

Shawn Dolan

From: Shawn Dolan <sdolan50@msn.com>
Sent: Monday, May 23, 2016 3:46 PM
To: 'joe.frazier@srpnet.com'; 'Kyle.heckel@srpnet.com'; 'Maurin, Lawrence'
Cc: 'SDOLAN50@MSN.COM'
Subject: EAB Petition on NSR Permit
Attachments: NGS NSR Permit T-0004-NN EAB Petition.pdf; Dolan - EAB - EPA Region 9 POS- .pdf

Kyle, as we spoke today attached is the petition filed with the EAB, and proof it was served on EPA Region 9.

Effectively, given the state of affairs and the amount of time opacity greater than 20% has been witnessed from the NGS facility we simply do not believe Method 9 is an adequate method for measuring opacity at NGS. Particularly when it comes to fugitives and coal dust measurement. I have documented coal dust clouds on the lake, that caused navigation hazards.

I have not named NGS in this petition as EPA Region 9 should be the forcing agency, they need to move away from the legacy Method 9 to ASTM D7520 aka EPA ALT 082. I am curious to hear how they will justify the adequacy of Method 9, given Method 9 has been in use for years and the historic pictures available.

As you will read at a minimum the option to use ALT 082 should be included in all Air Permits Nationally, as the technology is a quantum leap forward from Method 9.

My experience is an ALT 082 program for Opacity monitoring has a lower lifecycle cost than Method 9, both deliver Opacity determination within the same tolerances, so neither is "more stringent" than the other, but ALT 082 is reproducible and Method 9 is not. Therefore the reproducible, commercial method should be the required method on all things "New" at a bare minimum.

My objective here is simple, advance the measurement of Opacity at NGS for all stakeholders, but primarily to bring awareness to the matter such that Method 9 is gradually replaced with the more reliable and repeatable Method.

I hope NGS agrees with the amendment, I believe EPA R9 would if NGS does, and we could be back on track immediately.

Sorry for the delay. A copy via certified mail was just sent to the NGS address/PO Box in the comment filed.

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