



Cathy\_Wilson@ncair.

net

05/19/1999 07:21 AM

To: Johnson.Brenda

cc: Jim\_Roller@ncair.net, Prince.Kay, Terry.Randy, Krivo.Stanley

Subject: RE:ISC-Prime

Brenda,

I have discussed this ISC-Prime issue with Jim (Roller) and the information you have sent will be helpful.

This is not a SIP issue and will not be submitted to Region 4 as a SIP revision, at this point. We were inquiring so that we could handle the alternative model question the same way you would for a SIP issue. Thank you for your response.

Cathy Wilson

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-----Original Message-----

From: Johnson.Brenda@epamail.epa.gov  
[mailto:Johnson.Brenda@epamail.epa.gov]  
Sent: Tuesday, May 18, 1999 2:53 PM  
To: cathy\_wilson@ncair.net  
Cc: Krivo.Stanley@epamail.epa.gov;  
Terry.Randy@epamail.epa.gov; Prince.Kay@epamail.epa.gov  
Subject: ISC-Prime

Cathy:

The following questions are being sent in response to your telephone call on what is required to use the ISC-PRIME model for modeling demonstrations. First of all, ISC-PRIME is not an EPA guideline model but has been under review by EPA. For regulatory purposes, the ISC3 model should be used. Case-by-case consideration

and approval of non-guideline models are possible with the appropriate justification per section 3.2 of 40 CFR Part 51, Appendix W: Guideline on Air Quality Models. Any approval for ISC-PRIME, unless it became an EPA model, would be on a case-by-case basis and would not imply approval for use by other sources. Specifically, some questions/items that must be addressed for a case-by-case approval of ISC-PRIME include:

1. Why does ISC-PRIME offer a better theoretical simulation of the problem?
2. Based on the available performance evaluation data for ISC-PRIME, why would ISC-PRIME be expected to perform better than ISC3 for this application. To do this latter evaluation, the source/state should identify the evaluation data base(s) that is (are) similar to the situation for the proposed source. To assess similarity, the building/source geometry and the stack effluent characteristics should be compared for the evaluation data base and the proposed source. This could include a comparison of the stack height to building height ratios, and a comparison of the momentum and buoyancy fluxes.
3. Discuss the model evaluation of the ISC-PRIME model.

If this demonstration will be submitted to EPA as a SIP revision, we would prefer that a modeling protocol be submitted first. Approval of a non-guideline model should be approved prior to its use. Please let me know if I can be of further assistance. Have a great day....

Brenda Johnson

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Date: Wed, 19 May 1999 07:21:51 -0400  
From: Wilson Cathy <Cathy\_Wilson@ncair.net>  
Subject: RE: ISC-Prime  
To: "Johnson.Brenda@epamail.epa.gov" <Johnson.Brenda@epamail.epa.gov>  
Cc: Krivo.Stanley@epamail.epa.gov, Terry.Randy@epamail.epa.gov,  
Prince.Kay@epamail.epa.gov, Roller Jim <Jim\_Roller@ncair.net>  
Message-id: <A781D85D6504D211B40F00805F9F4C3A597E08@mail.aq.ehnr.state.nc.us>  
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