

RECORD OF COMMUNICATION

TELEPHONE CALL MEETING CONFERENCE CALL OTHER

INFORMATION COPIES TO: Dennis Dan Brenda

TO: D. Doll, D. deRoeck, D. Wilson
FROM: B. Johnson: R-IV
DATE: 1/24/97
TIME:
SUBJ: Peele-Koalin Quarry

SUMMARY OF COMMUNICATION:

Source began seeking a PSD permit back in 1990. The 1974-78 Macon GA surface data and Centreville AL upper air data were used in the analysis. At that time modeled violations of the TSP increment were found. 2 other nearby quarries contributed to the increment consumption. Later the analysis was redone, for the PM-10 increment, using the original 1974-78 met data base. The SIA analysis indicated a value 24-hour value of 4.99 ug/m3 (barely under the allowable increment).

Issue 1. Guidance requires that the latest readily available 5 year data set, which would require a different data set than the 1974-78 data. Are their valid technical reasons why the old data set would not be just as valid as the latest available?

Discussion: GA EPD approves of using 1974-1978 meteorology data because previous PSD modeling analyses conducted for this area were based on 1974-78 data. Also, GA EPD states that a different 5-year period would change the amount of increment consumed (either plus or minus) and would not be consistent with previous analyses. Finally, the current submittal does not allow any room for increases in the increment and NAAQS compliance demonstration. The SIA analysis gave a 24-hour value of 4.99 ug/m3 as compared to the PSD significance level for PM10 of 5 ug/m3. The PSD 24-hour increment modeled was 29.7 ug/m3 (HSH) and compared with the PSD increment of 30 ug/m3. GA EPD further state that a more recent data set would not be any more representative than the one used in the increment analysis. R-IV notes that this issue has been raised and discussed at several Regional/State and local modelers workshops with the same conclusions. That being, to adhere to the Modeling Guideline without change to the current policy.

C/H Comments:

1. The issue is pretty much one of consistency and to avoid data base shopping (if the latest available gave a more desirable answer, it seems that the source would want to use it.) From the technical end, the CAA requires that violations be identified and dealt with. By avoiding remodeling with the latest available data base it seems that one is avoiding such identification.

Issue 2a. The three quarries that consume increment are each fenced to preclude public access. Is it acceptable to subtract a quarry's own contribution to concentrations on its own fenced property, while still keeping the contributions of the other quarries at such receptors?

C/H Comment:

Yes. See e.g. Oct. 17 1989 memo from R. Bauman to Region VI.
(C/H Record # 90-VI-01).

Issue 2b. To determine the appropriate estimates for Issue 2a four modeling runs were made. The first run had all three sources included and was for receptors off of all company property. The second did not include the emissions for one of the quarries and was for receptors on that company's property only. The third run was akin to the second except emissions from the second quarry were not included for receptors

on its property. The fourth run was similar except the third company's property was analyzed. In this fashion all receptors were analyzed with appropriate emissions included.

C/H Comment:

Procedure sounds OK; check to see if was done as described.

Issue 3: The nearest Class I area is about 180 KM away. Is there any need to analyze for the Class I increment there.

C/H Comment:

Probably not, given the magnitude of the emissions. However, the State might want to contact the FLM, as a courtesy.

FOLLOWUP ANTICIPATED:

Region IV will discuss Issue 1 with GA further, with the going in position that they need to use the latest available 5-year data set.

MODEL CLEARINGHOUSE RECORDS INFORMATION:

SOURCE NAME: Peele-Koalin
LOCATION: Standardville GA
SOURCE TYPE: Quarry
POLLUTANTS: PM-10
REGULATION(S) INVOLVED: PSD
MET. DATA BASES (ON/OFF-SITE): Off
MODEL(S) USED: Not stated