Message

From: Robinson, Randall [robinson.randall@epa.gov]
Sent: 8/17/2016 3:42:54 PM
To: Damico, Genevieve [damico.genevieve@epa.gov]
CC: Darrow, Jennifer [darrow.jennifer@epa.gov]; Portanova, Mary [portanova.mary@epa.gov]; Giwojna, Benjamin [giwojna.benjamin@epa.gov]; Lacka, Monika [lacka.monika@epa.gov]
Subject: RE: Paired sums modeling

Thanks. We'll try and catch you in your office.

Randy Robinson
Air and Radiation Division
EPA Region 5
312 353-6713

From: Damico, Genevieve
Sent: Wednesday, August 17, 2016 10:27 AM
To: Robinson, Randall <robinson.randall@epa.gov>
Cc: Darrow, Jennifer <darrow.jennifer@epa.gov>; Portanova, Mary <portanova.mary@epa.gov>; Giwojna, Benjamin <giwojna.benjamin@epa.gov>; Lacka, Monika <lacka.monika@epa.gov>
Subject: RE: Paired sums modeling

Sure. Jennifer is at her AWL so we should call her too.

From: Robinson, Randall
Sent: Wednesday, August 17, 2016 10:18 AM
To: Damico, Genevieve <damico.genevieve@epa.gov>
Cc: Darrow, Jennifer <darrow.jennifer@epa.gov>; Portanova, Mary <portanova.mary@epa.gov>; Mooney, John <Mooney.John@epa.gov>
Subject: FW: Paired sums modeling

Hi Genevieve,

See the email below. Joy called me a week or so ago asking about the old USG Cloquet modeling conducted for a permit completed in 2012. She was most interested in an approach MPCA used for determining background. After checking around, we had some modeling issue resolution discussions with MPCA, but didn't do a comprehensive look at the modeling. We've had some concerns with the paired sums approach just because it's difficult to tell how conservative the approach may or may not be.

I'm also not sure why Joy is asking about this. Maybe the permit is up for renewal?

I would like to get back to Joy today. Can we have quick discussion?

Thanks, Randy

Randy Robinson
Air and Radiation Division
EPA Region 5
312 353-6713

From: Joy Wiecks [mailto:JoyWiecks@FDLREZ.COM]
Sent: Tuesday, August 16, 2016 11:41 AM
To: Robinson, Randall <robinson.randall@epa.gov>
Cc: Mooney, John <Mooney.John@epa.gov>
Subject: FW: Paired sums modeling

Hi Randy,

I don't know if you guys have been able to find out anything more about the review of the USG modeling (Cloquet, MN done in 2012) since we talked last week, but I would be interested in hearing if Region 5 believes that this modeling was performed in an appropriate manner.

-Joy

From: Fox, Tyler [mailto:Fox.Tyler@epa.gov]
Sent: Tuesday, August 16, 2016 11:32 AM
To: Joy Wiecks
Cc: Bridgers, George; Owen, Chris; Mooney, John; Robinson, Randall
Subject: RE: Paired sums modeling

Joy

Thanks for your note and acknowledgement that it is difficult to weigh in on situations that we are unfamiliar with. I would recommend contacting Region 5 to engage on the specifics here in terms of use of paired sums for PM2.5 and for NO2. They would be more familiar with these situations and be best able to provide input on any approvals and/or adequacy of the approach in those specific permit actions.

I would recommend contacting either John Mooney at (312) 886-6043 or Randy Robinson at (312) 353-6713 to determine the extent of any informal or formal approvals in these situations as well as the implications, if any, on the permit modeling results and demonstrations.

Thanks,

Tyler

From: Joy Wiecks [mailto:JoyWiecks@FDLREZ.COM]
Sent: Tuesday, August 16, 2016 11:44 AM
To: Fox, Tyler <Fox.Tyler@epa.gov>
Subject: Paired sums modeling

Hi Tyler,

I'm the Air Coordinator at the Fond du Lac Band of Lake Superior Chippewa, located in Minnesota. I think I've met you before at one meeting or another. I have some questions for you regarding paired sums modeling. I tried your phone but it wouldn't ring. Not sure if the problem is on my end or yours. Anyway, could you try to give me a ring at 218-878-7108 or else email me back?

My concern is with some sources right off the Fond du Lac Reservation (in Cloquet, MN) that did some modeling back in 2012 using the paired sums method for PM-2.5 NAAQS modeling, and paired sums and OLM and PVMRM for NOx Tier 3 modeling. It sounds like in June, 2010, the facility requested Region 5's approval for this and asked for written comments. By June, 2011, they hadn't heard anything, so they sent a formal written modeling protocol to Region 5 and

asked for formal written approval for this approach. They still hadn't heard back by Feb. 15, 2012 so they went ahead and used the paired sums method. Since that time there have been a few EPA documents warning against the use of paired sums in most situations. I'd like to talk to you about whether it might be worth requesting that this modeling be re-done. I'm curious if it was appropriate to move forward in this situation without formal EPA approval. My thought is that it was taking a chance to move ahead without formal approval. Thanks,

-Joy