

**From:** RANDALL ROBINSON  
**To:** mo, RTP10.RTPSTD.WILSON-DEAN, RTP10.RTPSTD.DOLL-DE...  
**Date:** 10/22/96 11:12am  
**Subject:** Met data for Ohio PSD source

I spoke with OEPA today regarding a question about what met data to use for a metals processing plant PSD PM source in southeastern Ohio. The plant is in the Ohio river valley amidst complex terrain and does not have representative met data. The source consists of only area and volume sources so CTSCREEN is not an option. OEPA wants to use 5 years of NWS data from Huntington WV. Region 5 has consistently prohibited the use of nonrepresentative data for complex terrain sources. My response was that the impacts from these low level sources is likely to be pretty close to the facility. I said to use SCREEN3, which has volume and area source characterization ability, and combine the impacts to see first if they are higher than the significance level for PM. Then, if necessary, see if they can show compliance with the NAAQS. Nearby sources would either be modeled or included in a representative background value for the NAAQS. Increment consuming sources would need to be modeled and impacts combined. OEPA is thinking about this approach, but are not really sold on it. They are also considering making arguments for the use of NWS data in this situation. I said the other option is to have the source collect one year of on-site met data.

**CC:** CN