

COMMENTS BY TWO RIVERS TERMINAL LLC

David A. Weeks, PE, BCEE, CIH
Washington PE No. 55392

Ammonium Sulfate is Already Regulated as PM

WAC 173-476-110 Standard:	35ug/m3	24-hr avg.	PM2.5
Typical Background Concentration:	20ug/m3	24-hr avg.	PM2.5
Incremental Conc. Regulated To:	15ug/m3	24-hr avg.	PM2.5
WAC 173-460-150 Acceptable Source Impact Level (ASIL):	120ug/m3	1-hr avg.	Ammonium Sulfate
Conversion to 24-hr Average Concentration:	48ug/m3	as 24-hr avg.	Ammonium Sulfate

Conversion Factor (0.4) from: USEPA's "Screening Procedures for Estimating the Air Quality Impact of Stationary Sources Revised," October 1992. See (<https://www.epa.gov/scram/clean-air-act-permit-modeling-guidance>); p. 4-16.

Note that PM2.5 regulated concentrations are less than the Ammonium Sulfate ASIL converted to a 24-hour average concentration.

Experience

- It is our experience that DOE always requires some form of air dispersion modeling to demonstrate compliance with the PM2.5 standard.
- Thus, compliance with the Ammonium Sulfate ASIL occurs automatically, and there is no need to double regulate it.

Other Comments

- We also agree with other comments that the basis of the ammonium sulfate ASIL is not based on sound science.