**From:** Anne Viner
**To:** Sieffert, Margaret
**Subject:** RE: Ele Corporation
**Date:** Friday, March 09, 2018 5:00:42 PM

---

Margaret:

The .bpi file that you sent appears to be for a different facility than the Ele Corporation facility. I'm assuming that is not the information that you used in your modeling, but rather just an attachment error. Please send the correct .bpi file.

Thanks.
Anne


***Anne E. Viner***
General Counsel, Environmental and Construction Law
Corporate Law Partners, PLLC
D: 312.470.2266
C: 847.421.4933
AViner@CorporateLawPartners.com

View my profile on LinkedIn

Chicago Office:
140 South Dearborn – 7th Floor
Chicago, IL 60603
O: (312) 763-9520

Minneapolis Office:
150 South Fifth Street, Suite 3100
Minneapolis, MN 55402
O: 612.504.7040


---

**From:** Sieffert, Margaret <Sieffert.Margaret@epa.gov>
**Sent:** Thursday, March 8, 2018 9:57 AM
**To:** Anne Viner <aviner@corporatelawpartners.com>
**Subject:** RE: Ele Corporation

Anne:

We appreciate Ele Corporation's cooperation in reviewing our modeling and suggesting improvements for accuracy. Attached please find the additional files you requested. Your previous email had alluded that Ele is close to providing more accurate modeling parameters. Shall we expect these by the end of next week? EPA will be remodeling using the corrected information and in order for us to understand any changes made, please provide documentation that explains the reason for the change. Please feel free to call me if you have any questions.

Thanks, Margaret

**Margaret Sieffert | U.S. Environmental Protection Agency R5**
**Air & Radiation Division | Air Toxics and Assessment Branch**
**77 W. Jackson Blvd. (AT-18J) | Chicago, IL 60604 | 312.353.1151**

---

**From:** Anne Viner [mailto:aviner@corporatelawpartners.com]
**Sent:** Tuesday, March 06, 2018 10:29 AM
**To:** Sieffert, Margaret <Sieffert.Margaret@epa.gov>
**Subject:** RE: Ele Corporation

Margaret:

We need a little more information from you, if possible. To rerun AERMOD, using the .INP file that you sent over, we also need the following files:

- Meteorology input files EPA used. Per the AERMOD .INP file, it looks like EPA used 2012-2016. File names are:

  SURFFILE MDWDVN12-16.SFC
  PROFFILE MDWDVN12-16.PFL

- Also, we need to get the BPIP (building downwash input file, usually named with a ".bpi" file extension). EPA has the stack in the wrong location, so a more accurate model, with correct stack location with respect to buildings nearby, requires rerunning of the building downwash program to generate the .bpi file.

Can you send this information? They may be large files, so feel free to send in multiple locations or in a Dropbox or however works best for you.
Thank you.
Anne

***Anne E. Viner***
General Counsel, Environmental and Construction Law
Corporate Law Partners, PLLC
D: 312.470.2266
C: 847.421.4933
AViner@CorporateLawPartners.com

View my profile on LinkedIn

Chicago Office:
140 South Dearborn – 7th Floor
Chicago, IL 60603
O: (312) 763-9520

Minneapolis Office:
150 South Fifth Street, Suite 3100
Minneapolis, MN 55402
O: 612.504.7040

---

**From:** Sieffert, Margaret [mailto:Sieffert.Margaret@epa.gov]
**Sent:** Friday, March 2, 2018 11:23 AM
**To:** Anne Viner <aviner@corporatelawpartners.com>
**Subject:** RE: Ele Corporation

Hi Anne,

We appreciate you taking the time to review the modeling parameters and look forward to hearing back from you. Attached is the AERMOD input file we used. Please let us know if you have additional questions.

Thanks, Margaret

**Margaret Sieffert | U.S. Environmental Protection Agency R5**
**Air & Radiation Division | Air Toxics and Assessment Branch**
**77 W. Jackson Blvd. (AT-18J) | Chicago, IL 60604 | 312.353.1151**

---

**From:** Anne Viner [mailto:aviner@corporatelawpartners.com]
**Sent:** Friday, March 02, 2018 9:22 AM
**To:** Sieffert, Margaret <Sieffert.Margaret@epa.gov>
**Subject:** Ele Corporation

Dear Ms. Sieffert:

Ele Corporation takes seriously your offer to assist the company with additional measures – beyond its current compliance with its emissions limits – to insure a protective environment for its employees and neighbors with regard to EtO. We have been carefully reviewing, with the assistance of our technical consultants, the information you provided in your email to John Lesnik, dated February 13, 2018. We appreciate you providing us with information on the Benzene NESHAP model run by the agency and the various parameters used in running the modeling. It appears that many of the parameters used are inaccurate. For example, the stack diameter is 8.25”, rather than the 4” you indicated. Also, we question the stack exit velocity of 0.11856 m/s; the actual stack exit velocity is much higher. These are just a few examples.

We would be glad to assist USEPA by providing the correct parameters, and suggest that an efficient way to proceed would be for our consultant to correct the necessary parameters in your modeling input files. Would the agency be amenable to sharing those with us for this purpose?

Please feel free to call me to discuss this at your convenience.
Thank you.
Anne

***Anne E. Viner***
General Counsel, Environmental and Construction Law
Corporate Law Partners, PLLC
D: 312.470.2266
C: 847.421.4933
AViner@CorporateLawPartners.com

View my profile on LinkedIn

Chicago Office:
140 South Dearborn – 7th Floor
Chicago, IL 60603
O: (312) 763-9520

Minneapolis Office:
150 South Fifth Street, Suite 3100
Minneapolis, MN 55402
O: 612.504.7040