



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

FILE

SEP 29 1999

Mr. James M. Salvaggio, Director  
Bureau of Air Quality Control  
Department of Environmental Protection  
Rachel Carson State Office Building  
P.O. Box 8468  
Harrisburg, PA 17105-8468

Dear Mr. Salvaggio: 

This is in response to your September 15, 1999, letter requesting approval of an alternative dispersion model for application at the Martins Creek Steam Electric Station. The alternative model would be used by Pennsylvania Power & Light Company for the air quality analyses in support of a prevention of significant deterioration (PSD) permit application.

As you stated in your letter, the PSD regulations specify that air quality modeling be based on the preferred models identified in Appendix W to 40 CFR Part 51 otherwise known as the Guideline on Air Quality Models (GAQM), except where the preferred model is inappropriate. Section 3.2 of the GAQM further specifies the conditions and procedures for selecting an alternative model.

EPA Region III has reviewed the rationale contained in your letter and determined that there is no model preferred by GAQM which is completely applicable to the area being evaluated. The meteorological data are adequate to perform the analysis with the proposed AERMOD model. Furthermore, the AERMOD model has been demonstrated not to be biased toward underprediction when compared with GAQM preferred models in similar circumstances. Therefore, under the provision of section 3.2.2.e of the GAQM, the proposed use of the AERMOD modeling system is approved for this application.

If you or your staff have any questions about this approval action please call Denis Lohman at (215) 814-2192.

Sincerely,



Judith M. Katz, Director  
Air Protection Division