



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107-4431

RECEIVED

MAY 07 1998

AIR POLLUTION  
CONTROL COMMISSION  
Northern Panhandle Office

MAY 05 1998

Mr. Tim J. Carroll  
Environmental Resource Program Manger  
Office of Air Quality  
Northern Panhandle Office  
1911 Warwood Avenue  
Wheeling, WV 26003

Dear Mr. Carroll:

The Environmental Protection Agency (EPA) has reviewed the April 1998, amended *Dispersion Model Protocol for Industrial Source Group Based in Marshall County, West Virginia*, as prepared by Energy and Environmental Management, Inc. With the clarifications, summarized below, obtained in the April 30, 1998, telephone conversation between Denis Lohman and Larry Simmons and the modifications received on May 4, 1998, the protocol is considered to satisfy the requirements of Appendix W to 40 CFR Part 51 otherwise known as the Guideline on Air Quality Models (GAQM).

In the final paragraph of section 4.4 RECEPTOR SELECTION on page 4-9, the "limited" access to property which exempts the property from being considered ambient air, for the source which owns and controls the property, must include a physical barrier.

The reference to "informational purposes" in a footnote to Table 8 on page 4-16 is superfluous in that all of the modeling performed by the ISG is only for the purpose of providing information to the State which has the statutory obligation to develop the state implementation plan (SIP). EPA must ensure that stack heights used to establish SIP emission limits to not exceed the height specified in 40 CFR 51.100 (ii). Because there is the possibility that the 900-foot stack height at Kammer will be found to be creditable, EPA does not object to that height being modeled in addition to the 600-foot height. There is, of course, the somewhat unlikely possibility that some intermediate height is established as the creditable stack height. In that event the modeling for Kammer would need to be redone.

The data requirements of Table 9-1 of GAQM relative to the sources listed in Tables 8 and 9 are under development and will be provided in sufficient time to verify the modeled emission rates prior to the emission limits being specified in a SIP revision request.

Section 4.9.3 POST-PROCESSING is only a brief and overly simplified description of the source contribution evaluation procedures which will establish the correct design concentration for each source being evaluated.

EPA Region III has determined that there is no model preferred by GAQM which is completely applicable to the area being evaluated. The extensive meteorological data are adequate to perform the analysis with the proposed CALPUFF model. Furthermore, the CALPUFF model has been demonstrated not to be biased toward underprediction when compared with GAQM preferred models in similar circumstances. Therefore, under the provision of section 3.2.2.e of the GAQM, the proposed use of the CALPUFF modeling system is approved for this application.

Thank you for the opportunity to review this protocol. If you have any questions please call me at (215) 566-2120 or Denis Lohman at (215) 566-2192.

Sincerely,



Marcia L. Spink  
Associate Director, Air Programs  
Air Protection Division

cc: Chris Arrington, WVOAQ  
Larry Simmons, EEM  
Phuong Nguyen, EPA Region V