

Sierra Club Petition

Exhibit 14

March 24, 1997

Mr. Edward A. Cutrer, Jr.
Program Manager
Stationary Source Compliance Program
Air Protection Branch
Environmental Protection Division
Georgia Department of Natural Resources
4244 International Parkway, Suite 120
Atlanta, Georgia 30354

SUBJ: Calculation of Cost Effectiveness of Emission Control Systems

Dear Mr. Cutrer:

This is in response to your letter dated February 21, 1997, which requested concurrence from EPA Region 4 with your position concerning the appropriate method for evaluating control costs when a particular control resulted in reductions in more than one regulated pollutant. The position stated in your letter was as follows:

“The particular situation involves a control device that effects substantial reductions in two regulated pollutants (VOC and CO) which are emitted in significant and similar quantities. It is our position that the cost effectiveness (dollars per ton of pollutant reduced) of the control device be calculated by dividing the annualized cost of the control device by the total of the CO and VOC emissions reduced by said device.”

We concur that the cost analysis should consider the total pollutant removed in making a determination of cost effectiveness. For the purposes of comparison with similar sources or the cost of control of a pollutant in general, it would be necessary to generate costs per ton removed of a specific pollutant. An example of how this would be done in this case would be to apportion the annualized costs based on the weight percentage of the components of the stream being controlled.

If you have further questions on this issue, please contact Mr. Gregg Worley of my staff at (404) 562-9141.

Sincerely yours,

Brian L. Beals, Chief
Preconstruction/ HAP Section
Air & Radiation Technology Branch
Air, Pesticides and Toxics
Management Division