

United States Environmental Protection Agency
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

April 30, 1987

MEMORANDUM

SUBJECT: Ambient Air

FROM: G. T. Helms, Chief /s/
Controlled Programs Operations Branch (MD-15)

TO: Bruce Miller, Chief
Air Programs Branch, Region IV

My staff and I have discussed the five situations involving the definition of ambient air that you sent on December 18, 1986. The following comments represent our interpretation of the ambient air policy. However, this memorandum is not a discussion of the technical issues involved in the placement of receptors for modeling. Our comments on each scenario follow:

Scenario One: We agree with you that the road and the unfenced property are ambient air and could be locations for the controlling receptor.

Scenario Two: We agree with your determination in this case also.

Scenario Three: We agree with you that the road is ambient air. However, Area B is not ambient air; it is land owned or controlled by the company and to which public access is precluded by a fence or other physical boundary.

Scenario Four: We do not think that any of the barriers mentioned here are sufficient to preclude public access so as to allow the source to dispense with a fence. An example of an unfenced boundary that would qualify is a property line along a river that is clearly posted and regularly patrolled by security guards. Any area, such as grassy areas that might even remotely be used by the public, would have to be fenced even in this situation. We would not think that a drainage ditch would meet these criteria.

Scenario Five: Both fenced pieces of plant property, even though noncontiguous, would not be considered ambient air (see Scenario Three). The road, of course, would be ambient air. Again, ownership and/or control of the property and public access are the keys to ambient air determination.