

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
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SUBJECT: Use of Allowable Emissions in PSD
NAAQS Analyses

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Over the last few months, we have had discussions with your staff regarding the Agency's policy on the appropriate characterization of emissions when performing an NAAQS analysis for a PSD permitting action. For us, the issue was first raised during our 1987 State Modeling Workshop and recently as an issue with a specific PSD permit in Virginia. At the workshop, a number of our states voiced confusion regarding whether actual or allowable emissions should be used when conducting a PSD NAAQS analysis. At that time, we explained that whenever an analysis is being performed to evaluate NAAQS attainment, allowable emissions must be used. We indicated that guidance appropriate to this question appears in Table 9.1 of the "Guideline on Air Quality Models". However, in spite of this verbal guidance, Virginia has used actual emissions to model near-by sources, for evaluating NAAQS attainment, in a recent PSD action. This was based on the fact that the footnote to that table specifically states that the guidance is not intended for PSD and that other Agency written material indicates that actual emissions could be used. Our comments on the action stated that allowable emissions should have been used.

In preparation for our recent State Modelers Workshop Al Cimorelli, of my staff, discussed this issue with Dean Wilson, Dan Deroeck and Gary McCutchen in order to provide a definitive statement on the issue at the workshop. These discussions confirmed our general understanding of the policy. We were told that in performing a PSD NAAQS analysis, the emissions inventory should be constructed, in general, to conform with the procedures defined in Table 9.1; that is, all sources are to be modeled with allowable emissions. In fact, we were told that for the

long-term average the use of a capacity factor, as allowed by Table 9.1, should not be used initially. Rather, full at operation for the entire year should be initially assumed and the capacity factor only used in a subsequent analysis if appropriate justification can be provided. During our November workshop, this policy was explained to all of our states.

Subsequent to the November State Modeler's Workshop the State of Virginia wrote us a letter responding to our comments on their permit. In this letter they point out that the guidance which we have verbally been providing is in conflict with that which is written in the PSD workbook and they quote (para. C.3 page I-C-20) "For existing sources, this inventory should be based on actual emissions if data are available. Actual emissions should be used in this case to reflect the impact that would be detected by ambient air monitors." Virginia indicates that this is the procedure that they have been following and that if there is written guidance which supercedes this they would like copies.

The written material that Virginia quotes clearly seems to support their interpretation of our guidance. However, the verbal guidance we have recently received from your staff as well as our own understanding is in direct contradiction of Virginia's position. We want to reconcile these positions and therefore request a written clarification of the Agency's policy so that we can appropriately advise our states.

Independent of what has been written in the PSD workbook, we feel strongly that any analysis performed to examine whether an emission limit will be protective of the NAAQS must evaluate the maximum emissions allowable under that regulation. Any other procedure would not ensure the attainment and maintenance of those standards. Furthermore, to have different criteria for evaluating NAAQS attainment in PSD and SIP's would be both inappropriate and illogical. Therefore we strongly suggest that a written policy requiring the use of Table 9.1 in PSD NAAQS analyses be developed.

cc: B. Turlinski (3AM10)
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