

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

JAN, 20 1984

MEMORANDUM

SUBJECT: PSD Increment Consumption Calculations

FROM: John R. O'Connor, Acting Director
Office of Air Quality Planning and Standards (MD-10)

TO: Thomas W. Devine, Director
Air and Waste Management Division, Region IV

Your November 13, 1983, memorandum proposes that spatial and temporal calculation of PSD increment consumption is the appropriate methodology to be used in the ambient analysis for the Alumax PSD permit. This methodology is used by Region IV as well as all States within Region IV. We also understand (memorandum from A. Smith to S. Meyers; dated May 3, 1983) that Region X is now implementing this method for all of their PSD permit processing.

We agree that the spatial and temporal calculation of PSD increments is appropriate not only for Alumax but for all cases where PSD increment consumption calculations need to be made. This methodology is consistent with the manner in which the total concentration is calculated for comparison with ambient standards and is consistent with the method used to calculate incremental concentrations for Level II emission trades (memorandum from Sheldon Meyers to the Director, AWMD/AMD, Regions I-X, dated February 17, 1983). This methodology is also consistent with our interpretation of the Clean Air Act and definition of increment and baseline concentrations in the PSD regulation.

If you have any questions concerning the use of this method for tracking the use of PSD increments or you are aware of any situations where it results in a significant impact on a past decision, please contact me or Dean Wilson of my staff.

Attachment

cc: Director, Air & Waste Management Division, Regions II, III, VI-VIII, X
Director, Air Management Division, Regions I, V, IX
Chief, Air Programs Branch, Regions I-X
Richard Rhoads
Sara Schneeberg
Mike Trutna
Darryl Tyler

bcc: Regional Modeling Contact, Regions I-X
B. Hogarth