PRIME is
considered
applicable and appropriate for application to the air quality impact
assessment
for the U.S. Sugar
Company's Clewiston Mill.

Date: 07/31/00
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Model Clearinghouse Information Storage and Retrieval System

Record Information Report

Record Number: 00-IV -03 Fiscal Year: 1900 Region: 04 Last Update:
Name: Duke Power Cliffside--No.2
07/17/00

State(s): NORTH CAROLINA

Pollutant(s): SO2
Regulation(s): SIP Revision - GEP
Source(s): Power Plant
Model(s): Fluid Model
PRIME
Subject(s): Downwash
Fluid Modeling
Technical Credibility of Nonguideline Techniques
Urban/Rural: Rural Only
Oral/Written: Oral
Terrain: Low Terrain (below stack height)
Guideline: Non-guideline
Database: Off-site
Involvement: Review and Comment
Record Comments:

RECORD OF COMMUNICATION

_x__TELEPHONE CALL ___MEETING ___CONFERENCE CALL ___OTHER

INFORMATION COPIES TO: Brenda, Warren
TO: D. Wilson
FROM: B. Johnson-Region IV
DATE: 6/21/00
TIME:
SUBJ: Duke Power Cliffside, Number 2
SUMMARY OF COMMUNICATION:
See also C/H Record 00-IV-01
Source needs to establish for GEP purposes that they have 40% increase in ground level concentrations due to downwash, resulting in a violation of the NAAQS.
Issue: Source argues that there is no longer a need to do fluid modeling to establish the 40% increase, since we now have a model, ISCPRIME, that we have good confidence in. They argued that the original need to do fluid modeling was prompted by uncertainties in modeled concentrations from the Huber Snyder & Schulman Scire downwash algorithms.
Discussion: Region IV & the C/H discussed the source's rationale. We are not sure about the source's argument that fluid modeling is dictated by technical reasons alone. We agreed that in order to entertain the source's position, there would be a need to involved OGC and it would take some time for OGC to get up to speed on the issue, from both a technical and legal standpoint. Also, we are concerned that ISCPRIME is a nonguideline model and will be such until the revisions to the Guideline are finally promulgated, which may be upwards of a year away. In this case we noted that we are actually applying a nonguideline dispersion