

MAY 26 2000

Mr. Leon Sedefian
New York State Department of Environmental Conservation
Division of Air Resources
Bureau of Technical Support, Room 400
80 Wolf Road
Albany, New York 12233-3253

Re: Use of Existing Meteorological Data Base as On-Site for the Grassy Point Energy Project

Dear Mr. Sedefian:

We have reviewed the request from the Grassy Point Energy Project to use the meteorological data collected at the Bowline site during June 1985 to May 1986 as input to the dispersion modeling analysis as "on-site" data in their PSD permit application. We also sought concurrence from the EPA Model Clearinghouse in our Office of Air Quality Planning and Standards (OAQPS). Both EPA Region 2 and OAQPS agree that it is acceptable to use the meteorological data collected at the Bowline facility as a surrogate to the on-site meteorological data at the Grassy Point stack location. Our rationale is given in the April 28, 2000 memorandum to the model clearinghouse. It is attached to this letter for your information.

Basically, the April 28th memorandum states that the atmospheric conditions experienced at the Bowline facility should be essentially the same as those experienced at the Grassy Point facility. The only recommendation we would make is given that the data was collected 15 years ago, the use of the highest impact rather than the highest second-highest impact should be used for compliance demonstrations to the PSD increment and National Ambient Air Quality Standard analysis, if one is required (see section 8.2.1 of the Guideline on Air Quality Models regarding temporal representativeness). In addition, we understand that the final stack height has not yet been determined. It is only known that the stack height will not be greater than the formula Good Engineering Practice (GEP) Stack height of 88 meters. Therefore, since Bowline collected meteorological data at 10 meters, 50 meters, and 100 meters, the data most representative to the actual stack height must be used in the modeling of air impacts. In addition, as OAQPS points out, since the stack will be less than the formula GEP height, downwash from the stack will also have to be addressed. If you have any questions regarding this letter, please call Annamaria Colecchia of my staff at (212) 637-4016.

Sincerely,

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Steven C. Riva, Chief
Permitting Section,
Air Programs Branch

Enclosures

✓ bcc: Warren Peters, OAQPS
Annamaria Colecchia, APB
File Copy (green)

U.S. ENVIRONMENTAL PROTECTION AGENCY
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TO: Warren Peters
OFFICE: QAQPS
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FAX: -0044

FROM: Annamaria Colecchia
DATE: 4-28-00

PAGES: 4

MESSAGE:
Warren,
~~the attached orders already~~
I changed Dean to a BCC: as
Dean Wilson + Associates.
Please call if you have any questions
(212) 637-4016
Thanks
Annamaria