



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

OCT 30 1992

MEMORANDUM

SUBJECT: Attainment Demonstrations Using the Empirical Kinetics Modeling Approach (EKMA)

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

TO: Brenda Johnson, Ozone Modeling Contact
Region IV

The Model Clearinghouse has reviewed your request to allow more than 3 years as a basis for using EKMA to estimate precursor controls necessary to demonstrate attainment of the National Ambient Air Quality Standard (NAAQS) for Ozone in Miami.

Guidance for the use of EKMA (prepared prior to the passage of the Clean Air Act) states that the most recent 3 years for which measurements are made generally should be chosen to estimate controls needed to meet the NAAQS. However, the 1990 Clean Air Act (CAA) (section 181(a)) classifies severity of an area's ozone problem using information from 1987-1989. This implies that this period should be considered within the period used to assess control needs. Furthermore, extension of the EKMA guidance to treat more than 3 years of data (e.g., n years where $n = 4$ or more years) with the attendant control target based on the highest $n^{\text{th}} + 1$ site could lead to a situation where "no modeling" is required.

After discussing this matter with the Regional Office Ozone Modeling Contacts, Model Clearinghouse staff, and the Ozone/CO Policy Branch, we have determined that EKMA modeling should be based on the 3-year period consistent with the time period on which nonattainment classifications were determined for the CAA. In most cases, this time period is 1987-1989.

If you have any questions please contact Ned Meyer at 919-541-5594.

cc: D. Grano, MD-15
T. Helms, MD-15
N. Meyer, MD-14
R. Scheffe, MD-14
D. Wilson, MD-14

FY-93 MODEL CLEARINGHOUSE MEMORANDA

<u>Date</u>	<u>Region</u>	<u>Subject</u>
10/7/92	IV	Response to Proposal to Allow Credit for a Stack Height Increase at the Dade County Resource Recovery Facility, Dade County, Florida
10/28/92	V	Demonstrating Attainment of the Ozone National Ambient Air Quality Standards (NAAQS) with the Urban Airshed Model (UAM) for Detroit
10/28/92	VII	Demonstrating Attainment of the Ozone National Ambient Air Quality Standards (NAAQS) with the Urban Airshed Model (UAM) for St. Louis
10/28/92	IV	Attainment Demonstrations using the Empirical Kinetics Modeling Approach (EKMA)