



Debbie J Mulrooney
11/04/2002 12:16 PM

To: Catherine A Barton/AE/DuPont@DuPont
cc:
Subject: FYI (C8 Modeling) - Permit Determination - Discussion with DAQ

----- Forwarded by Debbie J Mulrooney/AE/DuPont on 11/04/2002 12:15 PM -----

▶ **Robert L Rltchey**
11/04/2002 10:30 AM

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Subject: Permit Determination - Discussion with DAQ

After obtaining modeling results from Deb Mulrooney today on the proposed installation of facilities to evaluate reducing emissions at stack C1FSE, permitted under R13-2365A, I called John Benedict, DAQ, today to review the proposal with him and request his reaction, as per Ann Bradley's guidance.

I indicated to Mr. Benedict that the proposed installation, targeted for 1Q03, would not increase emissions and has the potential to reduce emissions. I indicated that on this basis, we were prepared to approve the change as an internal permit determination of no permit required, and that if successful, we would do testing to quantify the reduction, and if not, we would revert back to the present installation. I indicated that we had modeled the impact of the proposed change by changing the stack location to 5 meters east of present location and reducing the stack flow from 1000 ft³/min to 850 ft³/min, to allow for space to install the equipment and for the anticipated effect on flow, and that the results were no change in the location of the receptor with max concentration, and that concentration changes insignificantly.... at the third digit, going from .637 to .638 ug/m³. (The modeling was done assuming no change in emissions to be conservative.)

Mr. Benedict asked how soon we would like a response. I indicated that a week would be fine. He indicated that DAQ still owes us a response as to whether they find that we are in compliance with the screening level and are still working on that. He asked whether one response could combine the two issues, and I replied that I would like to keep this request separate and moving since it is aimed at reducing emissions and has no significant effect on the question of compliance with a screening level. He indicated he would review the proposal with his staff and get back to me in a week.

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