

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Definition of Postapproval Monitoring

DATE:

APR 30 1990

FROM: Marcia Spink, Chief *MS*
Air Programs Branch (3AM10)

TO: Ed Lillis, Chief
Non-Criteria Pollutant Programs Branch (MD-15)

My office recently reviewed a PSD permit application in which the source planned to locate in an attainment area for ozone. Since the source is going to produce over 200 tons per year of VOCs, preconstruction ozone monitoring is generally required. However, a source may gain an exemption from this requirement according to 40 CFR Part 51.166 paragraph m (air quality analysis) subsection v. This section states that "The plan may provide that the owner or operator of a proposed major stationary source or major modification of volatile organic compounds who satisfies all conditions of 40 CFR Part 51 Appendix S, section IV may provide postapproval monitoring data for ozone in lieu of providing preconstruction data as required under paragraph (m)(1) of this section."

While the definitions of preconstruction monitoring and postconstruction monitoring are explicit in the CFR, we were unable to find an explicit definition of postapproval monitoring. Among the possible definitions are that it is the same as postconstruction monitoring or that it is implied that monitoring could begin immediately after the source had received its permit. I would appreciate it if you could clarify the definition of postapproval monitoring as soon as possible. This reference was included in our comments for the public record, and the State may inquire as to its meaning.

cc: G. McCutchen
D. deRoeck