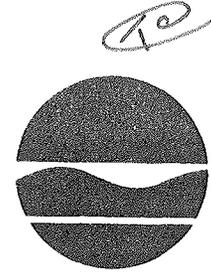


New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233

Dean
FYI



Thomas C. Jorling
Commissioner

September 30, 1992

*Call Abraham
next week
tell her you
support her
Also ask about
non 6th month/psd*

Mr. Steven Riva
Chief, Permitting and Toxics Support Section
US EPA Region II
Rm. 500
26 Federal Plaza
New York, New York 10278

Dear Mr. Riva;

We would like to follow-up on the response contained in Ken Eng's September 2nd letter to Art Fossa on the Sithe Energy Project relative to the definition of "on-site" for the purpose of meteorological data collections. We recognize that the Valley model results provided by Sithe alleviated your concern with the impact analyses for that project. However, we are concerned with your reasoning behind your definition of "on-site" to be "on-property".

Your letter notes that EPA policy and recommended procedures allow the use of the Complex I model only with data collected "on-site", with the later defined as "on-property". Your assertion did not contain any specific references which outline this requirement. In fact, our understanding of available EPA recommendations and guidance do not indicate any such requirement.

The EPA Modeling Guidelines, including the proposed Supplement, does not require on-site data with the Complex I model, but only for the RTDM and the refined CTDM PLUS model. (this was also recognized by the CTDM/TTW in its responses to public comment on Supplement B, in a memo from Rob Wilson to Joe Tikvart, dated 8/15/91). The requirement of on-site data for Complex I presumably stems from EPA Models Workshops and/or Clearinghouse decisions. However, to our knowledge none of these decisions have explicitly referenced "on-site" to mean "on-property".

Furthermore, the On-site Meteorological Program Guidance document defines on-site data as "collection of data at the actual site of a source that are representative, in a spatial and temporal sense, of the dispersion conditions for the source". No reference is made to having to collect the data on property of the source. We have identified this issue for discussion by the

On-site Meteorological Work Group (OSWG) once all of the relevant information has been gathered. At our last OSWG conference call, Region IV EPA staff identified at least one instance (Ashland Oil in North Carolina) where the on-site data collected was not on the property of the source.

We ask that you provide all relevant EPA guidance and references which specifically refer to "on-site" as "on property" especially as these relate to the use of the Complex I model. We look forward to resolving this issue so that our future guidance to source applicants can be in accord with EPA definition of "on-site".

Sincerely,

Ed Bennett
Chief, Impact Assessment and
Meteorology
Division of Air Resources

cc: A. Fossa
L. Sedefian
B. Barrett, EPA, Region II
T. Coulter, OSWG ✓

LS/bc