

Modeling Protocol Template

This template may be used to develop the modeling protocol. The format provided here is only a recommendation. It contains all normal topics that should be covered, but there could be unique information about a specific project that may need to be added.

The DNR's goal is to review and respond to all modeling protocols within two weeks (10 business days), including the development of source inventories if applicable. Unique situations that may cause delays are described herein.

If you have questions please contact the Air Quality Bureau at 515-725-9500, and ask to speak to the Dispersion Modeling Lead Worker.

<Date>

Dispersion Modeling Lead Worker
Iowa Department of Natural Resources
7900 Hickman Road
Suite 1
Windsor Heights, IA 50324

RE: PSD Dispersion Modeling Protocol for <facility name/location/description>

Dear Lead Worker:

<Introduction, project description (including which pollutants are subject to pre-construction review)>

PRE-CONSTRUCTION MONITORING

< Discuss whether pre-construction monitoring will be required for this project (based on the monitoring *de minimis* levels in Table 1 of the “Air Dispersion Modeling Guidelines For PSD Projects”). If pre-construction monitoring is required, state whether the facility will be conducting their own monitoring or if data from an existing monitor will be used. Should the applicant elect to use existing ambient monitoring data, ~~the Ambient Air Monitoring staff must be contacted regarding the use~~ justification of the suitability and representativeness of the existing monitoring data should be provided. ~~The decision to accept or reject existing ambient monitoring data to meet this requirement is made by the monitoring and permitting staff. In some cases it may be necessary for the DNR to review the results of the preliminary modeling analysis in order to determine the appropriateness of the proposed monitoring data. If this is the case, and no such analysis has been submitted, the acceptability of the proposed monitoring data will not be addressed in the Department’s response to the protocol.~~ Note that a net emissions increase of greater than 100 tpy of VOC emissions triggers the requirement to conduct pre-construction ozone monitoring.>

MODELING METHODOLOGY

DISPERSION MODEL

<Specify the model used, the version of model executable, etc>

SOURCE CHARACTERIZATION

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< Provide description of sources included in the analysis (including ancillary sources), scenarios to be modeled (including varying operational load analyses, etc.), any operating restrictions that will be incorporated in the modeling analyses, specifically state what methods will be used to model indoor venting units and all fugitive sources including haul roads, etc.>

RECEPTOR GRIDS

<Description of receptors included in analysis. At a minimum, receptors should include a Cartesian grid with receptors spaced as follows:

- 50 m along the facility fence line
- 50 m extending from the fence line to 0.5 km
- 100 m extending from 0.5 km to 1.5 km
- 250 m extending from 1.5 km to 3 km
- 500 m extending from 3 km to 5 km

Additional receptors, spaced at 1000 meters, may be necessary beyond 5 kilometers from the source. Concentrations should clearly be decreasing near the edge of the receptor grid. If not, additional receptors should be added; fine grids (50-meter) should be placed over the area of maximum concentration to ensure that the true maximum concentration is identified.>

TERRAIN ELEVATIONS

<Discussion of terrain elevations such as:

- Basis for imported elevations (National Elevation Dataset (NED), other data, source, etc.)
- Discussion of AERMAP processing>

BUILDING DOWNWASH

<Discussion of buildings and structures included in analysis, method for determining downwash parameters, version of executable used, etc.>

METEOROLOGICAL DATA

<Specify meteorological data used in analysis, profile base elevation, etc.>

MODELING ANALYSIS

<Pollutants subject to PSD should be modeled and the results compared to the significant monitoring concentrations and significant impact levels (SILs). These levels are listed in the “Air Dispersion Modeling Guidelines For PSD Projects” in Tables 1 and 2, respectively. >

<If any of the modeled concentrations resulting from the proposed project are above the SILs then the significant impact area should be determined and a full impact analysis conducted. The significant impact area is a circular area with a radius extending from the source to the most distant point where the predicted concentrations equal or exceed the SILs, or a receptor distance of 50 kilometers, whichever is less. See guidance provided in “Air Dispersion Modeling Guidelines for PSD Projects” for determination of the significant impact area for 1-hour NO₂. The full impact analysis is required to compare the modeled concentrations to the National Ambient Air Quality Standards (NAAQS) and the Class II PSD increments for the pollutants and averaging periods for which the SILs are exceeded. The NAAQS and Class II PSD increments are listed in the “Air Dispersion Modeling Guidelines for PSD Projects” Tables 3 and 5, respectively.>

SOURCE INVENTORIES

<Once the extent of the significant impact area is determined, the DNR should be contacted. The DNR will provide an ~~an~~ ~~source~~ inventory of Iowa facilities that should be considered for the full impact analysis.

