



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

7 DEC 1993

MEMORANDUM

SUBJECT: Revised Technical Comparison Document--Phelps Dodge

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

TO: Gerald Fontenot, Chief
Air Programs Branch, Region VI (6A-AP)

As follow up to my May 19, 1993 memorandum to you, and in response to Quang Nguyen's verbal request, we have reviewed the Technical Comparison Document (TCD), as revised on September 17, 1993. The cover letter to that document indicates that the revision is intended to respond to the comments we raised in our May 19 memorandum. We agree that they have adequately responded to our concerns. However, they have also made several additional changes to the model comparison protocol; we have one comment regarding those changes. We are also passing along a comment from the Air Quality Management Division regarding the claimed confidentiality of the subject document.

Recall that in their original TCD, the Company essentially proposed that the performance of their proposed model, Mesoscale Puff Dispersion Model (MPDM), should be compared to that of a reference model, Rough Terrain Dispersion Model (RTDM)/Industrial Source Complex Short Term (ISCST2). The model that showed the best performance would then be used in the State Implementation Plan (SIP) demonstration. They did indicate at that time that if the revisions to the Guideline on Air Quality Models were promulgated, then the reference model would become Complex Terrain Dispersion Model Plus (CTDMPLUS)/ISCST2, as recommended in the Guideline. We had no problem with that position.

Indeed, the revisions to the Guideline were promulgated in July 1993. Pursuant to that event, as part of the September 17 revisions to the TCD, the Company now proposes to use CTDMPLUS/ISCST2 as the reference model. However, they also propose to retain the RTDM/ISCST2 for comparison. In addition they propose a second version of CTDMPLUS/ISCST2 and several different procedures for applying their MPDM model as contenders in the performance evaluation. We believe that this is not appropriate as it really amounts to using the performance evaluation as a diagnostic tool rather than purely a test. We believe that RTDM/ISCST2 as well as the second version of

CTDMPLUS/ISCST2 should be dropped from contention since neither represent the Environmental Protection Agency's (EPA's) recommended model for this situation. The Company should then choose how they believe MPDM should be run in the regulatory mode and only enter that procedure into the competition. In this way, we are back to having one reference model competing against one proposed model, which we believe to be appropriate. If the Company wants to use another data set (or a subset of the data set being collected in conjunction with the performance evaluation) for diagnostic purposes in order to decide on how they want to run MPDM, we would be willing to entertain such a proposal.

Regarding the confidentiality question, we believe that it would be inappropriate to allow the Company to deny access to the TCD during the public comment period. The SIP revision process has always been an open one. While our regulations do not specifically address this issue to the extent that the Prevention of Significant Deterioration (PSD) regulations do, we believe it would be a significant departure from the policy of providing open and ready access to SIP documentation. Such a departure could set an undesirable precedent which could affect future regulatory actions. We have not as yet received any input from the Office of General Counsel (OGC); however, we believe that EPA's position on this issue should be that all model documentation including the TCD be made available during the public comment period, assuming the MPDM is used in the SIP revision. We recommend that you seek legal advice from your Regional counsel on this matter and we will continue to seek OGC's opinion. We will inform you if OGC's opinion differs from our own.

If you have any questions please contact Dean Wilson at 919-541-5683.

cc: G. Blais
P. Embrey
J. Paisie

FY-94 MODEL CLEARINGHOUSE MEMORANDA

<u>Date</u>	<u>Region</u>	<u>Subject</u>
11/18/93	X	Building Wake Effects on Volume Sources at FMC Corporation
11/22/93	IV	CP&L Stack Height Increase
12/07/93	VI	Revised Technical Comparison Document--Phelps Dodge