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

OCT 17 1989

MEMORANDUM

SUBJECT: Ambient Air

FROM: Robert D. Bauman, Chief
SO2/Particulate Matter Programs Branch (MD-15)

TO: Gerald Fontenot, Chief
Air Programs Branch, Region VI (6T-A)

My staff and I have discussed the ambient air case outlined in the August 24, 1989 memorandum from Jim Yarbrough of your staff to Doug Grano of my staff. Specifically, Region VI and the Texas Air Control Board propose that prevention of significant deterioration (PSD) modeling for Mitsubishi Industries can discount the contribution of a background source to the predicted concentration as follows:

1. Assume Mitsubishi and background plants B and C.
2. Mitsubishi and plants B and C are modeled and total concentrations are estimated.
3. Where a receptor is located on plant B's nonambient air property, the contribution from plant B (only) may be subtracted from the total concentration.

This situation is similar to a case raised to OAQPS's attention in 1987 by Region V. Guidance on this case was provided by OAQPS to Region V in a memorandum dated April 30, 1987 (attached). That guidance is consistent with your proposed approach and, therefore, we agree with your position.

However, the State should be advised that, when modeling Mitsubishi, all receptors off Mitsubishi property are in ambient air and that the ambient air policy does not allow sources to excessively pollute their neighbors. Note that a background source could, in the future, change their operation and make portions of their property accessible to the public. Care should be taken to avoid situations that could result in undue exposure to excessive concentrations and which could result in adverse public health impacts.

In response to your position on issuance of the permit where Mitsubishi makes a significant contribution to predicted violations of either the national ambient air quality standards (NAAQS) or PSD increments, policy contained in the July 5, 1988 memorandum from OAQPS to Region 3 should be

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applied (attached). For a new or existing NAAQS violation, the permit may be granted under specific conditions. However, for any increment violation for which the proposed source has a significant impact, the permit should not be approved unless the increment violation is corrected prior to operation of the proposed source.

If you have any questions regarding this memorandum, please call Doug

Grano at FTS-629-5255.

Attachments

cc: Air Branch Chief, Regions IV, VII-X
SO2 Contacts

bcc: John Calcagni
Dan deRoeck
Gary McCutchen
Joe Tikvart
Dean Wilson
Jim Yarbrough
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