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BEFORE THE
ENVIRONMENTAL QUALITY COUNCIL
STATE OF WYOMING

IN THE MATTER OF:)
)
MEDICINE BOW FUEL & POWER,) No. 09-2801
LLC AIR PERMIT CT-5873.)
)

DEPOSITION OF RANAJIT SAHU, Ph.D., taken on behalf of the Respondent, at 170 South Euclid Avenue, Pasadena, California, commencing at 9:12 a.m., on Friday, October 23, 2009, pursuant to Notice, before CLAUDIA REYES, CSR No. 12812, a Certified Shorthand Reporter, in and for the County of San Bernardino, State of California.

The following is an unedited rough draft and is not in final form. There will be various nontranslates and mistranslates that the reporter is trained to read. Various corrections and/or changes will be made before the final version is completed. This ascii/livenote connection is being provided as a special service to be used for limited purposes; however, the reporter and jonnell agnew and associates will not be responsible for the content of such rough draft and/or any variance thereof from the final transcript.

BY MR. COPPEDE:

Q. Could you be kind enough to state your name and address for the record.

A. Sure. My first name is Ranajit, spelled R-A-N-A-J-I-T. My last name is spelled Sahu, S-A-H-U. My address is 311 North Story, S-T-O-R-Y, place, city is Alhambra, California 91801.

Q. Is that your business address, Dr. Sahu?

1 As we sit here today, do you have any facts,
2 evidence, or other information that the Medicine Bow
3 facility is a major source of hazardous air
4 pollutants?

5 A. Right. That's my opinion. It's more likely
6 to be a major source.

7 Q. But my question was a little different. I
8 understand that's your opinion but, as we sit here
9 today, do you have any facts, evidence, or other
10 information -- okay. Let me ask it this way. What
11 is that based on, that opinion based on?

12 A. It's based on how the emissions were
13 calculated and the support for the various
14 assumptions that went into the potential to emit
15 calculations for the HAP emissions that are presented
16 in the records.

17 Q. Do you have an opinion as to how those
18 calculations should have been done, and what the
19 assumption should have been?

20 A. Well, not just how the calculations were
21 done, per se, but the support for the assumptions
22 that are at the heart of the calculations.

23 Q. What -- what specifically are you referring
24 to for -- what would you want to have seen, in other
25 words, to support the assumptions that you refer to?

1 Q. But I'm talking about where they're required
2 to use on the facility?

3 A. I don't know all the local rules and
4 requirements from every part of the country.

5 Q. Would it be fair to say, though, that in
6 this particular instance, you didn't -- you
7 personally, in connection with formulating your
8 opinions, you personally did not do a BACT analysis
9 for equipment leaks for this facility?

10 A. I did not do a BACT analysis for this
11 facility.

12 Q. Are you familiar with the RACT/BACT/LAER
13 Clearing House?

14 A. Yes.

15 Q. What's your understanding as to what that
16 is?

17 A. Well, it's a database that is maintained by
18 EPA in which states and other permitting authorities
19 submit information relating to technology assessment
20 pursuant to RACT, to BACT, to LAER, as to make those
21 determination. Generally, on volunteer basis,
22 although not always.

23 Q. Have you ever used that resource?

24 A. Sure.

25 Q. Did you review that resource that is the

1 RPLC, clearing house to research BACT equipment
2 leaks?

3 A. Not recently, and not for Medicine Bow.

4 Q. Okay. I think I'm getting close to done on
5 that topic.

6 (Recess.)

7 BY MR. COPPEDE:

8 Q. Dr. Sahu, did you do anything at all to
9 calculate the potential to emit for methanol in
10 connection with the Medicine Bow facility?

11 A. You mean, did I try to estimate it myself?

12 Q. Yes.

13 A. No. I didn't have enough information to do
14 that.

15 Q. Did you do anything to estimate the
16 potential to emit for benzene in connection with the
17 Medicine Bow facility?

