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Model Clearinghouse Information Storage and Retrieval System

## **Region II PSD Source-July 97** Record No: 97-II -06 Last Update: 07/16/1997 **EPA Region:** 2 Fiscal Year: 1997 UP State(s): **Pollutant**(s): **PM-10** Source(s): Unspecified **Stationary Source** Model(s): UNSPECIFIED Urban/Rural: Not Relevant Low Terrain **PSD** Terrain: **Regulation**(s): (below stack height) Guideline: Not Relevant **Database:** Both Off-Site & On-Site Review and **Oral/Written:** Oral Involvement: Comment

## Comments:

7/9-10/97 Issue: If the source uses either 5 years of off-site or 1 year of on-site met data, what modeled values does one use for comparison with the PM-10 increments and NAAQS? C/H Comments. The PM-10 increments are "deterministic." Thus, interpretation of modeled concentrations is in the same sense as for determining whether deterministic NAAQS, e.g. SO2, are attained. That is, for 1 year of on-site data one compares the high-second-high 24-hour and the highest annual concentration in the receptor network with the allowable increments. For 5 years of off site data, compare the highest of the yearly high-second-highs and the highest of the annual concentrations with the allowable increments.

The PM-10 NAAQS are statistical, that is the expected high-second-high and expected annual concentrations are to be compared to the NAAQS. The PM-10 SIP Development Guideline provides guidance on how to make this interpretation from 5 years of modeled data, that is to select the highest of the 6th high concentrations in the receptor network. Modelers have typically extended that logic to cases where there are more than 5 years of met data to select the high-7th high concentration for 6 years of met data, the high-8th-high with 7 years, etc. For cases with less than 5 years of modeled data, the interpretation has followed the logic that is used for monitoring data, in the PM-10 SIP Development Guideline. For 1 year of modeling on-site data the interpretation is to compare the high-second-high with the PM-10 NAAQS.