

"LIST AND CRITERIA"

INFORMATION REQUIRED OF APPLICANTS SEEKING A PERMIT FROM
THE SACRAMENTO AIR QUALITY MANAGEMENT DISTRICT
Adopted March, 1985
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INTRODUCTION

What is the "List and Criteria"?

The Sacramento Metropolitan Air Quality Management District has adopted this "List and Criteria" to help determine whether applications for future development projects, Title-V permits, or Title-V permit renewals are complete. This List and Criteria identifies information required of applicants seeking an Authority to Construct or Permit to Operate air pollution sources and requires submission of the information before an application can be determined to be complete.

While an application is being processed, the Air Pollution Control Officer may request that the applicant clarify, amplify, or supplement the information required by this List and Criteria.

Timeframe to determine application completeness:

Authorities to Construct:

Within 30 days after receiving an application for an Authority to Construct or Permit to Operate, the Air Pollution Control Officer will advise the applicant in writing whether the application is complete. If an application is incomplete, the Air Pollution Control Officer will tell the applicant what additional information needs to be provided. Upon resubmission of an application, a new 30-day review period begins.

Facilities that have Title V Permits to Operate and that are requesting review through the enhanced New Source Review (NSR) process (see Part A, Section 2) or that have significant Title V permit modifications will be subject to the same timelines and application completeness criteria as Title V Permit to Operate applications.

Title V - Permits to Operate:

Within 60 days after receiving an application for a Title V permit to operate, the Air Pollution Control Officer will advise the applicant in writing whether the application is complete. If an application is incomplete, the Air Pollution Control Officer will tell the applicant what additional information needs to be provided. Upon resubmission of an application, a new 60-day review period shall begin.

Information being requested for the application:

The information required of the applicant is divided into five parts:

Part A, which identifies the information required of all applicants seeking Authority to Construct permits for new facilities and for the modified portions of existing facilities, and additional information that is required from those applicants seeking permits through an enhanced NSR process, permits for sources which are subject to Prevention of Significant Deterioration (PSD) requirements, permits that will trigger emission offset requirements, or permits for sources that emit toxic air contaminants.

Part B, which identifies the information that is required of applicants seeking a Title V permit to operate.

Part C, which identifies the information that is required of applicants seeking an Emission Reduction Credit (ERC) certificate.

Part D, which identifies the information that is required of those applicants seeking to limit their emissions so that they qualify as synthetic minor sources and do not have to comply with the Title V permitting requirements.

Part E, which identifies the information that is required from those applicants requesting purchases of emissions credits from the Community Bank for the purpose of complying with applicable District Rules and Regulations.

How is information for an incomplete application requested?

If an applicant determines that a project is not subject to one or more of the sections (PSD, toxics, offsets, etc.) of the applicable part, the applicant may choose not to complete such section(s) of the applicable part. If during the processing of an application the Air Pollution Control Officer determines that a project is subject to a section that was not completed, or that the information supplied is incomplete, the Air Pollution Control Officer must do one of the following:

- (a) If the Air Pollution Control Officer determines that the application is incomplete within the 30-day review period, the Air Pollution Control Officer will instruct the applicant in writing to submit the additional information. If the applicant fails to submit the requested information within the 30-day period the Air Pollution Control Officer will find that the application is incomplete.
- (b) If the Air Pollution Control Officer determines that the application is incomplete after the 30-day review period, or after the application is deemed complete, the Air Pollution Control Officer must notify the applicant of this determination and set a deadline for submission of additional information. If the applicant fails to submit the additional information by the deadline, the Air Pollution Control Officer will deny the Authority to Construct and Permit to

Operate application.

Consultation with District staff for permitting and environmental review information:

The District urges all applicants to discuss their projects with our staff prior to the filing of applications. For some projects, it may not be necessary to submit all the information required by the List and Criteria in order to file a complete application. Consultation with the District staff will expedite the process by identifying the specific information that will be required of an applicant.

Information regarding the district's general permit requirements, such as filing deadlines, fee schedules, and appeal process, can be found in District's rules and regulations.

All applicants are urged to participate fully in the early stages of the environmental review process undertaken by the lead agency for the applicant's project in order to:

- 1) Be apprised of the applicable air quality and other environmental constraints, and
- 2) Make any project modifications identified during the environmental review.

Small business assistance program:

Sacramento County has a small business assistance center called Business Environmental Resource Center that provides help to small businesses with environmental-related issues. Assistance is available for a variety of topics such as rule interpretation, application completion, and hazardous waste minimization.

Requesting an exemption from a permitting requirement:

Anyone relying on an exemption established in any rule or regulation of the District may request that the Air Pollution Control Officer determine whether the equipment or operation is exempt. Anyone filing a request must supply all information necessary for the Air Pollution Control Officer to determine whether an exemption should be granted.

PART A - AUTHORITY TO CONSTRUCT

Section 1 - General Application Information:

All applications for Authority to Construct permits for new or modified air pollution sources are subject to the requirements of this portion of the list.

