UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202

February 15, 1989

REPLY TO: 6T-AN

MEMORANDUM

SUBJECT: Request for Comments Regarding Proposed Region 6 Response to Louisiana About PSD Modeling Issues

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

TO: Joseph Tikvart
Chief
Source Receptor Analysis Branch (MD-14)

I have attached a recent letter from the State of Louisiana that discusses several issues that have been sources of disagreement between Louisiana and Region 6. I have written Ed Lillis regarding the issue of modeling sources out to a distance of area of impact plus 50 km in PSD, and I will forward you a copy of this memo. However, there are two other, related issues involved in this controversy. I have listed these issues below and have included the Region 6 positions for each. I would appreciate your review of the Louisiana letter and the appropriateness of the following Region 6 positions:

1. 50 km limit for modeling -- Region 6 agrees with prevailing EPA guidance that the maximum, useful distance for current, non-long-range transport atmospheric dispersion models is 50 km. Our position, as articulated to Louisiana and other Region 6 states, is that when it is necessary to model a source (e.g., A) that is farther than 50 km from the farthest point in the proposed source's area of impact, then one should count that source's (i.e., A's) contribution only out to 50 km from the source (i.e., A). Attachment 2 illustrates this concept. There is, therefore, no need to use a long-range transport model, except in unusual cases (e.g., in modeling the impact on a class I area that may be 50-100 km distant).

2. use of actual emissions versus allowable emissions -- The resolution of this issue in PSD analyses is awaiting OAQPS action. However, Region 6 policy is to apply Table 9-1 in Guideline on Air Quality Models (Revised) to PSD NAAQS analyses. (This is consistent with past, verbal OAQPS guidance.) Specifically, this means that for short-term NAAQS analyses, maximum allowable emissions are used in modeling significant, background sources. Under normal circumstances, for long-term NAAQS analyses, Region 6 may allow an actual operating factor (as averaged over the last two years) to be used. Region 6 believes, however, that economic conditions in the Southwest have been severely depressed over the last few years so that use of an average operating factor is inappropriate. We have, therefore, advised Louisiana and Texas (home to a significant percentage of the nation's

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)