Message

From: Dunn, John [Dunn.John@epa.gov]
Sent: 5/7/2019 12:43:38 PM
To: Abbott, Michael [michael.abbott@dnr.mo.gov]; Hackler, Pam [pam.hackler@dnr.mo.gov]; Meyers, Leasue [leasue.meyers@dnr.mo.gov]; Cripe, Rebecca [Rebecca.Cripe@dnr.mo.gov]
CC: Curtis, Glenn [curtis.glenn@epa.gov]
Subject: RE: ICIC Based Limits for the Labadie Facility

Ameren didn't want a temperature limit because they wanted to take advantage of the variable mixing zone and the dilution it provided. My approach does allow that. Let's see what they come back with. --JD

From: Abbott, Michael <michael.abbott@dnr.mo.gov>
Sent: Tuesday, May 07, 2019 7:36 AM
To: Dunn, John <Dunn.John@epa.gov>; Hackler, Pam <pam.hackler@dnr.mo.gov>; Meyers, Leasue <leasue.meyers@dnr.mo.gov>; Cripe, Rebecca <Rebecca.Cripe@dnr.mo.gov>
Cc: Curtis, Glenn <curtis.glenn@epa.gov>
Subject: RE: ICIC Based Limits for the Labadie Facility

Thanks John
We will look into changing this in the permit with Labadie, but I am not going to hold my breath that they will accept this as we worked with them to derive temperature limits for their facility to no avail. I also would like to take this opportunity to indicate that the Thermal Discharge Parameter (TDP) was first to be capture in MoCWIS under the EPA ICIS parameter Thermal Discharge, ID = 78737, as a mass unit number. While this was not the best, it did not require conversion. Upon issuance we found out that this parameter was inactivated; thus, we started down the path of requesting a parameter that was better suited to capture the TDP. Therefore, if we cannot get the TDP parameter, we would request the re-activation of the parameter Thermal Discharge.

Pam
Can you get with Labadie and check with them on if John's conversion would be doable. We need to indicate that there is no parameter in ICIS that captures TDP so until we get an agreed upon parameter with Ameren and EPA, non-compliance; however erroneous, will be shown for their facility.

Michael J. Abbott, Chief
Operating Permit Section
573-526-5781
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We'd like your feedback on the service you received from the Missouri Department of Natural Resources. Please consider taking a few minutes to complete the department's Customer Satisfaction Survey at https://www.surveymonkey.com/r/MoDNRsurvey. Thank you.

From: Dunn, John <Dunn.John@epa.gov>
Sent: Friday, May 3, 2019 9:59 AM
To: Abbott, Michael <michael.abbott@dnr.mo.gov>; Hackler, Pam <pam.hackler@dnr.mo.gov>; Meyers, Leasue <leasue.meyers@dnr.mo.gov>; Cripe, Rebecca <Rebecca.Cripe@dnr.mo.gov>
Cc: Curtis, Glenn <curtis.glenn@epa.gov>
Subject: ICIC Based Limits for the Labadie Facility

Mike, et al.

The Ameren-Labadie facility was modified with limits based on modeling, using an output of that modeling. The output parameter didn't fit into the ICIS electronic reporting framework and you requested a new ICIS parameter. This requires a pretty huge effort at the HQ end, so I did the work to convert the modeling output limit into a standardized temperature limit (degrees F) that will fit in the ICIS format. Attached is the proposed procedure for conversion. I've shown how the converted limits can be expressed in the permit, and the applicable ICIS code. A second attachment shows heat related codes, and highlights the ones I picked.

Feel free to ask for explanation or assistance.

--JD