- I. Name
 - A. Business license name
 - B. Nature of business
 - C. Name, address, and phone number of person to contact regarding this application
 - D. Type of use entitlement (own, rent, lease)
 - E. Estimated construction dates and estimated completion dates
- II. Type of Application:
 - A.
 - 1. Original application
 - 2. Revised application
 - B.
 - 1. New facility
 - 2. Modification
 - 3. Existing facility not previously permitted
- III. Description of Facility:
 - A. Location
 - 1. Street address of facility (or location as described by section, township, and range)
 - 2. Scaled and dimensioned plot plan of facility which shows and identifies the location of:
 - a) Public and private streets
 - b) Property lines
 - c) Existing and proposed buildings (indicate their heights)
 - d) Adjacent property owners and uses
 - e) Storage areas for fuel, materials and products
 - f) Emissions unit, control, and air monitoring equipment
 - g) Piping and ducts for carrying fuels, products, and possible sources of air pollutants
 - h) Points of emissions
 - B. Describe the general purpose of the facility

IV. Description of Process:

- A. General description of each process line
- B. For facilities with more than one process line:
 - 1. Submit a block flow diagram which shows the interaction between each process line. Include a material balance and a description of the material processed as it changes in terms of maximum design rates
 - 2. Submit a drawing which shows the transfer of materials, products, and possible sources of air pollutants between process lines, buildings, and storage areas
- C. Emissions unit and control equipment descriptions (e.g., make, function, size, type, maximum capacity, horsepower)
- D. Operating schedule (number of hours/day, days/week, weeks/calendar quarter)
- E. Maximum quarterly, hourly, and daily production rates and raw material usage rates
- F. Total average annual production rates and raw material usage rates (such as tons/year)
- G. The following information associated with each piece of basic (existing, modified, and proposed) equipment:
 - 1. Equipment identification number
 - 2. Inlet and outlet temperatures
 - 3. The emission points and state to where the equipment is to be vented
 - 4. The material entering and leaving the equipment
 - 5. The energy consumption, (e.g., BTU/hr, KW/hr)
 - 6. Whether the operation is continuous or intermittent
- H. Describe control equipment and attach calculations and detailed drawings. Provide the following information associated with each piece of control equipment (existing and proposed):
 - 1. Schematic and description of overall control equipment
 - 2. Control equipment identification number
 - 3. Inlet and outlet concentrations
 - 4. Control efficiency (verify source of data, e.g., calculations, manufacturer's specifications, source test)
 - 5. The points of emission associated with each piece of equipment
 - 6. For particulate matter, include data on the size distribution and chemical nature of emissions

7. Energy consumption (e.g., BTU/hr, KW/hr)
- I. Describe locations and amounts of emissions (in terms of maximum design rates)
 1. Points of emission
 2. Height of the outlet above ground level
 3. Size and shape of the outlet; (e.g., 9" round)
 4. Flow rate of exhaust gases
 5. Outlet temperature
 6. The quantity of each pollutant emitted including: PM10, carbon monoxide, reactive organic compounds, nitrogen oxides, and sulfur oxides
 - J. Describe fugitive emissions, i.e., those not included in Section I above
 - K. Attach copies of all calculations used in answering the previous questions and state the references, and tolerance of the data
- V. Fuel Burning Equipment and Fuel:
- A. Describe burners
 1. Equipment identification number, manufacturer's name and model, number of burners minimum and maximum ratings per burner and burner type
 2. The burner mode of control (e.g. manual, automatic on-off, high-low) if applicable.
 3. Air compressor data (if air atomization is used): manufacturer's name and model, drive motor horsepower, compressor rating (pressure and capacity), and operating pressure
 4. Firing type (e.g. tangential, opposed, front)
 5. Type of fuels and the percentage of combustion air
 - B. Describe all fuels used; indicate the types, grades, consumption rates; pretreatment of the fuel if any (method and temperature); heating value (e.g., BTU/cu. ft., BTU/gal., BTU/lb.) and ash, sulfur, moisture, H₂S, and nitrogen contents, where applicable.
 1. For oil preheaters, indicate the type and the temperature to which the oil is expected to be preheated
 2. State whether unit is to be used to incinerate a waste gas or liquid stream. Submit a drawing of the method of waste stream introduction with respect to gas/fuel oil burners

3.
 - a) Indicate the amount of each fuel used per year (gal/yr. for liquid, million cu. ft/yr. for gaseous and tons/yr. for solid); also indicate fuels used as standby fuel
 - b) Indicate the maximum consumption rate of fuel in any one hour and any 24-hour period
 - C. For combustion facilities, specify the heat input rate or the thermal efficiency
- VI. Describe storage facilities:
- A. Size, model, type, and make of storage facilities
 - B. Properties or characteristics of materials and products being stored
 - C. Control procedures and equipment utilized on storage facilities
 - D. Conditions under which storage exists (e.g., temperatures, pressure, wind speed)

Section 2 - Enhanced NSR Process for Modification of a Title V Source:

The District has established an enhanced NSR process. The purpose of the process is to streamline the EPA and public review process for significant Title V permit modifications. The enhanced NSR process provides a longer time (45 days in lieu of a 30 days) for EPA and the public to review the Authority to Construct permit and at the same time meets the review requirements for a Significant Title V permit modification. Without this process, the District must provide a 30 day review period for EPA and the public for the Authority to Construct permit and a second 45 day review period when the Title V permit is modified to incorporate the new and/or revised Title V permit conditions resulting from the significant Title V permit modification. Title V permit revisions that go through the enhanced NSR process are later incorporated into the Title V permit as administrative amendments to the Title V permit. The administrative Title V permit amendments do not require EPA and public notification. Therefore, by following the enhanced NSR process, the time needed to review and issue the Title V permit modification is reduced. The process is available to facilities that have a valid Title V Operating Permit and that are seeking a permit for a new or modified emissions unit that qualifies as a significant Title V modification. The enhanced NSR process triggers the following Title administrative requirements:

