

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV - ATLANTA, GEORGIA

DATE: NOV 15, 1983

SUBJECT: Spatial and Temporal Calculation of Air Quality Concentrations

FROM: Director, Air and Waste Management Division

TO: Dr. Bernie Steigerwald, Director (MD-10)
Office of Air Quality Planning and Standards
Environmental Protection Agency
Research Triangle Park, North Carolina 27711

SUMMARY

The South Carolina Department of Health and Environmental Control has asked Region IV to provide additional guidance on the calculation of PSD increment consumption. Alumax Corporation, a large industrial source located near Charleston, South Carolina, is concerned that the state is using a procedure for calculating PSD increment that is not consistent with the procedure used by other states.

The procedure used by Region IV, as well as all states within Region IV, has been to calculate the increment on a spatially and temporally consistent basis. This approval is supported by guidance from Sheldon Meyers in a February 17, 1983, memorandum to all regions regarding calculation of increment consumption in the "Emissions Trading Policy." It is also supported by EPA's conditional approval of Florida's PSD rules now undergoing final review by Headquarters.

Alumax believes that the increment need only be calculated on a spatial basis and has pointed to a 1981 PSD permit for Alcoa (now ARGO metals) granted by Region X. However, since the issuance of that permit, Region X has followed the spatial and temporal concept of increment consumption. Region X also has written to OAQPS confirming that Region X will implement the spatial and temporal procedure for PSD sources (May 3, 1983, letter from Alexandra Smith to Sheldon Meyers).

ACTION

Region IV will continue to insist that all increment consumption be done on the basis of a spatially and temporally consistent basis. Since South Carolina has asked that EPA provide written guidance in this area, we believe it is now necessary for OAQPS to provide the regional offices with a confirmation that the spatial and temporal calculation of air quality impact applies not only to the "Emissions Trading Policy," but also to PSD as well as any other air quality related modeling permitting.

BACKGROUND

Telephone call from the South Carolina Bureau of Air Quality Control, October 11, 1983.

Thomas W. Devine
Enclosures (3)

cc: Dean Wilson (MD-14)
Research Triangle Park, North Carolina

Rob Wilson
Region X, Air Programs