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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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OFFICE OF
AIR AND WASTE MANAGEMENT

SUBJECT: Impact of Secondary Emissions in New Source Reviews

FROM: David G. Hawkins, Assistant Administrator
for Air and Waste Management

TO: Regional Administrator
Regions I-X

As you may know, EPA's emission offset interpretative ruling published on December 21, 1976, requires that offsets be obtained for certain secondary emissions resulting from the construction of a new source (e.g., ship or train emissions), if the secondary emissions are specific and can be accurately quantified. Consideration of the indirect impacts of motor vehicle and aircraft traffic is not required, since EPA's authority to perform or require indirect source review relating to mobile sources regulated under Title II of the Act has been restricted by statute. I would like you to call this provision to the attention of your States and urge them to make every attempt to quantify secondary emissions in their new source reviews. I should also mention that the upcoming PSD regulations will also require that the impact of secondary emissions be analyzed as part of the PSD review process.

cc: Air and Hazardous Materials Division Director, Regions I-X
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