

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION II

DATE:

DEC 09 1985

SUBJECT: Fluid Modeling Study of B.L. England Station

FROM:

William Baker, Chief WDB  
Air Programs Branch

TO:

Joseph A. Tikvart, Chief  
Source Receptor Analysis Branch (MD-14)

We have sent you under separate cover two documents describing a fluid modeling analysis of the B.L. England Station of the Atlantic City Electric Company. The State of New Jersey has requested our assistance with its review of this analysis, particularly with respect to its technical adequacy. Because Region II does not have fluid modeling expertise, we need to turn to you for any comments you can provide us regarding this analysis.

There may not be a strict federal requirement that the source conduct this work. The Atlantic City Electric Company is not presently requesting any change to its currently approved sulfur limits. The State, however, has observed running average twenty-four hour concentrations in excess of the ambient air quality standards. As a result, the utility has requested a permit modification from the State to allow construction of a new 143 meter stack. This three flue stack will replace the three existing 76 meter stacks.

We are concerned that EPA may at some time in the future be requested to act in such a manner as to consider an air quality analysis based on the modified stack. Given the fact that this fluid modeling analysis was developed without EPA guidance, we anticipate that there are technical problems of which New Jersey should be aware.

If there are any questions or comments, they should be directed to Raymond Werner of my staff. Thanks for your help.

cc: Raymond Werner