

DOCKET  
93-AFC-2

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REPORT OF CONVERSATION

DATE: MAR 14 1994

Procter & Gamble

RECD: MAR 16 1994

Telephone

NAME Aleta Kennard DATE 3/14/94 TIME 7:45 am

WITH SMAQMD PHONE 386-6179

SUBJECT(s) Interpollutant trading ratios, NO<sub>2</sub> background levels, District  
application of FIP, Campbell Soup boiler ERC

COMMENTS:

ARB has not identified a completion date for the photochemical modeling study. The schedule continues to slip as ARB adjusts boundary conditions (Bay Area emissions reductions) to the model.

Aleta said a concern may arise between the SIP and the FIP. The FIP identifies a 40/30 plan (40% reduction in NO<sub>x</sub> and 30% in VOC) while the ARB study, as part of the Sacramento District's SIP, may be closer to 50/50. She is not sure which plan (reductions) will be implemented.

Also, regarding the identification of the P&G Formica VOC offsets in the FIP, the Sacramento District will apply the RACT adjustment to the VOC offsets if the Placer District does not. Aleta said the issue is not the FIP, but rather the definition of RACT. She believes that both EPA and the Sacramento District had commented on the Placer District's evaluation of the Formica VOC ERCs, however Placer chose to ignore the comments on the need to apply RACT.

Aleta said that it is not relevant that the FIP is not adopted, the ERC needs to be RACT adjusted. Aleta said she has told SMUD of the need to RACT adjust the Formica VOC ERCs. SMUD has indicated that they thought the Placer District and the EPA worked out a deal. Aleta said that Matt Heber of EPA does not know of any deal or compromise with Placer.

Aleta said that Matt Heber is preparing a letter on the Campbell Soup boiler credits. The letter may be issued this week; Heber was awaiting additional historical operating data from Campbell.

The Sacramento District found the 357 µg/m<sup>3</sup> NO<sub>2</sub> background at Del Paso Manor was an error. The corrected maximum for Del Paso Manor in 1992 was 263 µg/m<sup>3</sup> NO<sub>2</sub>. Additionally, the Sacramento District believes that traffic patterns indicate that the North Highlands station is the most representative for NO<sub>2</sub> background (188 µg/m<sup>3</sup>) for the project site. The traffic at Fruitridge and Power Inn (project site) is 27,000 x 16,00 ADT (average daily traffic) compared to 26,000 x 13,000 ADT at Watt and Antelope (North Highlands station). Del Paso Manor has much higher traffic patterns. Contact John Ching at the District, 386-7054.

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cc: Chris Tooker  
Magdy Badr  
Shawn Pittard  
Darrel Woo

Signed   
Name Matt Layton