

Rhoads

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

30 JAN 1987

MEMORANDUM

SUBJECT: Ambient Air

FROM: G. T. Helms, Chief *Tom*
Control Programs Operations Branch (MD-15)

TO: Steve Rothblatt, Chief
Air Branch, Region V

My staff and I have discussed the five ambient air cases which you submitted for our review on January 16, 1987. The following comments are our interpretation of the ambient air policy. However, this memorandum is not a discussion of the technical issues involved in the placement of receptors for modeling.

Our comments on each of the cases follow:

Case 1 (Dakota County, MN): This case involves two noncontiguous pieces of fenced property owned by the same source, divided by a public road. We agree that the road is clearly ambient air and that both fenced pieces of plant property are not.

Case 2 (Warrick County, IN): This case involves two large sources on both sides of the Ohio River. We agree that receptors should be located over the river since this is a public waterway, not controlled by the sources. We also agree that the river does indeed form a sufficient natural boundary/barrier and that fencing is not necessary, since the policy requires a fence or other physical barrier. However, some conditions must be met. The riverbank must be clearly posted and regularly patrolled by plant security. It must be very clear that the area is not public. Any areas where there is any question--i.e., grassy areas, etc.--should be fenced and marked, even if there is only a very remote possibility that the public would attempt to use this property.

However, we also feel that current policy requires that receptors should be placed in ALCOA and SIGECO property for modeling the contribution of each source's emissions to the other's ambient air. Thus, ALCOA's property--regardless of whether it is fenced--is still "ambient air" in relation to SIGECO's emissions and vice-versa.

Case 3 (Wayne County, MI): This case involves the air over the Detroit River, the Rouge River and the Short-cut Canal. We agree that the air over all three of these is ambient air, since none of the companies owns them or controls public access to them. Note, however, that one source's property--regardless of whether it is fenced--is the "ambient air" relative to another source's emissions.

Case 4 (Cuyahoga County, OH): This case involves LTV Steel's iron and steel mill located on both sides of the Cuyahoga River.

We do not feel that LTV Steel "controls" the river traffic in that area sufficiently to exclude the public from the river, whether it be recreational or industrial traffic. The fact that there is little or no recreational traffic in that area is not sufficient to say that all river traffic there is LTV traffic. The public also includes other industrial users of the river that are not associated with LTV.

It is difficult to tell from the map whether the railroad line is a through line or not. If the railroad yard serves only the plant then it would not be ambient air but the railroad entrance to the plant would have to be clearly marked and patrolled. However, if the line is a through line then that would be ambient air. We would need additional information to make a final determination.

The unfenced river boundaries should meet the same criteria as in Case 2 above.

Case 5 (involves the placement of receptors on another source's fenced-property): As mentioned above in Case 2, we feel that present policy does require that receptors be placed over another source's property to measure the contribution of the outside source to its neighbor's ambient air. To reiterate, Plant A's property is considered "ambient air" in relation to Plant B's emissions.

I hope that these comments are helpful to you and your staff. This memorandum was also reviewed by the Office of General Counsel.

cc: S. Schneeberg
P. Wyckoff
R. Rhoads
D. Stonefield
Air Branch Chiefs, Region I-X

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

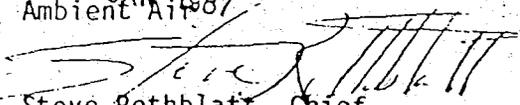
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96 JAN 1987

SUBJECT:

Ambient Air

FROM:


Steve Rothblatt, Chief
Air and Radiation Branch

TO: Tom Helms, Chief
Control Programs Operations Branch

The purpose of this memo is to request comments from the Control Programs Development Division (CPDD) on five ambient air cases that we are facing in Region V. Cases 1-4 are presented in the attached memo that was sent in December 1986 to the Model Clearinghouse. Because of the policy nature of these questions, we believe that CPDD, and not the Model Clearinghouse, is the appropriate group to respond to the cases. We, thus, request your comments.

Case 5 concerns the placement of receptors on another source's fenced property. Although a strict interpretation of the ambient air policy would not allow one source to pollute another source, this imposes a burden in modeling multi-source areas. That is, a bookkeeping system would have to be developed so receptors on Plant A's fenced property would consider the impact from all sources, except Plant A. Region V has previously not asked States to perform this extra step and, instead, have excluded receptors from all fenced plant property (with two exceptions: (1) if there is a monitor located on a plant's property, and (2) if the plant is not in the modeled emission inventory). We request your comments on this approach.

Please understand that an expeditious answer is necessary since these questions pertain to State Implementation Plan (SIP) revisions undergoing Regional Office review or development. The most pressing situation is for Case 4 (Cuyahoga County). As a result of litigation over the SO₂ SIP for Cuyahoga County dating back to 1976, USEPA recently informed the U.S. Court of Appeals for the Sixth Circuit that it will initiate rulemaking to revise the SIP. In its status report to the Court dated July 1, 1986, USEPA estimated that a Notice of Proposed Rulemaking (NPR) could be published in the spring of 1987. Region V and the State of Ohio having been working together on this project. We must start modeling by February 1987 in order to meet our commitment to the Court. Thus, we need an answer on this ambient air question by mid-February 1987.

Please call Mike Koerber at FTS 886-6061 to discuss these questions further.

Attachment

cc: J. Tikvart
D. Wilson
S. Reinders