



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI

1445 ROSS AVENUE, SUITE 1200

DALLAS, TEXAS 75202

REPLY TO: 6T-AN

**FEB 15 1989**

MEMORANDUM

SUBJECT: Request for Comments Regarding Region 6 Position in PSD Modeling

FROM: Gerald Fontenot *Gerald Fontenot*  
Chief  
Air Programs Branch (6T-A)

TO: Edward Lillis  
Chief  
Non-Criteria Pollutant Programs Branch (MD-15)

I have attached a recent letter from the State of Louisiana that discusses the distance to which sources should be evaluated for PSD increment and NAAQS air modeling analyses. (There are several, related issues that have been sources of disagreement between Louisiana and Region 6, but I believe that these relate more to Joe Tikvart's area of responsibility, and I have directed these questions to him. I will provide you with a copy of my memo to Joe.) Louisiana has apparently concluded from a short survey of some other EPA Regional Offices that Region 6 is being overly demanding and exceeding its regulatory authority in this aspect of PSD modeling. I would appreciate your review of the Louisiana letter and the following statement of the EPA-Region 6 policy regarding modeling distance:

the need to model sources out to a distance of area of impact plus 50 km from the proposed source -- Region 6 believes that it follows all applicable Part 52 and EPA guidelines in this matter. Specifically, under normal circumstances, for increment analyses, all increment-consuming sources out to this distance are required to be modeled, unless it can be shown by a supportable, empirical (e.g., screening) technique that such sources do not have a "significant" impact within the proposed source's area of impact. (Of course, if the proposed source does not exceed the PSD significance levels, there are no increment or NAAQS analyses required.) Under normal circumstances for NAAQS analyses, all major sources, minus those deemed by a supportable, empirical (e.g., screening) technique to have a "non-significant" impact in the area of impact, are required to be modeled. This is consistent with the Prevention of Significant Deterioration Workshop Manual (October 1980), page I-C-18. However, Region 6 believes that PSD permit applications from the State of Louisiana have been consistently deficient from several aspects so as to constitute quite abnormal situations. These deficiencies include failure to

model a majority of significant sources in the area of impact (not to mention any in the area of impact plus 50 km), failure to include all emissions from the source itself, a continuing problem with increment tracking in the State (so that undocumented emission decreases among baseline sources are claimed by the State to totally offset any increase due to new emissions), inconsistent reporting that a source is significant and inconsistent reporting of emissions from that source (based upon reports from separate PSD permit applications), and lack of documentation that an acceptable screening method is used to eliminate "non-significant" sources. Due to these continuing difficulties, Region 6 asked the State to require some recent applicants to model all increment-consuming sources out to a distance of area of impact plus 50 km and, for the NAAQS analyses, all major sources out to a distance of area of impact plus 50 km. Region 6 believes that these requirements were necessary to ensure, under 40 CFR 52.21(k), that the proposed source would not significantly contribute to an increment and/or NAAQS violation.

Louisiana informs me that completion of its review for at least one PSD application awaits resolution of this issue. Therefore, I request that you provide Region 6 with a timely review, if at all possible. Any questions that your staff may have should be directed to Jim Yarbrough (FTS 255-7214). Thank you.

Attachment

cc: **Joe Tikvart (MD-14)**  
Dean Wilson (MD-14)