

May 8, 1990

NOTE TO DEAN WILSON

SUBJECT: Modeling Plan for El Paso-Ciudad Juarez

In accordance with your request, I have looked over the modeling plan that was transmitted to SRAB under a cover memo from Region VI dated April 3, 1990.

General Comments

The emissions inventory year and SIP submittal dates are not clear from the plan. These need to be defined. Our suggestion is that given that enactment of amendments to the Clean Air Act are expected this year priority be given to the anticipated requirements in the new amendments. This would mean updating the existing 1987 or 1988 emission inventory to the enactment year (presumably 1990) in accordance with EPA's updating criteria or generating a new 1990 base year inventory. New requirements in the Act would also determine the projection and attainment year inventories as well as SIP submittal dates.

The EPA is in the process of updating/expanding it's guidelines on emissions inventories and modeling requirements for post-1987 SIPs. The expected date for distributing the new guidance is several months in the future. However, the new guidance should be incorporated into the plan to assure approvability by EPA.

The plan is not specific as to the "selected pollutants" estimates for mobile and area sources or what constitutes the "customized" MOBILE4 model. These should be defined.

To the extent possible, the plan should address/incorporate the quality assurance procedures recommended by EPA in it's guidance on emission inventories.

Because of the large contribution of emissions from highway vehicles to the total inventory, we would also recommend inclusion of a procedure to validate the highway mobile source inventory, such as traffic counts on a statistical sampling of the various road types of interest in the entire study area.

If you have any questions, please contact me at 629-5284.



Sharon Reinders

cc: T. Helms