



**NORTH DAKOTA DEPARTMENT OF HEALTH**  
**Environmental Health Section**

*Lee-APK*

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March 17, 1999

Mr. Richard Long, Chief  
 Air Programs Branch  
 U.S. EPA, Region VIII  
 One Denver Place  
 999 18<sup>TH</sup> Street, Suite 500  
 Denver, CO 80202-2405

Re: Increment Expanding Sources

Dear Mr. <sup>Dick</sup> Long:

The Department is currently involved in a modeling exercise to determine sulfur dioxide increment consumption at the Prevention of Significant Deterioration (PSD) class I areas in North Dakota. In order to conduct a thorough analysis of increment consumption, the Department is considering increment expanding sources in the modeling analysis which we have never considered before. A question has arisen regarding the emission rate that is to be used for these increment expanding sources. In the New Source Review Workshop Manual, it is indicated that the actual emissions of a source on the minor source baseline date (hereafter referred to as baseline emission rates) are determined individually for each increment averaging period (i.e. 3-hour, 24-hour, annual). The three hour and 24-hour baseline emissions rates are the maximum emission rate for the specified averaging period during the two years previous to the minor source baseline date. The annual baseline emission rate is the average of emissions for the two years prior to the minor source baseline date. Using this guidance, we have determined baseline emission rates for the 3-hour and 24-hour periods which are different from the annual emission rate.

We have been in contact with Mr. Kevin Golden of your staff regarding the use of these various emission rates in the modeling exercise. Mr. Golden has indicated that the annual emission rate (the lowest rate) should be used for the determination of increment expansion for all averaging periods.

We have had considerable debate regarding whether this interpretation is consistent with the PSD regulations and the guidance in the New Source Review Workshop Manual. Therefore, we

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Mr. Long

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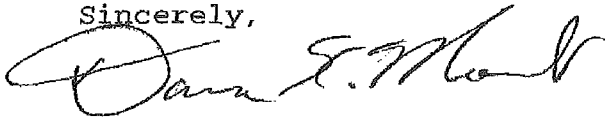
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are requesting this interpretation in writing. Since there is little guidance on this issue, it has significant ramifications, and national consistency is essential, we ask that the interpretation be reviewed and approved by EPA headquarters.

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If you would like to discuss our concerns or have any questions regarding this issue, please contact Tom Bachman of my staff.

Sincerely,



Dana K. Mount, P.E.  
Director, Division of  
Environmental Engineering

DKM/TB:csc

cc: Kathleen Paser, EPA Region VIII  
Kevin Golden, EPA Region VIII