



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

November 12, 1997

Ms. Barbara Kwetz, Director
Division of Planning and Evaluation
Massachusetts Department of Environmental Protection
One Winter Street
Boston, MA 02108

Dear Ms. Kwetz:

A handwritten signature in cursive script, appearing to read "Barbara Kwetz", written over the typed name.

After evaluating your August 27, 1997 submittal, EPA approves your request to use the CALGRID model for the attainment demonstrations required for the ozone nonattainment areas in Massachusetts, New Hampshire, Maine and Rhode Island. Note, however, that this approval is for the 1-hour attainment demonstration only which is due in April, 1998.

Additionally, although we are approving the use of the CALGRID model for attainment demonstration purposes, EPA has a number of comments on your August 27, 1997 submittal which we think need to be addressed in your ozone attainment demonstration due next April.

1. Appendix W of 40 CFR Part 51 states that a model performance protocol should be prepared whenever an alternative to a guideline model is being considered in a regulatory application. We did not require this protocol since we had extensive discussions prior to your submittal. We suggest you document this process to the extent possible in your submittal. Also, we suggest that you make the appropriate changes to your October 1992 modeling protocol to reflect the use of CALGRID as well as other changes in the modeling that have been made since then.
2. It is unclear why performance statistics weren't included for August 15 in the evaluation for the August 1987 episode. We suggest that the necessary performance statistics for CALGRID be included in your April 1998 ozone attainment demonstration submittal, or that you document your reason for omitting them.
3. UAM-IV is clearly better for the Unpaired Peak Accuracy test. The significance of this finding for the model evaluation and for use in future attainment demonstrations has not addressed. Since CALGRID predicted a higher Unpaired Peak Accuracy, this could imply that CALGRID might over predict. While we do not see that as an obstacle to the use of CALGRID, we do suggest that you explain your justification for using CALGRID despite this result.

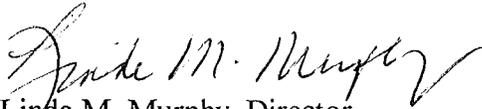


Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 75% recycled fiber

4. Statistics on precursor data were not included in your submittal. While we understand that the reason for this was probably a lack of monitored data to use for reference, we suggest that this be explained in your submittal.

We look forward to working with you and your staff to complete the ozone attainment demonstrations which are due in April 1998. If you have any questions, please contact David Conroy at 617-565-3245 or Ian Cohen at 617-565-3568.

Sincerely,



Linda M. Murphy, Director
Office of Ecosystems Protection

CC: Ken Colburn, NH DES
Jeff Underhill, NH DES
Steve Dennis, MA DEP
Joe Tikvart, OAQPS
Ellen Baldrige, OAQPS