



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

MEMORANDUM

DATE: FEB - 3 1989

SUBJECT: Response to January 23, 1989, Memorandum on Prevention of
Significant Deterioration Requirements

FROM: Bruce Miller, Chief
Air Programs Branch

A handwritten signature in cursive script, reading "Bruce Miller", is written over the typed name and title.

TO: Steve Rothblatt, Chief
Air and Radiation Branch (SAR-26)

The Region IV position on PSD pre-construction monitoring requirements and on the need for a modeling demonstration for VOC sources is as follows:

Preconstruction Monitoring

Region IV requires preconstruction monitoring for VOC sources greater than 100 tons a year unless they are located within 50 kilometers (km) of an existing representative ozone monitor. In situations where there may be two monitors within 50 km the monitor which has the highest concentrations will be used. The source has the option to do pre-construction monitoring if the existing monitor indicates the area is non-attainment for ozone and the source is locating in an attainment area.

This procedure has worked well within Region IV and the only problems we have had is when a source intends to locate more than 50 km from a representative ozone monitor and the source wants to use a regional monitor. We have attempted to handled that situation on a case-by-case basis. There has only been one application in the past three years where this situation has come up in an application that we have reviewed.

Attainment Demonstration

Region V is to be commended for aggressively pushing for routine screening analysis for new VOC sources. Region IV believes it has been following present guidance regarding this issue. Unless EPA (OAQPS) provides new guidance on how to do an attainment demonstration we will continue what we have been doing. As of January 27, 1989 we understand the OAQPS position is that there are no recommended models or procedures for demonstrating attainment through modeling by a new source.

cc: Joseph Tikvart (OAQPS, MD-14)
State/Locals (Region IV)