

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION X

1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

February 26, 1985



REPLY TO
ATTN OF: M/S 329

MEMORANDUM

SUBJECT: Concurrence with Use of SHORTZ for Tacoma

FROM: Robert B. Wilson *RB*
Regional Meteorologist

TO: Joseph A. Tikvart, Chief
Source Receptor Analysis Branch, OAQPS

The Washington State Department of Ecology has requested EPA approval of an air quality modeling approach which is not recommended in the Guideline on Air Quality Models. I am considering approval of the approach outlined below, and I request your concurrence.

A company called Energy Products of Idaho (EPI) is proposing on behalf of Tacoma City Light to construct a coal-fired cogeneration facility in the industrial (tideflats) area of Tacoma, Washington. (This project was proposed and received a PSD permit in 1981, but the permit expired. The revived project is somewhat smaller than the original proposal.) EPI contracted with the H. E. Cramer Company for the development of a modeling approach for the PSD analysis, and this proposal is attached for your information.

Basically, the approach which has been proposed is consistent with the approach I used in 1982 for the Kaiser PSD analysis (EPA-910/9-82-090). That analysis, which was accepted by the Model Clearinghouse (you), employed the SHORTZ model with class F stabilities re-assigned to stability class E. However, the current proposal contains an important difference: an entire year of hourly meteorological data will be modeled, rather than selected worst-case short-term periods. The Cramer Company will then use an "in-house" post-processor to summarize the model estimates. Note also that the Company is proposing to eliminate receptors in the analysis at which the proposed source has an insignificant impact. You approved the use of this concept in a June 29, 1984 memo to me concerning the Kaiser Aluminum plant at Tacoma.

A couple of items in the proposal remain to be negotiated. These include what meteorological data will be used, and what ultimate receptor spacing will be acceptable for the final model results. Other than these, I believe the proposed approach is fairly sound, and I request your concurrence by March 5, 1985, if at all possible.

Attachment

cc: Paul Boys, EPA Region 10
Phil Nelson, Washington Dept. of Ecology