

## Appendix 8

### Rule Revision Analysis Guidelines

#### Principles

- A SIP revision may not interfere with any applicable requirement concerning attainment of the NAAQS and reasonable further progress or other applicable requirements of the CAA (e.g., applicable PSD increments, progress towards meeting the national visibility goal in mandatory federal Class I areas). See CAA 110(l).
- In general, no technical demonstration is required for rule revisions that are simply administrative or procedural in nature (e.g. registration, reporting requirements) unless the effect of the rule was explicitly relied upon in an attainment or maintenance demonstration.
- The nature of the technical demonstration required for revisions to emission limitations (including test methods) or control measures will depend on the effect of the revision on the emission of air pollutants.
- In most cases, it is reasonable to assume that a rule revision that does not increase emissions (e.g., that is not a relaxation) will not interfere with attainment of the NAAQS and other CAA requirements.
- A more robust Section 110(l) demonstration may be needed in specific cases, including in response to comments raised during the public comment period on EPA's proposed approval of a SIP revision.

#### Determine if Revision is a Relaxation

- Describe the revision and document the change in emissions which would occur. The documentation should:
  - 1) explain the difference in requirements,
  - 2) identify all affected sources or source categories, and
  - 3) quantify changes in both actual and allowable emissions.
- Revisions that could increase emissions include, but are not limited to:
  - 1) a simple change in an emission limitation,
  - 2) a change to source applicability,
  - 3) a change in the nature or form of the requirement, and/or
  - 4) a change in the compliance test method or procedures.

#### Level of Technical Demonstration

- If emission changes cannot be quantified, then a qualitative assessment should be made.
- If the change in emissions is deemed de minimis, no additional demonstration is generally needed. For purposes of these guidelines, de minimis means that the total change in emissions does not exceed

EPA's significant emission rates for any facility (i.e., entire plant) that has emissions subject to the rule. A demonstration could be needed even for a change in emissions that is less than EPA's significant emission rates for an area that is very close to applicable standards.

- If the revision tightens emission limits, no further demonstration is generally needed. If the tighter limits are part of an attainment or maintenance plan, the effect of the revision must be included in the attainment or maintenance plan demonstration. Further demonstration could also be needed where available information shows the SIP revision, in conjunction with existing SIP requirements would interfere with attainment of the NAAQS and reasonable further progress or other applicable requirements of the CAA.
- For relaxations in attainment or unclassifiable areas, demonstrate that the increase in allowable emissions will not violate the NAAQS, that the increase in actual emissions will not violate any applicable PSD increment, and that the increase in allowable emissions is consistent with any applicable visibility/regional haze protection plan.

For relaxations in nonattainment areas demonstrate that the increase in allowable emissions resulting from the new emission limits are offset by decreases in allowable emissions from other new controls on other sources and either demonstrate that the new emission limits will attain and maintain the NAAQS, or document that the new emission limits are consistent with the approved demonstration of attainment. See also CAA Section 193.