

**San Joaquin Valley
Unified Air Pollution Control District**

Guideline for Expedited Application Review (GEAR)
Dormant designations for units subject to Rule 4306 – Boilers, Steam Generators,
and Process Heaters – Phase 3

Approved By: _____	Date _____
David Warner Director of Permit Services	

PURPOSE:

To outline the procedures for expedited processing of Authority to Construct (ATC) applications to designate as dormant units subject to Rule 4306 – Boilers, Steam Generators, and Process Heaters – Phase 3.

I. APPLICABILITY

This policy applies to applications for Authority to Construct to designate units as compliant dormant or non-compliant dormant for Rule 4306.

II. PERMIT APPLICATION AND SUPPLEMENTARY FORMS

The applicant must complete a regular ATC application form.

III. APPLICATION REVIEW

In order to standardize the application reviews for this source category, the application review found on the AIRNET will be used as a base document. The following pages are hard copies of the application review.

This hard copy version for the GEAR Policy manual includes the ATC application review.

The use of the standard application review will ensure that ATCs and PTOs are issued in a consistent and expeditious manner.

Unless the ATC is requested to be issued with a COC (for Title V sources), ATCs to designate a unit as dormant shall be issued within 30 days. If a COC is requested, the District's preliminary decision will be made within 30 days; the final decision will be made after receiving and responding to comments from EPA, if any.

IV. EQUIPMENT DESCRIPTION

To ensure uniformity, standard descriptions are established and presented in the attached application review.

V. AUTHORITY TO CONSTRUCT CONDITIONS

To ensure uniformity, a standard set of conditions to be added during the application review are included. In general, no conditions are to removed from the current PTO.

VI. UPDATES

This GEAR will be updated as necessary to accommodate any changes in prohibitory rules or other items affecting the policy. Each update will be posted on the AIRNET and District website.

San Joaquin Valley Air Pollution Control District
Application Review
Rule 4306 Dormant Emissions Unit

Facility Name:
Mailing Address:

Date:
Engineer:
Lead Engineer:

Contact Person:
Telephone:
Application #(s):
Project #:

Deemed Complete:

Notes to processing staff:

This application review template applies to the processing of applications to designate units subject to Rule 4306 as compliant or non-compliant dormant emissions units (DEU).

Text in blue must be revised for the specific proposal being evaluated.

Text in red is to provide guidance to staff when processing application and must be deleted when finished.

I. Proposal

[Facility Name] proposes to designate the unit(s) listed above (see Appendix A for current permit requirements) as [non-compliant] or [compliant] dormant emission units (DEU) for District Rule 4306, Boilers, Steam Generators, and Process Heaters – Phase 3. The applicant proposes to [physically disconnect the fuel line, etc.] or [physically disconnect the fuel line, etc. when the unit is not operated] to ensure that the units do not operate.

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (9/21/06)
Rule 2520	Federally Mandated Operating Permits (06/21/01) only for TV facilities
Rule 4101	Visible Emissions (2/17/05)
Rule 4102	Nuisance (12/17/92)
Rule 4201	Particulate Matter Concentration (12/17/92)
Rule 4301	Fuel Burning Equipment (12/17/92)

Rule 4305 Boilers, Steam Generators, and Process Heaters – Phase 2 (8/21/03)
 Rule 4306 Boilers, Steam Generators, and Process Heaters – Phase 3 (3/17/05)
 Rule 4351 Boilers, Steam Generators, and Process Heaters – Phase 1 (8/21/03)
 Rule 4801 Sulfur Compounds (12/17/92)
 CH&SC 41700 Health Risk Assessment
 CH&SC 42301.6 School Notice

III. Project Location

The facility is located at [physical location/stationary source](#). There is no increase in emissions of any hazardous air pollutants with this project; therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

The units do not comply with Rule 4306. The unit(s) will not be able to operate until an ATC application has been submitted and the unit(s) meet(s) Rule 4306 requirements.

Or

The unit(s) comply with Rule 4306 however, are not being operated. Designating the units as compliant dormant emission units will relieve the facility from performing periodic monitoring and source testing on the unit.

V. Equipment Listing

Existing equipment:

PTO #	PTO Equipment Description
X-XXXX-XXX-XX	XX.X MMBTU/HR BOILER

Proposed Modification:

ATC #	ATC Equipment Description
X-XXXX-XXX-XX	MODIFICATION OF XX.X MMBTU/HR BOILER: DESIGNATE AS NON-COMPLIANT DORMANT FOR RULE 4306

Or

Proposed Modification:

ATC #	ATC Equipment Description
X-XXXX-XXX-XX	MODIFICATION OF XX.X MMBTU/HR BOILER: DESIGNATE AS

	COMPLIANT DORMANT FOR RULE 4306

Post project equipment description:

If non-compliant dormant:

PTO #	PTO Equipment Description
X-XXXX-XXX-XX	NON-COMPLIANT DORMANT XX.X MMBTU/HR BOILER

If compliant dormant:

PTO #	PTO Equipment Description
X-XXXX-XXX-XX	XX.X MMBTU/HR BOILER

Compliant dormant units will not be designated as such in the equipment description.

VI. Emission Control Technology Evaluation

There are no proposed changes to the emission unit(s); therefore, there is no need to evaluate the emission controls.

VII. General Calculations

This project does not meet the criteria for a Rule 2201 Modification, as defined in Section 3.26, and is therefore not subject to the requirements of Rule 2201. Therefore, formal calculations for Rule 2201 are not required.

