VERIFICATION OF THE CZECH IMMISSION TEST (CIT)

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Ecology determined the dilution factors for the KB Alloys facility over ten years ago. The development document record is not clear as to the method used to determine the values. Ecology made an attempt to model the conditions using CORMIX 6, however the software cannot model a multiport diffuser located at a distance closer to the bank than the river depth. A single port diffuser scenario, while adequate to model dilution effects on temperature, yields a dilution factor considerably less than determined previously. The conditions were then modeled using Ecology's RIVPLUM model. The assumptions inherent in this model are not recommended for a large river like the Columbia River. Using the same conditions, the RIVPLUM model derives dilution factors comparable to those contained in previous permits. Using the same conditions, the CIT model derives dilution factors on about the same level as the RIVPLUM model.