

Comments on 10/3/96 draft letter from Winston Smith to Richard Grusnick
D. Wilson: 10/3/96

1. Most of the comments in the draft letter are good, albeit they may need to be couched a little differently; see next comment below. I have a few specific comments following comment 2 below.

2. The way I read this document is that it is guidance to potential applicants and not a list of requirements that ADEM is supposed to follow. For example, it says in several places that if certain situations occur or if emissions data are needed then the applicant needs to get that guidance or EI directly from ADEM. If this is the case i.e. the Guideline is for applicants, then ADEM needs to provide requirements for the applicants that are entirely consistent with the EPA Guideline on Air Quality Models (GAQM). This is because the State is required by their own SIP to follow the GAQM. Now ADEM may go beyond the GAQM requirements in their guidance to sources, but as a minimum it must follow the GAQM.

What I would do would be to provide to ADEM the above in the form of a general comment, to be followed by specific comments (most of what is in the draft letter) that follow from the above premise.

3. The other general comment that you might want to make is to indicate that you have not thoroughly reviewed some aspects of the ADEM Guideline, but instead focussed on the Bretton problem. Then maybe later you (probably others in the Region than Brenda) will provide additional comments on such things as preconstruction monitoring, GEP requirements, background concentrations etc.

4. . Specific Comments on the draft letter.

a. Item 2. I'm not sure whether the authority for selection of a nonguideline model is retained by the Region or is delegated to the State as part of their SIP. You might want to check with Dan deRoeck on that one.

b. Item 3. I don't believe the applicant provides notice and opportunity for public hearing on the nonguideline model. That is part of the State's responsibility.

In the next to last sentence delete "no".

c. Item 4. Is the development of the inventory an applicant responsibility. However, the comment is good in the EI must be consistent with PSD and GAQM (Table 9.2) requirements.

d. Item 9. The complex terrain modeling requirements for all screening models are spelled out in the GAQM. This is important for the Sipsey protocol where several complex terrain models are mentioned. Also, in the Sipsey protocol it says not to use the complex terrain option with ISC3. What is the applicant supposed to do if terrain is above stack height.

I would say that the Sipsey protocol should also be stricken from the ADEM Guideline and that the applicant needs to get specific case-by-case modeling guidance from ADEM.