



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Office of Air Quality Planning and Standards  
Research Triangle Park, North Carolina 27711

2 3 FEB 1993

MEMORANDUM

SUBJECT: AES Guayama, Puerto Rico Proposal to Use the Rough  
Terrain Dispersion Model with Off-Site Meteorological  
Data

FROM: Joseph A. Tikvart, Chief *J. Tikvart*  
Source Receptor Analysis Branch (MD-14)

TO: Kenneth Eng, Chief  
Air Compliance Branch, Region II (2AWM)

In response to your request, the Model Clearinghouse has reviewed your position requiring AES to collect on-site meteorological data at their proposed plant site. We agree with your rationale and conclusion. Your reasoning is sound and your conclusion is consistent with guidance and with a number of precedents for similar situations, including the Pfizer situation which you cite.

In addition to Pfizer, there is also a more recent example of a precedent in Region IX that is especially relevant. In this case, which also involved AES, the Company proposed to utilize nearby off-site meteorological data for a Complex I analysis for a proposed plant in Hawaii. In this case, the Clearinghouse agreed with Region IX that use of such data would be inappropriate. A copy of that determination is attached.

If you have any further questions, please contact Dean Wilson at 919-541-5683.

Attachment

cc: W. Barrett  
A. Colecchia  
D. deRoeck  
S. Riva  
D. Wilson

# **FY-93 MODEL CLEARINGHOUSE MEMORANDA**

<u>Date</u>	<u>Region</u>	<u>Subject</u>
10/7/92	IV	Response to Proposal to Allow Credit for a Stack Height Increase at the Dade County Resource Recovery Facility, Dade County, Florida
10/28/92	V	Demonstrating Attainment of the Ozone National Ambient Air Quality Standards (NAAQS) with the Urban Airshed Model (UAM) for Detroit
10/28/92	VII	Demonstrating Attainment of the Ozone National Ambient Air Quality Standards (NAAQS) with the Urban Airshed Model (UAM) for St. Louis
10/28/92	IV	Attainment Demonstrations using the Empirical Kinetics Modeling Approach (EKMA)
11/5/92	I	Proposal to Use ISCRDT to Model Intermediate Terrain (Boise Cascade, Rumford, Maine)
11/12/92	VIII	Denver PM-10 State Implementation Plan (SIP) Modeling Issues
12/10/92	V	Proposal for Resolving Part D Sulfur Dioxide State Implementation Plan Revision for Rhinelander, Wisconsin
12/15/92	IV	The Ozone Attainment Test in the State Implementation Plan (SIP) Modeling Demonstrations
2/18/93	II	AES Guayama, Puerto Rico Proposal to Use the Rough Terrain Dispersion Model with Off-Site Meteorological Data
2/22/93	VIII	Carbon Monoxide State Implementation Plan Attainment Demonstrations
2/23/93	II	AES Guayama, Puerto Rico Proposal to Use the Rough Terrain Dispersion Model with Off-Site Meteorological Data