



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

January 30, 1986

MEMORANDUM

SUBJECT: Brunswick Paper Company and North Carolina TSP SIP Revisions

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

TO: Bruce Miller, Acting Chief
Air Programs Branch, Region IV

We concur that the subject modeling protocols conform to current guidance. Their execution will ensure a comprehensive analysis that provides sufficient information for an adequate and acceptable determination of compliance with air quality standards. However, we are concerned as to whether they also will provide sufficient flexibility for the States to make prudent judgments during the course of their modeling. For example, some of the modeling with ISC may turn out to be extremely expensive because of the number of sources and/or receptors. The State may need to negotiate alternative approaches with Region IV in a stepwise manner as the analysis is conducted and pertinent information is sorted from that which is irrelevant.

Thus, some of the requirements listed in the protocols are indeed "hard" requirements, i.e., they must be followed in order to ensure that there is national consistency in modeling. The 5-year meteorological data requirement for both protocols is one such requirement. On the other hand, there are some other requirements that we regard as negotiable, such as the need to model every source within 50 kilometers. More specifically, for the Brunswick protocol we regard Items 2, 4, 5, 7, 10, 11, and 12 as hard requirements, whereas Items 1, 3, 6, 8, 9, and 10 might be negotiable, depending on the circumstances. For Item 3 our position on emissions for model input is contained in marked sections of the attached material from the revised modeling guideline. (While this is a draft, it resolves a long-standing issue and we have no objection to its use at this time.) Similarly, for the North Carolina SIP protocol we believe that Items 2, 3, 4, 5, 6, 8, 9, 10, 11, 14, and 15 are required, whereas some flexibility could be allowed in Items 1, 7, 12, and 13. Also note that some further specification of complex terrain model(s) under Item 11 is needed.

If your staff has any questions concerning these comments, please have them contact Dean Wilson at 629-5681.

Attachment

cc: T. Helms
S. Reinders
R. Rhoads

bcc: Regional Modeling Contact, Regions I-X

TES:DAWILSON:ltj:NCM:rm 831:x5681:1/30/86.