



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

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Air Management Division
Air & Radiation Branch
U.S. EPA Region V

MEMORANDUM

SUBJECT: Grandfathering of Modeling Analyses

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

TO: Michael Koerber
Regional Meteorologist, Region V

Thank you for providing the list of regulatory actions for States in Region V that contain modeling analyses subject to decisions on "grandfathering" the use of previous modeling guidance. As we have discussed with you, we intend to use the list for information purposes and agree with your proposal to seek clarification or documentation from the State on each SIP submittal. We provided some guidance on which to base a decision on grandfathering during the last Regional Modelers Workshop.

With respect to your second issue, long standing actions of the type you mention that include substantial periods of inactivity should be re-examined on a case-by-case basis. The following factors directly apply to the case you raise: (1) seven years have passed since the initial agreement; (2) major evolution of our guidance has taken place; (3) there has not been a mutually recognized protocol in effect since 1979; and (4) there are no ongoing analyses that would be disrupted by implementing our new guidance. Based on these factors, we do not believe grandfathering is appropriate for this case.

Please contact me if you have further questions.

cc: T. Helms
R. Rhoads
S. Rothblatt
D. Wilson

30 JUN 1986

Grandfathering of
Modeling Analyses

Michael Koerber
Regional Meteorologist

Joseph Tikvart, Chief
Source Receptor Analysis Branch

At the recent Regional Meteorologists meeting in Philadelphia, you asked each Regional Office to identify regulatory actions in preparation that may not fully comply with the forthcoming "Guideline on Air Quality Models (Revised)". On April 28, 1986, we requested each of our States to provide us with such a list of actions. Our letter, along with each State's response, is attached. The responses raise two issues that I would like to bring to your attention.

First, some State responses were rather vague (e.g., only a county and pollutant were identified). To obtain specificity, we will ask our States either to clarify each particular analysis and its status now (e.g., the protocol for an analysis could be provided for our information), or to document the protocol and the start-up date and include it with the formal SIP submittal.

Second, some analyses were identified which do not even meet current modeling guidelines, but which have been grandfathered (so far) for some reason or another. For example, as part of a compromise reached by Ohio, Region V, and OAQPS in 1979, the use of one year of meteorological data was accepted for the State's SO₂ SIP work. Although we have approved most of the counties in the State, we have yet to take final rulemaking on several counties. We ask for your comments on prolonging, in general, existing grandfathering agreements.

If you have any questions on this memo, please contact me.