

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: September 29, 1978

SUBJECT: PSD Increment Consumption Question

FROM: Darryl D. Tyler, Chief
Standards Implementation Branch, CPDD

TO: Jack S. Divita, Chief
Air Programs Branch, Region VI

Your letter of September 11, 1978, asked whether modifications which were individually less than 100 tons/year potential and which were made to a major source (as now defined) between January 6, 1975, and August 7, 1977, would cumulatively count against the PSD increment. We agree with your conclusion that such modifications contribute to the PSD baseline air quality, as opposed to consuming increment. We note that any modifications which would be, individually, a "major modification" as now defined, consume increment if the modification occurred after January 6, 1975.

cc: R. Biondi