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REMARKS

Since this is a preliminary reply and we expect additional resolution of the issue in the future, please do not distribute outside of the Agency.

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FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
Dean Wilson	Phone No. 629-5681

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711
April 13, 1987

MEMORANDUM

SUBJECT: Weirton Steel TSP Bubble

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

TO: Jesse Baskerville, Chief
Air Programs Branch, Region III (3AM10)

In response to your request, the Model Clearinghouse has reviewed the Regional Office position with respect to the proposed modeling protocol for the subject bubble. Basically we agree with your position on all three issues identified. We do have a few comments which you may wish to consider.

With regard to the modification of ISC to allow for calculations above stack height, you should be aware that the code for the model is quite complex. A seemingly simple change may not necessarily result in the output model estimates one is anticipating. This is especially true in the UNAMAP6 version of the model where we now have added a modification to allow for "terrain cutoff" estimates. One should ensure that this algorithm is indeed bypassed. Thus any ISC code modifications will require careful checking by your staff.

Regarding the use of the most recent year of the three years of available on-site meteorological data, there is some conflict between what we regard as the best technical approach and how a user might read our guidance. In the revised (1986) Guideline on Air Quality Models, we now recommend that for refined modeling as many years of on-site data as are available should be used. This change from our previous guidance of only requiring one year of on-site data was consciously made in an effort to produce a more technically sound estimate and to thwart any possible data base "shopping." Given this rationale, it seems prudent to model the Weirton plant with all three years of on-site data (provided that such data are found to be acceptably complete and representative).

At the same time, other guidance on Level II bubble analyses appears to present some conflict with this position. For example, a user could read the bubble policy as only requiring the most recent year of representative

meteorological data. Thus, it may not be possible, e.g. item 3 of the ETC Attachment I, to require the Company to use multiple years. However, in the interest of technical defensibility you may wish to encourage the Company to use all available valid data,

If you have any questions I can be reached on 629-5562. Russ Lee of my staff (629-5684) is available to discuss, from a conceptual standpoint, the difficulties of modifying the ISC model.

cc: B. Gilbert
R. Lee
S. Reinders
R. Rhoads
bcc: Regional Modeling Contact, Regions I-X