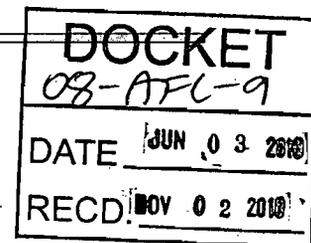


Felicia Miller - Re: 16_PHPP: Palmdale FDOC and Road Paving ERCs

From: "Yannayon.Laura@epamail.epa.gov" <Yannayon.Laura@epamail.epa.gov>
To: "Rivera.Shirley@epamail.epa.gov" <Rivera.Shirley@epamail.epa.gov>
Date: 6/3/2010 9:24 AM
Subject: Re: 16_PHPP: Palmdale FDOC and Road Paving ERCs
CC: "Steckel.Andrew@epamail.epa.gov" <Steckel.Andrew@epamail.epa.gov>, "Rios.Gerardo@epamail.epa.gov" <Rios.Gerardo@epamail.epa.gov>, "Aquitania.Manny@EPAMAIL.EPA.GOV" <Aquitania.Manny@EPAMAIL.EPA.GOV>, SteveRadis <steve.radis@mrsenv.com>

Hi Shirley,

Just as an FYI for everyone involved, let me provide a status update for Rule 1309.2. Before EPA could approve this rule, the local District must submit to EPA a PM10 attainment plan, including a detailed PM10 emission inventory. My understanding is that the District has been working on this for a couple of years, and this issue is the major stumbling block for any future action by EPA on this proposed rule. A source could not rely on credits generated by this rule, until the rule is approved by EPA into the SIP.

Laura Yannayon

US EPA, Region 9 / Air Division, Permits Office (Air-3) / 75 Hawthorne St. / San Francisco, CA 94105-3901
 yannayon.laura@epa.gov / (415) 972-3534 / (415) 947-3579 (fax)

From: Shirley Rivera/R9/USEPA/US
To: steve.radis@mrsenv.com
Cc: Manny Aquitania/R9/USEPA/US@EPA, Andrew Steckel/R9/USEPA/US@EPA, Gerardo Rios/R9/USEPA/US@EPA, Laura Yannayon/R9/USEPA/US@EPA
Date: 06/03/2010 08:52 AM
Subject: 16_PHPP: Palmdale FDOC and Road Paving ERCs

[Manny - Pls. read; and I have a copy of the FDOC. - S.]

[Andy & Laura - Will follow-up with you on Antelope Valley rulemaking calendar & this potential new rule. -S.]

[Gerardo - See below re: reference to ERC road paving rule; will follow-up with you next week. - S.]

=====

Hi Steve,

Thanks for your v/m (on Tuesday) regarding Palmdale. We may start to play phone tag, so figured I'd email you and get a few folks copied on this note who may have more knowledge of status of Antelope Valley's reference to a new ERC road paving rule. I've copied:

Manny - geographic lead for AVAQMD

Andrew - Chief of the Air Rules Office

Gerardo - Chief of the Air Permits Office

Laura - our Permits Office ERC point contact

Feel free to have me as your point contact, but just wanted to let you know who/why folks copied.

Below touches upon the topics you touched upon in your v/m to me.

- **Potential New ERC Road Paving Rule (1309.2):** Meanwhile, I understand your question relates to the following:
 - Antelope Valley AQMD
 - Proposed rule (1309.2) re: ERCs from Road Paving
 - AVAQMD Rulemaking Calendar

You briefly mentioned on your v/m msg that you all at the CEC still have some issues with PHPP, even though the FDOC has been issued. For convenience of reference of others copied, I'm attaching Antelope Valley's master calendar where on page 3 (of 4) there is reference to **Rule 1309.2, ERCs from Road Paving Operations, Potential New Rule Requested by EPA.**

[attachment "AVAQMD_MasterRule 2010 Calendar.pdf" deleted by Laura Yannayon/R9/USEPA/US]
<http://www.avaqmd.ca.gov/Modules/ShowDocument.aspx?documentid=917>

- **Rulemaking status:** I'll later check-in with Andy and Laura in our Division regarding this potential new rule.
-
- **PSD Permit Status:** So you know, we/Air Permits Office are awaiting information from Palmdale for its PSD permit app; we requested 1-hr NO2 modeling, among other additional info, so I'll check in with the PHPP folks (Sara) on status.
- **AVAQMD FDOC for Palmdale:** Yes, we do have a copy of the FDOC (Final Determination of Compliance, aka the "NSR permit"). And I have not checked-in on the status of the California Energy Commission's (CEC's) licensing process for PHPP, so we'll make a point to do so by end of next week. I do not know if Manny has had a chance to look at the CEC's activities. Meanwhile, with a quick check, I do see you all have the PSA.

***** CEC's Scheduling Order** ...If you have that handy, can you please forward? This will help us know when the pre-hearing, evidentiary hearing, etc. are projected.

If you have other specifics, feel free to call me and/or email me.

Best regards,

- Shirl

Week of May 31: In office Tuesday through Thursday (06/01-06/03)

Shirley F. Rivera

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