



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

OCT 20 1989

MEMORANDUM

SUBJECT: Effect of Changing Stack Heights on PSD Modeling and Monitoring

FROM: Bruce P. Miller, Chief
Air Programs Branch

Bruce P. Miller

TO: Gary McCutchen, Chief
New Source Review Section, OAQPS (MD-15)

On August 4, 1989 your office provided us documentation on how a source could get credit for a raised stack as part of a plant modification. Mr. Richard Grusnick, Chief of the Air Division of the Alabama Department of Environmental Management has sent us a letter asking for additional clarification on what criteria EPA uses to determine when an existing stack can be raised for plant modifications. This question is asked in the context that by raising a stack height, one may be able to keep the screening modeling values below the de minimis values for refined modeling and/or preconstruction monitoring, thereby avoiding the need for refined modeling and NAAQS review.

Region IV is proposing the following response to Mr. Grusnick's question of "Under what scenarios would raising the height of an existing stack allow that action to be considered as part of a proposed modification?" Our response needs to be considered in two parts. First, it is our position that a source can raise a stack up to the GEP formula height as part of or separately from a proposed modification. The reason for raising a stack height is really not material. If the stack was raised for some reason not associated with a plant modification, then the only effect of that action is to increase or decrease the available increment. The second part of our response is, that if a stack is raised as part of a planned modification, only then does the concern about using the expanded increment come into play per the significant impact question to avoid refined modeling and or preconstruction monitoring requirements.

In response to the three example questions, we believe it would be acceptable to allow modeling/monitoring credit in all cases to avoid the need for refined modeling and or preconstruction monitoring, provided the screening modeling using the higher stack height lowers the modeled impacts below the significant modeling and/or monitoring levels.

We would appreciate a response to our proposed answers to Mr. Grusnick's letter no later than November 8, 1989. Copies of our June 16, 1989 letter to Mr. Grusnick, a copy of your August 4, 1989 record of communication, and the current September 11, 1989 letter from Mr. Grusnick are attached.

If you have any questions, please call Mr. Wayne Aronson or Mr. Lewis Nagler of my staff at (404) 347-2864. ←

Attachments (3)