



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Office of Air Quality Planning and Standards  
Research Triangle Park, North Carolina 27711

November 19, 1985

MEMORANDUM

SUBJECT: Omaha Lead SIP

FROM: Joseph A. Tikvart, Chief *J. Tikvart*  
Source Receptor Analysis Branch

TO: John Silvasi, Chief  
Plans Analysis Section

As requested, my staff has reviewed the draft Technical Support Document for the draft Nebraska Lead SIP revision. We find that the document substantively addresses our concerns raised in the 9/13/85 memorandum from the Director, OAQPS, to the Director, Air and Toxics Division, Region VII. The analysis clearly shows that the EPA position is at least as well supported technically as the State's position on each issue. For those issues where there is not enough information to technically support a position different from Region VII's, the Region appropriately maintains consistency with modeling policy. Listed below are a few minor comments on the Technical Support Document.

1. It might be useful to more directly state what EPA's position is with regard to performance evaluations on nonguideline models. In such cases the guidance contained in the "Interim Procedures for Evaluating Air Quality Models" should be applied. Although this guidance document is mentioned on page 5 of the Technical Support Document, its applicability to the Omaha smelter is not clear. It should be pointed out that the Interim Procedures require, among other things, that a performance evaluation protocol and monitoring network design be established in advance, before any data are collected or analysis undertaken. In the case of the Omaha smelter this was not done. Moreover, neither ASARCO's actual evaluation procedure or monitoring network would have been acceptable even if proposed in advance.

2. If Region VII decides to prepare a Federal Register disapproval package, the wording in the Technical Support Document might have to be adjusted to ensure harmony with the Federal Register rationale. For example:

(a) The Technical Support Document is a bit confusing in that it seems to support the use of a model that is different from that on which the original SIP was based. The Technical Support Document seems to advocate that

ISC, Urban Mode 3 is the most appropriate technique, whereas ISC, Urban Mode 1 was used in the original SIP. Thus, the rationale leads one to conclude that not only is the proposed SIP revision unapprovable but the original SIP also may be deficient.

(b) The Technical Support Document often refers to ASARCO's position; it probably needs to refer to the State's position.

3. There are a number of "typos" in the Technical Support Document which should be corrected before it is finalized.

cc: T. Helms  
R. Rhoads