



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202

REPLY TO: 6T-AN

NOV 21 1988

MEMORANDUM

SUBJECT: Request for Use of ISCST and ISCLT Version 6.2 in Formosa
Plastics PSD Application

FROM: *James W. Yarbrough*
Air Modeling Contact, Region 6 (6T-AN)

TO: Dean Wilson
Model Clearinghouse (MD-14)

During the week of November 14, 1988, I discussed with you and Joe Tikvart my need to advise Formosa Plastics Corporation as to the proper version of ISC in its upcoming PSD application for a chemical production facility at Port Comfort, Texas.

My understanding at the time of my discussions with you was that Formosa intended to do preliminary ISC modeling to acquire a qualitative sense of its estimated air quality impact. Also, I understood that Formosa would probably alter its presently-planned control technology, prompting changes in the presently-planned plant configuration. These changes would, of course, necessitate re-modeling the facility before the State of Texas and Region 6 could consider Formosa's final PSD application. At that time I understood that Formosa did not intend to file a final PSD application for many weeks or even several months.

Based upon the above understanding, Joe Tikvart and I agreed that Formosa should use ISCST and ISCLT version 6.7 or even the proposed version 6.8 to gain its preliminary, qualitative information. We agreed that Formosa should then use the currently approved version of ISC when it does its final PSD modeling, assuming the time between the final modeling and its PSD application submittal is not unduly long.

Since my discussions with you and Joe during the week of November 14, however, Formosa has informed me that it intends to complete the final PSD modeling for the proposed Point Comfort facility by December 10, 1988, and file its PSD application shortly thereafter. Consequently, I now believe that the use of ISCST and ISCLT version 6.2 in the Formosa case is justified.

I have attached my proposed ISC directions to Formosa in this matter. Given (1) the uncertainty of the timing of the Formosa application, (2) the continuing uncertainties with ISC, and (3) the size and potential impact of the facility, my draft letter is cautious but, I think, comprehensive. I would appreciate your timely review of this draft letter and a positive, written response as soon as possible. Thank you.

Attachment

cc: Joseph Tikvart (MD-14)
John Hepola (6T-E)

DRAFT

REPLY TO: 6T-AN

Mr. Jay Su
Plant Manager
Formosa Plastics Corporation
P.O. Box 400
Point Comfort, Texas 77978

RE: Update on Use of Industrial Source Complex (ISC) Model

Dear Mr. Su:

As you recall, our telephone conversations of November 17, 1988, concerned the proper version of the ISC air dispersion model to use in the case of the planned expansion of Formosa's Point Comfort, Texas facility.

During our conversations you indicated that Formosa plans to complete its final Prevention of Significant Deterioration (PSD) modeling by December 10, 1988, and submit its final PSD application soon thereafter. This was a somewhat different schedule than I understood, and, in fact, Tony Wayne's November 10, 1988, letter to you (copy enclosed) indicates in the fourth paragraph that we believed Formosa's initial PSD permit application submittal would not be a final one. Based upon this understanding, we advised you in Tony's letter to use ISC version 6.8 in your modeling because we believed that version 6.8 would be available to you by November 10, 1988, and that Formosa would be revising its initial modeling later anyway.

Your plans to now complete the final PSD modeling by December 10, 1988, coupled with continuing unavailability of a "fix" to ISC version 6.7 (we believe this will be called ISC version 6.8), changes our position on the proper version of ISC in this application. Therefore, Region 6 will support Formosa's use of ISCST and ISCLT version 6.2 in its final PSD application modeling with the following provisos:

- (1) the final Point Comfort PSD modeling will be substantially complete by December 10, 1988, or by the time the U.S. Environmental Protection Agency (EPA) makes the "fix" to ISC version 6.7 available to commercial users, whichever comes first (It is my understanding from our Headquarters that this EPA "fix" to version 6.7 will not be available to commercial users before mid-December.)
- (2) the final Point Comfort PSD application will be submitted to the Texas Air Control Board (TACB) expeditiously following your December 10, 1988, modeling deadline

YARBROUGH(34):jwy/6T-AN disk 17 11-19-88 FILE: TSU 5-3 (Formosa)

6T-AN 6T-ET
DIGGS WAYNE

Please note that any changes made after the PSD modeling you plan to complete by December 10, 1988, (in plant configuration, emission rates, stack parameters or any other aspect) that might cause a change in the estimated air quality impact must be modeled using the ISC version that is approved for regulatory use at that time.

I have discussed this issue with Tony Wayne and Cyril Durrenberger of the TACB, and they are in agreement with my position as I have outlined it to you in this letter.

I hope that this gives you the guidance that you need to proceed with Formosa's PSD application. Thank you for your continuing cooperation with, and sensitivity to, our regulatory procedures in this matter. If I can provide any further guidance to you, please call me.

Sincerely yours,

James W. Yarbrough
Air Programs Branch
SIP/NSR Review Section (6T-AN)

Enclosure

cc: Tony Wayne (6T-ET)
Cyril Durrenberger, TACB
Karen Horne, TACB