

Rombough, Kyrik

From: David Keen [keen@rtpenv.com]
Sent: Monday, August 20, 2007 1:23 PM
To: Rombough, Kyrik
Cc: David Keen
Subject: RE: Hyperion Language

Hi Kyrik,

Thanks again for the information. A few of additional questions, if you don't mind.

- 1) Are all of the sources that are to be included in the model increment consuming sources? I can make this assumption as a conservative first pass, but it may be useful to know which of the 8 sources that will be in the model are increment consumers.
- 2) For the three sources that I have stack parameters (i.e., Basin Electric, University of SD, and Northwestern Public Service), how should I split the total emissions to each stack. If you have heat input rates for the units, I could ratio based upon that. Alternately, I could simply model the worst case stack with the total facility emission rate.
- 3) The inventories that you sent included TSP. I had not planned to model TSP. Is there a requirement in SD to address TSP impacts?
- 4) In an earlier comment on the modeling protocol, the Department stated that we should address PM2.5 impacts. EPA's policy is that PM10 can be used as a surrogate for PM2.5, meaning that if you demonstrate compliance with the PM10 NAAQS and increments using PM10 emissions as inputs, you meet the PM2.5 NSR requirements). The Department's comments on the protocol, however, sounded as though we should model PM2.5 emissions and compare to the revised PM2.5 NAAQS. Is this your understanding as well?

Thanks again,
Dave

-----Original Message-----

From: Kyrik.Rombough@state.sd.us [mailto:Kyrik.Rombough@state.sd.us]
Sent: Tuesday, July 31, 2007 12:10 PM
To: keen@rtpenv.com
Cc: Brian.Gustafson@state.sd.us; JimA.Anderson@state.sd.us
Subject: RE: Hyperion Language

Mr. Keen:

In regards to the source inventory, you asked if some of the sources that I forwarded could be excluded from the review. The sources I had sent were just the sources in the screening area (counties). We reviewed the sources and most of them do not need to be included. We used a radius of impact criteria developed from modeling specific sized volume sources and the North Carolina D20 method.

With the estimated 10 kilometer impact area, there are eight sources that may need to be included. Those sources are as follows:

1. SouthEast Farmers Elevator Cooperative - Union County
2. Terex Load King - Union County (Please read note)
3. Basin Electric - Clay County
4. Midwest Ready Mix - Clay County
5. Standard Ready Mix - Clay County
6. University of South Dakota - Clay County
7. Vermillion Fertilizer and Grain - Clay County
8. Northwestern Public Service - Yankton County

I am not aware of an EPA approved model that models volatile organic compounds (ozone) for a single source. In addition, sources located outside of an ozone nonattainment area are

presumed to have no significant impact on the nonattainment area. South Dakota does not have a non-attainment area for ozone. Therefore, Terex Load King does not need to be included because it has the potential to emit just volatile organic compounds.

If the impact area is estimated at 5 kilometers, there would be three sources that may need to be included. Those sources are as follows:

1. Basin Electric - Clay County
2. University of South Dakota - Clay County
3. Northwestern Public Service - Yankton County

Please let me know if you need any additional information or if I forgot to answer one of your questions or find the requested information.

Kyrik

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