

**MEMO #:** PS93-008 (revised)

**To:** Permit Section Staff and Dave Ouimette

**From:** R K Hancock III and Jim Geier

**Date:** November 19, 1993 (revised 12/02/93)

**Subject:** Modification Tracking Form

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I have developed a new form to replace the old Modification Tracking form. With this memo I am circulating a copy of this form and a copy of a portion of one of the old PPMs describing the use of this form.

The new form can also be found in K:\TMPLTS and is called MOD.TRK.

All sources (except portables and temporary sources) should have one of these forms filled out for each location. If you are doing a modification or addition to an existing source that has not had one of these filled out, you need to do so. I realized that this may be difficult to do for some sources, but it is important in determining major source status, major modifications, contemporaneous changes, etc.

If you are doing a new application for a new location, you also need to fill out one of these forms to include with the packet.

Please be aware that one provision of the old PPM instruction has changed. This change involves how a major modification is reviewed for PSD purposes. The old memo states that we will review contemporaneous changes for all changes at an existing major source in an attainment area. The Division is not using this approach, but instead follows EPA's method explained in the PSD/NSR workbook (October 1990). This requires that the individual change must first be a significant increase before contemporaneous changes are reviewed.

In non-attainment areas we will continue to examine contemporaneous changes with any change at a major source.