

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D.C. 20460

OFFICE OF
AIR, NOISE, AND RADIATION

April 8, 1981

Mr. Russell E. Dickenson, Director
National Park Service
U. S. Department of Interior
Washington, D.C. 20240

Dear Mr. Dickenson:

Thank you for your letter of February 26, 1981 outlining your concerns over the limited time that the National Park Service (NPS) has to review prevention of significant deterioration (PSD) permit applications for facilities which may impact Class I areas. Therein you suggested that EPA reconfirm our policy to notify the NPS as early in the permitting process as possible as outlined in the memo from Dave Hawkins to the Regional Administrators dated March 19, 1979. You also suggested that EPA amend 40 CFR Part 51 regulations for an approvable state PSD program and 40 CFR Part 52 PSD regulations to require EPA and States to provide the appropriate Federal Land Manager (FLM) with copies of relevant permit applications on or shortly after the date of receipt of the permit application.

I would first like to reaffirm the existing policy for timely EPA transmittal of PSD permits affecting Class I areas as identified in the Hawkins' memo of March 19, 1979. By this letter, I am advising the Regions that these permit applications should be sent to the appropriate FLM NPS Regional Office, NPS Air Quality Division Permit Review Unit, and all other appropriate personnel as described in your letter (see enclosure) as soon as possible. Normally the EPA Region should transmit the permit application within 10 days of receipt of such applications.

In response to your second suggestion, I do not believe that additional rulemaking is necessary to ensure that your staff has notice of each PSD source with potential Class I area impacts well before the preliminary determinations. As noted above, EPA's policy is to provide copies of the permit application to the applicable contacts soon after its receipt. This policy clearly covers those situations where EPA now implements the PSD review.

Similarly, further rulemaking is not necessary, to guarantee that State PSD programs provide this same type of notification. 40 CFR 51.24(p)(1) now requires that each PSD State Implementation Plan (SIP) is to provide that "the reviewing authority shall transmit to the Administrator a copy of each permit application relating to a major stationary source or major modification and provide notice to the Administrator of every action related to the consideration of such [application]."

EPA would read the quoted language to mean that the reviewing authority is to transmit a copy of each PSD permit application before it takes any significant action on the application. Also EPA would regard any determination of the completeness of an application as a significant action. As a result, EPA would interpret 40 CFR 51.24(p)(1) as requiring each PSD SIP to require in turn that the reviewing authority must submit each PSD application to EPA before it makes a completeness determination. Of course, once EPA receives an application for a project that might significantly affect a Class I area, it would provide you with notice of it in accordance with this letter and the March 19, 1979 policy.

I hope that this response has been helpful. If I can be of any further assistance, please do not hesitate to contact me.

Sincerely yours,

Edward F. Tuerk
Acting Assistant Administrator
for Air, Noise and Radiation

Enclosure

cc: Regional Administrator Regions I - X

United States Department of the Interior
NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

FEB 26 1981
IN REPLY REFER TO:
N3615 (492)

Mr. Walter C. Barber, Acting Administrator
U.S. Environmental Protection Agency
Washington, D. C. 20460

Dear Mr. Barber:

In a March 19, 1979 memorandum to the EPA Regional Administrators, Mr. David Hawkins requested each Regional Office to establish a mechanism to ensure that notice is provided to the Federal land manager immediately upon receipt of a PSD permit application for facilities which may affect a class I area. This action was requested by the Director of the National Park Service (NPS) to enable the NPS to carry out our statutory responsibilities for the protection of air quality related values in class I areas under section 165(d) of the Clean Air Act. Although in some instances the NPS has been notified of a permit application when it is submitted, or even before it is submitted, the majority of notifications are being made when EPA, or a state which has been delegated PSD authority, proposes the preliminary determination on the permit. This gives us at most 30 days to evaluate the impact on the class I area, which is simply not enough time to do a proper review.

Therefore, I urge you to reiterate the points made in Mr. Hawkins' March 19 memorandum. In addition, I urge you to amend the 40 CFR Part 51 requirements for an approvable State PSD program to include a requirement to notify the appropriate Federal land manager on the date of receipt of a permit application and to similarly amend EPA's 40 CFR Part 52 PSD requirements. Such notification should include at least two copies of the application, one for the NPS Regional Office and one for the NPS Air Quality Division Permit Review Unit. An updated list of responsible NPS officials is enclosed to assist EPA in meeting this request.

Under a cooperative agreement with the Fish and Wildlife Service (FWS), the NPS Air Quality Division is providing technical review of PSD permits that affect FWS class I areas. Therefore, I am also enclosing a list of responsible FWS officials to be notified.

We appreciate the continued cooperation of EPA in meeting our Clean Air Act responsibilities.