18 A. Same answer.

19 Q. No?

20 A. I didn't have enough information to do that.

21 Q. So the answer is no?

22 A. Correct.

23 Q. Did you do anything to calculate the
24 potential to emit formaldehyde in connection with
25 this facility?

1 A. I don't believe so.

2 Q. And if you had, it would be in your report;
3 is that fair to say?

4 A. Right.

5 Q. Or your rebuttal report?

6 A. Correct.

7 Q. Did you do anything to calculate the
8 potential to emit for hexane in connection with this
9 case?

10 A. No, I did not.

11 Q. Did you do anything to estimate the
12 potential to emit for toluene in connection with this
13 case?

14 A. No.

15 Q. Did you do anything to estimate the
16 potential emit for other hazardous air pollutants in
17 connection with the Medicine Bow facility?

18 A. No, I don't recall doing that.

19 Q. Are you familiar the EPAs PM10 surrogate
20 policy?

21 A. Yes.

22 Q. And would you just tell us briefly what you
23 understand the EPAs PM10 surrogate policy to be?

24 A. I think it refers to two memos that EPA
25 staff wrote. I believe the first in 1997, and the

1 But getting to my other question, do you
2 have any facts, information, or evidence that the
3 Medicine Bow facility will have any cold-fire
4 boilers?

5 A. I don't believe they have cold-fire boilers.

6 MR. COPPEDE: I may be close to done here.

7 (Recess.)

8 BY MR. COPPEDE:

9 Q. We need to go back a little bit to make sure
10 I've exhausted the topic.

11 A. That's okay.

12 Q. Earlier you were testifying or you mentioned
13 in your testimony that you've done dispersion of
14 modelling?

15 A. Yes, I have.

16 Q. What pollutants did you model for in those
17 incidents where you did that?

18 A. All the usual suspects, criteria pollutants,
19 HAP.

20 Q. And remind us again, and I apologize if I've
21 asked you this already, but remind us again the last
22 time you did any dispersion modelling?

23 A. Well, I don't do any dispersion modelling
24 right now because I don't specialize in that. But I
25 think the last dispersion modelling I think was

1 probably five or more years ago.

2 But I teach at quality classes. So I do
3 dispersion modelling as part of my teaching work as
4 well.

5 Q. When you did your dispersion modelling five
6 or six years ago, whenever it was you last did it,
7 what models did you use specifically?

8 A. Back then, I was using ISCST, which was the
9 EPA-approved model, the regulatory model, one of the
10 EPAs regulatory models.

11 Q. I take it then you didn't do any dispersion
12 modelling in connection with your opinions about this
13 case?

14 A. That's correct.

15 Q. Did you ever do any modelling fugitive
16 particulate emission?

17 A. You mean in this case or in general?

18 Q. Let's say in general.

19 A. Yeah. I've done that in the past.

20 Q. When was the last time you did any modelling
21 for fugitive particulate emissions?

22 A. Probably ten years ago.

23 Q. I take it, then, you didn't do any fugitive
24 particulate emission models in this case; is that
25 correct?

CERTIFIED COURT REPORTERS/VIDEOGRAPHERS

1 STATE OF CALIFORNIA)
2 COUNTY OF SAN BERNARDINO) ss.

3 I, CLAUDIA REYES, CSR No. 12812, a Certified
4 Shorthand Reporter, in and for the County of San
5 Bernardino, State of California, do hereby certify;

6 That prior to being examined, the witness
7 named in the foregoing deposition, was by me duly
8 sworn to testify the truth, the whole truth, and
9 nothing but the truth;

10 That said deposition was taken before me at
11 the time and place herein set forth, and was taken by
12 me in shorthand and thereafter transcribed into
13 typewriting under my direction and supervision, and I
14 hereby certify that the said deposition is a full,
15 true and correct transcript of my shorthand notes so
16 taken;

17 I further certify that I am neither counsel
18 for nor related to any party to said action, nor in
19 any way interested in the outcome thereof.

20 IN WITNESS WHEREOF, I hereunto subscribe my
21 name this 6th day of November, 2009 .

22
23
24 Certified Shorthand Reporter in and
25 For the County of San Bernardino,
State of California