



**DIVISION OF ENVIRONMENTAL PROTECTION**

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May 20, 1998

Mr. John Reggi, Administrative Coordinator  
Industrial Sources Group  
Ormet Corporation  
P.O. Box 176  
Hannibal, OH 43931

Dear Mr. Reggi:

The West Virginia Division of Environmental Protection Office of Air Quality (OAQ) has reviewed the Dispersion Model Protocol For Industrial Sources Group Based in Marshall County, West Virginia as prepared by Energy and Environmental Management and amended April, 1998. The model protocol is approved by the OAQ for use in the Marshall County sulfur dioxide State Implementation Plan analysis under the following qualifications.

There remains outstanding concerns regarding the ISG emission inventory as listed in Table 8 of the model protocol. Although most, if not all, of these concerns have been expressed verbally to the Industrial Sources Group (ISG), we believe it is important that the issues be described herein. Historically, the OAQ has found that the emission inventory is the primary foundation of a successful dispersion model demonstration. We have also found that by expeditiously resolving emission inventory issues, during the preliminary modeling phase, we can better minimize the effect of last minute inventory problems. With this objective in mind, we have outlined below our concerns regarding the inventory and have provided specific methods by which both the ISG and OAQ can, in concert, address those concerns.

Because there are differences in the data contained in Table 8 of the protocol, and emission inventory information provided to us some time ago, it is imperative that these differences be reconciled in a timely manner so that we are utilizing a common and accurate emission inventory database. It will be necessary for the ISG, with the assistance of the OAQ, to identify all current sources of SO<sub>2</sub> emissions along with the emission release parameters at each of the respective facilities. The ISG will then be required to document information that supports the allowable emission rates and release parameters. The ISG and OAQ must immediately work to reconcile any outstanding inventory discrepancies so that unnecessary costs and time delays will not occur in the modeling work.

The OAQ understands that there are some sources listed in Table 8 whose emissions are not necessarily current regulatory allowables, but are expected to be SIP revision allowables predicated on a company's prior or anticipated operational changes. Although we have encouraged companies to consider necessary future operational changes under the modeling scenarios, it is mandatory for such changes to be identified and supported through appropriate documentation. It also needs to be understood that a company's selected allowable, other than a current regulatory baseline allowable, that demonstrates attainment must ultimately be made an enforceable allowable emission rate under the SIP revision.

Also, it is our understanding that certain SO<sub>2</sub> sources have been omitted from Table 8 of the protocol document. As has been previously discussed, we have encouraged facilities to take the opportunity, during this demonstration, to account for prior operational changes that have resulted in emission rates less than current regulatory allowables. For example, as a business decision, a company may have voluntarily shut down a process source some years, switched to a lower emitting fuel or decreased the capacity of a unit and is now considering making this change permanently enforceable in the final SIP revision. Although the OAQ continues to support this approach, each company will necessarily be required to provide the supporting documentation identifying those emission units and provide pertinent emission data and release parameters for those sources. This will enable both your companies and the OAQ to define a revised allowable emission limit for those sources to include in the final SIP submittal.

Prior to the final control strategy model runs and attainment demonstration, the inventory must completely and accurately reflect enforceable allowable emission limits that will be incorporated into the SIP revision as submitted to USEPA. Enforceable allowables emissions that demonstrate attainment can include emission limits imposed through any workable combination of existing rules, permits, consent orders and rules or consent orders specifically entered as a result of the SIP demonstration.

For SIP submittal purposes, the USEPA requires that an emission inventory meet the requirements of Table 9-1 of the Guideline on Air Quality Models (GAQM). By resolving the above listed inventory issues, we can expect that the ISG and OAQ will be able to better meet this federal requirement.

The footnote at the bottom of Table 8 of the amended protocol states "Additional ISG sources exist but their emission rates are less than 0.1 grams/second. Final model runs at the hot spots will include these Deminimus sources". Prior to final model runs, these sources will need to be identified and their emission parameters characterized in order to verify the magnitude of their emissions and resulting impacts. Based upon that analysis, and in light of the above discussion regarding emission inventories and enforceability, it will need to be determined if all, or some, of these sources are to be included in the full grid model runs and not just at the hot spot receptors. For example, for certain small sources that may have had the capacity to burn fuel oil but for which the company has since selected to cease using the emission source or consume natural gas only, then it is possible that these sources may only need be run at the hot spot receptors. This does assume that emission rate limits from these small sources can be made enforceable as a final SIP revision in order to establish enforceability for the deminimus value.

Finally, the ISG's contractor has been provided a list of nearby SO<sub>2</sub> emission sources that lie outside the Marshall County demonstration area proper. The allowable emissions from these sources have been screened to determine if they have PSD level significant impacts in the Marshall County modeling grid. Although the OAQ will continue to assess these sources, is necessary for those sources that have demonstrated significance to be included in the ISG model runs.

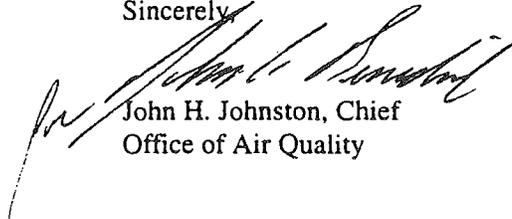
The OAQ welcomes the opportunity to offer our assistance to work with the Industrial Sources Group, concurrent with the SO<sub>2</sub> modeling, to continue to refine and format the inventory in a manner that addresses the aforementioned concerns and meets the requirements of GAQM Table 9-1. To better facilitate that end, and to emphasize the importance of resolving emission inventory issues, I have appointed Mr. G. Dale Farley as our project leader on the Marshall County inventory. He will be working, in conjunction with Mr. Tim Carroll of the Northern Panhandle Regional Office and the ISG to reconcile and refine the Marshall County inventory.

The OAQ appreciates and applauds, the hard work, time and effort put forth by those individuals that comprise the Industrial Sources Group (ISG) and the Technical Assessment Group (TAG) in developing an approvable model protocol that will provide the technical basis for guiding the SO<sub>2</sub> modeling

analysis in Marshall County. As such, this letter, in combination with USEPA's approval letter dated May 5, 1998, will enable the modeling runs to begin, as per the amended schedule, on June 1, 1998.

In closing, the OAQ looks forward to continue working with the ISG, TAG and USEPA on what has become an exemplary technical project. Should you have any questions or comments please contact me at 304-558-4022 or Mr. Tim J. Carroll at 304-238-1220.

Sincerely,

A handwritten signature in black ink, appearing to read "John H. Johnston", is written over the typed name and title.

John H. Johnston, Chief  
Office of Air Quality

cc: Michael Miano, Director, WVDEP  
John A. Benedict, Deputy Chief, OAQ  
Tim J. Carroll, Assistant Chief, OAQ  
Marcia L. Spink, Associate Director, USEPA Region III  
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