

KY ACP LAF - ~~002~~
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From: DEAN WILSON
To: RTPMAINHUB:RTPMAINHUB.WPXGATE(JOHNSON-BRENDA)
Date: 10/9/96 11:33am
Subject: background concentrations -Reply

Hi Brenda-

If I understand what the source wants to do here, I would say that it is not covered in any guidance and don't think it has been asked before. In general, a problem with eliminating directions based on impacts of a background source is that the the same argument could be made for a second background source and a 3rd etc. At some point in time one would eliminate all of the directions.

However, it is up to you if you want to entertain their proposal, specific to the source in question. I would say that it should be formally proposed to the State/Region IV with enough detail so that you can determine where maximum concentrations are and whether background values are being thrown out that would otherwise significantly affect these concentrations. Or, whether so many measured background values are being thrown out as to make the average of the remainder questionable as a useful number. I would ask them to carefully and completely follow the guidance in Section 9.2.2 (Option 1) of the Guideline on Air Quality Models, using the same rationale to discard measured background values associated with the sectors where the large background source has an effect. (Section 9.2.2 is cross referenced from 9.2.3, last paragraph).

I would shy away from using the high second high in non excluded sectors. Difficult to logically defend.