



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

March 4, 1991

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MEMORANDUM

SUBJECT: Particulate Matter from Surface Coal Mining

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

TO: Steve Rothblatt, Chief
Regulation Development Branch, Region V

The Model Clearinghouse has reviewed your issue regarding the use of ISC for the Vermillion County Indiana PM-10 SIP. You point out that a major source of PM-10 in the area is a surface coal mine and, given the provisions of Section 234 of the CAAA, you question whether EPA can permit the use of the ISC model for the SIP.

Our position has always been that ISC is applicable, as a refined model (not a screening technique), to fugitive dust emissions from surface coal mines. There is a school of thought that the use of ISC, along with the AP-42 emission factors, for surface coal mine fugitive emissions may lead to overprediction. If this were the case it seems to us that use of the model/emission factors would still be protective of the NAAQS. Thus, from a purely technical standpoint we have no problem with the use of ISC for regulatory modeling of the surface coal mine emissions in Vermillion County.

My understanding of the Vermillion County situation is that the State would like to use the model. However, whether or not Section 234 allows the State the option of using ISC on surface coal mines until the study mandated by that section is completed is a legal question. We recommend that you contact OGC (Vickie Patton) to seek resolution of this legal aspect of the issue.

If you have any questions please contact Dean Wilson at 629-5683.

cc: R. Dunkins
G. Felix
V. Patton
F. Renner
D. Stonefield

FY 91 MODEL CLEARINGHOUSE MEMORANDA

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