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03/12/08

Iowa Farm Bureau

Correspondence with the Iowa Farm
Bureau

Roling, Chris [DNR]

From: Roling, Chris [DNR]
Sent: Wednesday, March 12, 2008 8:19 AM
To: RRobinson@ifbf.org
Cc: Anita.maherlewis@gmail.com; Hanson, Lori [DNR]
Subject: RE: Alliant Proposal Question

Rick,

Sorry I didn't back to you sooner, but I wanted our dispersion modeler (Lori Hanson) to address the modeling portion of you question. Here is her response:

Dispersion modeling analyses for PSD projects involve two distinct evaluations: the preliminary and the full modeling analyses. In the preliminary analysis the potential increase in emissions from the project (or the net increase in emissions associated with a modification) is evaluated and the predicted concentrations from the project are compared to the applicable Significant Impact Level (or SIL). If the impacts from the preliminary modeling are below the applicable SILs, then no further modeling is required under PSD. If the impacts from the preliminary modeling exceed the SILs, then a full modeling analysis is required. The full modeling analysis evaluates emissions from the proposed project, any existing emissions at the facility, and emissions from nearby sources for comparison with the National Ambient Air Quality Standards (NAAQS) and the PSD increment values. Without going into any detail, the nearby sources included in a full modeling analysis are determined based on their potential emissions and the distance from the facility applying for the PSD permit.

Although IPL has not submitted the modeling for the project at this time, IPL has indicated the predicted concentrations from the preliminary modeling will be below all applicable SILs. In this case, no additional PSD modeling would be required under PSD. This guidance can be found in Chapter C of EPA's draft "New Source Review Workshop Manual" October, 1990. The link to the document is: <http://www.epa.gov/air/nsr/ttnnsr01/gen/wkshpman.pdf>. A description of the PSD modeling process can be found starting on page C.24 and a table the significance levels are listed on page C.28.

The timeline is still up in the air as we are waiting for updated information from IPL. I would say it is likely to go out for public comment sometime in this summer.

Chris

Christopher A. Roling, PE
Environmental Engineer Senior
Air Quality Bureau, IDNR
ph: 515-242-6002
fax: 515-242-5094

From: RRobinson@ifbf.org [mailto:RRobinson@ifbf.org]
Sent: Thursday, March 06, 2008 9:30 AM
To: Roling, Chris [DNR]
Cc: Anita.maherlewis@gmail.com
Subject: Alliant Proposal Question

Chris, I have a question about Alliant's air permit for the proposed Marshalltown plant. Alliant had said that the current plant design plan is such that emissions are low enough and you will not require them to look at other emission sources in the area for their air permit application (air source permit review). Christina Gruenhagen here said that she thought that the decision of whether to bring in more sources to model the permit thresholds also has to do with the proximity of those other sources to the plant. Can you help clarify this?

Also, what is your latest estimate of the timeline for the air permitting process, in case I get questions about when

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someone can comment on it.

Thanks for your help.

Rick Robinson
Environmental Policy Advisor
Iowa Farm Bureau Federation
5400 University Ave.
West Des Moines, IA 50266
515-225-5432 (office)
515-225-5419 (fax)
robinson@ifbf.org
iowafarmbureau.com

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