

**From:** DENNIS DOLL  
**To:** RTPMAINHUB:RTPMAINHUB.WPXGATE (JOHNSON-BRENDA)  
**Date:** 1/3/97 2:49pm  
**Subject:** Meteorological data -Reply

Brenda:

This is a question of representativeness of on-site met data. One question regarding this might be the spatial relationship of the culprit source to Ashland. For example, are they adjacent to one another and in similar terrain?. If so, then perhaps some case could be made to use the Ashland on-site data for the culprit modeling. If there are significant differences in surrounding terrain and distance is an issue, then using the Ashland data may be more problematic. As you know, we typically have been firm on the use of on-site data. However, if in your judgement, there is reason to believe the Ashland data are representative of the culprit source, then it may not be necessary to make the culprit source do the on-site data monitoring. Without additional info., I'd say do what in your professional judgement is most reasonable. If you would like us to take a closer look at the situation, then perhaps you could provide us with more info. to help answer the question. Thanks. DD

>>> brenda johnson 01/03/97 01:21pm >>>

GEP modeling was done for a source (Ashland Oil) with complex terrain applicability. A NAAQS violation is predicted but a background facility is the culprit. The source's contribution is insignificant. On-site met data for the source was used in the modeling. In subsequent modeling to resolve the modeling violation and set new emission limits for the culprit, can the same met-data be used? I believe that since the culprit is now performing the modeling on-site met data representative of its stacks should be used. However, since the culprit does not have its own on-site data, could the source's data or other on-site met-data within the Area be used?