- 40 CFR, Part 70, Section 70.7(a) - Action on application
- 40 CFR, Part 70, Section 70.7(b) - Requirements for a permit
- 40 CFR, Part 70, Section 70.6(a) - Standard permit requirements
- 40 CFR, Part 70, Section 70.6(b) - Federally enforceable requirements
- 40 CFR, Part 70, Section 70.6(c) - Compliance requirements
- 40 CFR, Part 70, Section 70.6(d) - General permits
- 40 CFR, Part 70, Section 70.6(e) - Temporary sources
- 40 CFR, Part 70, Section 70.6(f) - Permit shield
- 40 CFR, Part 70, Section 70.6(g) - Emergency provision

EPA will review permits issued through the enhanced NSR process to ensure that they comply with all applicable federally enforceable requirements. EPA's review will occur prior to the issuance of the Authority to Construct in order to reduce the likelihood that EPA will oppose the issuance of the permit to operate when the facility is ready to commence operation.

The enhanced NSR process will also combine the public review periods in the NSR and Title V reviews into one, speeding up the permit issuance process by at least 30 days.

Under the enhanced NSR process:

- The applications will be reviewed for completeness and evaluated pursuant to NSR and Title V regulations
- A draft evaluation and Authority to Construct will be prepared (the Authority to Construct will clearly identify all federally enforceable permit conditions)
- Applications, evaluations and permits will be subject to a 45-day public review period
- Once the public review period is over and all the comments received have been addressed, a final Authority to Construct will be issued, if appropriate
- Prior to commencing construction, the Title V permit will be amended administratively to include any new requirements identified through the enhanced NSR process.

I Applications: If requesting enhanced NSR review, applicants must submit the following with their Authority to Construct applications:

- A. A written requests to have the permit reviewed under the enhanced NSR process.
- B. A complete application for a significant Title V modification

Section 3 - Prevention of Significant Deterioration Sources:

When a source is subject to Rule 203 - Prevention of Significant Deterioration, an applicant shall supply the following in addition to the information required by Part A, Section 1, and any other applicable section.

- I. Information required for air quality impact analysis:
 - A. Any monitoring stations that may be installed by applicant
 - B. Sufficient data to perform an impact analysis from all emission points and fugitive emissions, including:
 1. Meteorological data
 2. Topographical data
 3. Air quality data
 4. Computer modeling data, including modeling assumptions that should be made
- II. Identify all facilities within the air basin that are owned or operated by the applicant and the compliance status of each
- III. Power Consumption of Facility
 - A. Total amount of electrical power to be consumed by the new facility or the increase in the amount of electrical power to be consumed due to the modification
 - B. Percentage of electrical power provided by off-site generating facilities; identify the source of power
- IV. Proposed mitigating measures:
 - A. Air pollution control equipment proposed
 - B. Process changes or operations utilized to reduce emissions
 - C. Other

Section 4 - Offsets:

When a source is required to provide emission offsets pursuant to Rule 202 - New Source Review, an applicant shall supply the information required by Part A, Section 1, and any other applicable section.

In addition, these applicants must:

- A. Provide sufficient information to allow the District to determine whether adequate emission reductions credits will be secured to offset the air quality impacts of the applicant's source (e.g., name and location of sources of emission reduction credits and how the emission reduction credits tradeoffs will be achieved)
- B. Provide any additional information required by the District to verify that the emission reductions meet regulatory and statutory requirements.

Section 5 - Toxics:

When a source is subject to review for its hazardous air pollutants (HAPs), the applicant shall supply the following in addition to information required by Part A, Section 1, and any other applicable section.

- I. Health Risk Assessment (HRA)
 - A. If the applicant prepares the HRA:
 1. HRA Protocol (must be approved by the District prior to doing the Health Risk Assessment)
 2. Health Risk Assessment
 - B. If the applicant chooses to have the District prepare a screening HRA:
 1. HAP Identification
 - a) Identify all HAPs that may be emitted directly or as a byproduct of the process and controls associated with the permit application
 - b) Identify all HAPs that may be emitted directly or as a byproduct of processes and controls previously permitted for which a screening or refined Health Risk Assessment was performed
 2. Describe the location and amount of emissions at maximum design rates and include:
 - a) Points of emissions
 - b) Height of the outlet above ground
 - c) Size and shape of the outlet (e.g., 100 sq. in., round)
 - d) Flow rate of exhaust gases
 - e) Outlet temperature
 - f) Maximum annual and hourly emission rates for each HAP emitted
 3. Describe fugitive HAP emissions (i.e., emissions that are not vented through a stack). Include:
 - a) Release points
 - b) Height of release above ground
 - c) Area or volume of release (e.g., 100 sq. ft.)
 - d) Maximum annual and hourly emission rate of gases
 - e) Maximum annual and hourly emission rates for each HAP emitted

4. Location of release point and receptors
 - a) One or more drawings showing the location of the release point, adjacent buildings, and any other structure that may affect the dispersion of the gas plume (to scale)
 - b) One or more drawings showing the location of the release point with respect to the property boundaries (to scale)
 - c) Distance and location of nearest residence
 - d) Distance and location of nearest non-residential building

PART B - TITLE V PERMIT TO OPERATE

Section 1 - General Application Requirements:

Sources subject to 42 U.S.C Section 7661 et seq (Title V) (Federal Operating Permit Program), shall submit a complete application for initial Title V permits, for significant Title V permit modifications, for minor Title V permit modifications, or for Title V permit renewals. The application must contain the information outlined below. All applications and forms must be certified by the facility's responsible official.

