August 2, 2010

Mr. Jared Blumenfeld, Regional Administrator
Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Blumenfeld:

IMPLEMENTATION OF GREENHOUSE GAS TAILORING RULE FOR PREVENTION OF SIGNIFICANT DETERIORATION (PSD) AND TITLE V

This letter is being submitted pursuant to the notification request in EPA's recently promulgated "Prevention of Significant Deterioration and Title V Greenhouse Gas Tailoring Rule" (Tailoring Rule) at 75 FR 31514, Sections IV.C and V.C.5.

The Shasta County Air Quality Management District (District) currently does not implement a PSD program. The District does implement an approved Title V permitting program under Part 70.

The District is observing the efforts of the California Air Pollution Control Officers Association (CAPCOA) on PSD and the Tailoring Rule. CAPCOA is undertaking development of two model Rules. One Rule will implement all the program requirements of PSD, and the other will implement the requirements of the Tailoring Rule. Both efforts are being undertaken in collaboration with EPA Region IX staff.

The District has been working with your staff for over two years to obtain limited PSD authority, and has to date been unable to obtain this authority due to, nearly continuous changes that your agency is making with these Rules. The District staff will inform EPA Region IX of our intent to adopt either of these model Rules or whether the District will pursue a different implementation path, as has been the intent for the last two years. Additionally, with litigation now pending in the D.C. Court of Appeals we ask you to stay the effectiveness of these proposed Rules, until this litigation is resolved.

Feel free to contact me with any questions.

Sincerely,

Russ Mull
Air Pollution Control Officer

rm/m

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Permits Office Air-3
U.S. EPA, Region 9