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

OFFICE OF
AIR AND RADIATION

OCT 29 1987

MEMORANDUM

SUBJECT: LAER Applicability Relocated Coating Lines

FROM: Rich Biondi, Chief
Regulations Analysis Section

TO: Marcia Spink, Chief
State Air Programs Section

This is to verify the response regarding LAER applicability to the relocated coating lines discussed in the attached memorandum from Lynne Hamjian to Sally Farrell.

In the example presented, a minor source consisting of two coating lines (one controlled by LAER, the other uncontrolled) is being relocated to the site of a major stationary source. Potential emissions from the minor source exceed the significance level for VOC. If the net emissions increase due to the addition of the two coating lines along with any other contemporaneous emission increases and decreases at the major stationary source is significant, then addition of the two lines constitutes a major modification. LAER would apply to both lines of the major modification, regardless of any prior application of control technology. The LAER analysis may or may not result in any additional controls for the previously controlled line, depending on whether LAER has changed since the previous control technology determination.

The Office of General Counsel and the Control Programs Development Division have been consulted in the preparation of this response. If you have any further questions, please contact Sally M. Farrell at FTS 382-2875.

Attachment

cc: David Soloman, CPDD
Greg Foote, OGC
Lynne Hamjian, Region I

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: September 24, 1987

SUBJECT: New Source Review Applicability
Determination

FROM: Lynne A. Hamjian
Regional New Source Review Specialist, Region I

TO: Sally Farrell
Stationary Source Compliance Division

On September 8, 1987, we discussed in a telephone conversation a new source review (NSR) applicability determination. I have summarized that situation in the following paragraphs.

Two existing stationary sources have the same owner, same two digit SIC Code, and emit the same pollutant (VOC). The sources are located in different towns, both of which are in the same ozone nonattainment area. One of the sources is a major stationary source. The other source is a minor source with 2 lines. One line is controlled and has had a LAER determination. The other line is currently uncontrolled. The owner of these two sources would like to relocate the entire minor source to the major source site.

My questions are the following:

- A. Does the controlled line have to have a new LAER determination?
- b. If the uncontrolled line has the potential to emit greater than 40 tons per year, is it a major modification subject to the (NSR) regulations?

In our telephone conversation you responded that the owner should look at the total potential to emit of the minor source being relocated. If the minor source has the potential to emit over 40 tons per year (after controls), it is a major modification subject to the NSR requirements. The uncontrolled line would have to be controlled (LAER) and the controlled line would have to be analyzed to see if the existing controls constitute an up-to-date LAER determination.

Thank you for responding so promptly to my questions. At this time, I am asking if you could confirm your answers in writing.

Thank you again for your assistance.