

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

6 JUN 1979

MEMORANDUM

SUBJECT: PSD Determination-Consolidated Edison of New York

FROM: Director
Division of Stationary Source Enforcement

TO: P. W. Giaccone, Chief
Air Facilities Branch, Region II

This is in response to your memo of April 12, 1979, in which you request a determination as to whether a drift eliminator should be considered an integral part of a natural draft cooling tower or whether it should be considered an air pollution control device. Drift eliminators are installed for the purpose of reducing water loss and reducing salt emissions from brackish water cooling towers. This question was raised for the purpose of determining the level of potential salt (particulate) emissions that would result from the installation of a new brackish water cooling tower at Consolidated Edison's Indian Point, New York nuclear generating Station.

The, phrase "potential to emit" is defined in the PSD regulations as:

"...the capability at maximum capacity to emit a pollutant in the absence of air pollution control equipment. Air pollution control equipment includes control equipment which is not, aside from air pollution control laws and regulations, vital to production of the normal product of the source or to its normal operation..." See 43 FR 26404, §52.21(b)(3). While a drift eliminator may reduce the amount of cooling water used, it is not essential to the operation of a cooling tower. Therefore, a drift eliminator should be considered an air pollution control device and potential salt (particulate) emissions should be those which would occur in the absence of the drift eliminator.

I understand that potential emissions from the Consolidated Edison cooling tower are expected to exceed 250 tons of particulate matter per year in the absence of control equipment, thus subjecting the source to PSD review, and that you have discussed the applicable requirements with the Nuclear Regulatory Commission.

If you wish to discuss this issue further, please contact Libby Scopino at 755-2564.

/s/

Edward E. Reich

cc:	Jim Weigold, CPDD	Winston Smith, Region IV
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