

## Question 16.1

**Topic:** Common Stack RATAs

**Question:** For a multi-unit situation where more than one unit feeds a common stack, how does EPA define low, medium, and high load for RATA purposes for affected units that produce electrical output or steam since there are numerous permutations or combinations in flows to the stack?

**Answer:** The method for determining the range of operation and the low, mid and high load levels for a unit or common stack is found in Section 6.5.2.1 of Appendix A to Part 75. For a common stack, the lower boundary of the range of operation is either: (1) the lowest minimum, safe stable load for any of the units discharging through the common stack; or (2) for a group of frequently-operated units, the sum of the minimum safe, stable loads of the individual units. The upper boundary of the range of operation is defined as the sum of the maximum sustainable loads for the individual units, unless that combined load is unattainable in practice, in which case, use the maximum sustainable combined load from a four quarter (minimum) historical lookback. The low, mid, and high load levels are expressed as percentages of the range of operation (0 – 30% of range = low, 30 – 60% = mid, and 60 – 100% = high).

**References:** Appendix A, Section 6.5.2.1

**History:** First published in Original March 1993 Policy Manual; revised in October 1999 Revised Manual; revised in October 2003 Revised Manual