



DRAFT

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

4APT/APB-aes

Mr. Jim Cody
Western North Carolina Regional
Air Pollution Control Agency
Buncombe County Courthouse
Asheville, North Carolina 28801-3569

Re: Air Quality Modeling Protocol

Dear Mr. Cody:

As requested we have reviewed the proposed air modeling protocol for predicting sulfur dioxide concentrations from the Dayco plant in Waynesville, North Carolina. We have the following comments and/or concerns:

- ° How will missing meteorological data (stability, wind speed and direction) be accounted for?
- ° Calm winds processing should follow the procedure found on pages 9-24 of the "Guideline On Air Quality Models (Revised)." Specifically, the response threshold of the instruments must be considered when determining whether a wind speed is zero or one meter per second.
- ° Table 6-1 indicates that there are four boiler stacks and two incinerators. Please document that these are the only sources of SO₂ at the plant.
- ° Two other sources of SO₂ are possibly in the Dayco impact area. These plants are American ENKA and Champion Paper. These should be included in the analysis or an explanation provided why these sources should be excluded.
- ° The ISC Model as revised in the Federal Register of January 6, 1988, 53 FR 392-396 must be used in the analysis.

This concludes our comments. Please address these concerns in the final protocol. If you have any questions, please contact me or Mr. Lewis Nagler of my staff at (404) 347-2864.

Sincerely yours,

Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division