

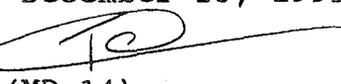


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Office of Air Quality Planning and Standards  
Research Triangle Park, North Carolina 27711

27 JAN 1992

MEMORANDUM

SUBJECT: East Helena Lead SIP - Protocols for Design Value Determination and Model "Verification"; Clarification of Model Clearinghouse Memorandum of December 23, 1991

FROM: Tom Coulter, Environmental Scientist   
Techniques Evaluation Section, SRAB (MD-14)  
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TO: Mindy Mohr, Lead SIP Coordinator  
SIP/Permit Section, Region VIII (8AT-AP)

This transmittal is to clarify our December 23, 1991 memorandum to you, particularly the intent of the comments (Attachment 1) on the Inter-model Comparison Protocol (December 2, 1991 Protocol). While everything in the attachment was accurate, its intention was not to undermine any ongoing activities engaged by ASARCO or any agreements between ASARCO and Region VIII. While the attachment stated that ASARCO's intended efforts described in Section 2.2 of the December 2, 1991 Protocol were not rooted in any definitive Environmental Protection Agency (EPA) guidance or policy (and therefore not amenable to standard EPA evaluation), it was not intended to say that such efforts were without value. Indeed, such efforts, especially presented as a "demonstration," may provide valuable insight into the degree of uncertainty to be expected between the now reconciled dispersion modeling estimates and receptor modeling results for the 10 selected days at each site. Demonstration exercises of this nature using independent data are strongly encouraged in any modeling endeavor. And we applaud the foresight given to perform such an effort.

We hope this clarification is helpful and eliminates any confusion that might be associated with our December 23, 1991 memorandum. We also hope that any misunderstanding it may have caused does not compromise the level of effort to be carried out in the remainder of this activity. If you have any questions, please feel free to call one of us at FTS 629-5683.

Attachment

cc: J. Irwin  
J. Tikvart

bcc: Regional Modeling Contact, Regions I-X (with a list of FY-92  
Clearinghouse memoranda)

OAQPS/TSD/SRAB/TES:TCOULTER:bcannady:MD-14:\*0832:January 27, 1992  
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**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)
12/23/91	VIII	East Helena Lead SIP - Protocols for Design Value Determination, and Model "Verification"
12/26/91	VI	Information Copy of El Paso-Juarez PM-10 Modeling
01/13/92	I	NHARD Modeling Guideline
01/27/92	VIII	East Helena Lead SIP - Protocols for Design Value Determination and Model "Verification"; Clarification of Model Clearinghouse Memorandum of December 23, 1991