Statement of Southern Company to the
Clean Air Scientific Advisory Committee
NOx & SOx Secondary NAAQS Review Panel

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Good afternoon, my name is John Jansen, Principal Scientist for Southern Company. These comments supplement the comments I made at the Panel's October 6 meeting.

First, I repeat an earlier comment; "Florida lakes have thriving fisheries despite low pH and ANC due to low aluminum levels." Contrary to the comment made by Dr. Bryan Hubbell as part of the discussion on screening criteria for naturally acidic lakes, Florida lakes also have low DOC and will not be screened out using the simplistic criteria for naturally acidic lakes. In fact, of the 289 water bodies that appear to be in FL in the EPA spreadsheet labeled "EcoDataWLogAnc," about 50 have DOC > 10 ueq/l and would be excluded. However, only **one** has an ANC less than 100 and would thus be relevant at the thresholds being considered.

Second, EPA has not presented any usable assessment of what the various options for crafting and applying the AAPI will mean in terms of "attainment/non-attainment." As a stakeholder from Alabama, I want to understand the degree of "attainment/non-attainment" in the state and on what basis such status has been derived. Are the AL water bodies contained in the spreadsheet representative of the state's aquatic resources? Where does each of the critical parameters in the AAPI come from? Are they Alabama-specific or are they interpolated or extrapolated from other areas? What assurance do I have that the AAPI parameter assumptions are appropriate to Alabama? Please note that the questions and issues pertain to the matter of "designations" and Policy assessments need to inform the extent to which different options of the standard will drive designation of attainment/non-attainment areas in order for the Administrator to make informed decisions. This has been the norm in other risk and policy documents and the novelty of this NAAQS should not exempt EPA from disregarding this crucial element.

Third, I took the spreadsheet and crudely filtered for water bodies in AL and FL using latitude and longitude.

- AL has about 91 water bodies in 5 level 3 ecoregions with 97, 89, and 75% being at or above ANC's of 20, 50, and 100 ueq/l. One ecoregion (8.4.9) is not indicated in Figure 5-10. Only 40% of the water bodies below ANC 100 have any DOC data. What about the other 60%? As a state, is AL in attainment for a

NAAQS set at an AAPI of 90% > 20 and at an AAPI of 75% > 100, regardless of current deposition?

- FL has about 189 water bodies in 3 level 3 ecoregions with 84, 75, and 65% being at or above ANC's of 20, 50, and 100 ueq/l. One ecoregion (15.4.1) is not indicated in Figure 5-10 and one is not shown to be in FL (8.3.5). While 73% of the water bodies below ANC 100 have DOC data, only one would be excluded as "natural." At current deposition, what is the attainment status under the different options of level and percentile?
- Without the critical loads, trade-off curves, or the deposition of NHx, NOx, or SOx, I cannot assess what these data mean relative to "attainment/non-attainment."
- Relative to geographic distribution across states and taking the data at face value, ecoregion 8.3.5 has about 99 water bodies in AL and FL. The 90% percentile ANC is ~9 ueq/l and includes no AL, only FL, water bodies. The 75% percentile ANC is 36 ueq/l and includes only 5 AL water bodies. Should AL's status be driven by FL problems?
- The preceding comment is particularly problematic if the 5 clusters represented in Figure 5-11 are used. AL is lumped with many disjointed states including NY and WI. Should AL's status be driven by NY and WI?

Southern Company continues to have serious concerns with the staff's recommendations for revising the secondary NAAQS for NOx and SOx. The NAAQS program is simply ill-suited to address the issue at hand. EPA needs to consider and pursue more reasonable, alternative approaches. Failing that, EPA must take the time to consider the many issues raised by CASAC and the public, revise and complete their analysis, and issue another draft of the PAD for CASAC and public review.

Thank you.