Message

From: Dunn, John [Dunn.John@epa.gov]
Sent: 5/3/2019 3:02:48 PM
To: Ramach, Sean [Ramach.Sean@epa.gov]; Clark, Jackie [Clark.Jackie@epa.gov]; Jacobson, David [Jacobson.David@epa.gov]
CC: Curtis, Glenn [curtis.glenn@epa.gov]
Subject: FW: ICIC Based Limits for the Labadie Facility
Attachments: ICIS based limits for Heat at Labadie.docx; thermal codes with units hilite.xlsx

I think I ironed out an approach that does not require an ICIS addition. It also makes data more understandable and transparent to the public.

This will require a public notice, so it isn't a done deal, but this will fly. --JD

From: Dunn, John
Sent: Friday, May 03, 2019 9:59 AM
To: Abbott, Michael <michael.abbott@dnr.mo.gov>; Hackler, Pam <pam.hackler@dnr.mo.gov>; Meyers, Lease <lease.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