Sincerely yours,

Russell E. Dickenson
Director

Enclosure

AIR QUALITY CONTACTS FOR
NATIONAL PARK SERVICE

REGIONAL DIRECTORS

Regional Director
Alaska Regional Office
540 West 5th Avenue
Anchorage, AK 99501

Regional Director
Mid-Atlantic Regional Office
National Park Service
143 South Third Street
Philadelphia, PA 19106

Regional Director
Midwest Regional Office
National Park Service
1709 Jackson Street
Omaha, NE 68102

Regional Director
North Atlantic Regional Office
National Park Service
15 State Street
Boston, MA 02109

Regional Director
National Capital Parks
National Park Service
1100 Ohio Drive, S. W.
Washington, D. C. 20242

Regional Director
Pacific Northwest Regional
Office
National Park Service
601 Fourth and Pike Building
Seattle, WA 98101

Regional Director
Rocky Mountain Regional Office
National Park Service
655 Parfet Street
P.O. Box 25287
Denver, CO 80225

Regional Director
Southeast Regional Office
National Park Service
75 Spring Street, S. W.
Atlanta, GA 30303

JURISDICTION

Alaska

Pennsylvania, Maryland, West
Virginia,
Delaware, Virginia, excluding parks
assigned to National Capital Parks

Ohio, Indiana, Michigan, Wisconsin,
Illinois, Minnesota, Iowa, Missouri,
Nebraska, Kansas

Maine, New Hampshire, Vermont,
Massachusetts, Rhode Island,
Connecticut, New York, New Jersey

District of Columbia, some units in
Maryland, Virginia, West Virginia

Idaho, Oregon, Washington

Montana, North Dakota, South Dakota,
Wyoming, Utah, Colorado

Kentucky, Tennessee, North Carolina,
South Carolina, Mississippi,
Alabama,
Georgia, Florida, Puerto Rico,
Virgin Islands

Regional Director
Southwest Regional Office
National Park Service
P. O. Box 728
Santa Fe, NM 87501

Arkansas,
New Mexico

Regional Director
Western Regional Office
National Park Service
450 Golden Gate Avenue
Box 36063
San Francisco, CA 94102

California,
Hawaii

NPS CLASS I AREA SUPERINTENDENTS:

Superintendent
Acadia National Park
Route 1, Box 1
Bar Harbor, ME 04609

Superintendent
Arches National Park
446 South Main Street
Moab, Utah 84532

Superintendent
Badlands National Monument
P. O. Box 6
Interior, South Dakota 57750

Superintendent
Bandelier National Monument
Los Alamos, NM 87544

Superintendent
Big Bend National Park
Big Bend NP, Texas 79834

Superintendent
Black Canyon of the Gunnison NM
P. O. Box 1648
Montrose, CO 81401

Superintendent
Bryce Canyon National Park
Bryce Canyon, Utah 84717

Superintendent
Canyonlands National Park
446 South Main Street
Moab, Utah 84532

Superintendent
Carlsbad Caverns National Park
3225 National Parks Highway
Carlsbad, New Mexico 88220

Superintendent
Capitol Reef National Park
Torrey, Utah 84775

Superintendent
Lewis S. Albert
Chiricahua National Monument
and Wilderness Area
Dos Cabezas Star Route
Willcox, Arizona 85643

Superintendent
Crater Lake National Park
P. O. Box 7
Crater Lake, Oregon 97604

Superintendent
Craters of the Moon NM
P. O. Box 29
Arco, Idaho 83213

Superintendent
Everglades National Park
P. O. Box 279
Homestead, Florida 33030

Superintendent
Glacier National Park
West Glacier, Montana 59936

Superintendent
Grand Canyon National Park
P. O. Box 129
Grand Canyon NP, Arizona 86023

Superintendent
Grand Teton National Park
P. O. Box 67
Moose, Wyoming 83012

Superintendent
Great Smoky Mountain NP
Gatlinburg, TN 37738

Superintendent
Great Sand Dunes NM
P. O. Box 60
Alamosa, Colorado 81101

Superintendent
Guadalupe Mountains National Park
3225 National Parks Highway
Carlsbad, Texas 88220

Superintendent
Haleakala National Park
P. O. Box 537
Makawao, Hawaii 96768

Superintendent
Hawaii Volcanoes National Park
Hawaii National Park, Hawaii 96768

Superintendent
Isle Royale National Park
87 North Ripley Street
Houghton, MI 49931

Superintendent
Joshua Tree National Monument
74485 Palm Vista Drive
Twentynine Palms, California 92277

Superintendent
Kings Canyon National Park
Three Rivers, California 93271

Superintendent
Lassen Volcanic National Park
Mineral, California 96063

Superintendent
Lava Beds National Monument
P. O. Box 867
Tulelake, California 96134

Superintendent
Mammoth Cave National Park
Mammoth Cave, KY 42259

Superintendent
Mesa Verde National Park
Mesa Verde NP, CO 81330

Superintendent
Mount McKinley National Park
P. O. Box 9
McKinley Park, Alaska 99755

Superintendent
Mount Rainier National Park
Tahoma Woods, Star Route
Ashford, WA 98304

Superintendent
North Cascades National Park
800 State Street
Sedro Woolley, WA 98284

