

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
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ATLANTA, GEORGIA 30303-8909

JAN 20, 1998

4APT-ARB

Ms. Laura L. Burrell
State of Mississippi
Department of Environmental Quality
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

Re: Secondary Emissions For PSD Air Quality Assessments
Choctaw Generating, Inc., Red Hills Generating Facility
Choctaw County, Mississippi

Dear Ms. Burrell:

This letter is in response to your request for documentation of our discussions concerning the modeling procedure to address Red Hills Generating Facility (RHGF). Emissions from the RHGF will be greater than the Prevention of Significant Deterioration (PSD) major source emission level - the reason for the PSD application for the RHGF power plant. To provide fuel for the RHGF, a company not related to Choctaw Generating, Inc. will develop a lignite mine on adjacent property. Although no PSD permit is required for the mine's operation because its emissions are less than the PSD major limits, the mine's emissions are "secondary emissions" for the power plant and must be included in the impact assessment for RHGF (reference: New Source Review Workshop Manual, 1990, Section II.B.4).

Of concern to the MS Department of Environmental Quality (MSDEQ) in the air quality impact assessment is the location of receptors for the analysis of the mine's impact. PSD computer impact modeling of the power plant's emissions are performed at receptors located on non-power plant property (i.e., power plant ambient air defined as air not over land owned or controlled by the plant with physical barriers precluding public access) which includes the mine property. MSDEQ's question in modeling the secondary mine emissions is whether the power plant "ambient air" is used for the mine's impact analysis (i.e., impact analysis of mine emissions at receptors located on the mine's property) or does the mine have its own ambient air defined by the mine's property boundary?

To address the ambient air issue for secondary emissions, I have contracted both USEPA Regional 4 and OAQPS modelers as well as reviewed available USEPA documented guidance. Although no specific guidance document was available on this issue, all Regional and OAQPS individuals contacted agreed that PSD air quality impacts are not modeled on the property owned and controlled by the owner of the emission source. Therefore, secondary emissions from a separately owned and controlled mine should be modeled in ambient air for the mine. The modeling receptor grid for the mine should include properties outside the mine's property boundary which includes the power plant property.

I hope this letter satisfies your request for documentation of our discussions concerning ambient air impact modeling of secondary emissions for the Red Hills Generating Facility. Please let me know if you have further questions on this subject.

Sincerely,

/s/

Stanley J. Krivo, COM, QBP
Environmental Scientist
Preconstruction/Hazardous Air
Pollution Section
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Branch