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SUBJECT: Ozone Transport Values for SIP Revisions

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TO: Director, Air and Hazardous Materials Division, Region I, III-X
Director, Environmental Programs Division, Region II

Techniques for selecting transport values have been discussed in past guidance.¹ This memorandum is to further reinforce Agency policy concerning the use of background and present/future transport values in the development of ozone control strategies employing the linear rollback or EKMA method.

When developing an ozone control strategy, consistent assumptions must be employed. A control strategy cannot assume that a significant portion of the present ozone problem is due to ozone transported into the control region and at the same time assume that future transport will be at the commonly accepted natural background level of 0.04 ppm. For example, a control strategy for an urbanized area with a ozone design value of 0.19 ppm should not assume ozone presently transported in at a level of 0.13 ppm, while at the same time assuming that future ozone transport measurements will drop to the 0.04 ppm background level. High present transport is indicative of the influence of significant upwind sources which one can assume will be controlled to attain the standard. However, if the influence of these upwind emissions is as significant now as in the example, they will continue to be an important influence in the future. Accordingly, a future transport number at the natural background levels is not acceptable.

Regional Offices should pay careful attention to the present and future transport values in all linear rollback and EKMA evaluations made for ozone control strategies. Strategies which assume that transported ozone is a significant portion of the present problem and accordingly employ high present transport values, but then assume future transport to be at natural background, are not approvable.

cc: D. G. Hawkins
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¹ August 16, 1978, memo from Richard G. Rhoads to Regional Air and Hazardous Materials Division Directors, "Clarification of Attainment/Nonattainment Evaluation Guidance."