



July 13, 2022

John Glass
Bureau of Air Quality- Modeling Section Manager
South Carolina Department of
Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Re: Response to June 29, 2022 DHEC comments on New-Indy Catawba, LLC's Corrective Action Plan Air Dispersion Modeling Analysis

Dear John:

New-Indy Catawba LLC (New-Indy Catawba) submits this information in response to questions from the South Carolina Department of Health and Environmental Control (DHEC) received via electronic mail on June 29, 2022. The DHEC questions pertain to the air dispersion modeling submittals from New-Indy Catawba to DHEC on August 30, 2021 and October 27, 2021. The DHEC questions and New-Indy Catawba responses are discussed below.

DHEC Question 1: *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.*

New-Indy Catawba Response 1: Aerator numbers 26, 28 and 39 were "landlocked" in July 2021. The small area of free liquid surface surrounding each aerator is dissociated from the wastewater flowing from the entrance of the ASB. The wastewater enters the ASB near aerator number 52, and, at the time of the July 2021 testing, crossed the northwest corner of the ASB between the solid material and aerator number 27 and 51, reaching the northern bank at aerator number 20. The wastewater flow then passed through a narrow channel along the northern bank of the ASB, eventually passing between the northern bank and aerator numbers 40 and 41 before spreading across the eastern two-thirds of the ASB. The wastewater flow bypassed the landlocked aerator numbers 26, 28, and 39 due to the accumulation of solid material in this area of the ASB (much of the solid material has since been removed). The small area of free surface water surrounding each landlocked aerator had no wastewater flow due to the solid materials

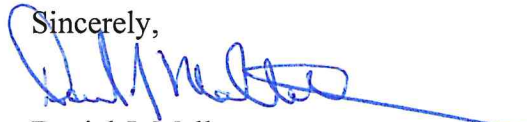
surrounding each at the time of the modeling. Therefore, emissions were not expected from the surface area near aerator numbers 26, 28, and 39 at the time of the July 2021 modeling. Accordingly, they were excluded from the analysis.

DHEC Question 2: *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 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?).*

New-Indy Catawba Response 2: The daily average measured ASB parameters were used to model the H₂S and TRS emissions rates, including the average number of aerators operating each day (average of daytime and nighttime number of operating aerators). The H₂S and TRS emissions rates based on the daily average measured ASB parameters were assumed to be 24 hours/day, 7 days/week.

Please feel free to contact me if you have any additional questions.

Sincerely,



Daniel J. Mallett
Environmental Manager