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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2739

Not really useful for the doc

DEC 8 1989

Mr. Larry Devillier
Air Quality Division
Louisiana Department of Environmental Quality
P. O. Box 44096
Baton Rouge, Louisiana 70804

Re: Dispersion Modeling of Net Emissions Increase

Dear Mr. Devillier:

Recently a question has arisen regarding the appropriate dispersion model inputs to use in conducting PSD ambient air quality analyses. Mr. Doug Walters of LDEQ and Mr. Mark Johnson of Trinity Consultants have expressed their opinions to Region 6 via the telephone. Mr. Johnson has requested that Region 6 address the issues raised in his November 3, 1989, letter to Mr. Walters. The basic question is whether or not the applicant for a PSD permit should use the "net emissions increase" or only the project emissions as input for the screening modeling determination for ambient significance and pre-construction ambient monitoring.

The September 18, 1989, memorandum from John Calcagni to William Hathaway reiterated EPA's policy for determining the net emission increase from a modification at a major stationary source. The policy requires that creditable, contemporaneous emission increases and decreases (if they are federally enforceable) from all emission points within the facility be included with emission increases from the proposed modification to determine the "net emission increase".

Mr. Johnson of Trinity Consultants contends that only the emission increases from the modification (which do not include the creditable, contemporaneous increases and decreases) should be input in the screening modeling process to determine if the PSD ambient significance levels are exceeded or if the PSD monitoring de minimis levels are exceeded. To support his position, Mr. Johnson of Trinity Consultants contends that EPA and the states have extended the policy of not accumulating de minimis emissions to trigger PSD review to ambient air quality modeling demonstrations.

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

of pages *2*

To *DEAN WILSON*

From *W. PETERS*

Dept./Agency

Phone #

Fax # *520-818-0465*

Fax # *919-541-0044*

NSN 7540-01-317-7368

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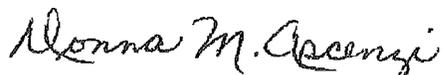
GENERAL SERVICES ADMINISTRATION

Region 6 has consulted with EPA's Office of Air Quality Planning and Standards (OAQPS) on this matter. Both Region 6 and OAQPS are in agreement that the regulations address the question at hand. Specifically, 40 CFR 52.21(m), Air quality analysis, indicates that an application for a PSD permit shall contain an ambient air quality analysis, for each pollutant for which it would result in a significant net emissions increase. Further, 40 CFR 52.21(i)(8), Review of major stationary sources and major modifications - Source applicability and exemptions, indicates that PSD monitoring may be exempted if the net emissions increase would cause air quality impacts less than the de minimis values. Also, 40 CFR 52.21(k), Source Impact Analysis, indicates that the applicant shall demonstrate that emission increases from the proposed modification, in conjunction with all other applicable emissions increases or reductions would not cause or contribute to the exceedance of an increment or NAAQS.

Neither Region 6 nor OAQPS is aware of any EPA guidance or policy, alluded to by Mr. Johnson of Trinity Consultants, that does not require an applicant to include contemporaneous emissions in the PSD ambient significance or monitoring de minimis determinations. In summary, it is and has been EPA's position that the net emission increase from a major modification is required to be used as input to the dispersion modeling analysis that is used for comparison to the ambient significance levels and pre-construction monitoring de minimis levels.

If you have any further questions regarding this matter, please contact Merrit Nicewander of my staff at (214) 655 7223.

Sincerely yours,



Donna Ascenzi, Chief
ALO Enforcement Section (6T-EA)
Air Enforcement Branch

cc: Mike McDaniel, LDEQ
Doug Walters, LDEQ
Mark Johnson, Trinity Consultants
✓ Gary McCutchen, OAQPS, (MD-15)