

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality

Subject: Air Guidance Memo No. APG-307
Interim Implementation of New Source Review for PM_{2.5}

To: Agency Deputy Directors, Regional Directors, Regional Deputy Directors, Regional Air Permit Managers

From: James E. Sydnor
Air Division Director

Date: October 10, 2006

Copies: Office of Air Permits Director, Office of Regulatory Development Director, Office of Air Compliance Director

Summary:

This policy adopts the current Environmental Protection Agency (EPA) guidance on interim implementation of New Source Review (NSR) for PM_{2.5}.

Electronic Copy:

An electronic copy of this guidance is available on the DEQ website at <http://www.deq.virginia.gov/>.

Contact Information:

Please e-mail [Tamera Thompson](mailto:Tamera.Thompson@deq.virginia.gov) or call (804) 698-4502 with any questions regarding the application of this guidance.

Background

A new National Ambient Air Quality Standard (NAAQS) for PM_{2.5} went into effect on September 16, 1997 and was revised on September 22, 2006. When the standard went into effect, PM_{2.5} became a regulated pollutant under the Clean Air Act and subject to major NSR under Title I of the Clean Air Act. Although PM_{2.5} is covered under NSR, the measurement, calculation and modeling of PM_{2.5} had not been fully developed and EPA issued guidance both in October 1997 and April 2005 addressing the interim implementation of PM_{2.5} until such time as EPA promulgates standards or guidelines. Both guidance documents direct permitting authorities to use PM₁₀ as a surrogate for PM_{2.5}.

On September 1, 2006, Virginia's Major New Source Review regulations went into effect and incorporates a PM_{2.5} significance level of 10 tpy.

Definitions

The terms of this policy shall have the same meaning as the terms defined in 9 VAC 5 Chapter 10 and

Articles 8 and 9 of Part II of 9 VAC 5 Chapter 80.

Policy

EPA has issued guidance on the interim implementation of Major New Source Review for PM_{2.5} in the following documents:

[Interim Implementation of New Source Review Requirements for PM_{2.5}](#) – October 23, 1997

[Implementation of New Source Review Requirements in PM_{2.5} Nonattainment Areas](#) – April 5, 2005

For the purpose of implementing Major New Source Review, DEQ shall use PM₁₀ as a surrogate for PM_{2.5}, as specified in the EPA guidance documents, until such time as:

- DEQ establishes a more appropriate implementation methodology; or
- EPA promulgates revised implementation guidance or policy; or
- EPA promulgates final regulations

Virginia sources under 9 VAC 5 Chapter 190 and 9 VAC 5 Chapter 230 with a site-wide emissions cap, may use the PM₁₀ limit as a surrogate PM_{2.5} limit until such time as noted above or until the source has received a PM_{2.5} plantwide applicability limit (PAL) as established by Articles 8 or 9 of Part II of 9 VAC 5 Chapter 80, whichever comes first.