

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
APR 29 1980

Office of  
Enforcement

MEMORANDUM

SUBJECT: PSD Analysis for SIP Relaxation in Metropolitan Boston Air  
Pollution Control District - Eastman Gelatin

FROM: Director  
Division of Stationary Source Enforcement

TO: Linda Murphy, Chief  
Stationary Source Section - Region I

This is in response to your memo of April 2, 1980, in which you asked Rich Biondi whether a SIP relaxation, allowing Eastman Gelatin to burn 2.2% sulfur fuel oil, would consume PSD increment. My understanding of the facts in the case is that the SIP revision would relax only the SO<sub>2</sub> standard. The TSP standard which applies to Eastman Gelatin is already lax enough to allow the switch to the higher sulfur content fuel.

According to Section 52.21(b) (11), any SIP relaxation which is submitted to EPA after the applicable baseline date consumes increment. The SIP relaxation consumes increment for all pollutants which, as a result of the relaxation, increase above baseline levels. The term "baseline levels" is defined in Section 52.21(b) (11) and generally means actual emissions. As a part of the SIP revision process, the State must analyze the impact of the relaxation on the applicable increments. If the analysis projects an increment violation, EPA must disapprove the SIP revision.

In the case at hand, the SIP revision must include a projection of the impact on the applicable SO<sub>2</sub> and TSP increments, assuring that the baseline has been triggered. If the SIP relaxation is to be approved before promulgation of the September 5, 1979, PSD proposal, the baseline date is August 7, 1977. If the relaxation is approved after promulgation of the final amendments, the definition of "baseline" will have changed and it will be necessary to determine whether there have been any applications for PSD permits for sources in the area where Eastman Gelatin is located. See definitions of "baseline" in 40 CFR 52.21(b) (11) (1979) and 44 FR 51953, September 5, 1979.

Region 4 recently reviewed a SIP revision for Florida Power and Light (FP&L) which was similar to your case involving Eastman Gelatin. Florida proposed to relax its particulate standards

for FP&L so as to allow the burning of higher sulfur oil. The SO<sub>2</sub> standard did not need to be relaxed. In that case, EPA required an increment analysis for both TSP and SO<sub>2</sub>. The final notice of partial approval/partial disapproval on FP&L is attached.

Should you wish to discuss this issue in more detail, please contact Rich Biondi at 755-2564.

Edward E. Reich

cc: Lydia Wegman, OGC  
Jim Weigold, OAQPS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: April 2, 1980

SUBJECT: Question - Does a SIP Relaxation for SO2 Consume Increment?

FROM: Linda Murphy  
Stationary Source Section

TO: Richard Biondi, DSSE

A question regarding increment consumption has arisen which I am referring to you for clarification.

On August 22, 1977 the Metropolitan Boston Air Pollution Control District was approved by EPA to burn 2.2% sulfur fuel oil. At this time the MBAPCD was classified non-attainment for TSP. Eastman Gelatin, Peabody, Mass. was disapproved to burn the higher sulfur fuel for TSP concerns and is presently burning 1% sulfur fuel. Subsequently, the MBAPCD was reclassified to attainment for TSP.

I am requesting a determination on whether or not a SIP relaxation for SO2 for allowing Eastman Gelatin to burn 2.2% sulfur fuel oil would consume increment according to the definition of "baseline concentration" in Section 52.21 (b) (11). I would appreciate a response within two weeks of receipt of this memo. A telephone call to Margaret McDonough (FTS 223-4448) of my staff would be sufficient.

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SUMMARY

On August 31, 1979, the State of Florida submitted to EPA, as a SIP Revision, a temporary variance from July 25, 1979 until July 25, 1981, which had been adopted by the Environmental Regulation Commission. This variance allows the Florida Power and Light Company (FP&L) to continue certain operations during the current low-sulfur oil shortage. On December 4, 1979, EPA proposed to approve the submitted variance, with certain exceptions, which relaxes the requirements specific FP&L generating units must meet with regard to emission of particulates, sulfur dioxide, visible emissions and excess emissions. EPA is today approving the submitted variance except for certain provisions as discussed below.