

Holladay, Cleve

From: Ellen_Porter@nps.gov
Sent: Friday, June 22, 2001 5:06 PM
To: Bud_Rolofson@nps.gov; Kirsten_King@nps.gov
Cc: Holladay, Cleve
Subject: Cargill Fertilizer Project 1787

Bud and Kirsten,

I just spoke to Cleve Holladay about Cargill's modeling. They exceeded the 5% visibility threshold several times (max 5.6%). I mentioned that we had asked them to consider a lower limit for SAM, but they declined. I said we were not comfortable with the modeled impacts and recommend that Cargill accept a lower SAM limit or decrease production so that the net result are emissions that do not contribute significantly to haze.

I will be out all next week, but Cleve would like to set up a call with the two of you, and maybe Steve Marks. Bud, he will call you Monday. Kirsten, if Cleve needs some comments from us, could you summarize our concerns in an email and send them to him. We need to send a formal letter later on this one, but Cleve can start with an email now.

So, our concerns include:

We think they could accept a lower SAM limit, based on stack tests from a similar facility.

The project as proposed contributes significantly to visibility impacts at the Class I area. We recommend that Cargill reduce emissions by lowering emission rates or decreasing production so as to reduce visibility impacts below the significance threshold.

In our formal letter, we'll comment on these items, as well as on the predicted increment exceedances (to which Cargill does not significantly contribute).

Thanks - leave me a voicemail message if you need something. I won't have email access.

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