



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

October 29, 2019

MEMORANDUM

SUBJECT: Concurrence Request for Approval of Alternative Model AERCOARE in Conjunction with AERMOD, in Support of Clean Air Act (CAA) Permitting Effort

FROM: Ashley Mohr, Regional Air Permit Modeler
Air Permits Section, Air and Radiation Division
EPA Region 6, Dallas, Texas

THRU: Jeffrey Robinson, Chief
Monitoring and Grants Branch, Air and Radiation Division
EPA Region 6, Dallas, Texas

A handwritten signature in black ink, appearing to read "Jeff Robinson", is written over the "THRU:" line of the memorandum.

TO: George Bridgers, Director of Model Clearinghouse
Air Quality Modeling Group, Office of Air Quality Planning and Standards

The U.S. Environmental Protection Agency (EPA) Region 6 seeks concurrence from the Model Clearinghouse regarding the prospective EPA Region 6 approval of an alternative model for a CAA Prevention of Significant Deterioration (PSD) permitting effort. The AERCOARE meteorological data preprocessor program will be used in conjunction with AERMOD (AERCOARE/AERMOD) to conduct an air quality modeling analysis as part of the PSD permit application for the proposed Sea Port Oil Terminal (SPOT) Terminal Services LLC's Deepwater Port (DWP) project to be located in the Gulf of Mexico. SPOT Terminal Services LLC has sought approval to allow the use of the AERCOARE/AERMOD model for their air quality modeling analysis, under 40 CFR Part 51, Appendix W §3.2.2(b), Condition (3), for the project's PSD permit application. Under Condition (3), an alternative model may be used if the Regional Office finds the conditions specified in Appendix W §3.2.2(e) are satisfied.

SPOT Terminal Services LLC submitted their revised alternative model request on October 1, 2019, that provided justification satisfying the requirements of §3.2.2(e). An initial alternative model request was submitted by SPOT Terminal Services LLC to Region 6 on September 14, 2018, but the initial request was subsequently replaced by the October 1, 2019 revised request, which reflected the applicant's revised modeling approach.

EPA Region 6 has conducted a thorough review of the request and currently intends to approve the use of AERCOARE/AERMOD as an alternative model to conduct the air quality modeling analysis as part of the SPOT Terminal Services LLC PSD permit application. We have found the proposed application of the model is satisfactory under the requirements of §3.2.2(e). A technical analysis summarizing our review is attached to this memo for your consideration, and includes the October 1, 2019 revised alternative model request submitted by SPOT Terminal Services LLC. Please feel free to contact Ashley Mohr of my staff at (214) 665-7289 if you have any questions regarding the request.

Attachment