

ENVIRONMENTAL PROTECTION AGENCY

APR 12 1979

SUBJECT: Emissions from Ships Unloading at a Dock
FROM: Director
Division of Stationary Source Enforcement
TO: Joe Winkler
Air and Hazardous Materials Division, Region VI

This memo will confirm a telephone conversation between Libby Scopino of my staff and Conrad Peterson of PEDCO, whom I understand has been contracted by your office to assist in the review of PSD applications.

The situation in question involves a new docking facility which will be receiving shipments of crude oil. The question raised is whether ship emissions, which occur while a ship is tied up at dock, are considered primary emissions from the docking facility.

The distinction between primary and secondary emissions is made for the purpose of determining the applicability of the PSD regulations and the extent of the review required (one- or two-tier review). In calculating the potential and the allowable emissions of a source, only primary emissions will be considered. That is, a source must increase primary potential emissions by 100/250 tons per year to trigger PSD review and increase primary allowable emissions by more than 50 tons per year to trigger second-tier review, regardless of the magnitude of secondary emissions. However, once a source is determined to be subject to PSD for a particular pollutant, based on primary emissions, the PSD requirements shall apply to both primary and secondary emissions.

In order to determine whether the emissions from a particular facility are primary or secondary the following guidelines shall be used. If the facility is directly involved with the operation of the PSD-affected source, the emissions are primary. On the other hand, if the emissions are associated with but not directly involved in the operation

of the source, they are secondary. An example of secondary emissions from a PSD-affected docking facility would be the emissions which result from the ballasting of ships servicing the dock. This does not mean that all ship emissions are necessarily secondary to the operations taking place on the dock. On the contrary, any ship emissions which result from the unloading of the ships are directly involved in dock operations and therefore are considered primary.

In the particular case described by Conrad Peterson, the pollutants CO, SO₂, VOC, and NO_x would be emitted from the boilers of ships unloading crude oil at the dock. To the extent the boilers are operated for the purpose of supplying power for the pumping of crude oil from the ships to the dock, the boiler emissions are primary. As primary emissions they should be taken into account in calculating potential as well as allowable emissions.

For a broader discussion of EPA's secondary emissions policy, please see page 3281 of the Interpretative Ruling (44 FR, January 16, 1979).

If you have any additional questions on this issue, please contact Libby Scopino at FTS 755-2564.

Edward E. Reich