- I Identifying information
 - A. Company's name, location & mailing address
 - B. Facility's name, location & mailing address (if different from the company)
 - C. Owner's name
 - D. Name and telephone number of plant's responsible official
 - E. Name and telephone number of plant site manager and contact person (if different)
- II. Description of Process
 - A. A description of the source's processes and products (by Standard Industrial Classification Code)
 - B. A description of any process or product associated with alternative operating scenarios identified by the stationary source
- III. Emission-Related Information
 - A. Insignificant Emission Units: For emission units considered insignificant by EPA because of size or equipment rating, an applicant is only required to submit a list of those units. A list of insignificant emissions units is identified in Part B, Section 5.
 - B. All Other Emission Units: Identify and describe all points of emissions (emission units and fugitives) in sufficient detail to verify which applicable federal requirements or fees are applicable to the stationary source. Fugitive emissions shall be included in the Title V application in the same manner as stack emissions.
 - C. For each point of emissions:
 - 1. The following information to the extent it is needed to determine or regulate emissions: Fuel type, fuel usage, raw materials, production rates, and operating schedules
 - 2. Emissions rate in tons per year, pounds per day, and such terms (e.g., part per million) as are necessary to establish compliance consistent with the applicable standard reference test method any other applicable requirement
 - 3. Identification and description of air pollution control equipment and compliance monitoring devices or activities

4. A description of any limitations on source operation affecting emissions or any work practice standards, where applicable, for all regulated air pollutants at the source
 5. Other information required by any applicable requirement (including information related to stack height limitations developed pursuant to Sections 123 (42 U.S.C. Section 7423) of the Federal Clean Air Act)
 6. Supporting calculations for the emission related information
- D. Quantification of emissions of pollutants (in tons per year) which define the source as a major stationary source, and all emissions of regulated air pollutants from all emissions units and fugitives (this should be a summary of all emissions from each point of emissions identified above)
- IV. Air Pollution Control Requirements
- A. For each point of emissions, include:
1. Citation and description of all applicable requirements
 2. Description of or reference to any applicable test method for determining compliance with each applicable requirement
 3. Any other specific information that may be necessary to implement and enforce other applicable requirements of the Federal Clean Air Act or 40 CFR Part 70 regulations or determine the applicability of such requirement
 4. A statement of methods used for determining compliance with each applicable requirement, including a description of monitoring, recordkeeping, and reporting requirements and test methods
 5. For each requirement applicable to this emissions point for which the source is in compliance, a statement that the source will continue to comply with such requirements
 6. For each requirement that will become effective during the Title V permit term and applicable to this point of emissions, a statement that the source will meet such requirement on a timely basis (a statement that the source will meet in a timely manner applicable requirements that become effective during the Title V permit term shall satisfy this provision, unless a more detailed schedule is expressly required by the applicable requirement)
 7. For each requirement applicable to this point of emissions for which the source is not in compliance at the time of Title V permit issuance, a narrative description of how the source will achieve compliance with such requirements (the source must also complete a compliance schedule as outlined in Section VII)
 8. A statement indicating the stationary source's compliance status with any enhanced monitoring and compliance certification requirements of the Federal Clean Air Act applicable to this emissions unit
- V. An explanation of any proposed exemptions from otherwise applicable requirements

VI. Alternative Operating Scenarios

A. Any information on alternative operating scenarios, including:

1. hours of operation
2. production rates
3. quantification of emissions for each operating scenario

VII. Compliance Schedule

Only sources which are **not** in compliance with all applicable requirements need to submit a Compliance Schedule.

A. Such a schedule shall be prepared in accordance with Rule 207, TITLE V - FEDERAL OPERATING PERMIT PROGRAM and must include the following:

1. A schedule of remedial measures that will be taken to achieve compliance
2. Enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the source is not in noncompliance
3. A schedule for submission of certified progress reports no less frequently than every 6 months

VIII. Progress Reports

A. Facilities required to submit progress reports under a schedule of compliance may use the **COMPLIANCE SCHEDULE PROGRESS REPORT** form, which can be found at the end of this document in Appendix A

IX. Compliance Plan for Acid Rain Sources

The compliance plan content requirements specified in this section shall apply and be included in the acid rain portion of a compliance plan for an affected stationary source, except as specifically superseded by regulations promulgated under Title IV of the Federal Clean Air Act with regard to the schedule and method(s) the source will use to achieve compliance with the acid rain emissions limitations

X. Compliance Certification

A. A schedule for submission of compliance certifications during the Title V permit term, to be submitted no less frequently than annually, or more frequently if specified by the underlying applicable requirement or by the District

B. A certification of compliance with all applicable requirements by a responsible official

The certification of compliance requirement may be satisfied by submitting a completed copy of the **CERTIFICATION REPORT** form, which can be found at the end of this document in Appendix A.

