

**From:** <deanw@mindspring.com>  
**To:** Kevin Golden <golden.kevin@epamail.epa.gov>  
**Date:** 4/7/99 10:05pm  
**Subject:** ND Increment Expansion

Hi Kevin--Sure didn't take you very long to test out my fax. It came thru just fine. After reading the issue, I tend to agree with you at least to the extent that providing increment credit based on the short term maximum emissions provides too much credit. In a way it is analogous to the issue we had with Region I a few years back where the source wanted to use a conservative screening technique (Valley I think) to estimate the increment expansion resulting from emission decreases. It does seem that use of the average annual emissions is really a pretty fair way to address the issue since there will be short term met situations where that could be either conservative or nonconservative. The only other way I can think of off the top of my head would be to randomize the emissions, but that sounds too much like ex-ex.

Look forward to talking with you next week. I should be around most days. AZ stays on MST which is the same as PDT so maybe call after 830 your time.

**CC:** Warren Peters <peters.warren@epamail.epa.gov>