



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

Dean Wilson
TSD

February 15, 1989

MEMORANDUM

SUBJECT: Modeling Requirements for Pennsylvania Power and Light
(PP&L), Martins Creek, Pennsylvania

FROM: Robert D. Bauman, Chief *Bob*
SO./Particulate Matter Programs Branch (MD-15)

TO: Joseph Tikvart, Chief
Source Receptor Analysis Branch (MD-14)

This is in response to a memorandum dated January 4, 1989 from Al Cimorelli, Region 3, to Dean Wilson of your branch. Since this appears to be more of a policy than a technical issue, my branch agreed to prepare a response.

Region 3 is asking if EPA policy would allow PP&L's modeling analysis to address only the designated nonattainment area in Warren County, New Jersey. If so, it might be possible to reclassify the Warren County area to attainment without an evaluation of PP&L's impact outside the Warren County nonattainment area. Additionally, the Region has asked if a redesignation for Warren County could proceed independent of any revision to the Pennsylvania SIP, in the event the modeling analysis shows Warren County to be attainment but shows a modeled violation in Pennsylvania.

The Guideline on Air Quality Models (Revised) (Guideline) on page 1-3 states that the current guidance should be followed in all air quality analyses relative to State implementation plans and in analyses required by EPA, State and local agency air programs. This policy is consistent with stack height implementation policy and general guidance found in a January 2, 1985 memorandum from SRAB to the regional modeling contacts. Guidance contained in the Guideline recommends on page 9-8 that "all sources expected to cause a significant concentration gradient in the vicinity of the source or sources under consideration for emission limit(s) should be explicitly modeled." On page 8-4, the Guideline states that "Receptor sites for refined modeling should be utilized in sufficient detail to estimate the highest concentrations and possible violations of a NAAQS or a PSD increment."

I believe that application of guidance noted above does not allow a partial modeling analysis. If a modeling analysis is required for any reason, that analysis must meet the requirements of the Guideline.

Redesignation policy is generally contained in the April 21, 1983 memorandum from Sheldon Meyers to the Regional Air Directors. That policy includes requirements for a modeling analysis demonstrating attainment and evidence of implementation of the approved SIP. As noted by Region 3, PP&L's analysis may show violations at locations outside of the designated nonattainment area, while demonstrating an absence of violations within the nonattainment area. In such an event, the existing SIP may be judged adequate to demonstrate attainment in Warren County and an action to redesignate the area to attainment could proceed before the State completes the necessary effort to resolve the violations outside the nonattainment area. While separate rulemaking actions are possible, it may be more efficient to consolidate the redesignation and SIP revision actions whenever possible.

I trust that this memorandum is responsive to Region 3's concerns. If you need any additional information, please call me.

cc: A. Cimorelli, Region 3
E. Ginsburg, OAQPS/AQMD
D. Grano, OAQPS/AQMD
S. Sambol, Region 2
✓ D. Wilson, OAQPS/TSD