



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII

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DENVER, COLORADO 80202-2405

Ref: 8AT-AP

JUN 20 1990

MEMORANDUM

TO: Joseph Tikvart, Chief
Source Receptor Analysis Branch

FROM: Douglas M. Skie, Chief
Air Programs Branch *Dean Gilliam for*

SUBJECT: ASARCO, East Helena Overall Modeling Protocol

I am writing to request your assistance in the review of an overall modeling protocol for the East Helena, Montana Lead SIP that we are scheduled to receive July 10, 1990. I am forewarning you because the State and ASARCO want to meet with us (and your staff if you can arrange the travel to Denver) around August 1, 1990 to discuss this protocol. Therefore, a quick review by your staff will be necessary.

As part of the ongoing Lead SIP work in East Helena, we have requested the State to submit an overall modeling protocol that puts in one document the steps ASARCO intends to follow with respect to the CMB and dispersion modeling analyses and reconciliation. This protocol would chart out and answer the "if"/"then" questions, i.e., explain what would be done should things not go as planned.

We told the State that we envisioned the modeling protocol would include:

1. Introduction - which discusses the background and purpose for doing modeling;
2. Modeling design - which discusses model inputs (e.g., model selection, receptor data, meteorological data, emission inventory data, and reconciliation efforts); how the models will be used, planned deviations from EPA approved methods, and planned alternative actions should things not go as designed;
3. Summary of efforts - which discusses who is doing each effort and how all the efforts will be coordinated; and
4. References - which discusses the technical documents that will be utilized in the study.

We believe we need to concur on the modeling approach the State and ASARCO intend to follow before they begin the modeling. Once all the data is collected and the State and ASARCO begin the modeling, there will be no time for disagreements if they are to submit the SIP on schedule by February 1992. Please contact Laurie Ostrand at FTS 330-1814 if you have any questions.