

Model Clearinghouse Information Storage and Retrieval System

Record Information Report

Record Number: 00-VII -02 Fiscal Year: 1900 Region: 07 Last Update:
Name: MN Corn Processing Plant 07/17/00

State(s): NEBRASKA
Pollutant(s): PM-10
Regulation(s): PSD
Source(s): Chemical Plant
Model(s): ISC3
Subject(s): Emission Rates for Model Input
Urban/Rural: Rural Only
Oral/Written: Oral
Terrain: Low Terrain (below stack height)
Guideline: Guideline
Database: Off-site
Involvement: Review and Comment
Record Comments:

RECORD OF COMMUNICATION

TELEPHONE CALL MEETING CONFERENCE CALL OTHER: email

INFORMATION COPIES TO: Mick, Dan, Warren
TO: W. Peters, D. DeRoeck, D. Wilson
FROM: Mick Day, Region VII
DATE: 6/7-21/00 (Several Communications)
TIME:

SUBJ: MN Corn Processing Plant

SUMMARY OF COMMUNICATION:

Issue:

6/7/00

A source is doubling its annual production but the 24-hour PM10 emissions will not increase--only the number of days, or hours, that the unit will be used. Usually with no increase in 24-hour emissions there is no short-term increment increase. However, there will be days, because of the increased number of days, where there will be impact where there was none before. Can these days be used to determine increment consumption? At first I didn't think so but now I think that this source will be consuming short-term increments. For modeling purposes it could be assumed that the same days will give the same impact but the additional days will have impacts that will consume increment. (Probably the source would select the days with maximum impact as the "common" days so the

additional days would have lesser impact.) What do you think?

C/H Comment 1:

6/7/00

From: Deroeck.Dan@epamail.epa.gov

Subject: Re: Short-Term Increments

To: Daye.Richard@epamail.epa.gov

Cc: deanw@mindspring.com, deq215@mail.deq.state.ne.us,

Peters.Warren@epamail.epa.gov

Mick: I have a few questions to ask concerning your increment issue--

Was previous modeling done to calculate the source's increment consumption? If so, did it calculate it for all days or only days of operation? If the source's impacts were not calculated for days when the source was not in operation, then new modeling needs to be done for such days. The annual will need to be redone also, of course.

Please explain: I don't understand your comment that the source will select "common days" of maximum impact so that additional days will have lesser impact.

You mention that there will be an increase in the number of days "or hours." Does this mean the source may operate longer on days on which it is already operating? If so, then there 24-hour emissions will increase as well--won't they??

Clarification of Issue:

From: <deanw@mindspring.com>

To: <Daye.Richard@epamail.epa.gov>

Cc: "Warren Peters" <peters.warren@epa.gov>,

"Dan deRoeck" <deroeck.dan@epa.gov>

Subject: Re: Short-Term Increments

Date: Tue, 20 Jun 2000 10:22:21 -0700

Hi Mick--Like Dan, I'm not sure that I understand the situation that well either.

Date: Tue, 20 Jun 2000 14:40:34 -0400

From: Deroeck.Dan@epamail.epa.gov

Subject: Re: Short-Term Increments

To: deanw@mindspring.com

Cc: Daye.Richard@epamail.epa.gov

I think I understand it a little better now. The source is increasing its operation such that it will now operate on days that it did not previously operate. Yet, it is not a seasonal issue. I guess that means that it operated on some week days but not others (sounds strange.) When the source began operation, it's emissions were apparently pre-PSD and are now considered part of the baseline concentration for increment purposes. The new emissions -- occurring on days not for which the source did not previously operate -- will consume increment along with other increment-consuming sources. It seems to me that the modeling must be done without regard for the fact that

on some days the source's emissions are in the baseline. If a violation of increment is modeled, then we must assume that it could occur on one of the days when the source's emissions consume increment. Is there any way to draw a clear distinction between "baseline days" and "increment days" when the modeling is done?? If it were a seasonal issue, then it would be a lot simpler to approach. What do you think??

Mick, did I summarize the situation correctly?? Was the source allowed to operate previously on any days it wanted to if it did not exceed its annual or daily limit?? What restrictions were originally placed on the source that might possibly help us sort this thing out??

Dd

C/H Comment 2:

From: <deanw@mindspring.com>

To: <Deroeck.Dan@epamail.epa.gov>

Cc: <Daye.Richard@epamail.epa.gov>, "Warren Peters" <peters.warren@epa.gov>

Subject: Re: Short-Term Increments

Date: Tue, 20 Jun 2000 13:17:07 -0700

I think you're right Dan. I don't know of any fair way of giving them credit for emissions that are in the baseline, yet still be protective of the increments. The new emissions could have occurred on the day with the critical ambient concentration. Does that make sense, Mick?

6/21/00

C/H Discussion with Region VII

Given that it is not possible to clearly define what days/hours the source operated

in the past, it is most appropriate to assume that all emissions could occur on a

day that the source was not operating in the past, and that could be any day or part

of any day, from a met data standpoint. Thus, for the short term analysis, one would need to model the max short term emissions from the plant and assume that they

consume increment. For the annual one could give some credit for the annual emissions that are in the baseline.

If the source can establish a firm track record as to when they operated and what

the emissions were, we might be able to do something to subtract out the baseline emissions

FOLLOW UP ANTICIPATED: Region VII will follow up with NE

MODEL CLEARINGHOUSE RECORDS INFORMATION:

SOURCE NAME: MN Corn Processing Plant

LOCATION: NE

SOURCE TYPE: Chemical Plant

POLLUTANTS: PM-10
REGULATION(S) INVOLVED: PSD
MET. DATA BASES Off