

# Texas Natural Resource Conservation Commission

INTEROFFICE MEMORANDUM

To: Karen Bullard  
New Source Review Division

Date: January 17, 1996

Thru: Dom Ruggert, *DR* Team Leader  
Permit Modeling Unit II  
Air Quality Planning Division

From: Anwar H. Miah, *AW*  
Permit Modeling Unit I  
Air Quality Planning Division

Subject: Modeling Audit Results--US Department of Army, Camp Stanley Storage Activity  
Permit Number 29466/BG-0841-5

I have conducted a modeling audit for the following project:

Project Title: US Department of Army, Camp Stanley Storage Activity  
Facility Type: Permanent- Storage Activity  
Permit Number: 29466/BG-0841-5 County: Bexar  
Modeled By: Parsons Engineering Science, Inc.  
Submittal Date: January 8, 1995

I have reviewed the air dispersion modeling section of the report submitted by Parsons Engineering Science, Inc., entitled Air Quality Analysis for Texas Natural Resources Conservation Commission, Air Permit Application No. 29466/BG-0841-5, United States Department of the Army Camp Stanley Storage Activity, Boerne, Texas, December 1995.

The modeling submittal is accepted. Comments are enclosed.

Enclosures

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Comments

1. Compliance Demonstration Overview.

Pollutant	Avg. Time	NAAQS ( $\mu\text{g}/\text{m}^3$ )	Standard/Guideline/ESLs ( $\mu\text{g}/\text{m}^3$ )	State De minimis/PSD Significant Levels ( $\mu\text{g}/\text{m}^3$ )
Isopropyl Alcohol	1-Hour	-	7856	
	Annual	-	980	
Mineral Spirits	1-Hour	-	3500	
	Annual	-	350	
Stoddard Solvent	1-Hour	-	3500	
	Annual	-		

2. I could not locate a Table 1(a) in the modeling report. So, I contacted Ms. Glynis Fowler at Parsons Engineering Science, Inc., and she sent me a copy of the Table 1(a). I am enclosing a copy of this with this memo for your reference.
3. Please note that modeling was performed for Isopropyl Alcohol, Mineral Spirits and Stoddard Solvent. The applicant summarized the modeling results in Table 1. Also, the applicant documented the predicted maximum concentration for a generic emission rate of 1 lb/hr in Table 2.
4. In the input file for Mineral Spirits modeling, the emission rate from EPN 5 was found to be 0.022 lb/hr. Table 1(a) shows that the emission rate from EPN 5 for Mineral Spirits should be 0.1031 lb/hr. I performed SCREEN3 model test runs with the correct emission rate. The predicted maximum concentration was found to be  $1583 \mu\text{g}/\text{m}^3$ . Please note that this is a very conservative prediction, because I added impacts from all four individual EPNs to get the maximum predicted concentration.
5. Please note that the applicant over predicted the annual concentrations by using higher emission rates than those listed in Table 1(a).

*I used the emission rates I reported concentrations  
 to get 1232  $\mu\text{g}/\text{m}^3$*