UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

1998

MEMORANDUM

SUBJECT: U. S. Generating Company - Athens Generating Project - Approval of Meteorological Monitoring Plan

FROM: Dennis Doll
EPA Model Clearinghouse

TO: Annamaria Colecchia, Environmental Scientist
Permitting Section, Region II

In response to your request, the Model Clearinghouse has reviewed your position on the meteorological monitoring site for the Athens Generating Station. We agree with your position that locating the tower 1.4 km from the power plant site would be an appropriate exception to guidance, given the rationale and caveats you have expressed in your memorandum.

As you have pointed out, the guidance for siting a meteorological monitoring station for a facility to be located in complex terrain is that the station should be "on-site." In your memorandum you indicate that the proposed location, 1.4 km from the proposed plant location, is technically not really "on-site," but that you would expect the meteorological data to be essentially equivalent. You then provide various reasons why the proposed station location makes more sense than requiring that it be located "on-site."

We considered three criteria in forming our opinion on whether the proposed station location is appropriate. These are: 1) practical considerations, 2) technical considerations, and 3) precedent setting considerations.

First are the practical considerations. In locating any meteorological station there are practical limitations such as site access, power availability and topographic/demographic setting. In the Athens situation you have pointed out the problems with power and access at the plant site. From the topographic/demographic standpoint you have noted the problems with tree clearing and noise considerations at the plant site. By moving to the proposed meteorological station site these problems are ameliorated. While you point out that it is not impossible to locate the station at the plant site, this alternative is undesirable and should be avoided unless other considerations are compelling. It should be noted that cost considerations should really not be a significant factor in locating the station except in the most extreme circumstances. In the Athens situation it is not just a case of taking advantage of a nearby existing meteorological station to save time and money. In the Athens situation a new tower is going to be erected anyway and the we would not

expect that there is a large difference in the overall cost between the plant site and the proposed site. Thus one cannot say that the station location is not being proposed for economic reasons.

From a technical standpoint you have made several convincing arguments that the proposed location is defensible. Our review, given the facts you have provided, leads us to a similar conclusion. The data from that site should be just as representative of plume transport and dispersion in this complex terrain setting as data that might be collected exactly at the plant site.

Finally, a problem that we sometimes have in situations like this is the possibility that it might set a precedent for other situations where it would be inappropriate to approve the use of off-site data, but for which it would be difficult to draw a "bright line" difference from the precedent based on technical or other considerations. We agree with you that this situation is truly unique from a number of aspects and there is little danger in setting an undesirable precedent.

In summary, we agree with you that it is appropriate to accept the proposal to establish a meteorological station at the proposed location, the data from which can be used to describe plume transport and dispersion from the proposed Athens Generating Station.

If you have any questions, please contact me at 919-541-5693.

cc: D. Bailey
J. Tikvart
D. Wilson
S. Riva