



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VII
901 NORTH 5th STREET
KANSAS CITY, KANSAS 66101

January 22, 2009

MEMORANDUM

SUBJECT: ADM Columbus, Nebraska – PSD Review

FROM: Richard L. Daye
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ARTD/APDB

TO: Patricia A Scott
Environmental Protection Specialist
AWMD/APCO

The modeling for the ADM Columbus (Wet Mill) PSD application has been reviewed. The report, AIR DISPERSION MODELING FOR THE ARCHER DANIELS MIDLAND FACILITY IN COLUMBUS, NEBRASKA, prepared by RTP Environmental Associates, July 2008, contains the essential information. Our concern is that haul roads were not included in all the analyses. The modeling report shows that PM₁₀ haul road emissions were not included in the 24-hour PM₁₀ increment analyses. The haul road PM₁₀ emissions were included in the PM₁₀ NAAQS analyses.

Table 6-1. Significant Impact Analysis Results on page 14 of the report indicated that the highest modeled 24-hour PM₁₀ concentration was 53.07 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). There were no high-second highest 24-hour PM₁₀ concentrations for increment that included haul road emissions. Usually the high-second highest 24-hour PM₁₀ concentrations are close to the highest concentration. An analysis to support "...Roads were not included in assessment of increment compliance as the impacts from ADM alone with road impacts included were determined to be less than 25 $\mu\text{g}/\text{m}^3$ on the 24-hour average...", p12 of the report should have been included.

In Appendix A, there should have been supporting documentation for the Truck Roadway Volume Source Parameter Calculations, e.g., the size and number of trucks, truck speed, and justification of an adjusted road width.

SUMMARY: Haul road emissions should have been included in the 24-hour PM₁₀ increment analyses. Supporting information for road sources should have been included.

(via email)