

ADEM

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



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September 11, 1989

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Mr. Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division
U. S. Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, GA 30365

Dear Mr. Miller:

We received documentation from Region IV EPA of a phone conversation of August 4, 1989, between your staff and EPA-RTP, concerning how a plant expansion subject to PSD could be evaluated for possible exclusion from preconstruction monitoring and certain modeling requirements. The communication (attached) stated that if an applicant intended to raise the height of an existing stack up to GEP height as part of a proposed modification, then the applicant would be allowed to take credit for the air quality improvement afforded by the higher stack in the screening analysis to determine if refined modeling or preconstruction monitoring would be required. The question that I have is "Under what scenarios would raising the height of an existing stack allow that action to be considered as part of a proposed modification?" The following examples illustrate potential situations that may arise:

1. A baseline (non-PSD increment consumer) emission unit's stack will be raised from 100 feet to 250 feet (below GEP) at the time of a mill expansion.
 - a. The reason for raising the stack is to produce enough air quality credit so that the expansion's impact on air quality would fall below the thresholds which necessitate preconstruction monitoring and refined modeling.
 - b. The reason for raising the stack is to prevent a nuisance to the workers inside a new 200 foot building and subsequently would reduce the modeled impact of the expansion.
2. An existing PSD increment consuming emission unit has a 100 foot stack. In conjunction with a mill expansion, the stack would be raised to 250 feet to avoid worker exposure inside a new 200 foot building and subsequently would reduce modeled impact of the expansion.

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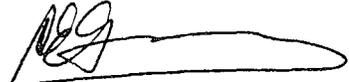
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3. An existing PSD increment consuming lime kiln has a new kiln constructed beside it. The existing kiln has a wet scrubber with a 100 foot stack. The new kiln has an ESP. A common stack 300 feet high vents the emissions of both kilns.

In each of the situations described above, I would like for you to comment on EPA's position in allowing credit from raising stacks as it applies to refined modeling and preconstruction monitoring requirements.

In general, it would be helpful if you would describe the criteria that is used by EPA in determining when raising stacks, either baseline or PSD, would be considered as part of a proposed modification which would allow the plant to take the appropriate credit in avoiding the refined modeling or preconstruction monitoring requirements. Your assistance in this matter is appreciated; and if you have any questions, please contact Ken Barrett of my staff at 205/271-7861.

Sincerely,


Richard E. Grusnick, Chief
Air Division

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