



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

JUN 16 1989

MEMORANDUM

SUBJECT: Response to Region VI Position on PSD Modeling Issue

FROM: Edward Lillis, Chief
Noncriteria Pollutant Programs Branch (MD-15) *Edward Lillis*

TO: Gerald Fontenot, Chief
Air Programs Branch, Region IV (6T-A)

The purpose of this memorandum is to respond to your February 15, 1989 memorandum requesting guidance on the consideration of background sources in PSD increment and NAAQS analyses. In discussions with Jim Yarborough of your staff, it appears that your request was intended to focus on the question of whether sources outside the proposed project's impact area need to be modeled for short-term effects, given the general statements made in the 1980 PSD Workshop Manual. I have reviewed your position and, as explained more fully below, I am in basic agreement with you that a short-term analysis should not automatically exclude emission contributions outside the impact area.

The "Prevention of Significant Deterioration Workshop Manual" (EPA-450/2-80-081, October 1980) (the PSD Manual) describes the extended area of concern, which goes out 50 kilometers beyond the defined impact area, as the "annular ring." The Manual suggests that this ring may have greater utility for annual impact determinations, but it should not be so strictly interpreted to preclude the potential usefulness of the area within this ring for short-term analyses. For example, stationary sources located just beyond the area of impact could be important components of a short-term NAAQS or PSD increment analysis. Therefore, a blanket exclusion from short-term modeling analyses of sources located outside the impact area is unacceptable.

It is reasonable for States to establish a method for determining which sources may not need to be modeled. Both the PSD Manual and the "Guideline on Air Quality Models (Revised)" provide some considerations for developing such a method. Any method for excluding sources from modeling should include flexibility for case-by-case judgments, as well as assurances for accountability. The bottom line is that the basis for excluding a source from the required modeling analysis should be consistent

with EPA guidance, which includes that any exclusions be clearly documented under the required ambient impact analysis. Until a State establishes an exclusion method that your office can accept, your position that all increment-consuming sources (for increment analyses) and all major sources (for NAAQS analyses) in the annular ring be modeled is the best approach.

cc: J. Calcagni
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New Source Review Contacts
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