



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

JUN 24 1997

Alan Dresser  
Research Scientist II  
New Jersey Department of Environmental Protection  
401 E. State Street  
CN 027  
Trenton, New Jersey 08625-0027

Dear Mr. Dresser:

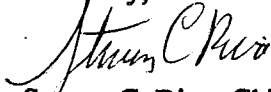
This is in response to your May 22, 1997 request to remove the 20 meter per second wind speed category in the SCREEN3 dispersion model. Your request is based on findings undertaken by the NJ Bureau of Air Quality Evaluation (BAQEv) which showed that both 15 and 20 meter per second winds are rare. This conclusion was based on meteorological data collected at Newark, Atlantic City, and Philadelphia during 1987 to 1991. The BAQEv believes that this wind speed category may result in overly conservative impacts and misplacement of receptors in refined analyses.

We also understand that this request is primarily to avoid unlikely meteorological conditions when determining worst-case operating loads for facilities and not for setting emission limits for determining final design concentrations. The NJ BAQEv believes that the 20 meter per second condition leads to the controlling load in most of their permit applications.

We considered your request and consulted the Model Clearinghouse in making this determination. However, we cannot find enough justification to support the removal of the 20 meter per second wind speed in all cases. As stated in your letter to us, wind speeds of 18 meter per second have been recorded. Therefore, a 20 meter per second is not out of the realm of possible wind speeds. As you know, screening models are specifically designed to be conservative in their estimates of impacts. If the predicted impacts seem too high, or the condition which lead to the controlling impact seem unreasonable, it is best to proceed to a more refined model. The refined model would also serve as a better tool for determining proper receptor placement in a refined grid.

Therefore, we do not recommend that the 20 meter per second wind speed category be removed from the SCREEN3 analyses. If you would like to discuss this further, please call Annamaria Colecchia of my staff at (212) 637-4016.

Sincerely,



Steven C. Riva, Chief  
Permitting Section,  
Air Programs Branch.

cc: Dennis Doll, OAQPS