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

JAN, 20 1984

MEMORANDUM  
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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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IV - ATLANTA, GEORGIA

DATE: NOV 15, 1983

SUBJECT: Spatial and Temporal Calculation of Air Quality Concentrations

FROM: Director, Air and Waste Management Division

TO: Dr. Bernie Steigerwald, Director (MD-10)  
Office of Air Quality Planning and Standards  
Environmental Protection Agency  
Research Triangle Park, North Carolina 27711

#### SUMMARY

The South Carolina Department of Health and Environmental Control has asked Region IV to provide additional guidance on the calculation of PSD increment consumption. Alumax Corporation, a large industrial source located near Charleston, South Carolina, is concerned that the state is using a procedure for calculating PSD increment that is not consistent with the procedure used by other states.

The procedure used by Region IV, as well as all states within Region IV, has been to calculate the increment on a spatially and temporally consistent basis. This approval is supported by guidance from Sheldon Meyers in a February 17, 1983, memorandum to all regions regarding calculation of increment consumption in the "Emissions Trading Policy." It is also supported by EPA's conditional approval of Florida's PSD rules now undergoing final review by Headquarters.

Alumax believes that the increment need only be calculated on a spatial basis and has pointed to a 1981 PSD permit for Alcoa (now ARGO metals) granted by Region X. However, since the issuance of that permit, Region X has followed the spatial and temporal concept of increment consumption. Region X also has written to OAQPS confirming that Region X will implement the spatial and temporal procedure for PSD sources (May 3, 1983, letter from Alexandra Smith to Sheldon Meyers).

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#### ACTION

Region IV will continue to insist that all increment consumption be done on the basis of a spatially and temporally consistent basis. Since South Carolina has asked that EPA provide written guidance in this area, we believe it is now necessary for OAQPS to provide the regional offices with a confirmation that the spatial and temporal calculation of air quality impact applies not only to the "Emissions Trading Policy," but also to PSD as well as any other air quality related modeling permitting.

#### BACKGROUND

Telephone call from the South Carolina Bureau of Air Quality Control, October 11, 1983.

Thomas W. Devine  
Enclosures (3)

cc: Dean Wilson (MD-14)  
Research Triangle Park, North Carolina

Rob Wilson  
Region X, Air Programs