



**NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF AIR QUALITY**

January 21, 1999

MEMORANDUM

TO: Regional Supervisors
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FROM: Laura S. Butler, P.E., Chief

THROUGH: Keith Overcash, Deputy Director

SUBJECT: Lease Arrangement Modeling Procedures for 15A NCAC 2D . 1100

This memorandum supersedes the previous memorandum on the same subject dated April 21, 1995 and sets forth new procedures for handling modeling scenarios where one facility is located within another facility's property boundaries (i.e., the "doughnut" effect). This recommendation is specifically applicable to industrial facilities that are separate corporate entities contained within each other's property boundaries and should not be construed to be an alteration of the definition of "facility."

If the larger facility is required to perform toxics modeling, the larger facility must place its modeling receptor array at its own outer property boundary. The larger facility need not place receptors along the inner facility's leased space or property boundary (i.e., the hole in the "doughnut").

A facility leasing space or property within another facility's property boundaries and which is required to perform toxics modeling may begin its modeling receptor array at the larger facility owner's outer property boundary.

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This revised approach is based on the premise that the ambient air to be protected by the toxics rules is "non-industrial" air. In keeping with the definition in 2D.0101(3) in this particular context, "ambient air" is that portion of the atmosphere outside the enclosed "industrial" property. In making a required modeling demonstration under 2D .1106, neither facility considers the other facility's emissions in their modeling analyses. However, the Division has the right to perform the combined impact analysis pursuant to 2D .1107(c) in order to ensure that the combined impacts do not adversely affect human health.

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