



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

NOV 22 1985

MEMORANDUM

SUBJECT: Omaha Lead State Implementation Plan (SIP)
FROM: Darryl D. Tyler, Director *Darryl D. Tyler*
Control Programs Development Division (MD-15)
TO: William A. Spratlin, Director
Air and Toxics Division, Region VII

In response to your request of November 1, 1985, my staff has reviewed the revised Omaha, Nebraska, lead SIP. Our review uncovered no issues in the revised SIP itself of which your staff was not already aware.

Our review also indicates that the technical support document prepared by your staff provides a sound technical basis for the Region VII position and is consistent with modeling policy. A memorandum from the Source Receptor Analysis Branch listing their comments and concerns is attached. One concern that deserves further thought is that the support document seems to favor the use of the ISC, Urban Mode 3 model over the model used in the original SIP (ISC, Urban Mode 1). The implication is that the modeling analysis in the original SIP is deficient; however, in the January 31, 1985, final rulemaking on the original SIP, EPA found the original modeling acceptable. The technical support document should address this apparent contradiction.

We appreciate the opportunity to comment on this matter. If you still feel that a meeting between our respective staffs is needed, please let me know.

Attachment

cc: G. Emison
T. Helms
R. Rhoads
J. Silvasi
J. Tikvart