



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

NOV 15 1988

*Mike C / Spm*

MEMORANDUM

SUBJECT: Information Regarding Refinery Tank Farms and Their Rural/Urban Designation

FROM: *James L. Wilson for*  
Dean A. Wilson, Meteorologist  
Techniques Evaluation Section, SRAB (MD-14)

TO: James W. Yarbrough, Air Modeling Contact  
Region VI (6T-AN)

The Model Clearinghouse has considered your concerns regarding the urban/rural classification of areas characterized by tank-farm land use. We note from the Clearinghouse files that there have been several cases in the last few years where there has been an issue regarding the appropriate classification of an area. In most of these cases the land use was approximately 50 percent rural/50 percent urban and there were differences of opinion as to which was the appropriate classification. Such differences of opinion are not surprising since, as Dr. Auer has pointed out in the TENERA letter, there is an element of professional judgment involved in determining the land use. We believe that the tank-farm land use issue is another example of a difference of opinion that can be traced to professional judgment.

In 1986 Region V, who had been facing a number of these "differences in professional judgment" issues on urban/rural classification, asked the Clearinghouse if it might not be appropriate to consider other criteria in addition to the land use in making the determination. The Clearinghouse recommendation at that time was that we not modify our urban/rural guidance but continue to entertain exceptions on a case-by-case basis. In particular, the Clearinghouse noted that a justification based on a comparison between monitored data and model estimates would probably be the most defensible. Since that time, Region V has used this monitored/modeled data comparison in some cases to clarify the classification.

We continue to believe that there is insufficient basis to change, clarify, or tighten our guidance on urban/rural classification, at this time. Thus, future issues such as your tank-farm issue should be handled on a case-by-case basis as they arise, perhaps clarifying any differences of opinion using some of the criteria considered by Region V. However, we are willing to entertain a proposal to modify our guidance. Accordingly, in

the process of drafting the next Regional Office/State Modelers Workshop Agenda, we will call you to see if you would like to take the lead in proposing "strawman" revised guidance at that Workshop. That strawman probably should not be narrowly limited to the tank-farm issue but attempt to address the general problem of tightening guidance to minimize the qualitative nature of the urban/rural classification scheme.

Finally, I would like to note that the Model Clearinghouse disagrees with TENERA's (July 2, 1988) conclusion that Dr. Auer completely agrees with the TENERA position that the tank-farm area is rural. This conclusion does not follow from Dr. Auer's opinion that "good judgment and common sense" should be used in making each determination.

If you have any questions please contact me.

cc: D. deRoeck (MD-15)  
D. Grano (MD-15)  
S. Reinders (MD-14)  
D. Wilson (MD-14)  
Regional Modeling Contact, Regions I-V, VII-X (with incoming memorandum and list of FY-89 Clearinghouse Memoranda)