

INTER-OFFICE COMMUNICATION

TO: Stationary Sources Staff

FROM: Jim Geier/ Dave Ouimette

DATE: March 5, 1999

RE: **PS Memo 98-008** Ozone Permitting Requirements for Metro Denver

This memo revises the APCD's requirements for permitting for the ozone NAAQS in the Metro Denver area. The requirement is that Prevention of Significant Deterioration (PSD) will now be required for new major stationary and major modifications, instead of the more stringent Non-Attainment New Source Review (NA-NSR).

BACKGROUND

The Denver Metro area has been classified as Ozone non-attainment for permitting purposes since the 1970's. Over the years the ambient ozone concentrations have been reduced and violations of the Ozone one-hour NAAQS have occurred. Official redesignation, by EPA, to attainment did not occur. In 1997 a new ozone eight-hour ambient standard was promulgated by EPA. With the implementation of the new standard EPA has eliminated the non-attainment classification for the Denver metro area. Currently Denver has no classification for ozone. A new classification determination is not expected until July 2000.

NEW REQUIREMENTS

Since Denver is no longer non-attainment for ozone the NA-NSR requirements are no longer in effect and PSD requirements now apply. The most significant results of this change are that the major stationary source permitting threshold is now 250 tons per year for unlisted source categories instead of 100 TPY (listed source categories are those found in the definition of Major Stationary Source and are still major at 100 tons per year); and the Lowest Achievable Emission (LAER) requirement is replaced by the Best Available Control Technology (BACT) requirement. Other PSD requirements also apply as stated in Part B IV.D.3.

REGULATION 7

The VOC control requirements contained in Regulation 7 will still be in effect. This regulation, which is an element of the Metro Denver ozone SIP, will continue to be in effect until such time as a new SIP is developed to address the eight-hour Ozone standard.

PRECURSORS

The only pollutant which is considered a precursor to ozone in the Denver area is volatile organic compounds. Nitrogen oxides are not considered when permitting for ozone in Denver, however, it is still a precursor for PM10 in the Denver area. It should be noted that in many other areas of the US, NO_x is considered an ozone precursor and extensive reduction requirements exist.