



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

October 16, 1991

MEMORANDUM

SUBJECT: Dade County, Florida, Stack Height Increase
FROM: Gwen Jacobs *Gwen Jacobs*
SO₂/Particulate Matter Programs Branch, AQMD (MD-15)
TO: Lew Nagler, Regional Meteorologist
Air Programs Branch, Region IV

I have received your October 1, 1991 memorandum regarding the requested credit for a stack height increase at the Dade County, Florida, Resource Recovery Facility. Specifically, you asked:

Can the GEP regulations be interpreted to allow an increase in stack height up to GEP if plant-wide SO₂ emissions are not more than 5000 tons per year, SO₂ pollution control equipment will be installed, and actual emissions will be decreased?

The answer is no; beyond the 65 meter threshold, there is currently no other de minimis exemption for stack height increases. The important thing to note here is that 40 CFR, Part 51.100(hh)(2)(C)(v), or the discussion of sources emitting less than 5000 tons per year, applies to other dispersion techniques. Stack height increases must still be justified either through fluid modeling or through demonstration of a local nuisance during periods of downwash conditions. Likewise, the addition of pollution controls will not exempt a stack height increase from justifying that increase through the measures stated in the previous sentence. As a result, the proposed stack height increase in Dade County must be justified through either fluid modeling or demonstration of a local nuisance.

Please do not hesitate to call if you would like additional clarification on this issue. I may be reached at (FTS) 629-5295.

cc: Gary Blais, MD-15
Patricia Embrey, LE-132A
Eric Ginsburg, MD-15
Dean Wilson, MD-14

bcc: Regional Modeling Contact, Regions I-III, V-X,
with copy of incoming memorandum and list of FY 92
clearinghouse memoranda

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