From: Sieffert, Margaret
To: John Lesnik
Subject: Ele Corporation"s Response and Modeling Parameters
Date: Tuesday, February 13, 2018 1:13:00 PM

John,

Thank you for emailing me a copy of Elé Corporation's (Elé) letter which was sent last week. I have not received the hard copy yet. While Elé has declined EPA's request to visit, we hope you might be open to continued conversations via a conference call or via email to further discuss the modeling results. EPA is still very concerned about the elevated risk we modeled based on 2014 emissions, and would like to make sure that the 2015 and 2016 emission reductions will reduce that risk to acceptable levels. EPA uses the Benzene NESHAP (https://www.epa.gov/sites/production/files/2015-07/documents/54fr38044.pdf) as guidance in reviewing cancer risk. EPA would like obtain the more recent emissions, along with projections of any future emission reductions, so that we can remodel the risk using AERMOD. EPA is sharing the modeling parameters with Elé for review and to provide Elé an opportunity to suggest improvements.

EPA used google earth to obtain these values. Let us know if Elé is in agreement with them.
-For building #1, please verify building #1's corners (lat/long) and building height.
Building Height = 6.89 m
Lat/long of building corners
1. 41.805254; - 87.8176624
2. 41.805257; - 87.8171744
3. 41.805645; - 87.8171793
4. 41.805641; - 87.8176673
-For building # 2, please verify building #1's corners (lat/long) and building height.
Building Height =4.82 m
Lat/long of building corners
1. 41.805679; -87.8172308
2. 41.805676; -87.8175991
3. 41.805766; - 87.8176015
4. 41.805774; -87.8172392
-For the facilities property line, please verify the corners (lat/long)
1. 41.806007; -87.81768765
2. 41.806042; -87.81643253
3. 41.803766; -87.81632177
4. 41.803732; -87.81717361
5. 41.803031;-87.81713702
6. 41.802865;-87.81760557

Elé has 1 listed stack at the following lat/long located in the area to the south (just outside) of building #1: lat: 41.805177, long:-87.8175832. If this is incorrect or if there are additional stacks that emit EtO, please provide the lat/long for each of the stacks, or if easier you can mark each stacks location on a map (created using google maps or something similar) and share a screenshot. Also for modeling purposes, EPA has the facility operating 24/7 for 365 days but if this is incorrect, please let us know

your annual operating hours.

For each stack that emits EtO, EPA needs the following information: stack lat/long, stack emission rate, stack height, stack exit temperature, stack flow rate, stack diameter, and if the stack is vertical or horizontal. The table below lists the input parameters EPA used in the modeling. Does Elé have process fugitive emissions not ducted to a vent or stack not listed in table below? The stack parameter information could be found in a permit application, a stack test, or from manufacturer specifications. With regard to the 2015 and 2016 emissions, please provide the same information.

Stack ID	Lat	Long	2014 Emission Rate (TPY)	Stack Height (m)	Stack Temperature (K)	Stack Exit Velocity (m/s)	Stack Diameter (m)	Vertical or Horizontal Stack?
Stack#1	41.805177	-87.8175832	0.2184	2.44	293.7	0.11856	0.1	V

EPA suggests a potential response/review completion date of February 23. If you need additional time, please let me know. We hope you take the opportunity to review the modeling parameters and please don't hesitate to email or call me if you have any questions,

Margaret

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