

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

June 12, 1978

MEMORANDUM

SUBJECT: Applicability of PSD Regulations

FROM: Director,  
Division of Stationary Source Enforcement

TO: Gregory J. Glahn, Acting Chief  
Air Programs Branch  
Region IV

This is in response to your memo of May 23, 1978, requesting a determination as to whether the PSD regulations apply to two coal-fired boilers which were shut down in 1971 and 1972 and are now going to be put back into service. In a telephone conversation with Libby Scopino (DSSE), Walter Bishop (Region IV) indicated that the two boilers are part of a textile mill and that the purpose of the boilers is to generate power to operate equipment at the textile mill.

According to the definition of "source" in the latest draft of the PSD regulations\*, all structures, buildings, facilities, and equipment at the site of the textile mill, including any boilers, make up a single source. Since the end product of the source is considered a textile mill. Any major modifications to the textile mill which increase potential emissions of a regulated pollutant by 250 tons or more per year, will be subject to PSD preconstruction review. Since the two coal-fired boilers were not permitted to operate at the time the baseline was established (8/7/77), their renewed operation will be considered a modification of the textile mill. If the operation of the

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\*The latest draft of the PSD regulations defines "source" as "any structure, building, facility, equipment, installation, or operation (or combination thereof) which is located on one or more contiguous or adjacent properties and which is owned or operated by the same person (or by persons under common control).

two coal-fired boilers potentially increases emissions by 250 tons or more per year they will be subject to appropriate PSD review, regardless of their size. Whether or not the two boilers are the subject to PSD review, their actual emissions will consume the available PSD increments.

If you have any questions regarding this matter, please contact Libby Scopino (755-2564) of my staff.

Edward E. Reich

cc: Mike Trutna, CPDD