



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

March 4, 1988

MEMORANDUM

SUBJECT: Four Corners Power Plant NO<sub>x</sub> SIP Variance  
Model Clearinghouse Referral

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

TO: Gerald W. Fontenot, Chief  
Air Programs Branch, Region VI

In response to your request, the Model Clearinghouse has reviewed the NO<sub>x</sub> modeling protocol for the Four Corners Power Plant. We agree that the modeling techniques proposed for showing attainment of the Federal annual standard are in conformance with current guidance. We do have a few comments on the meteorological data bases available for model input.

First, we understand that only one year of the available four years of meteorological data has at least 90 percent valid data recovery, but that the State proposes to use all four years in modeling. Both for technical reasons (minimum of data substitution) and in conformance with EPA data recovery minimums, we recommend that only the year with 90 percent data recovery be used for modeling. Second, the protocol should indicate what data will be used for missing hours. Finally, the protocol should indicate that calms will be processed according to EPA's calms policy.

Regarding the modeling to show attainment with the more restrictive State 24-hour NO<sub>2</sub> standard, we do not believe it is our role to place specific requirements on the State in modeling for its own ambient standard. However, if it was a Federal 24-hour standard, we believe the Agency would apply the same modeling guidelines used for SO<sub>2</sub>, including the requirement that a full capacity (100%) emission rate be used, rather than the 95% rate described in the protocol. We agree that the proposed ozone limiting method should be conservative.

cc: J. Calcagni  
T. Helms  
W. Keith  
W. Laxton  
R. Vogel  
D. Wilson