



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

NOV 01 1985

MEMORANDUM

SUBJECT: Omaha Lead SIP

FROM: William A. Spratlin *WAS*
Director, Air and Toxics Division - Region VII

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

Attached is the revision to the Nebraska State Implementation Plan (SIP) for Lead for Omaha which the State submitted on October 21, 1985. Also attached is a draft of a technical support document which reviews ASARCO's performance evaluation for their "revised model" and also provides information on the adequacy of the control strategy for the ASARCO lead refinery contained in the SIP submission.

We would appreciate your detailed review of these documents by November 15, 1985. We are particularly interested in your comments on the adequacy of the draft support document to explain why the ASARCO revised model does not perform better than the guideline model and why the ASARCO assumptions concerning plume enhancement and plume height are incorrect. After your review, a face-to-face meeting of our staffs may be necessary to establish a unified EPA position.

Attachments

cc: John Silvasi (with attachments)
Dean Wilson (with attachments) ✓