

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: FEB 12 1991

SUBJECT: Particulate Matter from Surface Coal Mining

FROM: *Steve Rothblatt*
Steve Rothblatt, Chief
Regulation Development Branch

TO: Joe Tikvart, Chief
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Vermillion County, Indiana, is a Group III area initially designated nonattainment due to ambient air violations. The main source is a surface coal mine owned by Peabody. The Indiana Department of Environmental Management (IDEM) has taken enforcement actions against Peabody for violating their control plan. IDEM believes that if Peabody complied with their control plan there wouldn't have been any ambient air violations in Vermillion County. IDEM concludes that the Particulate Matter State Implementation Plan (SIP) for Vermillion will have the existing control strategy for Peabody and a model demonstration using the Industrial Source Complex (ISC) Model for their SIP requirements.

Title II, Section 234, Fugitive Dust of the Clean Air Act Amendments of 1990 (CAAA), states that prior to using ISC, the Administrator shall analyze the model and make revisions, if necessary. The revisions are due within 3 years after the enactment of the CAAA. Under Title I, Section 105 of the CAAA, areas initially designated nonattainment must submit a plan submission for attainment within one year after the enactment of the CAAA. Since an attainment demonstration is needed within one year, we are inquiring about the acceptability of the ISC Model for surface coal mines before the Administrator makes the revision to the model. While Dean Wilson has verbally informed my staff that ISC can be used as a conservative screening model, we are now requesting a written response.

If you have any questions, feel free to call Gustavo Felix of my staff at (312) 353-6009.

bc: Fred Renner, Acting Chief
SO2/PM Programs Branch
Office of Air Quality Planning and Standards