

OCT 01 1987

REPLY TO: 6T-AH

Mr. Cubia L. Clayton
Chief, Air Quality Bureau
P.O. Box 968
Santa Fe, New Mexico 87504-0968

Dear Mr. Clayton:

Since the receipt of the air quality modeling analysis on March 5, 1987, which you submitted in support of the nitrogen dioxide variance order for Arizona Public Service Company (APS) as a revision to the New Mexico State Implementation Plan, we have completed our technical review and have discussed our concerns with you and your staff. As has been discussed, the variance for APS is not approvable based on the current air quality analysis.

On September 22, 1987, Joe Winkler of my staff met with members of your staff and representatives of APS to discuss the air quality modeling which accompanied the variance request. APS had completed some additional modeling and provided the results to us. It is agreed that the air quality analysis is best handled by separating it into two evaluations, one for complex terrain and one for simple terrain. The application of Complex I and MPTER, respectively, is appropriate.

Considering that this is a special case relative to modeling techniques and data bases, we have decided to submit it to the Model Clearinghouse which is the single EPA focal point for review of air quality modeling proposed for use in specific regulatory applications. In this regard, we request that you prepare a modeling protocol document including the following points:

1. Provide background information including a discussion of the regulatory application and a description of the facility focusing on nitrogen oxides emissions and control.
2. Summarize the modeling approach.
3. Describe the meteorological data base including a discussion demonstrating that the on-site data meet the requirements under, "On-site Meteorological Program Guidance for Regulatory Applications", EPA-450/4-87-013.
4. Provide a summary of the source data including a discussion of how the analysis handles worst case loading and operational conditions.
5. Describe how other NO_x sources in the area of influence are considered in the modeling and outline how background concentrations are developed.

6T-AH:WINKLER:ddb:Disk #3, Doc #3:9-28-87

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6. Discuss the siting of receptors.
7. Indicate which model options will be used.

In the development of the protocol document, please refer to the "~~Guideline on Air Quality Models (Revised)~~", July 1986, EPA-450/2-78-027R. In order to proceed with developing an acceptable revision, we ask that you submit this protocol document to us by October 30, 1987. After we have notified you that we have an approvable protocol document, we will expect you to submit the revised air quality modeling analysis within thirty days. At that time we will reactivate processing the variance request.

From our discussions, we are aware that APS had been granted an extension to the variance until October 15, 1987. For us to act on this additional extension to the variance, it must be officially submitted to us by the Governor.

If you have any questions, please contact Tom Diggs of my staff at (214) 655-7214.

Sincerely yours,

Jack S. Divita
Chief
Air Programs Branch (CT-A)