XI. Stationary Source Summary and Total Stationary Source Emissions Forms

The **STATIONARY SOURCE SUMMARY** form, the **EXEMPT EQUIPMENT** form and the **TOTAL STATIONARY SOURCE EMISSIONS** form, which can be obtained from the District, must be submitted with any Title V permit application. These forms will be forwarded to U.S. EPA as a summary of the application package. Upon review of the summary forms (Stationary Source Summary, Exempt Equipment form & Total Stationary Source Emissions forms), U.S. EPA may request additional information.

Section 2 - Acid Rain Sources:

When a source is subject to Title IV of the Federal Clean Air Act, the applicant shall complete the federal forms for the acid rain portions of Title V permit applications and compliance plans in addition to the information required in Part B, Section 1.

Section 3 - Risk Management Plan:

If a Risk Management Plan is required pursuant to Section 112(r) of the federal Clean Air Act Amendments of 1990, the applicant must supply verification that the RMP is registered with the appropriate agency. The District may also require the applicant to submit copy of the Risk Management Plan.

Section 4 - Minor Permit Modifications:

For applications requesting the use of minor permit modification procedures the following information must also be included:

- A. A description of the change
- B. The emissions resulting from the change
- C. Any new applicable requirement that will apply if the change occurs
- D. A suggested draft permit for the source
- E. Certification by the responsible official stating that the modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used
- F. Completed forms for the District to use to notify the EPA and any affected states

Section 5 - List of Title V Insignificant Activities

I. General Criteria for Insignificant Activities

An insignificant activity is any activity, process, or emissions unit which is not subject to a source-specific requirement of a State Implementation Plan, preconstruction permit, or federal standard¹ and which: 1) meets the "Criteria for Specific Source Categories" below; or 2) emits no more than 0.5 tons per year of a federal hazardous air pollutant (HAP)² and no more than two tons per year of a regulated pollutant that is not a HAP.

II. Criteria for Specific Source Categories

A. Fugitive Emissions Sources Associated With Insignificant Activities

Any valves, flanges, and unvented (except for emergency pressure relief valves) pressure vessels associated with an insignificant activity on this list.

Justification: Insignificant air pollutant emissions from this source

B. Combustion and Heat Transfer Equipment

1. Any combustion equipment, other than a gas turbine, that has a maximum heat input rating of no more than five million British thermal units (mmBtu) per hour (gross) and is equipped to be fired exclusively with natural gas, liquefied petroleum gas, or any combination thereof, provided the fuel contains no more than five per cent by weight of hydrocarbons heavier than butane (as determined by American Society for Testing and Materials (ASTM) test method E-260-73) and no more than 0.75 grains of total sulfur per 100 cubic feet of gas (as determined by ASTM test method D-1072-80).

Justification:

$100 \text{ lb NOx}/10^6 \text{ ft}^3 * 5 \text{ mmBtu/hr}/1,050 \text{ mmBtu}/10^6 \text{ ft}^3 = 0.5 \text{ lb NOx/hr}$
(Reference AP-42)

2. Any piston-type internal combustion engine with a manufacturer's maximum continuous rating of no more than 50 brake horsepower (bhp).

Justification: $14 \text{ g NOx/hp-hr} * 50 \text{ hp}/454 \text{ g/lb} = 1.5 \text{ lb NOx/hr}$ (Reference AP-42)

¹ Federal standards include: 40 CFR Parts 60 (New Source Performance Standards), 61 (National Emission Standards for Hazardous Air Pollutants), 63 (National Emission Standards for Hazardous Air Pollutants for Source Categories).

² HAPs are toxic substances listed pursuant to Section 112(b) of the Federal Clean Air Act.

3. Any internal combustion engine which emits no more than 2 tons per year of NO_x and is operated solely for the purpose of: 1) providing power when normal power service fails (service failure does not include voluntary power reductions); or 2) the emergency pumping of water.

Justification:

$14 \text{ g NO}_x/\text{hp-hr} * 300 \text{ bhp} * 100 \text{ hr/yr}/454 \text{ g/lb}/2,000 \text{ lb/ton} = 0.46 \text{ tons NO}_x/\text{yr}$
(Reference AP-42)

4. Any non-electric space heater that is not a boiler.

Justification:

$94 \text{ lb NO}_x/10^6\text{ft}^3 * 60,000,000 \text{ Btu/hr} * 720 \text{ hr/yr}/1,000 \text{ Btu/scf} = 2 \text{ tons NO}_x/\text{yr}$
Note: An electric space heater should be considered a trivial activity.

C. Cooling Towers

1. Any water cooling tower which: 1) has a circulation rate of less than 10,000 gallons per minute; and 2) is not used to cool process water, water from barometric jets, or water from barometric condensers.

Justification:

$0.019 \text{ lb PM}_{10}/1,000 \text{ gal/min} * 10,000 \text{ gal/min} * 60 \text{ min/hr} * 0.10 = 1.14 \text{ lb PM}_{10}/\text{hr}$

D. Printing and Reproduction Equipment

1. Any printing, coating, or laminating activity which uses no more than two gallons per day of graphic arts materials, including: inks, coatings, adhesives, fountain solutions, thinners, retarders, or cleaning solutions.

Justification: $7.5 \text{ lb VOC/gal} * 2 \text{ gal/day} = 15 \text{ lb VOC/day}$

2. Any photographic process equipment, and control equipment venting such equipment, which reproduces images upon material sensitized to radiant energy.

