UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

11 MAR 1992

MEMORANDUM

SUBJECT: Modeling Credits for Stack Height Increases and Merging Flue Gases at Taunton Municipal Light Plant

FROM: Dean A. Wilson, Meteorologist
Techniques Evaluation Section, SRAB (MD-14)

Eric Ginsburg, Chief
$SO_2$/Particulate Matter Programs Branch, AQMD (MD-15)

TO: Ian Cohen, Regional Meteorologist
Technical Assistance Section, Region I

Brian Hennessey, Regional Modeler
Technical Assistance Section, Region I

In response to your request, the Model Clearinghouse has reviewed your position concerning Taunton Energy Center's request to seek dispersion credits for a physical stack height increase and merged flue gases for Taunton Municipal Light Plant (TMLP).

Your interpretations of the regulations as they apply to the TMLP are consistent with EPA policy. The request for dispersion credit for the stack height increase must be justified by fluid modeling. The current stack height is considered to be Good Engineering Practice (GEP) for the source unless demonstrated otherwise; any additional stack height is therefore an increase in excess of GEP. Given the fact that TMLP emits less than 5000 tons of $SO_2$/yr, the source may be eligible for a merger of gas flues and could then model $SO_2$ emissions using a single output stream. Yet, this exemption clause does not pertain to other criteria pollutants. In order to justify modeling TMLP's $NO_2$ and PM-10 emissions with merged gas streams, the source must install pollution controls which result in a net reduction of allowable emissions.

Regarding the issue of increment consumption, the New Source Review Section (NSRS) has informed us that the Regional position is consistent with guidance provided in the 1990 draft New Source Review Workshop Manual (see page C.11, concerning stack height changes occurring after the minor source baseline date).

If you need additional information, please contact Dennis Atkinson at FTS 629-0518 for modeling concerns or Gwen Jacobs at FTS 629-5295 for questions relating to stack height policy.

cc: D. Atkinson
G. Blais
D. de Roeck
J. Dicke
G. Jacobs

bcc: Regional Modeling Contact, Regions II-X (with copy of incoming memorandum and list of FY-92 Clearinghouse memoranda)

## FY-92 MODEL CLEARINGHOUSE MEMORANDA

| Date | Region | Subject |
|---|---|---|
| 10/16/91 | IV | Dade County, Florida, Stack Height Increase |
| 11/7/91 | VI | Phelps Dodge--Hidalgo Modeling Protocol |
| 11/15/91 | VIII | ASARCO E. Helena Lead State Implementation Plan (SIP) |
| 12/04/91 | I | Proposal to Use a Non-Guideline Model to Satisfy Intermediate Terrain Policy in New Source Permitting (Pine State Power; Jay, Maine) |
| 12/23/91 | VIII | East Helena Lead SIP - Protocols for Design Value Determination, and Model "Verification" |
| 12/26/91 | VI | Information Copy of El Paso-Juarez PM-10 Modeling |
| 01/13/92 | I | NHARD Modeling Guideline |
| 01/27/92 | VIII | East Helena Lead SIP - Protocols for Design Value Determination and Model "Verification"; Clarification of Model Clearinghouse Memorandum of December 23, 1991 |
| 03/06/92 | I | Modeling Credits for Stack Height Increases and Merging Flue Gases at Taunton Municipal Light Plant |