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MEMORANDUM:

DATE: October 17, 1977

SUBJECT: New Source Review Modeling Emission Baselines

FROM: Director, Division of Stationary Source Enforcement

TO: David Kee, Chief,
Air Enforcement Branch, Region V

This is in response to your memo dated September 23, 1977 concerning emission baselines for new source review.

Generally, when conducting an air quality analysis the allowable emission rate is used for purposes of defining the emission baseline. This allowable emission rate could be part of the applicable state implementation plan (SIP), the new source review permit, a new source performance standard, or any other federally enforceable requirement. However, in the absence of an emission limit the baseline for new source review must be the actual emissions of the source. In this case, I would concur with your concerns for protection of the short term ambient air quality standard and would recommend the use of the higher sulfur number 6 fuel oil as the emission baseline, unless the number 6 fuel oil will only be used in an emergency situation as defined in Section 110(f) of the Clean Air Act amendments of 1977. In order to assure continued maintenance of the national ambient air quality standards, we cannot allow for malfunction type situations under SIPs. In addition, the scheme outlined in your memo appears to provide for the use of number 6 fuel oil as a normal condition and not only during an unavoidable upset.

If you have any additional questions or comments, please contact Rich Biondi (755-2564) of my staff.

Edward E. Reich

cc: Dick Rhoads - CPDD
Mike Trutna - CPDD

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: SEP 23 1977

SUBJECT: New Source Review Modeling Emission Baselines

FROM: David Kee, Chief
Air Enforcement Branch

TO: Edward E. Reich, Director
Division of Stationary Source
Enforcement (EN-341)

We have received a question from the State of Wisconsin which we would appreciate your views on.

In a case where a proposed new boiler is designed for use on low sulfur #2 oil with a standby capability of burning higher sulfur #6 oil, would the State be required to do its air quality impact assessment on the basis of the standby fuel?

Our initial response was that concern for the protection of the 24-hour standard would require that modeling be based on the higher sulfur content fuel. The view was expressed, however, that since the fuel would only be used in an emergency that it should be treated as a malfunction type of situation and not be made part of the new source assessment.

I would appreciate your determination on this matter.

David Kee