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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

Post Office Box 2063
Harrisburg, Pennsylvania 17120

April 20, 1988

Bureau of Air Quality Control

RECEIVED

APR 26 1988

Air Management Unit (continued)

Mr. Thomas Maslany
Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, PA 19107

Tom
Dear Mr. Maslany:

I am writing to you with regard to a letter sent to Al Cimorelli of your office by John Slade, Chief of the Analysis Section for the Pa. Bureau of Air Quality Control, on April 8, 1988. It is most important that the "CORESTAR" modeling issues raised in this letter be addressed as quickly as possible.

Besides the two PSD permit applications presently in process, referred to in the write-up attached to the April 8, 1988 letter, there are at least two more pending applications that will most likely be affected by this decision. There is also the CRS Sirrene project which was proposed for northern Indiana County about a year ago that never reached the application stage because of this very issue.

First let me state that I believe the approach explained in the April 8 letter to be not only in keeping with protection of the environment as is the intent of the PSD regulations, but actually promotes the resolution of problems, instead of ignoring them. The official EPA policy of not accepting "CORESTAR" can promote hiding large problems by discouraging small sources from even submitting permit applications. Also my staff has informed me that they have become aware that a modified corestar approach is already in use in EPA Region V.

I propose that Region III implement the following "Modified CORESTAR" modeling approach:

- 1.) The PSD review would be conducted as per Guidelines defining the area of significant impact and modeling all sources that could significantly impact into that area.

- 2.) If the modeling shows that existing source(s) cause nonattainment independent of the contribution of the new proposed source(s):
 - a. Pennsylvania will first commit to an appropriate modeling study of the existing source(s)
 - b. Pennsylvania will review whether the new proposed source(s) could contribute significantly, as defined in the PSD regulations, to the modeled nonattainment by the existing source(s) at the locations and during the time periods shown to be nonattainment.
- 3.) If the new proposed source(s) does not contribute to the modeled nonattainment, then the new source(s) would be approved from an ambient impact analysis standpoint along with a commitment to Region III to conduct the appropriate air quality modeling for the area.

I request that you give this important matter a high priority so that Pennsylvania can respond to these permit reviews in a timely manner.

Sincerely yours,



James K. Hambright
Director
Bureau of Air Quality Control