

Rombough, Kyrik

From: David Keen [keen@rtpenv.com]
Sent: Wednesday, July 25, 2007 4:24 PM
To: Rombough, Kyrik
Cc: David Keen
Subject: NC 20D Screening Procedure

Kyrik,

Attached is the document that describes the 20D inventory screening technique that was developed by the NCDQA. Many states use the procedure to screen inventory sources. In fact, I got the document off of the Mississippi DEQ's website. I'll go ahead and use the procedure to see what sources screen out.

Thanks,
Dave

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20d Procedure



State of North Carolina
Department of Natural Resources and Community Development
Division of Environmental Management
512 North Salisbury Street • Raleigh, North Carolina 27611

James G. Martin, Governor
S. Thomas Rhodes, Secretary

July 22, 1985

R. Paul Wilms
Director

Mr. Lewis Nagler
Air Management Branch
EPA Region IV
345 Courtland Street
Atlanta, Georgia 30365

Dear Mr. Nagler:

Subject: A Screening Method for PSD

A simple screening procedure which is applicable to PSD has been developed by the North Carolina Air Quality Section. The "Screening Threshold" method is designed to rapidly and objectively eliminate from the emissions inventory those sources which are beyond the PSD impact area yet within the screening area, but are not likely to have significant interaction with the PSD source. Sources which are flagged by this procedure may then be evaluated with conventional screening techniques, or else be included in refined modeling.

Page I-C-18 of the PSD Workshop Manual does state "A simple screening model technique can be used to justify the exclusion of certain emissions...Such exclusions should be justified and documented." The "Screening Threshold" method is documented in the attachment.

We would very much appreciate your comments and ultimate approval. Please feel free to direct any questions or comments to me in writing or by phone at (919) 733-7015.

Sincerely,

Eldewins Haynes
Eldewins Haynes, Meteorologist
Air Permit Unit

Attachment

cc: Mr. Ogden Gerald
Mr. Mike Sewell
Mr. Sammy Amerson
Mr. Jerry Clayton
Mr. Richard Laster
Regional Air Engineers

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"Screening Threshold" Method for PSD Modeling
North Carolina Air Quality Section

This method is best suited for situations where a PSD source has several sources outside its impact area, but within its screening area. The object is to find an effective means to minimize the number of such sources in a model, yet to include all sources which are likely to have a significant impact inside the impact area.

As a first-level screening technique, it is suggested to include those sources within the screening area when

$$Q = 20D$$

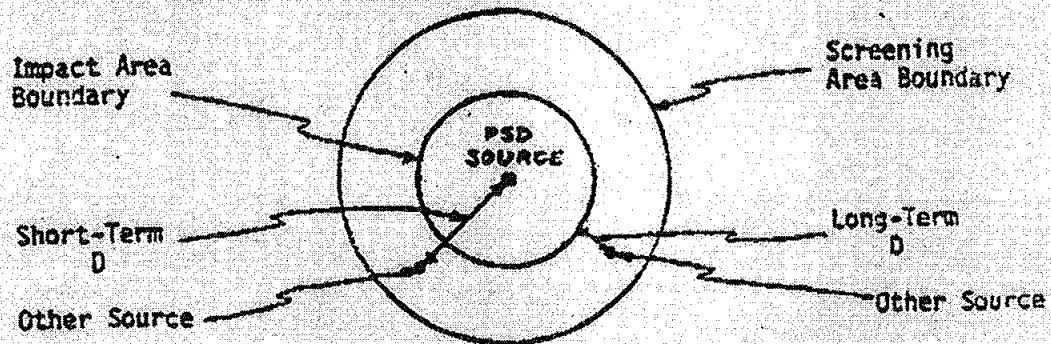
where Q is the maximum emission rate, in tons/year, of the source in the screening area; and D is a distance, in kilometers, from either:

- a. the source in the screening area to the nearest edge of the impact area, for long-term analyses

or

- b. the source in the screening area to the PSD source defining the impact area, for short-term analyses.

The figure below illustrates the difference between the long-term D and the short-term D .



This method does not preclude the use of alternate screening techniques or of more sophisticated screening techniques given the approval of the review agency. Also, this method does not prevent the review agency from specifying additional sources of interest in the modeling analysis.

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The justification for this "Screening Threshold Method" rests upon the following assumptions:

- effective stack height = 10 meters
- stability class D (neutral)
- 2.5 meter/second wind speed
- mixing height = 300 meters
- $Q = 200$ = critical emission rate for a given pollutant
- one-hour concentrations derived from figure 3-5D in Turner's WADE or from PTDIS.
- 3-hour and 24-hour concentrations estimated using "Vol. 10R". Annual impacts are 1/7 of 24 hour impacts.

The results, for various distances, are shown in the table below:

D (km)	Q (T/yr)	1-hr Conc. ($\mu\text{g}/\text{m}^3$)	3-hr Conc. ($\mu\text{g}/\text{m}^3$)	24-hr Conc. ($\mu\text{g}/\text{m}^3$)	Annual Conc. ($\mu\text{g}/\text{m}^3$)
0.5	10	47	42	19	2.7
1.0	20	32	29	13	1.9
1.5	30	27	24	10	1.4
2.0	40	23	21	9	1.3
3	60	18	16	7	1.0
4	80	17	15	7	1.0
5	100	14	13	6	1
6	120	13	12	5	1
10	200	10	9	4	1
20	400	7	6	3	1
30	600	6	6	3	1
40	800	6	6	3	1
50	1000	7	6	3	1

The "Screening Threshold" method is conservative. Most sources either have effective stack heights greater than 10 meters, or they have several short stacks spread out over an industrial complex. Thus, actual modeled concentrations will most likely be lower than the "Screening Threshold" would indicate in the table above. One implication of the table is that all major sources within 5 km of the subject PSD source or within 5 km of the PSD source's impact area should be scrutinized before being exempted from the final emissions inventory.

The "Screening Threshold" method is in qualitative agreement with the suggestions on page I-C-18 of the Prevention of Significant Deterioration Workshop Manual (1980). On that page, it is suggested that a 100 T/Y source 10 km outside the impact area may be excluded from the analysis. The above table would exclude a 100 T/Y source more than 5 km beyond the impact area for long-term analyses or more than 5 km away from the PSD source for short-term analyses; if the source is inside the impact area, it must be included regardless of the "Screening

Factors: 1hr - 3hr 0.90
 1hr - 24hr 0.40
 1hr - Annual 0.26

Threshold". The PSD Workshop Manual also states on page I-C-18 that a 10,000 T/Y source 40 km outside the impact area would probably have to be included in the increment analysis. By the "Screening Threshold" method, the critical distance $D = Q/20 = 10,000/20 = 500$ km. Thus a 10,000 T/Y source within 500 km would always be included for short-term and long-term analyses if within the screening area.

This "Screening Threshold" method is quick, inexpensive to execute, conservative, and consistent with the intent of the PSD Workshop Manual.