ADEM has obtained the actual, quality-assured monitor data for the first six months of 2017 near a DRR source in Shelby County, AL. We assembled a met data set and ran the AERMOD model (v16216r) to provide data for a comparison of reality versus model. We did not add any background concentrations to the model results, which means that the model data is underestimated by a few $\mu g/m^3$ for conservatism. The NAAQS for SO2 is 196 $\mu g/m^3$, 4th high, averaged over three years. The number of hours available for comparison varies because of calibration downtimes at the monitor.

Highest 1-hour concentration of the 4344 hours in the six months as predicted by the model: **1937** $\mu g/m^3$

Highest 1-hour concentration as measured by the monitor: $113 \mu g/m^3$

Difference: Model overpredicts by a factor of **17x**.

4th highest concentration from modeling: **1229** μg/m³

4th highest concentration from monitor: **58.9** μg/m³

Difference: Model overpredicts by a factor of **21x**.

Average of all hours (4344) in the six month period as predicted by model: 28.38 $\mu g/m^3$

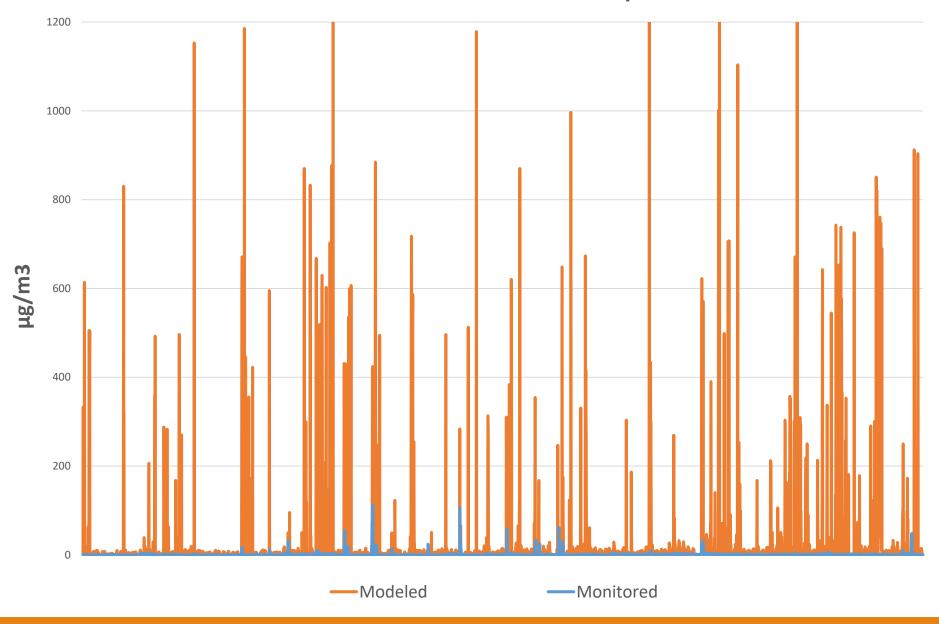
Average of all hours (3811) as measured by the monitor: **0.98** μg/m³

Model overpredicts by a factor of **29x**.

Out of 3811 hours, the number of hours the model overpredicts versus monitoring: **2695**, or **70.7**%

Out of 3811 hours, the number of hours the model underpredicts versus monitoring: **863**, or **22.6** %

Model vs Monitor Concentrations January- June 2017



The reason that a monitor is installed and operating near this source is that the full 3-year model predicted a NAAQS violation. The above data show that an actual violation is unlikely, and that the model tends to be very conservative.