~~Whenever possible, the DNR will provide a list of emission sources at each facility in the inventory, along with the appropriate emission rates and source parameters. The DNR will provide model input files for facilities and pollutants that have been previously modeled, as available. If the impact or screening area extends into surrounding states, the DNR will coordinate with the appropriate agency to obtain an inventory of facilities in those states, and a list of sources at each. This source inventory should be used to compile a modeling inventory with information available on the website and in the Air Quality Bureau’s Records Section, which is open Monday through Friday from 8:00 AM to 4:30 PM. Contact Record’s Section at (515) 725 9500 to obtain information on records procedures and photocopying costs. The DNR will provide input files for facilities and pollutants that have been previously modeled, as available. If the impact or screening area extends into surrounding states, the appropriate agency should be contacted to obtain emissions inventory information for facilities in those states.~~

~~If the extent of the significant impact area is known at the time the protocol is submitted, please provide that information in the protocol. The DNR will provide the inventory and source list concurrent with the modeling protocol response. The response may be delayed if it is necessary to coordinate with adjacent states.>~~

BACKGROUND VALUES

~~<_Appropriate background values must be added to modeled concentrations when a NAAQS analysis is being conducted. Current statewide default background values can be obtained from Table 4 and Figure 1 of the “Air Dispersion Modeling Guidelines For PSD Projects”.~~

~~Applicants may use local monitoring data, if available, instead of the statewide default background values, to determine more refined estimates of background values. Acceptable methods for determining refined estimates of background values from local monitoring data include 40 CFR Part 51, Appendix W or background concentrations based on monitoring data from locations with similar land use. If refined values are used, provide a detailed explanation of how the background value(s) were derived, the data considered, and the resulting values used for department review and approval.~~

Appropriate background values must be added to modeled concentrations when a NAAQS analysis is being conducted. Applicants may use the default backgrounds, or they may use local monitoring data, if available, to determine more refined estimates of background values. Acceptable methods for determining background values from local monitoring data include 40 CFR Part 51, Appendix W or background concentrations based on monitoring data from locations with similar land use. The background concentrations being proposed will determine the level of review necessary to approve them. Level 1 and 2 backgrounds will be reviewed within the normal 2-week protocol response period. Level 3 backgrounds may require additional review, and may delay the DNR's response to the protocol.

Level 1: Default

The appropriate default background concentrations are considered representative or conservative for each area of the state that they represent. They may be used without justification or prior approval. Current default background values can be obtained from Table 4 and Figure 1 of the "Air Dispersion Modeling Guidelines For PSD Projects".

Level 2: Nearest and Newest

The most recent design concentration from the nearest non-source-oriented monitor is generally acceptable for use as the background concentration. Please provide the proposed concentration(s) along with the location of the monitor(s) and period being used. The DNR will confirm that these represent the most recent available data, and that the monitor is the nearest non-source-oriented site. This type of background concentration is generally approvable, but care should be taken to ensure that unique conditions near the monitor do not adversely impact the background concentration (i.e. impacted by emissions not representative of the project site, or by emission sources explicitly included in the dispersion modeling analysis).

Level 3: Other

All other background concentrations will require a more extensive review by the DNR to determine if they are adequately representative. Examples include time-varying backgrounds and those from distant sites. Please provide a detailed explanation of how the background value(s) were derived, the data considered, and the resulting values used for department review and approval. Review of alternative background concentrations may delay the approval of the modeling protocol depending on the workload of DNR staff. If the review is expected to take a

considerable amount of time the DNR may respond to the remainder of the protocol so that work may begin, and respond in regards to the background concentrations at a later date.>

ADDITIONAL IMPACTS ANALYSIS

<An additional impacts analysis must be conducted for all PSD projects. The additional impact analysis must address the following topics.>

GROWTH

<Discuss the impacts associated with growth resulting from the proposed project.>

SOILS AND VEGETATION

<The impacts on soils and vegetation of the proposed project must be considered. Discuss how those impacts will be quantified. Simply stating that the predicted impacts are below the applicable SILs or NAAQS is not adequate.>

VISIBILITY

<A Class II area visibility analysis must be conducted for sensitive areas as identified by the DNR. The DNR will determine the sensitive areas once the SIAs for the projects are established. State how the visibility analysis will be conducted (e.g. VISCREEN, etc.). Only projects with particulate and/or NO_x/NO₂ emissions need perform a visibility analysis.>

CLASS I AREA IMPACTS ANALYSIS

<All PSD projects for facilities that propose to locate within 100 kilometers of a Class I area and PSD projects for facilities proposing to locate at a distance greater than 100 kilometers from a Class I area, that are large enough that they may have an impact on a Class I area, must conduct a Class I area impact analysis. There are currently no Class I areas located within the state of Iowa or within 100 kilometers of Iowa's borders. During review of the submitted modeling protocol, the department will determine if the PSD project is large enough to require a Class I area impact analysis.>

If you have any questions concerning this modeling protocol, or if you need additional information, please contact <name> at <phone number> or <email address>.

Sincerely,

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<COMPANY>

<Name>

<Title>

<Attachments?>

~~If you have any questions in regard to developing a modeling protocol, or if you need additional information, please contact a member of the modeling group at (515) 725-9500.~~

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