

EPA received an adverse comment on August 1, 1994, on its approval of the SIP. The effective date of the rule was withdrawn on September 13, 1994, to allow time for EPA to review and respond to the comment. See 59 FR 46929. EPA has thoroughly considered the comment in determining the appropriate action on the La Grande PM-10 SIP. The response to the comment is presented in the "Response to Comments" section below.

EPA is approving the La Grande PM-10 SIP as described in the July 1, 1994, **Federal Register** Notice at 59 FR 33914 and its accompanying technical support document and proposed in the July 1, 1994, **Federal Register** Notice at 59 FR 33941.

II. Response To Comments

A. Source Apportionment

The commenter questioned the validity of using Chemical Mass Balance (CMB) for source apportionment of the various smoke sources in the area. Commenter was concerned that CMB may not accurately distinguish between residential wood combustion, industrial emissions, field burning, and other open burning and therefore could lead to a control strategy that is not going to work properly. The Commenter did not provide specific evidence that the attainment demonstration is actually flawed, but rather raised as a concern the possibility that the source apportionment was inaccurate.

EPA has broad discretion in determining what modeling is appropriate for moderate PM-10 nonattainment areas. The CAA only requires that an attainment demonstration include "Air Quality Modeling" and does not describe a particular analysis. CAA § 181(B)(i). In contrast, CAA § 182(c)(2)(A) specifies that attainment demonstrations for serious ozone nonattainment areas must be based on photochemical grid modeling or an alternate analytical model that EPA determines to be at least as effective. See also, *Central Arizona Water Conservation Dist. v. EPA*, 990 F.2d 1531, (9th cir.), cert. denied 1114 Sup. Ct. 94, (1993).

As indicated in the General Preamble, 57 FR at 13539, EPA has developed a supplemental attainment demonstration policy for initial PM-10 nonattainment areas such as La Grande, Oregon. An earlier April 2, 1991, memorandum titled, "PM-10 Moderate Area SIP Guidance: Final Staff Work Product" contained "Attachment 5" describing the same policy. The policy sets out specific criteria for attainment demonstrations based on proportional

rollback analysis and explains that such analysis may be appropriate in cases where "time constraints, inadequate resources, inadequate data bases, lack of a model for some unique situations, and other unavoidable circumstances would leave an area unable to submit an attainment demonstration" by November 15, 1991. The policy further explains that its application is reserved for those initial PM-10 nonattainment areas that have "completed the technical analysis * * * and made a good-faith effort to submit a final SIP by their November 15, 1991, due date." The CAA gave states containing initial moderate PM-10 areas only a limited time—1 year from designation—to develop comprehensive control strategies and attainment demonstrations. CAA 189(A)(2)(a).

As discussed in the July 1, 1994, **Federal Register** and the technical support document for that notice, the Oregon Department of Environmental Quality (ODEQ) conducted an attainment demonstration based upon receptor modeling (Chemical Mass Balance version 7.0) and proportional emission inventory roll-back analysis. The results of the emission inventory and CMB analysis were consistent between themselves in identifying woodsmoke and soil dust as the major sources of PM-10 on exceedance days (e.g. local woodsmoke = 61 percent and 60 percent and soil dust = 38 percent and 32 percent for CMB and rollback methods, respectively). Control strategies for the area were developed based on this analysis. The CMB modeling was conducted according to EPA guidance. It was used in lieu of dispersion modeling because at the time the attainment plan was being developed, valid historical meteorological data was not available. It would not have been possible for the state to use dispersion modeling and still submit the SIP by November 15, 1991.

Therefore, because ODEQ followed EPA guidance, used the approved EPA CMB model, and because the CMB results were verified by the emission inventory, EPA is satisfied that the source apportionment provided by ODEQ in the La Grande PM-10 SIP is adequate. EPA has also considered the fact that, since implementation of the control strategies in 1991, the area has not exceeded the PM-10 NAAQS. The last measured 24-hour PM-10 exceedance occurred on January 28, 1991, indicating that the selected measures, are likely to be sufficient to attain the NAAQS and protect public health.

B. Potential Impact From Point Source Located Outside Nonattainment

The commenter questioned why the emissions from a large industrial source located "within close proximity to the PM-10 nonattainment area" was not accounted for in the SIP. The comment did not contain any specific data showing the sources' impact on the nonattainment area and did not provide any technical support for the general concern.

The source in question is Boise Cascade's Island City facility. This major source is located approximately five kilometers northeast of the La Grande PM-10 monitor and three kilometers from the nonattainment area border. The Island City facility is about fifty-five feet lower in elevation and is down valley from the PM-10 monitor.

It is the State's contention that the results from both the CMB modeling and wintertime PM-10 saturation surveys,³ indicate that this point source is not a significant contributor to the nonattainment problem. The CMB modeling, based on the analysis of 43 PM-10 samples (seven of which exceeded the 24-hour NAAQS), showed La Grande industrial source category emissions to be insignificant. The emission inventory showed industrial emissions to be less than five percent on a worst case day basis. Wintertime PM-10 saturation surveys conducted in 1985, 1989, and 1990, do not indicate a significant impact from the source. For these reasons, EPA thinks the State's contention is reasonable and it is EPA's position that the implemented control measures will bring the area into attainment of the NAAQS by the December 31, 1994, attainment date. See 59 FR 33918 and its accompanying support documents for a description of the control measures. Also, as previously stated, the area has not exceeded the NAAQS since 1991, indicating that the implemented control measures are sufficient to attain the NAAQS.

To further address the adequacy of the attainment demonstration and the point source issue, EPA reviewed the effectiveness of the control measures. Because the control strategies are achieving greater emission reductions than anticipated and accounted for in the SIP, EPA's analysis indicates that even if the Island City facility had a significant impact on the nonattainment area or influenced the background concentration, the area will still attain

³ Short term intensive ambient monitoring studies in which portable PM-10 samplers are distributed throughout a small geographical study area to better characterize PM-10 concentrations.