



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI

1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202

REPLY TO: 6T-AN

OCT 28 1988

Ms. Carolyn Atwood
Tenera Environmental Services
1995 University Avenue
Berkeley, California 94704

RE: Ogden-Martin Systems, Tulsa, Oklahoma

Dear Ms. Atwood:

This letter is to inform you of the U.S. Environmental Protection Agency (EPA)-Region 6 positions on two heretofore outstanding issues with the Ogden-Martin Prevention of Significant Deterioration (PSD) permit application.

First, EPA-Region 6 will require the use of ISC version 6.7 in this application. As you recall, your letter to me of October 17, 1988, states that the identified errors with ISC 6.7 should not impact this application because the Ogden-Martin situation does not trigger the Schulman-Scire downwash algorithm. (Please note that Joe Tikvart's memorandum of October 11, 1988, which I previously forwarded to you and which addresses alternatives to ISC 6.7 if these are necessary, refers to an alternative as "ISC UNAMAP Change 3." This is in error, as the reference should have been "Change 2.")

Second, EPA-Region 6 agrees to the use of rural dispersion coefficients in Valley modeling for Ogden-Martin; for ISC we will support the use of rural dispersion coefficients, with one condition. That condition is, if, when using ISC in the area of impact/monitoring significance analysis, increment analysis, National Air Quality Standard (NAAQS) analysis or any other part of the PSD modeling, your critical, modeled concentrations are above 75% of the relevant significance/monitoring exemption levels, increment levels, NAAQS or action levels, then you will remodel using urban dispersion coefficients. You should then select the higher of the rural or urban results for your critical concentration.

I believe that this approach to the rural/urban dispersion coefficients question is necessary given the ambiguous results from the Auer land use classification for the three kilometer circle around the Ogden-Martin site. Reviewing the materials Tenera has submitted to date, I conclude that, per Auer and Tenera's land use percentages in Tom Arnold's October 3, 1988, letter to me, the rural/urban land use percentage is approximately 50.3%/49.7%, respectively. This includes an allowance that 71.9% of area 12A in Tom Arnold's October 3, 1988, letter is rural. Our checks with local Tulsa officials confirm that a city vehicle garage is located in 12A. Consequently, I

count this portion and other, obviously commercial portions of 12A (i.e., 28.1% of 12A) as urban. Thus, I consider the USGS classification of 12A to be partially erroneous.

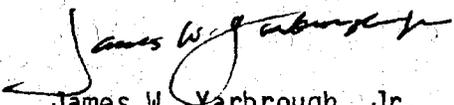
Thus, I believe that, given the probable margin of error in such land classifications, it is fair to say that the area within a three kilometer radius of the Ogden-Martin site is approximately evenly divided between rural and urban land uses.

Additionally, I disagree with Tenera's position that the tank farms in the adjacent Texaco and Sun Oil refineries should be counted as rural. I do not believe that the Guideline on Air Quality Models (Revised) provides for independent sub-parceling of USGS land use classifications that are not obvious errors. However, I will forward Tom Arnold's information about the tank farms that he gleaned from Dr. August Auer to EPA-Office of Air Quality Planning and Standards for review for possible consideration for inclusion in the Guideline on Air Quality Models (Revised) in the future. Also, the heat flux calculations Tenera supplied to us for the adjacent Texaco and Sun Oil refineries do not clearly demonstrate to me that it is justified to automatically require the Ogden-Martin facility to be modeled with urban dispersion coefficients. Your heat flux estimates for these facilities, added to what we believe are reasonable estimates for other heat-producing sources within a three kilometer radius, show that a critical level of 2.0 milliwatts/cm² is probably not exceeded.

Please note that the previous EPA-Region 6 modeling guidance given to Tenera and Ogden-Martin that is not specifically superseded by this letter is still applicable.

I hope that this sufficiently explains the EPA-Region 6 positions. Thank you for your diligence in providing the requested information regarding the land use classification and the applicability of ISC 6.7 to the Ogden-Martin situation. If I can provide further guidance in this matter, please call me.

Sincerely yours,



James W. Yarbrough, Jr.
SIP/NSR Section (6T-AN)

cc: Jeffrey Hahn, Ogden-Martin Systems
Tom Arnold, Tenera Environmental Services