

From: brenda johnson
To: RTP10.RTPTSD (DOLL-DENNIS,WILSON-DEAN)
Date: 1/21/97 9:28am
Subject: FIve year data set

Dennis:

1. I have a PSD permit application which used a historical meteorology data set. The 1974-1978 meteorological data set from Macon, GA (Surface) and Centreville, AL (Upper air) were used in the air quality modeling demonstration. GA EPD approves of using 1974-1978 meteorology data because previous PSD modeling analyses conducted for this area were based on 1974-78 data. Also, GA EPD states that a different 5-year period would change the amount of increment consumed (either plus or minus) and would not be consistent with previous analyses. Finally, the current submittal does not allow any room for increases in the increment and NAAQS compliance demonstration. The SIA analysis gave a 24-hour value of 4.99 ug/m³ as compared to the PSD significance level for PM10 of 5 ug/m³. The PSD 24-hour increment modeled was 29.7 ug/m³ (HSH) and compared with the PSD increment of 30 ug/m³.

GA EPD further state that a more recent data set would not be any more representative than the one used in the increment analysis. Unfortunately, Section 9.3.1.2.a of the EPA Modeling Guideline recommends consecutive years of the most recent, readily available 5-year period as the preferred meteorology data set. A more recent data set should have been used for the modeling. This issue has been raised and discussed at several Regional/State and Local Modelers Workshops with the same conclusions. That being, to adhere to the Modeling Guideline without change to the current policy. It is also optional for the applicant to use the historical meteorological year upon which the design concentration or increment consumption compliance was based in addition to the most recent five year data set.

Are there any more technical reasons, other than the national consistency standpoint, for not accepting the 1974-1978 data set for the modeling that I could use in my comments? OR should I let it go and agree with Georgia EPD?

2. The nearest class I area is approx. 180 km away for the PSD source. Is this far enough away to say, no class I impacts should be considered?

Model Grandfathering Issue?
Is there previous precedent where to PA approved PSD permit not using most recent data (e.g. only 74-78)

This is effect
arounds to data
shopping because
they suspect most
recent data would
push them over limits

Has FEP seen this?
Probably yes but need to
review with FMA.
Contact Don De Boeck.