Justification: Insignificant air pollutant emissions from this source

3. Any laser printing equipment.

Justification: Insignificant air pollutant emissions from this source

E. Food Processing Equipment

1. Any oven in a food processing operation where less than 1,000 pounds of product are produced per day of operation.

Justification:

13.7 lb VOC/2,000 lb product * 1,000 lb product = 6.9 lb VOC/day
(Reference AP-42)

2. Any smokehouse in which the maximum horizontal inside cross section area does not exceed 20 square feet.

Justification:

0.3 lb PM10/ton of meat * 1 ton /day = 0.3 lb PM10/day
0.6 lb CO/ ton of meat * 1 ton/day = 0.6 lb CO/day
(Reference AP-42)

3. Any confection cooker, and associated venting or control equipment, cooking edible products intended for human consumption.

Justification: Insignificant air pollutant emissions from this source

F. Plastic and/or Rubber Processing

1. Any hot-wire cutting of expanded polystyrene foam, provided such cutting is limited to packaging operations.

Justification: 20 cuts/day * 0.27 lb VOC/cut = 5.4 lb VOC/day
[San Diego APCD emission factor based on BASF Wyandotte Corporation industrial hygiene tests]

2. Any equipment used exclusively for the extrusion or compression molding of rubber or plastics, provided no plasticizer or blowing agent is used.

Justification: Insignificant air pollutant emissions from this source

3. Any oven used exclusively for curing, softening, or annealing plastics except for ovens used to cure fiberglass reinforced plastics.

Justification: Insignificant air pollutant emissions from this source

G. Storage Containers, Reservoirs, and Tanks - Fuel, Fuel Oil, Asphalt

1. Any temporary storage of gasoline in flexible containers to support equipment responding to an emergency or for the purposes of training to support such equipment.

Justification:

11.5 lb VOC/1,000 gal transferred * 5,000 gal * 2 transfers/yr = 115 lb VOC/yr

2. Any equipment with a capacity of no more than 1,500 gallons used exclusively for the storage of gasoline.

Justification:

Breathing losses	= 30.5 lb VOC/1,000 gal capacity * 1,500 gal capacity
	= 45.8 lb VOC/yr
Working losses	= 10 lb VOC/1,000 gal throughput * 12,000 gal throughput/yr
	= 120 lb VOC/yr
Total losses	= 0.08 ton VOC/yr

3. Any equipment with a capacity of no more than 19,800 gallons (471 barrels) used exclusively for the storage of petroleum distillates used as motor fuel with specific gravity 0.8251 or higher [40° American Petroleum Institute (API) or lower] as determined by API test method 2547 or ASTM test method D-1298-80.

Justification: 0.03 lb/1,000 gal throughput (Reference U.S. EPA 450/4-90-003)

4. Any equipment used exclusively for the storage of fuel oils or non-air-blown asphalt with specific gravity 0.9042 or higher (25° API or lower) as determined by API test method 2547 or ASTM test method D-1298-80.

Justification: 0.03 lb/1,000 gal throughput (Reference U.S. EPA 450/4-90-003)

H. Storage Containers, Reservoirs, and Tanks - General Organic and VOC-containing Material

1. Any equipment used exclusively for the storage of unheated organic material with:
 - a. An initial boiling point of 150° Centigrade (C) [302° Fahrenheit (F)] or greater as determined by ASTM test method 1078-86); or
 - b. A vapor pressure of no more than five millimeters mercury (mmHg) [0.1 pound per square inch (psi) absolute] as determined by ASTM test method D-2879-86.

Justification:

0.39 lb VOC/1,000 gal storage capacity-yr * 10,000 gal stored = 3.9 lb VOC/yr
0.007 lb VOC/1,000 gal storage capacity-yr
(Reference U.S. EPA 450/4-90-003 for propylene glycol)

2. Any equipment with a capacity of no more than 250 gallons used exclusively for the storage of unheated organic liquid.

Justification:

30.5 lb VOC/1,000 gal storage capacity-yr * 250 gal capacity = 7.62 lb VOC/yr
17.9 lb VOC/1,000 gal storage capacity-yr * 250 gal capacity = 4.5 lb VOC/yr
(Reference U.S. EPA 450/4-90-003 for carbon tetrachloride)

3. Any equipment with a capacity of no more than 6,077 gallons used exclusively for the underground storage of unheated organic liquid with a vapor pressure no more than 75 mm Hg (1.5 psi absolute) as determined by ASTM test method D-2879-86.

Justification:

3.6 lb VOC/1,000 gal storage capacity-yr * 6,077 gal capacity = 21.9 lb VOC/yr

4. Any transport, delivery, or cargo tank or equipment on vehicles used to deliver VOC-containing material.

Justification: 0.005 lb VOC/1,000 gal (Reference U.S. EPA 450/4-90-003)

I. Storage Containers, Reservoirs, and Tanks - Inorganic Materials

1. Any equipment used exclusively for the storage of fresh, commercial or purer grade of:
 - a. Sulfuric or phosphoric acid with acid content of no more than 99 per cent by weight; or
 - b. Nitric acid with acid content of no more than 70 per cent by weight.

Justification: Insignificant air pollutant emissions from this source

J. Storage Containers, Reservoirs, and Tanks - Liquefied Gases

Any equipment used exclusively for the storage of liquefied gases in unvented (except for emergency pressure-relief valves) pressure vessels.

