

May 6, 1971

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COMMENTS ON LETTER FROM NPVLA TO EPA

In item (1) I think we should make a stronger argument for reinstatement of the 85% reduction clause. If you use Appendix J to compute the amount of hydrocarbon reduction needed, to meet the oxidant standard, you see that an 85% hydrocarbon reduction is considered sufficient to reduce to an acceptable level original photochemical oxidant concentrations of as much as 500 ug./m^3 (0.25 ppm.).

Item (3) could be worded more clearly to emphasize the "corrected for methane" part of the definition.

Is item (8) still necessary? The Standards published April 30, 1971, have quite clearly defined the method of analysis to be used for measurement of pollutants. I doubt that anyone would use a different method for the early sampling (July 1, 1971, to September 30, 1971) unless the apparatus and trained personnel are not available to utilize the "approved" method.

Some statement should be added to item (9) to the effect that, even though we consider Appendix J invalid, if it is going to be used, it should be redrawn to reflect the higher photochemical oxidant standard of 160 ug./m^3 . (The curve should be shifted to the right).

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