



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711
March 23, 1990

MEMORANDUM

SUBJECT: Mon Valley SO₂ Study
Allegheny County, PA

FROM: Joseph A. Tikvart, Chief *J. Tikvart*
Source Receptor Analysis Branch (MD-14)

TO: Marcia L. Spink, Chief
Air Programs Branch, Region III (#AM10)

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Air & Radiation Branch
U.S. EPA Region V

In response to your request the Model Clearinghouse has reviewed your proposal for completing the Mon Valley study and establishing SO₂ emission limits for Allegheny County, PA. Based on the information provided in your memorandum and subsequent discussions between our staffs, it appears that your proposed approach is conservative in that it is mindful of potential underprediction problems. It is our understanding that both the State and Allegheny County BAPC support the proposal. It is also our understanding that post-application monitoring will be undertaken in the Clairton area to ensure that the uncertainties in emissions and modeling do not result in any NAAQS violations. With these understandings, and subject to the condition described below, we support your proposal as being technically reasonable.

A condition of our support is that you will be able to satisfactorily reconcile the basis for your action with modeling guidance at that point in the future when formal regulatory action is taken. As you may be aware, the procedures in the Allegheny County study leading to the development and evaluation of a nonguideline model, while perhaps technically logical, would not meet our current regulatory guidelines which specify the requisite procedures for justifying nonguideline models. This was also the case in 1986, when Region III last contacted the Model Clearinghouse regarding the design of the study. At that point in time we negotiated an agreement with Region III (July 9, 1986 memorandum from me to J. Sydnor) on how the study would be conducted to be consistent with the guidance in place at that time. The agreement included grandfather justifications for certain directions that the study would take in order to take advantage of existing data bases and prior agreements.

At the present time we have an "information gap" between the 1986 agreement regarding the conduct of the study and the outcome of the study, namely the selection of MPMOD for use in one or more areas in Allegheny County. If and when MPMOD is used to support emission limits contained in a Federal Register package, this information gap will need to be filled in as part of the reconciliation of the chosen use of the nonguideline model with guidance. My understanding, based on discussions between our staffs, is that

you believe that such reconciliation can be satisfactorily written at the time that regulatory action is taken.

In summary, we support your proposed action on the Allegheny County SO₂ SIP, subject to the understandings and conditions detailed above. If you have any questions please contact me at 629-5562 or the appropriate Clearinghouse contacts (Dean Wilson, TSD, 629-5683 or Doug Grano, AQMD, 629-5255).

cc: R. Bauman
E. Ginsburg
D. Grano
D. Wilson

bcc: Regional Modeling Contact, Regions I-X, (with copy of incoming memorandum and list of FY-90 Clearinghouse memoranda)

FY 90 MODEL CLEARINGHOUSE MEMORANDA

<u>Date</u>	<u>Region</u>	<u>Subject</u>
10/17/89	VI	Ambient Air
11/7/89	II	Interpretation of On-site Meteorological Data Requirements and the Use of RTDM for a PSD Source
11/28/89	VIII	Utah PM-10 Secondary Sulfate and Nitrate Calculations
01/02/90	IV	Effect of Changing Stack Heights on Prevention of Significant Deterioration (PSD) Modeling and Monitoring
01/10/90	VIII	Utah PM-10, Secondary Sulfate and Projections
01/10/90	VIII	Review of The Utah County PM-10 Draft SIP
01/11/90	VI	Alternative Emission Reduction (Bubble) SIP Revision Authorizing Operation of a New Sulfur Recovery Plant at the Conoco Inc. Ponca City Refinery
01/16/90	VI	Recent Texas Air Control Board (TACB) Evaluation of the ISC Area Source Algorithm
01/16/90	V	Refined Metals Lead Modeling Analysis
02/22/90	III	Approval of Equivalence Demonstration Plan Integrated Intermediate Terrain Model
03/01/90	VIII	East Helena Lead SIP
03/23/90	III	Mon Valley SO ₂ Study Allegheny County, PA