



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

*Bob K*  
*Quinn C.*

MAY 24 1990

MEMORANDUM

SUBJECT: Review of El Paso/Juarez Modeling Plan

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

TO: Gerald Fontenot, Chief  
Air Programs Branch, Region VI (6T-A)

In response to your request, the Model Clearinghouse has reviewed the subject Air Modeling Plan. It was our understanding that you wanted a coordinated review, i.e. one that reflects both regulatory and technical comments. As such, we requested comments from CO, O<sub>3</sub>, and PM-10 personnel in the Air Quality Management Division (AQMD), as well as technical comments from monitoring, emission inventory and modeling personnel in the Technical Support Division. Attached are the comments we received from these individuals.

Our impressions from these comments are as follows:

1. While the design of the study does not seem to conflict with current regulatory requirements, the SIP process could be impacted by the proposed Clean Air Act Amendments (CAAA). To the extent possible, the design of the study should take into account the expected effects of these amendments.
2. While the Urban Airshed Model (UAM) does seem appropriate for the area for all three pollutants, there are a number of concerns on the use of the model for CO and PM-10 because of the possible need to address specific localized impacts, the manner in which the design concentration will be chosen, and the possible need to address secondary particulates. Also, it was pointed out that the wind field model to be based on wintertime meteorological conditions may not be applicable to high summer O<sub>3</sub> days.
3. Most of the comments reflect concerns about the emission inventory (EI). Our sense from the written comments is that the reviewers did not have serious problems with the emissions inventory procedures. It was noted, however, that the EI requirements might need to be changed in the future because of CAAA requirements and updated guidance. Followup discussions with some individuals indicated that the biggest concern is a lack of confidence that the end product (the EI) will be "good enough" to use in modeling. This concern prompted one reviewer to suggest the use of a modeling "fudge factor" to compensate for uncertainties in the EI. While we do not

necessarily agree with that idea, it may be necessary to qualitatively interpret the modeling results because of EI uncertainties.

In summary, the Model Clearinghouse does not have significant problems conceptually with the proposed study. The attached comments should be reflected in a more detailed protocol, which we assume will be forthcoming at some point in time. If you have any questions, please contact Dean Wilson at FTS 629-5683.

#### Attachments

cc: R. Bauman  
T. Helms  
W. Hunt  
W. Laxton  
N. Meyer

bcc: K. Baugues  
T. Braverman  
G. Dorosz  
O. Gerald  
T. Pace  
S. Reinders  
M. Smith  
D. Wilson

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 <sub>2</sub> Study Allegheny County, PA
05/10/90	VIII	Four Billings Montana Modeling Proposals
05/14/90	VIII	Comments on the Overview of Geneva Steel's PM <sub>10</sub> Control Plan

FY 90 MODEL CLEARINGHOUSE MEMORANDA (cont'd)

05/24/90

VI

Review of El Paso/Juarez Modeling  
Plan