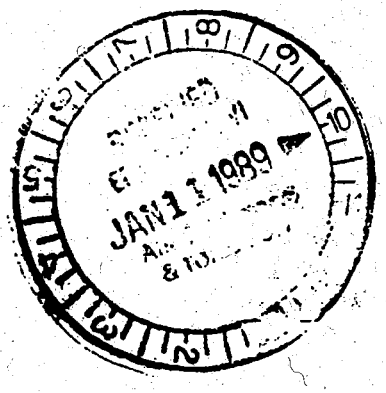
State of Louisiana

Department of Environmental Quality

BUDDY ROEMER
Governor

PAUL TEMPLET
Secretary

January 5, 1989



Mr. William B. Hathaway, Director
Air, Pesticides & Toxics Division (6T)
United States Environmental Protection Agency
Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202

Dear Mr. Hathaway:

RE: Recent comments from EPA, Region VI on PSD permit applications.

We would like to respond, in general, to one of the comments received by the Louisiana Air Quality Division from EPA Region VI with regard to recent PSD permit applications.

We have been repeatedly told that all sources within a ring extending 50 KM from a proposed PSD source impact area should be modeled to determine compliance with the NAAQS and allowable increment consumption. In the Prevention of Significant Deterioration Workshop Manual (USEPA, October, 1980) on page I-C-18, first paragraph, it is stated "Generally, on a short term basis, such as a 24 hour or a 3 hour period, the PSD applicant need only identify those increment consuming emissions within the respective impact area. However, for annual impact determinations, large emission sources located as far as 50 kilometers from the impact area may have impacts within the applicant's impact area." The second paragraph points out that a screening method may be used to determine which of these sources should be modeled. The Louisiana Air Quality Division's Louisiana New Source Review Manual sets forth such a procedure on page 4-25. There is no similar statement made with regard to the NAAQS in the "Guidelines", so it must be assumed that an analogous procedure is used for the NAAQS determination. The only reference in 40 CFR 52 is that the modeling guidelines should be used. The Guideline on Air Quality Models (Revised) (EPA-450/2-78-027R, July 1986) states on page 7-8 that "Section 165(e) of the Clear Air Act requires that suspected significant impacts on PSD Class I areas be determined. However, the useful distance to which most Gaussian models are considered accurate for setting emmission limits is 50 KM". We assume that there is no practical way to model emissions for greater than 50 KM from the proposed source.

In summary, it appears the practice of modeling sources further than 50 KM away is intended for Class I areas only, and a Long Range Transport Model must be used and justified. However, the PSD workshop manual states that for long term standards (e.g. NO_2, SO_2, TSP, PM-10 and lead) sources within 50 KM from the impact area will be modeled. This will be accomplished using the aforementioned long term screening technique in the New Source Review Manual. There will be no addressing of sources outside of an impact area for NAAQS or increment allowables purposes for 24 hours or less.

Any questions should be directed to Doug Walters of my staff at (504)342-1206.

Sincerely,

Mike D. McDaniel, Ph.D.
Assistant Secretary

MMcD:DW:jsb

cc: John Hepola, EPA Region VI
Merritt Nicewander, EPA Region VI
Jim Yarbrough, EPA Region VI
Gus Von Bodungen, LAAQD
Harendra Raol, LAAQD
Doug Walters, LAAQD

Attachment 2

With source A 55km from the proposed source (denoted by "x"), only that part of the proposed source's area of impact that is shaded can be modeled with source A.