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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

JUN 28 1985

MEMORANDUM

SUBJECT: Seasonal Afterburner Policy, Applicability of Part D New Source Review Requirements

FROM: Robert D. Bauman, Chief
Standards Implementation Branch, CPDD (MD-15)

TO: William S. Baker, Chief
Air Programs Branch, Region II

This is in response to your memorandum dated March 8, 1985, in which you requested guidance on whether emissions increases associated with the winter shutdown of VOC control equipment must be reviewed for applicability for new source review (NSR). Your proposal would allow sources which have historically been using the EPA Seasonal Afterburner Policy to exempt the increases in emissions for NSR applicability. All other sources are prohibited from exempting any emissions from the applicability requirements. These sources include any sources which deviate from the EPA Seasonal Afterburner Policy, existing sources which although able to use the EPA Seasonal Afterburner Policy have not chosen to apply it, and all new sources of air pollution. I support your proposal except for one minor change. All sources in existence before the date of this memo, which have not previously requested an exemption under the EPA Seasonal Afterburner Policy should not be required to evaluate the associated increase in emissions for NSR applicability if the exemption is processed as a SIP revision.

This policy position has been agreed on by Office of General Counsel and Regulatory Reform staffs which should avoid any further revisions in the near term. The attached outline summarizes the relationship between the EPA Seasonal Afterburner Policy and NSR.

Attachment

cc: M. Levin
W. Petersen
D. Tyler

THE RELATIONSHIP BETWEEN THE SEASONAL AFTERBURNER POLICY
AND NSR APPLICABILITY

1. Sources which have historically been using the EPA Seasonal Afterburner Policy will not be required to evaluate the associated increase in emissions for NSR applicability.
2. Sources in existence as of the date of this memo, which have not previously requested an exemption under the EPA Seasonal Afterburner Policy, will not be required to evaluate the associated increase in emissions for NSR applicability if the exemption is processed as a SIP revision.
3. New sources which request the use of the EPA Seasonal Afterburner Policy must be reviewed accordingly:

a. Evaluate the associated increase in emissions when calculating potential emissions for applicability purposes.

b. If the request results in a source being classified as a new major source or major modification, then require:

i. Offsets for all emissions on a tons-per-year basis,

ii. Statewide compliance, and

iii. LAER, which may include seasonal shutdown of afterburners if the State determines this shutdown meets standard industry practices for the use of afterburners.

4. Any other State exemption which allows increases in VOC's during the wintertime which deviate from the EPA Seasonal Afterburner Policy (e.g., for boilers using oil) will be required to evaluate the associated increase in emissions as discussed in (3) above.