



June 29, 2022

VIA EMAIL

dan.mallett@new-indycb.com

Mr. Daniel Mallett
Environmental Manager
New-Indy Catawba LLC
PO Box 7
Catawba, SC 29704

Re: Corrective Action Plan Air Dispersion Modeling Analysis

Dear Mr. Mallett,

SCDHEC recently received a question concerning your October 27, 2021 response to a question we posed in an email from me dated September 17, 2021. Specifically, the September 17 question concerned whether the area sources representing the aeration stabilization basin (ASB) in the modeling that had been submitted completely represented the emissions and area of the ASB where H₂S and other total reduced sulfur (TRS) constituents were being emitted during the period of the July 2021 ASB testing. In your October 27 response you said:

The area of the ASB used for the emissions calculations and the air dispersion modeling encompasses the free liquid surface area of the ASB based on drone images captured on July 8, 2021, one day prior to the ASB testing conducted July 9-11, 2021. The western side of the upper section (ASB Zone 1) was filled in with material, so it was excluded from both the emissions calculations and the air dispersion modeling. Attachment 1 of this response shows the free water surface of the ASB on July 8, 2021.

Further review of Attachment 1 (Aerator Status during 7/9-11/2021 IPT, also attached to this letter) raises some questions concerning your response. First, there are three aerators (numbers 26, 28, and 39) that are identified in the legend as "Operational but not included in the model." It appears that the areas immediately surrounding these aerators are liquid surface area that could have H₂S/TRS emissions. Please explain why emissions from these areas were not included in the air dispersion modeling.

In addition, Attachment 1 also identifies several aerators that the legend identifies as "Aerators Running at Night (5:30 pm – 7:00 am)." Please explain if there were any adjustments made to the modeled H₂S/TRS emissions for the limited operation of these

Mr. Daniel Mallett

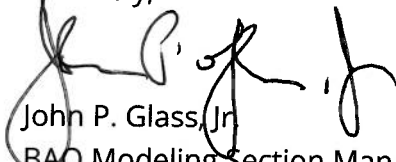
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aerators (i.e., were the H₂S/TRS emissions limited in any way for the limited aerator operation or were the maximum H₂S/TRS emissions assumed 24 hours/day, 7 days/week?).

Please provide responses to these comments by July 14, 2022. Please contact me at glassjp@dhec.sc.gov if you have any questions about this request.

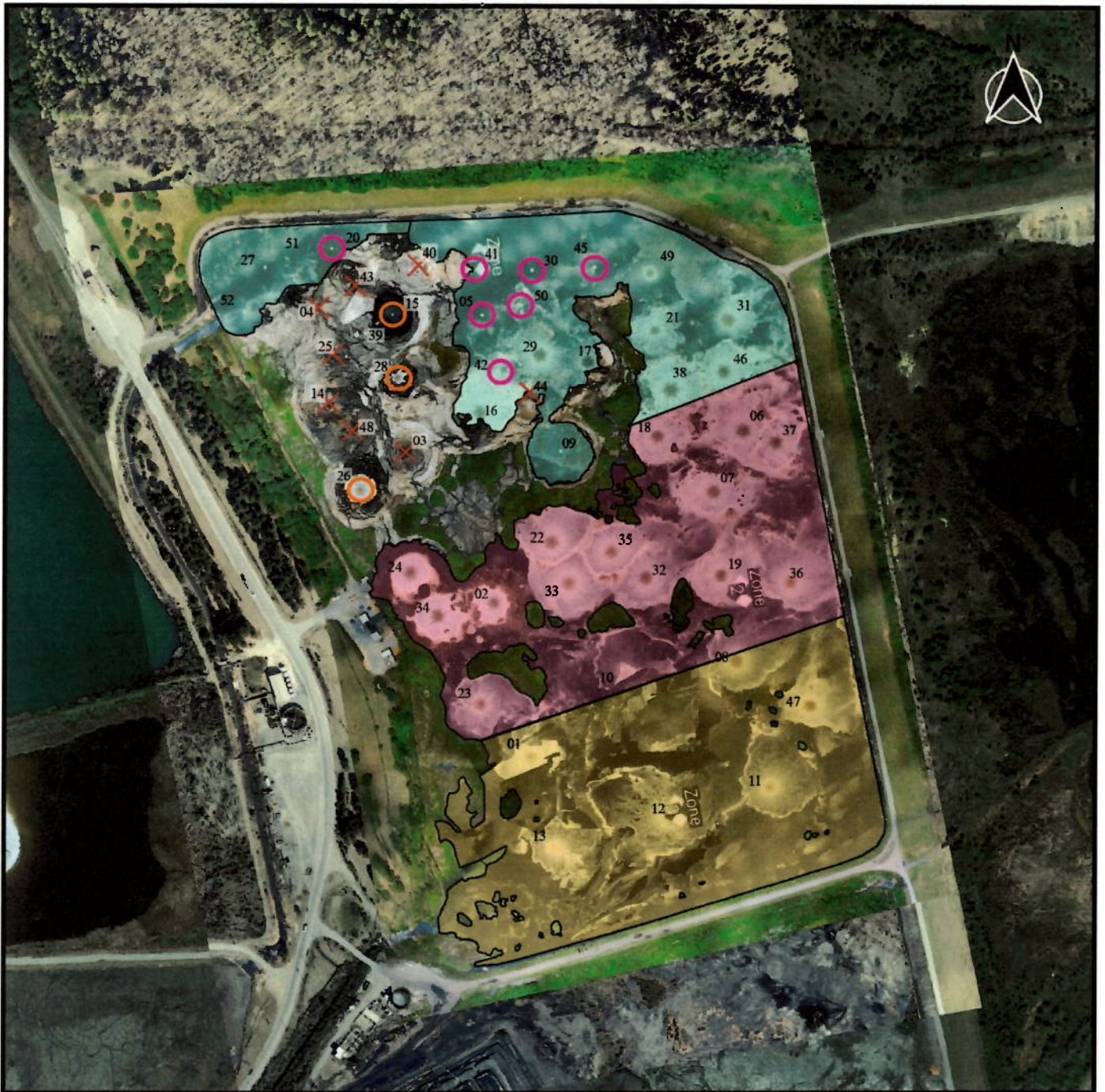
Sincerely,



John P. Glass, Jr.
BAQ Modeling Section Manager

ec: Rhonda Thompson
Keith Frost
Heinz Kaiser

Attachment - Aerator Status during...IPT, Attachment 1, October 27, 2021 New Indy Response



Legend

- Zone 1 Free Water
- Zone 2 Free Water
- Zone 3 Free Water
- X Non-operational during IPT
- Aerators Running at Night
(5:30 pm - 7:00 am)
- Operational but not included in the model

0 75 150 225 300 m



New-Indy Catawba
Catawba, SC

Attachment 1
Aerator Status during 7/9-11/2021 IPT

