

Model Clearinghouse Information Storage and Retrieval System

Record Information Report

Record Number: 99-V -02 Fiscal Year: 1999 Region: 05 Last Update:
Name: MN Iron & Steel--Aug 99 08/30/99

DRAFT 8/25/99

(AR-18J)

Mr Dennis Becker
Minnesota Pollution Control Agency
Environmental Outcomes Division
Multi-Media Modeling & Assessment Unit
520 Lafayette Road N.
St. Paul, MN 55155-4194

Dear Mr. Becker:

This letter is in response to your June 22, 1999, letter regarding a proposed ambient air boundary at Minnesota Iron and Steel located near Nashwauk, Minnesota. I appreciate you also sending the map detailing the geographic location of the proposed boundary and descriptions of the land use characteristics.

As you are no doubt aware, 40 Code of Federal Regulations, Part 50.1(e) defines ambient air as

"that portion of the atmosphere, external to buildings, to which the general public has access."

Clarifications of this definition over the years have focused on the "public access"

aspect. This

has typically been interpreted by the Environmental Protection Agency to mean that

exemptions

from ambient air are only available for areas owned or controlled by the source and

to which

public access is precluded by a fence or other physical barriers. The intent of the

ambient air

clause is to ensure that the public does not have access to atmospheric concentrations that exceed

the National Ambient Air Quality Standards (NAAQS). Therefore, it may be reasonable to conclude that physical barriers, combined with "private property" postings and/or patrolling would be adequate to preclude access by the general public to areas where modeling has indicated exceedances of the NAAQS.

The map, enclosed with your letter, contains general descriptions of a proposed boundary surrounding Minnesota Iron and Steel. It appears that some of the proposed boundary clearly

Date: 08/30/99

Page: 2

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precludes public access through fencing. Other areas may provide physical barriers such as thick woods and/or steep-walled mine pits. It is unclear what physical boundaries exist, if any, for the remaining boundary areas and how public access would be precluded. Due to the large and varied characteristics of the proposed ambient air boundary, I recommend that the dispersion modeling be conducted to determine an area of concern. At that time, a determination can be made as to the measures needed to preclude access by the public to the area identified by the modeling as threatening the NAAQS. Additionally, although the maps were very helpful in visualizing the scope and terrain of the proposed boundary, a visit will likely be necessary before a final determination can be made. I will make myself available to visit the plant and surrounding area at the earliest convenience. I appreciate you seeking EPA input into this matter early in the process and hope that together we can arrive at a boundary that makes sense as well as protects the health of the people living in the area. Please call me if you have any questions or comments.

Sincerely,
Randy Robinson
Regional Meteorologist
EPA Region 5

cc: Richard Patelke, Minnesota Iron and Steel Company
Richard Hardegger, Barr Engineering
Eric Edwalds Barr Engineering
Ann Foss, MPCA Northern District
Doug Hall, MPCA Northern District
Beth Lockwood, MPCA Northern District
Shelley Burman, MPCA
Bob Beresford, MPCA Duluth Regional Office
Trent Wickman, MPCA Duluth Regional Office
standard bcc's: official file copy w/attachment(s)
originator's file copy w/attachment(s)
originating organization reading file w/attachment(s)
other bcc's: C. Nash
ARD:APB:RDS2:rrobins:8/24/99

Date: 08/30/99

Page: 3

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Diskette/file:

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