



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7  
901 NORTH 5TH STREET  
KANSAS CITY, KANSAS 66101

JUL 29 2000

Rick Brunetti, Director  
Bureau of Air  
Kansas Department of Health and Environment  
Attn: Sunflower Comments  
1000 SW Jackson Street, Suite 310  
Topeka, Kansas 66612-1366

Dear Mr. Brunetti:

The United States Environmental Protection Agency (EPA) review of the air dispersion modeling associated with the draft permit for the Sunflower Holcomb Generation Station expansion project has revealed an error in the meteorological data used in the air dispersion model (AERMOD). The modeling is used to show the expected air quality impacts of the proposed project, including compliance with the National Ambient Air Quality Standards (NAAQS). This error is significant enough that we believe the air quality analyses must be redone for all air pollutants, in order to accurately evaluate the impacts of the proposed project on air quality. Further, we believe the public should be given a meaningful opportunity to comment once the modeling is corrected and made available to the public.

The observed meteorology and the input meteorology to AERMOD are not the same hour, e.g. the observed meteorology parameters for 0100 hours are being used for 0500 hours. Essentially, this means that the temperature, wind direction and wind speed, as well as the boundary layer parameters created by the meteorology pre-processor AERMET, are not correct for any hour. We believe the wrong "time" is because the CD144 formatted data used by Sunflower had Universal Time Constant (UTC), or GMT time instead of the local time that the AERMET program expected with a CD144 format.

We are concerned that these errors in meteorological data caused changes in air dispersion model results. Therefore, we believe the air quality analyses must be redone and the public given adequate opportunity for comment.

Please note that this letter only addresses this specific comment and we will follow up with other comments at a later date. If you have any questions, please feel free to contact me at (913) 551-7876.

Sincerely,

A handwritten signature in cursive script that reads "Becky Weber".

Becky Weber, Director  
Air and Management Division