

PM2.5 NSR

As of April 5, 2005, we have new PM2.5 nonattainment designations

Implementation of New Source Review Requirements in PM2.5 Nonattainment Area, From Steve Page, Director of OAQPS, April 5, 2005

Available on EPA NSR website. www.epa.gov/nsr

Guidance applies between now and when EPA promulgates the final rule (excepted April 2006)

This applies to NAA only

For Attainment (PSD), *Interim Implementation of New Source Review Requirements for PM2.5*, John S. Seitz, Director of OAQPS, October 23, 1997 still applies.

What does the April 5, 2005 memo say?

- Use PM10 as a surrogate for PM2.5.
- Major source threshold is 100 tpy
- Offset ratio is 1:1
- A source may quantify its PM2.5 fraction. This could be done with test method which includes both the filterable and condensible portions of PM2.5. Could use data from a similar source for the quantification. Other method may be acceptable if found to be reliable.
- Guidance does footnote that the definition of PM2.5 includes condensibles.
- If demonstrate not Major for PM2.5 then no need for NAA permit
- Significant Emission Rate = 15 tpy
- Precursors do not apply. CAIR will cover this for SO2 and NOx. Plan to take comment on this when the proposed rule is published.

Attainment Areas: (Oct. '97 Seitz memo)

- Revised NAAQS PM10 and new PM2.5 in 1997. (PM10 later vacate so the original still holds today)
- October 1997 Seitz memo says treat PM10 as surrogate for PM2.5
- Seitz memo say to use surrogate since monitors and models not ready. Models referred to secondary formation. Model today (especially with out precursor are o.k. except for the post-processing which is under way).

We will still need SIL - for Net Air Quality Benefit tests or cause or contribute test.

Which NAAQS applies?