Justification: Insignificant air pollutant emissions from this source

K. Compression and Storage of Dry Natural Gas

Any equipment used exclusively to compress or hold dry natural gas. Any internal Combustion engine or other equipment associated with the dry natural gas should not be considered an insignificant activity unless such internal combustion engine or other equipment independently qualifies as an insignificant activity.

Justification: Insignificant air pollutant emissions from this source.

L. Transfer Equipment

1. Any transfer equipment when used with the equipment described in G-K, above.

Justification: Please see justification for G-K, above

2. Any equipment used exclusively to transfer crude oil, asphalt, or residual oil from a delivery vehicle.

Justification: 0.03 lb/1,000 gal transferred (Reference U.S. EPA 450/4-90-003)

3. Any equipment used exclusively for the transfer of crude oil with 0.8762 specific gravity or higher (30 degrees API or lower) as measured by API test method 2547 or ASTM test method D-1298-80.

Justification: Transfer emissions for heavy crude oil are much less than 1 lb/1,000 gal

4. Any equipment used exclusively for the transfer of less than 4,000 gallons per day of:
1) unheated organic material with an initial boiling point of 150°C (302°F) or greater as determined by ASTM test method D-86; or 2) fuel oil with 0.8251 specific gravity or higher (40° API or lower) as determined by API test method 2547 or ASTM test method D-1298-80.

Justification: Less than 0.03 lb/1,000 gal transferred
(Reference U.S. EPA 450/4-90-003)

M. Adhesive Application

1. Any adhesive operation in which no more than 173 gallons of adhesives are applied in a consecutive 12-month period.

Justification: 11.1 lb VOC-HAP/gal* 0.52 * 173 gal/year = 0.5 TPY VOC-HAP

"Note: Districts with SIP-approved adhesive rules should determine if insignificant adhesive application at a Title V facility should be less than 173 gallons/year."

N. Surface Coating

1. Any equipment or activity using no more than one gallon per day of surface coating, or any combination of surface coating and solvent, which contains either VOC or hazardous air pollutants (HAP), or both.

Justification: 7.5 lb VOC/gal * 1 gal/day = 7.5 lb VOC/day

2. Any coating operation using less than 10, 950 gallons per year of coating(s) that contain less than 20 grams of VOC per liter.

Justification: 0.16 lb VOC/gal * 10,950 gal/year = 1,752 lb VOC/yr

O. Solvent Cleaning

1. Any equipment or activity using no more than one gallon per day of solvent, or combination of solvent and surface coating, which contains either VOC or HAP, or both.

Justification: 7.5 lb VOC/gal * 1 gal/day = 7.5 lb VOC/day

2. Any unheated, non-conveyorized cleaning equipment (not including control enclosures): 1) which has an open surface area of no more than 10.8 square feet (2

square meters) and internal volume of no more than 92.5 gallons; 2) which uses organic solvents with an initial boiling point of 302° F or greater as determined by ASTM test method 1078-78; and 3) from which the owner or operator can demonstrate, through solvent purchase and use records, that less than 25 gallons per year of solvent was lost exclusive of solvent loss from recycling or disposal.

Justification: 7.5 lb VOC/gal solvent * 25 gal solvent/yr/2,000 lb/ton = 0.094 ton VOC/yr

3. Any solvent wipe cleaning provided such cleaning: 1) utilizes a container applicator to limit emissions (e.g., squeeze containers with narrow tips, spray bottles, dispensers with press-down caps, etc.); and 2) occurs at a facility which emits no more than five tons VOC (uncontrolled emissions) per calendar year from all solvent wipe-cleaning operations or which purchases no more than 1,500 gallons of solvent per calendar year.

Justification: Less than 5 tons VOC per calendar year

P. Abrasive Blasting

1. Any blast cleaning equipment using a suspension of abrasive material in water and the control equipment venting such blast cleaning equipment.

Justification: Insignificant air pollutant emissions from this source

2. Any abrasive blast room when vented to a control device that discharges back to the room.

Justification: Insignificant air pollutant emissions from this source.

Q. Brazing, Soldering, Welding, and Cutting Torches

1. Any brazing, soldering, welding, or cutting torch equipment used in manufacturing and construction activities and with the potential to emit hazardous air pollutant (HAP) metals, provided the total emissions of HAPs do not exceed 0.5 tons per year.

Justification: Less than 0.5 tons per year of total HAPs

Note: U.S. EPA's List of Trivial Activities says brazing, soldering, and welding associated with maintenance is a trivial activity. Such activity performed as part of the manufacturing process is also a trivial activity, provided no metal HAPs are emitted.

R. Solder Leveler, Hydrosqueegee, Wave Solder Machine, or Drag Solder Machine

1. Any solder leveler, hydrosqueegee, wave solder machine, or drag solder machine which uses less than an average of 10 pounds/day of any VOC-containing material.

Justification: Less than 10 pounds/day of VOC

S. Metal Products

1. Any equipment, and associated control equipment, used exclusively for the inspection of metal products.

Justification: Insignificant air pollutant emissions from this source.

T. Aerosol Can Puncturing or Crushing

1. Any aerosol can puncturing or crushing operation that processes less than 500 cans per day, provided such operation uses a closed loop recovery system.

