**From:** Anne Viner
**To:** Sieffert, Margaret
**Subject:** Ele Corporation
**Date:** Friday, March 02, 2018 9:22:22 AM

---

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