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 model to a situation where the regulations essentially say that a dispersion model should not
be used, but that a fluid model is necessary.
C/H comment: The C/H and Region IV agreed that it would be better for all parties
if the source would pursue the fluid modeling route. There are too many uncertainties and anticipated delays in the ISCPRIME route.
FOLLOW UP ANTICIPATED:
MODEL CLEARINGHOUSE RECORDS INFORMATION:
SOURCE NAME: Duke Power--Cliffside
LOCATION: NC
SOURCE TYPE: PP
POLLUTANTS: SO2
REGULATION(S)INVOLVED: SIP Revision
MET. DATA BASES Off