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MEMORANDUM:

DATE: April 13, 1977

SUBJECT: Emission Offset Policy

FROM: Chief, Compliance Monitoring Branch

TO: Warren Peters, Region I

This is in response to a question you raised during a telephone conversation you had with Rich Biondi of my staff on April 12, 1977. In that conversation you described a new hydrocarbon source which will emit less than 100 tons per year after application of control equipment. This limit will be required through the terms of the NSR permit. However, the source is projected to commence operation approximately 6 to 12 months prior to installation of the control equipment. During this interim period the source, in compliance with the SIP, will emit more than 100 tons per year. Your question is whether or not the offset policy should apply.

Since the source's allowable emission rate at the time it commences operation will be in excess of 100 tons per year the offset policy must be applied. However, if the source will agree to limit its operation during the period between the commencement of operation and installation of controls, so that the emission rate will be less than 100 tons per year, then the offset policy will not apply. This operation curtailment must be a State and federally enforceable requirement. (e.g., SIP revision, new source review permit, State and federal tracking orders.)

If you have any additional questions on this, please contact Rich Biondi (755-2564) of my staff.

John B. Rasnic

cc: M. Trutna CPDD