

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Martins Creek - Requirements for
Redesignation

DATE: JAN 04 1989

FROM: Alan J. Cimorelli *Mr. Garrison*
Lead Meteorologist (3AM12)

TO: Dean Wilson, Meteorologist
Techniques Evaluation Section, SRAB (MD-14)

As you know, Region II and Region III are presently in the process of negotiating a model evaluation protocol with Pennsylvania Power & Light (PP&L). A major purpose of this action is to evaluate the need for a change in PP&L's emission limit in order to resolve a designated non-attainment area in Warren County NJ. In a recent meeting we had with PP&L, an issue regarding the required modeling domain was raised. I would appreciate review of our opinion on this matter.

Accompanying any SIP change, an acceptable demonstration of attainment must include an evaluation within the source's impact area. This area has never been explicitly defined for SIP's as it has been for PSD. However we have always interpreted it to be an area large enough to contain all possible areas in which the design concentration of the source in question could occur. For PP&L, it is clear that their impact area is substantially larger than the Warren County non-attainment area. Therefore, it would appear that any analysis performed in support of a SIP change for PP&L will require a modeling analysis which extends beyond the Warren County non-attainment area. This is both understood and agreed to by PP&L. However, if through the study it is determined that the impact from PP&L's present SIP allowable does not cause or contribute to non-attainment in the Warren County area the Company has asked if the area could be reclassified without an evaluation of PP&L's impact outside the area?

It is PP&L's opinion that this is a likely scenario and they would like to resolve the non-attainment issue independent from problems which may arise when the other areas are examined. It is important to note that no matter how we approach resolution of the non-attainment area the Company has agreed to immediately begin work on the other areas.

I have been unable to find any guidance which specifically addresses this question. However, if the study being performed by the Company shows that no additional control is needed to provide for attainment in the area then we must conclude that at the time the area was redesignated to non-attainment it was, in fact, attainment. Therefore there would appear to be no need to require any further actions on the part of the Company to simply correct a previous misconception and redesignation could proceed without further analysis. On the other hand, if it is shown that a change to the SIP is required to redesignate the area then the question of what limit is needed to provide for attainment everywhere within the sources impact area becomes germane. If this occurs it would seem that a full study would be needed before either the SIP could be revised or the area redesignated.

I would appreciate your comments as soon as possible. If you should need any additional information please call.

cc: L. Felleisen
J. Kunz
M. Garrison
D. Lohman
S. Sambol (Region II)

FY 89 MODEL CLEARINGHOUSE MEMORANDA

<u>Date</u>	<u>Region</u>	<u>Subject</u>
10/11/88	VI	Use of ISC UNAMAP 6, Change 7
11/07/88	VI	Compilation of Most Recent, Available 5-Year Meteorological Data By Texas
11/08/88	V	State of Indiana Meteorological Preprocessor Program
11/09/88	VI	Information Regarding Refinery Tank Farms and Their Rural/Urban Designation
11/09/88	VI	Request for Use of ISC 6.2
11/21/88	VI	Request for Use of ISCST and ISCLT Version 6.2 in Twin Oak Steam Electric Station PSD Application
11/28/88	VI	Request for Use of ISCST and ISCLT Version 6.2 in Formosa Plastics PSD Application
01/30/89	VIII	E. Helena Lead SIP
02/08/89	IV	Yates Power Plant GEP SIP
02/10/89	VIII	Denver PM ₁₀ SIP
02/27/89	IV	Paradise Power Plant
02/28/89	VI	Proposed Region VI Responses to Louisiana About Modeling Issues
02/28/89	III	Martins Creek -- Regulations for Redesignation