



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR RESOURCES
235 Promenade Street
Providence, Rhode Island 02908

February 6, 2019

Patrick Bird
EPA - New England, Region I
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Dear Pat,

On March 26, 2018, the Rhode Island Department of Environmental Management (RIDEM), Office of Air Resources submitted an amended version of Air Pollution Control Regulation 9, entitled "Air Pollution Control Permits" as a revision to the Rhode Island State Implementation Plan (SIP).

We are clarifying the March 2018 submittal to only include the following changes made to the regulation for the purposes of incorporation into the Rhode Island SIP.

- Amendment to the definition of "Regulated NSR Pollutant" in 9.5(A)(36), which corresponds to 9.1.36 in the currently approved Rhode Island SIP.
- Amendment to the definition "Subject to Regulation" in 9.5(A)(41), which corresponds to 9.1.41 in the currently approved Rhode Island SIP.
- Amendment to the definition of "Baseline concentration" in 9.5(C)(2), which corresponds to 9.5.1(b) in the currently approved Rhode Island SIP.
- Amendment to the definition of "Major Source Baseline Date" in 9.5(C)(4) which corresponds to 9.5.1(d) in the currently approved Rhode Island SIP.
- Amendment to the definition of "Minor Source Baseline Date" in 9.5(C)(5) which corresponds to 9.5.1(e) in the currently approved Rhode Island SIP.
- Amendment to the definition of "Major Stationary Source" in 9.5(C)(6) which corresponds to 9.5.1(f) in the currently approved Rhode Island SIP.
- Amendment to the definition of "Increment" in 9.5(C)(6) which corresponds to 9.5.1(c) in the currently approved Rhode Island SIP.
- Elimination of the restriction on increment consumption in subsection 9.9.2 which corresponds to 9.5.3(a) in the currently approved Rhode Island SIP.
- Amendment to the provisions in 9.9.2(A)(5)(e)(3) which corresponds to 9.5.3(c)(5)c in the currently approved Rhode Island SIP, and
- Amendment to the table in 9.9.4(a), which corresponds to the table at 9.5.5 in the currently approved Rhode Island SIP.

RIDEM requests that EPA insert the above changes into the existing Rhode Island SIP in a manner that places the changes in the proper context of the existing SIP even though the codification format

associated with the changes will be different than the format used in the existing SIP. RIDEM understands that the new inserted changes will be federally-enforceable even though they differ from the configuration in the existing SIP.

Due to a state-wide recodification of Rhode Island regulations, the format of Regulation 9 has changed significantly. RIDEM intends to make further revisions to Regulation 9 in the near future and at that time we will seek to have the existing SIP version of Regulation 9 be replaced in its entirety with the revised version.

Should you have any questions about this submittal, please contact Karen Slattery at (401) 222-2808 ext. 7030 or karen.slattery@dem.ri.gov.

Sincerely,



Laurie A. Grandchamp, P.E.
Administrator, Environmental Protection
Office of Air Resources