3.

### 5.6 Air Quality Impact Driver Tables

For any AAQS or increment that is exceeded or within five percent of the standard/threshold, provide a table of the air quality impacts for each pollutant and averaging period from each source included in the model. If there are many sources included in the model, include those sources that contribute at least five percent of the air quality impacts in the table. This will allow the District to identify which devices are contributing most to the air quality impacts. For each table, include a statement indicating which of the devices or operations contributes most to the air quality impacts.

### 5.7 Required Files

The following files are required to be submitted electronically:

- AQIA report (*.pdf)
- Emission calculations spreadsheet (*.xlsx)
- Surface meteorological data file (*.sfc)
- Profile meteorological data file (*.pfl)
- Digital elevation map files (*.dem)
- AERMAP receptor file
- AERMAP source file
• BPIP input file
• BPIP summary file
• BPIP output file
• AERMOD input file for each pollutant/averaging period
• AERMOD output file for each pollutant/averaging period
• AERMOD error file
• Plotfiles for each source group (*.plt)

If the AQIA or AQIA report fail to comply with these guidelines, the AQIA and AQIA report will be returned, with District comments, to the applicant for revision.

6. References


• Santa Barbara County Air Pollution Control District. 2019. *AQIA: Class I Area*. https://www.ourair.org/aqia-class-i-area/


7. Contacts

For questions about the District’s requirements for modeling, contact the District at:

  phone: 805-961-8800
  email: engr@sbcapcd.org

For questions about AERMOD, contact EPA’s Region IX Modeling Contact, Carol Bohnenkamp, at:

  phone: 415-947-4130
  email: bohnenkamp.carol@epa.gov
Appendix A – Variable Emissions Modeling

During some air quality studies, modelers may encounter certain emitting scenarios that require the use of variable emissions modeling. This appendix outlines modeling techniques to account for special operating schedules.

AERMOD includes options for modeling source emissions that fluctuate over time. With the variable emissions option, the modeler can select the hours of operation and the emission rate for each individual source. Emission variations can be characterized across many different periods, including hourly, daily, monthly and seasonally. If variable emissions are used, the applicant must submit documentation with the AQIA that justifies using that variable emissions scenario. The District may require permit conditions to enforce the operating hours, days, months, etc. selected in the variable emissions scenario.

A.1 Non-Continuous Emissions

Emissions can be modeled with varying rates over time within AERMOD by applying factors to different time periods. For example, for a source that is non-continuous, a factor of 0 is entered for the periods when the source is not operating or is inactive, and a factor of 1 is entered for the periods when the source is operating. Model inputs for variable emissions rates can include the following time periods:

- Seasonally
- Monthly
- Hour of day
- Wind speed
- Season and hour of day
- Hour of day, day of week
- Hour of day, 7 days of the week
- Season, hour of day, day of week
- Season, hour of day, 7 days of the week
- Month, hour of day, day of week
- Month, hour of day, 7 days of the week

A.2 Plant Shutdowns and Start-Ups

Plant start-ups and shutdowns can occur periodically due to maintenance or designated vacation periods. The shutdown and subsequent startup processes impact emissions over the related time periods. As an example, process upsets in the combustion units or air pollution control system can also impact emissions; these upsets can often result in the release of uncontrolled emissions through the emissions sources. As a result, over short periods of time, upset emissions are often expected to be greater than normal source emissions1. AERMOD can account for these differences in emission rates by using variable emission factors.

---

Example Variable Emissions Scenario: A turbine operates from 6AM to 8PM (1 hour for startup, 1 hour for shutdown, and 12 hours of normal operation) every day. The startup/shutdown emissions are twice that of normal operating emissions. The emission rate during normal operation should be entered in g/s in the source parameters window in AERMOD. The emission rate factors that reflect this operating schedule should be entered in the variable emissions scenario in AERMOD as shown in Table A.2-1.

It is important to note that the hours of the day displayed in AERMOD correspond to the hour ending at the time displayed. Therefore, hour 7 corresponds to the hour from 6AM to 7AM, and hour 20 corresponds to the hour from 7PM to 8PM.

<table>
<thead>
<tr>
<th>Hour of Day</th>
<th>Emission Rate Factor by Hour</th>
<th>Hour of Day</th>
<th>Emission Rate Factor by Hour</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>0</td>
<td>13</td>
<td>1</td>
</tr>
<tr>
<td>2</td>
<td>0</td>
<td>14</td>
<td>1</td>
</tr>
<tr>
<td>3</td>
<td>0</td>
<td>15</td>
<td>1</td>
</tr>
<tr>
<td>4</td>
<td>0</td>
<td>16</td>
<td>1</td>
</tr>
<tr>
<td>5</td>
<td>0</td>
<td>17</td>
<td>1</td>
</tr>
<tr>
<td>6</td>
<td>0</td>
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<td>24</td>
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</table>
Appendix B – Modeling Specific Source Types

This appendix will be updated with additional source types in the future.

B.1 Liquid Storage Tanks

Storage tanks are generally of two types—fixed roof tanks and floating roof tanks. In the case of fixed roof tanks, most of the pollutant emissions escape from a vent, with some additional contribution from hatches and other fittings. In the case of floating roof tanks, most of the pollutant emissions escape through the seals between the roof and the wall and between the deck and the wall, with some additional emissions from fittings, such as ports and hatches.

Approaches for modeling emission impacts from various types of storage tanks are outlined in Sections B.1.1 and B.1.2 below.

B.1.1 Fixed Roof Tanks

Model a fixed roof tank as a point source (i.e., a stack). The point source location and release height should represent the tank vent, which is usually in the center of the tank. The tank should also be represented as a building for downwash modeling. Table B.1.1-1 shows the values that should be entered for the velocity, diameter and temperature.

<table>
<thead>
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<th>Velocity</th>
<th>Diameter</th>
<th>Temperature</th>
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</thead>
<tbody>
<tr>
<td>Near zero, i.e., 0.001 m/s</td>
<td>Nero zero, i.e., 0.001 m</td>
<td>Ambient – a value of 0 prompts the model to use the ambient temperature</td>
</tr>
</tbody>
</table>

There is virtually no plume rise from tanks. Therefore, the stack parameters for the stack gas exit velocity and stack diameter should be set to near zero for the stacks representing the emissions. In addition, stack temperature should be set equal to the ambient temperature. This can be accomplished in AERMOD by inputting a value of 0 for the stack gas temperature.

Note that it is very important for the diameter to be at or near zero. With low exit velocities and larger diameters, stack tip downwash will be calculated. A very small stack diameter effectively eliminates the stack tip downwash. Because all downwash effects are being modeled with the building downwash algorithm, the additional stack tip downwash calculations would be inappropriate.

B.1.2 Floating Roof Tanks

Model a floating roof tank as an area source. The area source inputs should represent the diameter of the tank and the height of the tank. The tank should also be represented as a building for downwash modeling if there are nearby point sources that may be affected.