

From: brenda johnson
To: RTP10.RTPTSD(DOLL-DENNIS)
Date: 9/17/96 2:33pm
Subject: flares and cooling towers

Dennis:

In determining GEP, how are cooling towers handled? Are they considered as the nearby structures contributing to potential downwash? Are they excluded because of their "aerodynamic???" design. Should one consider them as some rectangular-like structure? I know that the GEP TSD does not address calculating GEP for these structures without a fluid modeling demonstration. And that the wind structure may not be as great as that around block-like structures.

As for flares, should they be modeled as other emission points in a SIP or PSD demonstration. For the GEP stack height demonstrations, they were excluded from the regulation and GEP analyses. However, the SCREEN user guide does address them.

The reason for the concern is that a TVA nuclear plant that was supposed to be built is going to be converted to a coal-fired facility. Alabama DEM wanted to know how to handle the cooling tower(s) and flares in any downwash assessments should it (and it most likely will) trigger PSD.

CC: RTPMAINHUB.WPXGATE (JOHNSON-BRENDA)

*Dean,
Would Flares be exempt from pt.
Source modeling for ~~SD~~ PSD or
NAAQS modeling? NO.*