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June 4, 1990

MEMORANDUM

SUBJECT: Definition of Postapproval Monitoring

FROM: Ed Lillis, Chief
Noncriteria Pollutant Program Branch (MD-15)

TO: Marcia Spink, Chief
Air Programs Branch (3AM10)

This is in response to your April 30, 1990 request to clarify the definition of "postapproval monitoring" as the term is used in the regulations for prevention of significant deterioration (PSD) at 40 CFR 51.166(m)(v). As you know, the term is used to identify the time when ambient ozone monitoring is to be undertaken when the normal PSD requirement for preconstruction ozone monitoring is waived. The correct interpretation is that the postapproval period may begin any time after the source receives its PSD permit. This is explained in the Ambient Monitoring Guidelines for Prevention of Significant Deterioration (PSD) [EPA-450/4-87-007, May 1987], which further provides that "in no case should the postapproval monitoring be started later than 2 years after the start-up of the new source or modification." (See page A-19.)

Please give me or Dan deRoeck a call if you have any questions.

cc: Air Branch Chief, Regions I-X
NSR Contacts
Regional Modeling Contacts