

July 24, 1991 (DRAFT)

MEMORANDUM

SUBJECT: Hudson Power - Buena Vista PSD
Permit Class I Increment Issue

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

TO: Alan J. Cimorelli, Lead Meteorologist
Technical Assessment Section, Region III (3AT12)

In response to your request, the Model Clearinghouse has reviewed your proposal for modeling the increment consumption in Shenandoah National Park attributable to multiple sources. The modeling is required as part of the Hudson Power Plant Prevention of Significant Deterioration (PSD) permit application.

We have previously negotiated your proposal over the telephone and through telefax. Thus we agree that we can support it. The proposed technique is technically defensible, given the time frame available to work out a solution. As you point out there is no guidance specifically applicable to this type of situation; thus there are no conflicts in that regard. Also there are no historical precedents that would conflict with your proposal.

While we agree with your proposal, we want to emphasize that the proposed modeling technique is unique to this situation and should not be regarded as precedent for other multiple source increment modeling problems. It is clear the case for straight line Gaussian models for multiple sources each having their own on-site meteorological data, and even including long range transport, leaves a bit to be desired as a permanent solution. Over time we will need to be thinking about how we can establish credible techniques that develop and utilize the spatial and temporal variations in meteorological data.

If you have any questions please contact Dean Wilson or me.

cc: Dan deRoock

bcc: Regional Modeling Contact, Regions I, II, IV-X (with copy of incoming memorandum and list of FY-91 Clearinghouse memoranda)