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Subject: Region VII Power Plant -Reply

Here are my responses, and thanks for starting my day off with a thud:

Issue 1. Is it necessary to model at GEP or can they be grandfathered?

C/h Comment: Because they are changing the boiler size it may not qualify for grandfathering.

Or it may be that they just decided to go ahead and model at GEP because their impacts were

below the significance level anyway. If they decide they want to grandfather and model at 600

feet, we need more details.

In my mind this is essentially a new source so I don't think they can do any grandfathering.

Issue 2. For modeling at GEP should they use the 21 foot diameter, assuming that is the diameter at 500 foot level. Or, should they model with a 16 foot diameter?

C/H Comment. It really doesn't make any difference as long as they use the correct volumetric flow rate and temperature, as these are the only parameters that enter into buoyant

plume rise calculations

I bow to Dean's modeling expertise on this one. I would have said that they must use the actual diameter of the stack (16ft) but if that's not used in the model, I agree that the issue is moot.

Gary