



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

7 NOV 1989

SUBJECT: Interpretation of On-Site Meteorological Data
Requirements and the Use of RTDM for a PSD Source

FROM: Joseph A. Tikvart, Chief *J. Tikvart*
Source Receptor Analysis Branch (MD-14)

TO: Raymond Werner, Chief
Impact Assessment Section, Region II

The following is the Model Clearinghouse opinion in response to your request for an interpretation of complex terrain modeling issues primarily associated with the proposed new Pfizer facility in Puerto Rico.

Use of Nearby Representative Meteorological Data in a Complex Terrain Model

We agree with your conclusion that it will be necessary for Pfizer to collect on-site meteorological data if they plan to use RTDM, Complex I or any other complex terrain model that requires the input of sequential meteorological data. While some persuasive technical arguments can be made that the Aguirre data might be representative, one can also take issue with this position since the data site is located on the bay whereas Pfizer is located inland a couple of miles in more rugged terrain. However, the main reason for requiring on-site data is the precedent that was set with the May 29, 1987 memorandum to Region IV (attached) involving RTDM and the Alabama SIP. There we agreed, based on a consensus of the Regional Meteorologists, that it was more important to maintain technical credibility and consistency; thus the use of 60m meteorological data, in lieu of 100m data, could not be accepted.

Use of RTDM

We believe it is premature to deal with your several "what if" and generic questions regarding the future use of RTDM. All of the Regions will be party to decisions on how we deal with the future of RTDM. At the present time the only advice that we have been giving to your Region and others is that you should be cognizant that there is a potential problem with RTDM and you should try to factor in options on commitments to future applications of the model as much as possible. We do recognize that if the model is indeed removed from Guideline status it will be necessary to entertain grandfathering for those cases where the model has already been applied or where irrevocable commitments to its use have been made. It appears that your Halfmoon Power

Plant application might be a candidate for grandfathering. Right now we believe that we would handle the grandfathering on a case-by-case basis, similar to the procedure we used with the faulty ISC code problem; for each case a short memorandum to the Clearinghouse outlining the facts in the situation would be necessary.

If you have any questions, please contact Dean Wilson (FTS-629-5683) or me (FTS-629-5562).

Attachments

cc: D. DeRoeck, OAQPS (MD-15)
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