

Wilson

NOTE TO BILL HUNT CONCERNING THE EL PASO/JUAREZ MODELING PLAN, ETC.

Attached please find the Monitoring Section's comments regarding the modeling plan for El Paso/Juarez. Should you wish to discuss these comments in further detail, please advise.

  
N. O. Gerald  
May 4, 1990

Attachment

cc: G. Dorosz  
D. Wilson

## COMMENTS ON EL PASO MODELING PLAN

- o Page 1 - Irrespective of the fact that a detailed modeling protocol is being developed by the TACB and approved by Region VI and OAQPS, it would seem appropriate in this important case to still incorporate an OAQPS review of the final or interim products (assuming that Region VI will also opt to do the same).
- o Page 2 - If doubt exists that the Juarez emissions inventory is complete, the additional use of a multiplier to arrive at UAM inputs may be justified.
- o Page 3 - Although five meteorological monitoring stations are proposed, upper air data may also be necessary to properly execute the UAM.
- o Page 3 - If the goal is to establish highest area concentrations (and the CO/O<sub>3</sub> sites apparently are to be compromised), it is recommended that one CO/O<sub>3</sub> pair be located in an area of high predicted O<sub>3</sub> and one CO/O<sub>3</sub> pair be located in an area of high predicted CO, utilizing the remaining site for typical background.
- o The Alliance Report could not be properly evaluated since every other page was missing.
- o Page 12 - Alliance - Facility inspections without any measurements or samples lends itself to underestimated and sometimes erroneous emissions inventories.
- o Should the UAM results and implementation of all available controls not lead to compliance with a NAAQS, the imposition of construction bans for sources with greater than de minimis impacts should be contemplated.