



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

July 1, 1987

RECEIVED

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SUBJECT: PSI Gibson Model Evaluation Study
FROM: *Dean Wilson*
Dean Wilson, Meteorologist
Techniques Evaluation Section, SRAB (MD-14)

Air & Radiation Branch
U.S. EPA Region V

TO: Mike Koerber, Regional Meteorologist, Region V

In response to your request the Model Clearinghouse has reviewed your position, including your draft memorandum to IDEM, regarding the acceptability to the MPSDM model for regulatory use at the Gibson Generating Station and the acceptability of the Company's claim that air quality data on November 28, 1986, should not be used for regulatory purposes. We have also reviewed the supporting material submitted by PSI and the documentation of the negotiations that have taken place between PSI and the regulatory agencies. As a result of our review, we agree with your positions on both issues and have no significant problems with your draft letter to IDEM.

It is clear that PSI's analyses for both problems are in conflict with current guidance. Regarding the validity of SO₂ monitored data taken during the stagnation/inversion conditions of November 28, 1986, EPA's exceptional events guideline clearly states that such meteorological conditions are not exceptional events for purposes of flagging air quality data. Regarding the procedures used by PSI to demonstrate the acceptability of MPSDM, the available guidance (the Interim Procedures) clearly states that the performance evaluation protocol/data base network design must be agreed upon before implementation in advance and that these plans must be followed during the evaluation process unless all parties agree with any change. This guidance was not followed.

There are certainly cases where the available guidance can be shown to be nonapplicable because the developers of the guidance did not anticipate the nature of the issues that actually arose. The Model Clearinghouse is always open to discussing exceptions to the guidance in such situations. However, for the two analyses performed by PSI, we do not believe that the issues were unanticipated when the guidance was developed. On the contrary, these issues (meteorological phenomena including stagnation, need for a protocol and need to follow that protocol) were specifically considered and are specifically addressed in the guidance.

If you require further assistance on this request, please let me know.

cc: R. Rhoads
S. Reinders
S. Sleva
J. Tikvart