From: brenda johnson
To: RTP10.RTPTSD(DOLL-DENNIS,WILSON-DEAN)
Date: 5/7/97 9:04am
Subject: Re: NAAQS modeling area -Reply

Thanks for your reply. The major company's involved agree Ashland Oil and Calgon. I have a few more questions but first a bit of background. Ashland did
GEP modeling an indicated NAAQS violations. They changed some emission limits but Calgon was the major contributor to the violations. Calgon is changing some
of their emission limits but wants to redo the modeling. Calgon submitted a protocol. The state want to eventually use this modeling for their redesignation of the current SO2 nonattainment area.

Calgon doesn't have on-site data and wants to use Ashland's 10 meter stack which
is ~2 miles up river. I don't agree with this because the terrain appears to complex to make the meteorological monitoring site representative of their stacks. Plus no information on plume heights of interest and other information to make the case for representativeness other than similarity of terrain and elevation were submitted. I'm suggesting the use of CTSCREEN and ISC instead of
ISC3 with the Ashland off-site data. This won't be acceptable to them though. I know that it is usually recommended that the meteorological data be representative of the source setting the emission limit. However, Ashland and Calgon are both setting new emission limits. COULD I SUGGEST THAT THE ORIGINAL
ASHLAND MODELING BE REDONE WITH THE NEW EMISSION DATA AND THEN ISC3 COULD BE USED?

I was going to suggest that at a minimum the same area should be modeled as was
done by Ashland so that the previous modeling violation can be shown to be resolved. This would mean modeling the same receptors and terrain features. SHOULD CALGON NOT IDENTIFY ADDITIONAL TERRAIN FEATURES FOR THEIR STACKS SINCE THEY ARE DOING THE MODELING FROM THEIR STACKS' PERSPECTIVE?

Finally, all of Calgon's sources were not modeled in the Ashland modeling unbeknownst to me. Now 60 Calgon sources are listed with the majority of them below 65 meters. If CTSCREEN is used, should only terrain features be identified
with respect to the Calgon stacks plus the original terrain for which the violations were indicated on?

I know that you are extremely busy. However, I need to finish this before next
week. Any comments are appreciated. Thanks
again._____
Reply Separator _____
Subject: NAAQS modeling area -Reply
Author: dean wilson at X400
Date: 05/06/97 10:55 AM

Hi Brenda--Sorry we didn't get back to you earlier on your modeling domain question. Getting ready for this workshop has been hectic. Anyway, my understanding is that this is only a SIP modeling issue and that PSD is not involved. In these cases we have always said that the modeling domain is a judgment call on the part of the modeler, with judgmental review by the appropriate agendy (ies). Certainly they should include the area of expected maximum concentration, which would most likely include the receptors with

violations from the past. To the extent that the modeling domain should include a larger area than what was modelied in the past would depend on the nature of the differences in emissions, stack configurations and modeling techniques from previous modeling.
I don't know that we have a reference other than Section 8.2.2 of the Guideline, although if you really need something more we could probably find a past memo where the kinds of words I stated above are included. Let me know.
Also, for purposes of keeping track of these questions in a Clearinghouse file,

could you let me know the name of the source involved here?
Thanks
Dean