Justification: 0.02 lb VOC/aerosol can * 500 aerosol cans/day = 10 lb VOC/day
[San Diego County APCD emission factor based on saturated vapor in aerosol can]

U. Biotechnology Manufacture

1. Provided the total uncontrolled VOC emissions from any biotechnology manufacturing facility does not exceed five tons per year, any equipment used in the manufacture of:

- a. Biotechnology pharmaceutical products used exclusively in federal Food and Drug Administration (FDA)-approved clinical trials;
- b. Biomedical devices and diagnostic kits used exclusively in FDA-approved clinical trials and laboratory failure analysis testing; or
- c. Bioagricultural products for exclusive use in field testing required to obtain FDA, U.S. EPA, United States Department of Agriculture (USDA), or California Environmental Protection Agency (Cal-EPA) approval .

Justification: No more than 2 tons VOC/year

V. Textile Dyeing, Stripping, or Bleaching

1. Any equipment used for dyeing, stripping, or bleaching textiles, provided no organic solvents, diluents, or thinners are used.

Justification: Insignificant air pollutant emissions from this source

W. Laboratory Fume Hoods and Vents

1. Any laboratory fume hood or vent, provided such equipment is used exclusively for the purpose of teaching, research, or quality control.

Justification: Insignificant air pollutant emissions from this source
Note: According to the U.S. EPA's List of Trivial Activities, "many lab fume hoods or vents might qualify for treatment as insignificant"

X. Refrigeration Units

1. Any refrigeration unit provided the unit:
 - a. Contains less than 50 pounds of refrigerant; and
 - b. Is not used in conjunction with air pollution control equipment.

Justification: Insignificant air pollutant emissions from this source.

PART C - EMISSION REDUCTION CREDITS (ERCs)

Section 1 - General Application Information:

All applications for ERCs are subject to the requirements of this portion of the list.

- I. Name
 - A. Business license name
 - B. Nature of business
 - C. Name, address, and phone number of person to contact regarding this application
 - D. Type of use entitlement (own, rent, lease)
 - E. Estimated construction dates and estimated completion dates
- II. Type of Application
 - A.
 1. Original application
 2. Revised application
 - B.
 1. Permitted emissions unit (provide permit number)
 2. Non-permitted emissions unit
 3. Mobile/transportation
- III. Description of process
 - A. Source of Emission Reduction Credits
 1. General description of original emissions unit
 2. Description of measure(s) taken to generate the emissions reduction (e.g. change of equipment, change in formulation of material, add-on controls, shutdown)
 3. Reason for measure(s) taken
 - B. Historic Actual Emissions
 1. Actual monthly emissions for the existing emissions unit for the two year period immediately preceding the date of the application for emission reduction credits. Actual emissions must meet all the criteria outlined in Rule 204, Section 201.1, 201.2, 201.3 and 201.4
 2. If the last two years are unrepresentative of normal source operations as determined by the Air Pollution Control Officer, then any two consecutive years of the last five years that the Air Pollution Control Officer determines represent normal source operation may be used

C. Projected Emissions

1. Proposed emissions for each calendar quarter based on the same operating characteristics (e.g. fuel consumption, production level, throughput) as historic actual emissions for the same calendar quarter
2. Description of measure(s) taken to ensure that actual emissions don't exceed projected emissions (e.g. enforceable emissions limits in the permit, projected emissions based on equipment capacity, removal/shutdown of emissions unit, etc.)
3. Description of measure(s) taken to verify that actual emissions don't exceed projected emissions (e.g. record keeping requirements in the permit)

PART D - SYNTHETIC MINOR SOURCE STATUS

Section 1 - General Application Information:

A request for designation as a synthetic minor source shall include:

- I. The identification and description of all existing emission units at the source.
- II. The calculation of each emission unit's maximum annual and maximum monthly emissions of regulated air pollutants for all operating scenarios to be permitted, including any existing federally enforceable limits established by a mechanism other than this rule. The calculated emissions for each emissions unit shall include the following fugitive emissions:
 - A. Hazardous air pollutant fugitive emissions for all sources
 - B. Other regulated air pollutant fugitive emissions for sources specified in 40 CFR, Part 70.2, Major Sources.
- III. A proposed federally enforceable condition which:
 - A. Limits source-wide emissions to below major source threshold
 - B. Is permanent, quantifiable, and otherwise enforceable as a practical matter.
- IV. Proposed federally enforceable conditions to impose monitoring, recordkeeping, and reporting requirements sufficient to determine compliance.
- V. Any additional information requested by the Air Pollution Control Officer
- VI. Certification by a responsible official that the contents of the request are true, accurate, and complete

PART E - COMMUNITY BANK

Section 1 - General Application Information:

A request for allocation from the Community Bank shall include the following information:

- a. Calculation of emissions credits needed by the stationary source for each calendar quarter.
- b. For stationary sources subject to Rule 411, BOILER NOx, the Authority to Construct application shall contain the following information:
 1. The NOx emissions level for the boiler in pounds per million BTU;
 2. Fuel type and quarterly usage
- c. For all other stationary sources the following information shall be submitted:
 1. The volatile organic compound content of each noncompliant coating or adhesive as applied in lbs/gallon and lbs-VOC/lbs-solids
 2. The quarterly usage for each noncompliant coating or adhesive;
 3. Identification of the coating or adhesive category for which the noncompliant coating or adhesive belongs to
- d. Technical data on the air pollution control equipment including but not limited to the following, if used:
 1. Equipment manufacturer and model number
 2. Control efficiency
 3. Any supporting information supplied by the equipment manufacturer
- e. A statement of how long the alternative compliance will be used.