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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

SEP 13 1985

MEMORANDUM

SUBJECT: Omaha Lead SIP

FROM: Gerald A. Emison, Director
Office of Air Quality Planning and Standards (MD-10)

TO: William A. Spratlin, Director
Air and Toxics Division, Region VII

RECEIVED
SEP 27 1985
AIR PROGRAMS BRANCH
U.S. EPA, REGION V, AMD

In response to your request, my staff has reviewed the Region VII proposed position on the draft Nebraska Lead SIP revision for the ASARCO smelter in Omaha. While we agree with your position, our agreement is primarily based on the numerous verbal discussions that our staffs have held over the last year or so. As a result of these discussions, we are aware that your staff has done a thorough analysis of (1) each issue that ASARCO has raised, (2) the assumptions contained in the ASARCO model, and (3) the questionable validity of the performance evaluation for that model. Our problem at the present time is that the written material you have forwarded does not reflect these analyses in a organized, thorough manner.

Nebraska and ASARCO have a well written case that might appear convincing to some readers. Both of our staffs are aware of the holes in their analysis and the task before you is to lay out in writing a more convincing and conclusive case for the EPA position. I suggest that for each issue/assumption, etc. that Nebraska or ASARCO have made you first state what the issue is. Then state what the State's position is and the basis for their position. Following this, analyze their position, considering technical adequacy and consistency (with EPA guidance). Finally, draw a logical conclusion which, based on current knowledge, would be the same as the positions you have stated in your memorandum dated 9/9/85.

It is most important that a careful written position be prepared on the validity of ASARCO's performance evaluation for their proposed model. The EPA guidance on performance evaluations is the "Interim Procedures for Evaluating Air Quality Models". This guidance indicates that a reasonably sound model proposed for regulatory application in a given situation should be applied, if its performance is superior to that of the EPA guideline model. In this case the ASARCO model appears to be reasonably sound; they make a seemingly good case that it performs better than the guideline model. However both of our staffs are aware that the ASARCO analysis is in conflict with a number of critical aspects of an acceptable performance evaluation. For example, we are aware that there are deficiencies in the monitoring network in terms of monitor location and coverage. Also there has been no

apparent effort to develop an up-front protocol for the performance evaluation and data base network, as recommended in the Interim Procedures. Moreover, it is doubtful that EPA would have agreed to a protocol for the limited performance evaluation that ASARCO carried out. These points need to be brought out in your written position.

In summary OAQPS supports your position leading to disapproval of the Nebraska lead SIP revision. However, a better case needs to be made in supporting this disapproval. If we can be of help to you in reviewing your written position, please feel free to contact Joe Tikvart or Dean Wilson of my staff.

cc: D. Rhoads
J. Silvasi
D. Tyler

bcc: ✓ Regional Modeling Contact, Regions I-X (with incoming memo)

SRAB:JATikvart/D.Wilson:jam:rm836:MU,x5561:9-12-85