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

DATE: April 8, 1980

SUBJECT: New Source Review Requirements for Lead

FROM: Richard G. Rhoads, Director, Control Programs Development Division
(MD-15)

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

Recently, several Regions have requested guidance regarding new source review requirements for lead SIPs.

The "Supplementary Guidelines for Lead Implementation Plans" contains a brief outline of general SIP requirements. This outline discusses those portions of 40 CFR 51 regulations "Requirements for Preparation, Adoption, and Submittal of Implementation Plans" that were not revised to account for the lead standard, but which are still applicable to the lead SIPs. Specifically, the requirements of CFR 51.18 Review of New Sources and Modifications must be satisfied for lead SIPs.

Existing permitting regulations adopted in accordance with Section 51.18 may be applicable to lead depending on the specific exemptions included in the State's general permitting regulation. In general, the NSR requirement for lead SIPs may be satisfied by simply revising existing permit regulations to eliminate any exemption of sources that have the potential to emit five tons/year or more of lead.

The source size limit is based on the definition of a point source of lead which is five tons/year actual emissions of lead. The rationale for this limit is based on an analysis contained in the "Supplementary Guidelines for Lead Implementation Plans," pages 73-77. Briefly, this rationale indicates that sources which emit five tons/year of lead have the potential to violate the ambient standard for lead.

If you have any questions regarding new source review in lead SIPs, contact Susan Jackson (629-5365) of my staff.

cc: Chief, Air Branch, Regions I-X
Mike James, OGC
Ed Reich, DSSE