Superintendent
Sequoia National Park
Three Rivers, California 93271

Superintendent
Olympic National Park
600 East Park Avenue
Port Angeles, WA 98962

Superintendent
Petrified Forest National Park
Petrified Forest NP, AZ 86028

Superintendent
Pinnacles National Monument
Paicines, California 95043

Superintendent
Point Reyes National Seashore
Point Reyes, California 94956

Superintendent
Redwood National Park
Drawer N
Crescent City, California 95531

Superintendent
Rocky Mountain National Park
Estes Park, CO 80517

Superintendent
Saguaro National Monument
P. O. Box 17210
Tucson, Arizona 85731

Superintendent
Shenandoah National Park
Route 4, Box 292
Luray, Virginia 22835

Superintendent
Theodore Roosevelt NMP
Medora, ND 58645

Superintendent
Virgin Islands National Park
P. O. Box 806
Charlotte Amalie
St. Thomas, VI 00801

Superintendent
Voyageurs National Park
P. O. Drawer 50
International Falls, MN 56649

Superintendent
Wind Cave National Park
Hot Springs, SD 57747

Superintendent
Yellowstone National Park
P. O. Box 168
Yellowstone National Park, WY 82190

Superintendent
Yosemite National Park
Yosemite NP, California 95389

Superintendent
Zion National Park
Springdale, UT 84767

NPS AIR QUALITY DIVISION:

Chief, Air Quality Division
Department of the Interior
National Park Service (492)
18th and C Streets, N. W.
Washington, D. C. 20240

Chief, Permit Review Unit
National Park Service - AIR
P. O. Box 25287
Denver, CO 80215

AIR QUALITY CONTACTS FOR
US. FISH AND WILDLIFE
SERVICE

Washington Office

Elisabeth Cumminings
Richard Eichhorn
Division of Refuge
Management
Branch of Planning
U.S Fish and Wildlife
Service
U.S Dept. of Interior
19th and E. St., N.W.
Washington, D.C. 20240

Phone FTS: 343-4047
Comm. 202-343-4047

FWS/NPS Technical Staff

John Christiano
Air Quality Team
National Park Service
655 Parfet Street,
25287
Lakewood, CO 80225

Phone FTS: 234-6419
Comm. 303-234-6419

Regional Offices

Region 1

Harvey Lee
U.S. Fish and Wildlife
Service
Suite 1692, 500 N.E.
Multnomah Street
Portland OR 97232

Phone FTS: 429-6171
Comm. 503-231-6171

Region 2

Wayne Gueswel
U.S. Fish and Wildlife
Service
Box 1306
Albuquerque, NM 87103

Phone FTS: 474-2036
Comm. 505-766-2036

Region 3

Calvin P. Gale
U.S Fish and Wildlife
Service
Federal Building, Fort
Snelling
Twin Cities, MN 55111

Phone FTS: 725-3570
Comm. 612-725-3570

Region 4

Travis McDaniel
U.S. Fish and Wildlife
Service
Richard B. Russell
Federal Bldg.
75 Spring Street S.W.
Atlanta, GA 30303

Phone FTS: 242-3538
Comm. 404-221-3538

Region 5

Gaylord Inman
Brigantine NWR
Great Creek Road, Box 72
Oceanville, NJ 08231

Comm. 609-652-1665

Region 6

Bill Knauer
U.S. Fish and Wildlife
Service
Box 25486, Denver Federal
Center
Denver, CO 80225

FTS 234-4608
Comm. 303-234-4608

Alaska

Don Redfearn
U.S. Fish and Wildlife
Service
1011 E. Tudor Road
Anchorage, AK 99503

Comm. 907-276-3800

I Areas

ALASKA

Bering Sea Wilderness

Charles Strickland,
Refuge Manager
Clarence Rhode NWR
Box 346
Bethel, AK 99559

Comm. 907-543-3151

Simeonof Wilderness

John Sarvis, Refuge
Manager
Izembek NWR
Pouch #2
Cold Bay, AK 99571

Comm. 907-532-2445

Tuxedni Wilderness

James Frates, Refuge
Managor
Kenai National Moose
Range
Box 2139
Soldotna, AK 99669

Comm. 907-262-7021

Mingo Wilderness

Gerald Clawson, Refuge
Manager

Comm. 314-222-3589

Mingo NWR
Rural Route 1, Box 9A
Puxico, MO 63960

Ralph F. Fries, Refuge
Manager

Comm. 406-538-8707

Charles M. Russell NWR
Box 110
Lewistown, MT 59457

Lake Wilderness

Jay R. Bellinger, Refuge
Manager
Medicine Lake NWR

Comm. 406-789-2305

Red Rock Lakes Wilderness

Eugene Stroops, Refuge
Manager

Comm. 406-276-3347

Red Rock Lake NWR
Monida Star Route, Box 15
Lima, MT 59729

Brigantine Wilderness

Gaylord L. Inman, Refuge
Manager

Comm. 609-652-1665

Brigantine NWR
Great Creek Road, Box 72
Oceanville, NJ 08231

Salt Creek Wilderness

LeMoyne Marlatt, Refuge
Manager

Comm. 505-622-6755

Bitter Lake NWR

Box 7
Roswell, NM 88201