



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

MEMORANDUM

SUBJECT: Demonstration of Attainment Utilizing the Urban Airshed Model

FROM: Royan W. Teter *Royan W. Teter*
Environmental Engineer
Air Planning and Development Section

TO: Richard Scheffe
Ozone Modeling Contact
Model Clearinghouse
(MD-14)

As you know, Missouri, Illinois, and Regions V and VII are working together in pursuit of a sound Ozone State Implementation Plan (SIP) for the St. Louis area. Missouri staff have expressed considerable concern over the inconsistency between Environmental Protection Agency's (EPA) policy, with regard to demonstration of attainment utilizing the UAM and EPA's policy with regard to allowed monitored exceedances. In the case of the former, no modeled ozone exceedances are allowed while the latter allows one monitored exceedance. In addition, there are some concerns with regard to the sensitivity of the model. Missouri staff feel there exists the potential for costly overcontrol if no modeled exceedances are allowed. In light of these concerns Missouri proposed that one exceedance should be allowed in developing the St. Louis UAM Modeling Protocol. Pursuant to our June 10, 1992 teleconference, this memorandum is a formal request from Regions V and VII that Missouri and Illinois be allowed to deviate from EPA guidance, relative to the above proposal. The following is offered as justification:

1. The states have elected to model four episodes rather than the minimum recommended three.
2. The four episodes selected are the highest ranking exceedances on record for the recommended modeling time frame with the exception of one episode for which there is no Regional Oxidant Modeling support.
3. The four episodes will represent a total of twelve modeled days.

4. The states were participants in a teleconference with staff from the Source Receptor Analysis Branch (SRAB), Region V, and Region VII in which we agreed that one modeled exceedance would be acceptable under the conditions above. Although no formal declaration from the model clearinghouse was given to allow one modeled exceedance, the nature of the call, the levels of authority represented, and the final agreement led to the conclusion that one modeled exceedance would be allowed. As a result, the states were provided with written notification stating the St. Louis UAM modeling protocol which allows one modeled exceedance, would be approved; Region VII copied SRAB on this correspondence.

The apparent miscommunication is regrettable. In any case, the regional offices (V and VII) are not in a position to reverse the policy decision communicated to the states. In light of the above reasons, the regional offices strongly support the approval of one modeled exceedance. Your immediate attention to this matter will be greatly appreciated.

CC: Ed Doty, U.S. EPA Region V