From: Ashley Mohr
To: Mohr, Ashley
Subject: Fw: Discussion Topics - Norit Modeling (Monday, June 27th)
Date: Friday, August 09, 2013 12:26:47 PM

----- Forwarded by Ashley Mohr/R6/USEPA/US on 08/09/2013 12:26 PM -----

From: Ashley Mohr/R6/USEPA/US
To: Phillip.Fielder@deq.ok.gov, eric.milligan@deq.ok.gov
Cc: Dinesh Senghani/R6/USEPA/US@EPA, Erik Snyder/R6/USEPA/US@EPA
Date: 06/27/2011 08:38 AM
Subject: Discussion Topics - Norit Modeling (Monday, June 27th)

Below is a list of topics that we would like to discuss during our call later this morning. This list includes items that we have currently identified during our review of the modeling analysis conducted for the Norit Pryor Facility. During our call we hope to discuss our concerns on these specific topics and obtain additional clarification, where available.

Discussion Items for Norit Modeling Call - Monday, June 27th

- Cumulative Analysis Receptor Grid
  Applicant indicated that the 20-km circular grid used in the cumulative analysis was not based on the significance modeling analysis results
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- Modeled Negative Emission Rates
  Applicant modeled the following sources with negative NO2 and SO2 emission rates: CARBE, CARBW, ACTIVE, ACTIVW
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- Consolidated Stack Emissions (Primary Carbonizer Boiler, Secondary Carbonizer Boiler, Activator Boiler, and Main Activator Stacks) with SO2 Reductions
  Clarification of merged stack approach and basis of emission reductions
-
- NO2 1-hour Modeling
  Applicant conducted a Tier 2 analysis for 1-hour NO2 and used a 0.75 conversion factor to adjust NOx to NO2

- SO2 Background Concentration
  Applicant did not include background SO2 concentration in cumulative modeling analysis and stated exclusion of background monitored concentration was to in an effort to reduce the potential for double-counting of modeled and monitored contributions
-
- NAAQS Exceedance Contribution Analysis
  Unclear if applicant demonstrated no contribution to all modeled NAAQS exceedances, including those below the 98th-percentile (for NO2 or 99-th percentile for SO2)
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- Ozone Modeling Analysis
  Unclear if applicant conducted an analysis to demonstrate that the facility does not cause or contribute to exceedance of the O3 NAAQS.
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- Class I Impacts Analysis
  Applicant utilized AERMOD to model impacts at Class I area located 175 km from the facility

We will talk to you soon.

Thanks,

Ashley

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