Message

From: Stauffer, Panah [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=50083CE00E384879B4E4E066B0923C22-BHALLA, PANAH]
Sent: 8/23/2019 9:24:43 PM
To: Xu, Jin@ARB [jin.xu@arb.ca.gov]
CC: Smith, Noah [SMITH.NOAH@EPA.GOV]; Yannayon, Laura [Yannayon.Laura@epa.gov]
Subject: RE: Appendix S- NNSR- Letters from Districts

Hi Jin,

Yes, I understand the question. The Infrastructure SIP requires us to verify whether districts are following a federally approved NNSR program. Districts where NNSR rules have not yet been approved, or have not yet been submitted, are required to follow Appendix S if they need to issue a major source permit for their nonattainment pollutant(s).

The purpose of the letter is to verify that districts who do not yet have approved NNSR rules (whether or not they have been submitted) are still following the federally approved Appendix S process. It's a verification process for the infrastructure SIP and is separate from the approval process for the NNSR rule. It's the same process we went through for the last Infrastructure SIP.

I hope that helps- feel free to give me a call if it doesn't.

Thanks a lot,
Panah

Panah Stauffer
Air Division (AIR-2)
US EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
415-972-3247

From: Xu, Jin@ARB <jin.xu@arb.ca.gov>
Sent: Friday, August 23, 2019 1:47 PM
To: Stauffer, Panah <Stauffer.Panah@epa.gov>
Subject: FW: Appendix S- NNSR- Letters from Districts

Hi Panah,

Please see Dave's email below. I am wondering as well if the Districts need to submit the letters while waiting for EPA's action?

Thanks,
Jin

From: Dave Conway <dconway@mariposacounty.org>
Sent: Friday, August 23, 2019 1:39 PM
To: Xu, Jin@ARB <jin.xu@arb.ca.gov>; Jim McHargue <jmchargue@amadorgov.org>; Gretchen Bennitt <gretchen@myairdistrict.com>; Gary Arcemont <garcemont@co.slo.ca.us>; Doug Carson <DCarson@co.calaveras.ca.us>; jtona@tehcoapcd.net
Subject: RE: Appendix S- NNSR- Letters from Districts

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Hello Jin,
We submitted our NSR rule in Feb of this year and received a completeness determination from EPA. Why are we having to go through this exercise when we are actually waiting on them to take action?

Dave Conway, REHS
Deputy APCO
Director, Environmental Health Division
Mariposa County Health and Human Services Agency

From: Xu, Jin@ARB [jin.xu@arb.ca.gov]
Sent: Friday, August 23, 2019 12:06 PM
To: Jim McHargue; Dave Conway; Gretchen Bennitt; Gary Arcemont; Doug Carson; jtona@tehcoapcd.net
Subject: FW: Appendix S- NNSR- Letters from Districts

Dear all,

Based on our communications with US EPA Region 9, your Districts are currently using Appendix S of 40 CFR Part 51 until you have SIP-approved NNSR programs. Therefore, EPA is asking you to send them a confirmation letter for this, and attached is a template you can use for the letter. The email below also includes information on who you should email the signed letter back to. EPA would like to receive the signed letters by the end of September if possible. Please let me and/or Panah (from EPA) know if you have any questions.

Thanks,
Jin

Jin Xu
Manager, Air Quality Analysis Section
Air Quality Planning and Science Division
California Air Resources Board
jin.xu@arb.ca.gov
(916) 327-1511

From: Stauffer, Panah <Stauffer.Panah@epa.gov>
Sent: Friday, August 23, 2019 11:18 AM
To: Xu, Jin@ARB <jin.xu@arb.ca.gov>; Densberger, Matthew@ARB <Matthew.Densberger@arb.ca.gov>; Andrews, Paul@ARB <Paul.Andrews@arb.ca.gov>; Kwong, Jenette@ARB <jenette.kwong@arb.ca.gov>
Cc: Smith, Noah <SMITH.NOAH@EPA.GOV>
Subject: Appendix S- NNSR- Letters from Districts

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Hi Jin, Matthew, Paul and Jenette,

As we discussed yesterday, our permits colleagues have indicated that six districts are using Appendix S of 40 CFR Part 51 until they have SIP-approved NNSR programs. The districts are:

Amador
Mariposa
Northern Sierra
San Luis Obispo

Tehama
Tuolumne

We need letters from these districts confirming that they are using Appendix S. The template is attached.

Here are the email addresses for sending the letters back. I listed Jin and Matthew as ARB contacts in the eC line in the Word doc- feel free to change that.

To: Rios.Gerardo@epa.gov
CC: jin.xu@arb.ca.gov; Matthew.Densberger@arb.ca.gov; Stauffer.panah@epa.gov; Smith.Noah@epa.gov

Thanks in advance and please let us know if you have any questions or concerns. It would be great if we can get the signed letters by the end of September. Also, if any of these districts are not using Appendix S, please let us know.

Thank you very much,
Panah

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