



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

December 4, 1991

MEMORANDUM

SUBJECT: Proposal to Use a Non-Guideline Model to Satisfy
Intermediate Terrain Policy in New Source Permitting
(Pine State Power; Jay, Maine)

FROM:

Dean A. Wilson
Dean A. Wilson
Techniques Evaluation Section, SRAB (MD-14)

Dan deRoock
Dan deRoock
New Source Review Section, PPB (MD-15)

TO:

Ian Cohen, Regional Modeling Contact
Technical Assistance Section, Region I

Brian Hennessey
Technical Assistance Section, Region I

In response to your request, the Model Clearinghouse has reviewed your proposal to accept the Pine State Power (PSP) implementation of the intermediate terrain policy for their forthcoming Prevention of Significant Deterioration permit. We have previously negotiated the technical and procedural details of this issue through drafts of your request memorandum. Thus we are in agreement with your proposal.

Over the last few weeks we have discussed a few additional caveats to our agreement. Here is our understanding of our discussions, for the record. We agreed that PSP's use of the ISCMX model is, in general, limited to the stack configuration, building dimensions and modeled background sources that were included in the equivalency demonstration. In that regard, we understand that the State now wants to include another background source, the James River Company, in the modeling but that source, because of its source-receptor geometry, is not expected to contribute to the design concentration. Thus we have no problem with its inclusion in the permit modeling.

We also indicated that the Clearinghouse did not review the fine details of the equivalency demonstration, e.g. whether the correct wind speed profiles were used. You agreed that this is not expected of us and that the State/Region will be responsible for that level of review, as appropriate.

In summary, subject to the conditions stated in Section E of your November, 6, 1991 memorandum, and to the above caveats, we agree with your proposal to approve the equivalency demonstration for PSP.

If you have any questions, please contact us.

cc: R. Lee

FY-92 MODEL CLEARINGHOUSE MEMORANDA

<u>Date</u>	<u>Region</u>	<u>Subject</u>
10/16/91	IV	Dade County, Florida, Stack Height Increase
11/7/91	VI	Phelps Dodge--Hidalgo Modeling Protocol
11/15/91	VIII	ASARCO E. Helena Lead State Implementation Plan (SIP)
12/04/91	I	Proposal to Use a Non-Guideline Model to Satisfy Intermediate Terrain Policy in New Source Permitting (Pine State Power; Jay, Maine)