



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

Blue
Attachment

27 JUN 1990

MEMORANDUM

SUBJECT: Carbon Monoxide Target Level for State Implementation Plan Revisions

FROM: G.T. Helms, Chief *Tom*
Ozone/Carbon Monoxide Programs Branch (MD-15)

TO: George Able, Chief
Air Programs Branch, Region X

Your staff recently expressed concern regarding John Calcagni's letter of April 27, 1990 to Cheryl Richardson of the Alaska Clean Air Coalition (attached). Specifically they were concerned about the statement of what is the appropriate target carbon monoxide (CO) level for State implementation plan (SIP) revisions. In an attempt to clarify our reasoning, I offer the following comments.

The Calcagni letter stated that for planning purposes, 9 ppm, the current CO national ambient air quality standard (NAAQS), should be used as the target level. The problem arises because of the definition of a violation, which is 9.5 ppm due to the rounding convention explained in the letter. The 9.5 ppm value is used to allow for uncertainty in monitoring equipment and methodologies. This definition of a violation has no bearing on the target level for demonstrations of attainment. As for all other criteria pollutants, modeling should always apply the NAAQS (9 ppm for CO) as the appropriate level to be achieved. By designing a SIP around 9.5 ppm, a State has increased the likelihood of future violations and have not insured maintenance of the NAAQS as required in section 110(a) of the Clean Air Act. For proper planning, the design value for the area should be taken down to 9 ppm, giving you the amount of control necessary to attain and maintain the NAAQS.

If you have any further questions, please call Jill Vitas of my staff at FTS 629-5313.

Attachment

cc: Air Branch Chiefs, Regions I- IX