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New York State Department of Environmental Conservation

MEMORANDUM

TO: Tim Ross
FROM: Leon Sedefian
SUBJECT: Part 231-3.6 Impact Evaluation Approach
DATE: September 30, 1992

Source applications which need to get emissions offsets per proposed 231-3 are to also demonstrate that there is a net air quality benefit (on balance) from the combined proposed emissions increase and the emission offsets in the affected area of the proposed source. Part 231-3.6(a) notes that this requirement applies to permit applications in other than ozone non-attainment areas, but the intent of this limitation should rather note the need for analyses for cases other than the impact of emissions of NO_x and VOCs on ozone non-attainment areas.

I want to propose clarifications on two issues which have surfaced relative to the modeling analysis required in this subpart. These issues are 1) the emissions which should be used for the source providing the offsets and 2) the definition of the proposed sources "affected" area. There is no clear guidance on either issue in EPA's Draft 1990 NSR Workshop Manual, but Chapter 6, Section III.A notes that States have latitude in determining what the offset requirements must meet. It also points out that the net air quality benefit need not be at every location, but "on balance" with the offsetting source impacting the general area of the proposed source.

It is rather clear that for annual NAAQS the emissions which are to be used in modeling the offsetting source should be the actual annual emissions used to quantify the emissions offsets. On the other hand for short term NAAQS, the use of this annual emission rate might underestimate the impact offset which occurs in reality. Thus, it is proposed that the rate to be used should be the same as that defined for PSD increment expansion purposes in Chapter C, Section IV.D.4 of the NSR Manual; i.e. the maximum actual emissions defined as the maximum rate with "the highest occurrence for the specific averaging period during the previous two years of operation".

The definition of affected area should be determined on a case-by-case basis. However, as a general rule, the proposed source's affected area can be identified by the Significant Impact Area (SIA) concept used for PSD purposes. In cases where the proposed source has no significant impact or a larger area than the SIA is desired, the net air quality (on balance) benefit should be demonstrated over the

SR/AN
action plan.
also, what is
this all about.

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receptor grid contained in an acceptable modeling protocol.

With a copy of this memo to EPA, I am asking for their comments on these clarifications.

cc: E. Bennett
A. Fossa
P. John
K. Eng, EPA Region II ✓
LS/bc