



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI

1445 ROSS AVENUE, SUITE 1200  
DALLAS, TEXAS 75202

REPLY TO: 6T-AN

NOV 16 1988

MEMORANDUM

SUBJECT: Request for Use of ISCST and ISCLT Version 6.2 in Twin Oak  
Steam Electric Station PSD Application

FROM: James W. Yarbrough  
Air Modeling Contact  
Region 6 (6T-AN)

TO: Dean Wilson  
Modeling Clearinghouse (MD-14)

It has come to my attention that Texas Utilities, in its PSD application for the Twin Oak Steam Electric Station, must perform air dispersion modeling as soon as possible. Texas Utilities received a PSD permit in 1977 for this facility and then stopped construction in 1987. The PSD permit will expire after 18 months (i.e., on December 26, 1988) if construction has not resumed. Region 6 has insisted that, due to changes in NSPS requirements since 1977, Texas Utilities must now meet more stringent NSPS requirements than those agreed to in 1977. If modeling incorporating the new NSPS measures is not received by Region 6 and the Texas Air Control Board by December 26, 1988, Texas Utilities will have to obtain a new PSD application. Thus, it is necessary for Forsite Corporation, Texas Utilities' consultant, to complete ISCST and ISCLT modeling prior to that date. Further, it is apparent that the Schulman-Scire downwash algorithm is triggered in the modeling analysis for the facility. Given the fact that there is apparently still some uncertainty about the proposed "fix" to ISCST version 6.7, I request that the Modeling Clearinghouse approve the use of ISCST and ISCLT version 6.2 in this PSD application.

I would appreciate your timely, positive approval of this request. If I can answer any questions about this request, please phone me at FTS 255-7214. Thank you.

Attachment

cc: John Hepola (6T-E)