For non-compliant units:

As Rule 4306 has various compliance options, the Rule 4306 compliant potential to emit for this unit is not know at this time, i.e. it will be established when modifications are made to achieve compliance with the emission limits in Rule 4306.

As such, the emissions from PAS for the existing unit will be entered into PAS for this ATC except for NO_x, which will be entered at the standard Rule 4306 compliance level.

or

For compliant units:

The emissions from PAS for the existing unit will be verified and entered into PAS for this ATC. If PAS has no emission values, the potential to emit is calculated below and entered into PAS.

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

This project does not meet the following criteria for a Modification, as defined in Section 3.26, and is therefore not subject to this rule.

- Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.
- Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.
- An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.
- Addition of any new emissions unit which is subject to District permitting requirements.
- A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

Compliance with this rule is expected.

Rule 2520 Federally Mandated Operating Permits **only for Title V facilities**

Retain the applicable discussion, below, and delete the non-applicable discussion. If the applicant has requested to process the project with a COC, be sure to prepare the COC EPA notice letters found on the AirNet.

For Title V facility requesting to process this project with a COC

[Facility Name] is subject to Rule 2520 (Title V) and has received their Title V Operating Permit.

The changes in this project constitute a Minor Modification to the Title V Permit. The applicant has requested that the ATC(s) in this project be issued with Certificate(s) of Conformity. Therefore, the 45-day EPA comment period will be satisfied prior to the issuance of the ATC(s). The facility's Compliance Certification Form is included in Appendix B. Prior to operating with modifications authorized by this ATC, the facility is required to submit application(s) to modify their Title V permit as administrative amendments in accordance with Rule 2520, Section 11.4.2.

The following conditions will be added to ensure compliance with this rule:

{1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Y

{1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Y

or

For Title V facility not requesting to process this project with a COC

[Facility Name] is subject to Rule 2520 (Title V) and has received their Title V Operating Permit.

The changes in this project constitute a Minor Modification to the Title V Permit. The applicant has not requested that the ATC(s) in this project be issued with Certificate(s) of Conformity.

Prior to operating with modifications authorized by this ATC, the facility is required to submit application(s) to modify their Title V permit as a minor modification. The following condition will be added to ensure compliance with this rule:

{1829} The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Y

Rule 4102 Nuisance

Section 4.0 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of this unit, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

California Health & Safety Code 41700 (Health Risk Assessment)

District policy APR 1905 specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite. There are no increases in emissions associated with this project, therefore a health risk assessment is not necessary and no further risk analysis is required.

Rule 4201 Particulate Matter Concentration

This rule specifies the maximum allowable concentration of particulates in the exhaust as 0.1 gr/dscf. Gas fired equipment readily complies with this requirement. Continued

compliance is expected

Rule 4301 Fuel Burning Equipment

This rule specifies maximum emission rates in lb/hr for SO₂, NO₂, and combustion contaminants. This rule also limits combustion contaminant concentration to ≤ 0.1 gr/scf.

This unit currently complies with this requirement. Continued compliance is expected.

Rule 4305 Boilers, Steam Generators and Process Heaters – Phase 2

This rule applies to any gaseous fuel or liquid fuel fired boiler, steam generator, or process heater with a rated heat input greater than 5 million Btu per hour.

Since the dormant unit(s) will not be operated, compliance with this rule is expected. The emission limits, monitoring provisions, and testing requirements of this rule will be satisfied when the unit is operated in compliance with Rule 4306.

Rule 4306 Boilers, Steam Generators and Process Heaters – Phase 3

This rule applies to any gaseous fuel or liquid fuel fired boiler, steam generator, or process heater with a rated heat input greater than 5 million Btu per hour. Since the dormant unit(s) will not be operated, compliance with this rule is expected.

Retain the applicable discussion, below, and delete the non-applicable discussion.

For non-compliant unit(s):

The emission limits, monitoring provisions, and testing requirements of this rule will be satisfied when the facility applies for ATC(s) to operate in compliance with this rule. The following conditions will be incorporated into the permit(s) to enforce the dormant emission unit status pursuant to District Policy SSP 1705. The conditions below will be placed ahead of the existing permit conditions:

No modification to this unit shall be performed without an Authority to Construct for such modification(s), except for changes specified in conditions below. [District Rule 2010]

The fuel supply line shall be physically disconnected from this unit. [District Rule 4306] or

The hour-meter shall not exceed a reading of XXX hours. [District Rule 4306] or Other APCO approved method to ensure the unit is not operated. [District Rule 4306].

This equipment shall not be operated for any reason until an Authority to Construct permit is issued approving all necessary retrofits required to comply with the applicable requirements of District Rule 4306 and all other applicable District regulations. [District Rule 4306]

For compliant unit(s):

The emission limits, monitoring provisions, and testing requirements of this rule will be satisfied upon recommencing operation of the unit(s). The following conditions will be incorporated into the permit(s) to enforce the dormant emission unit status pursuant to District Policy SSP 1705. The conditions below will be placed ahead of the existing permit conditions:

The permittee shall notify the District at least seven calendar days prior to the designation of this permit unit as a dormant emissions unit or an active emissions unit. [District Rule 1070]

When designated as a dormant emissions unit the fuel supply line shall be physically disconnected from the emissions unit. [District Rule 4306]

When designated as a dormant emissions unit, the permittee shall not be required to perform source testing or monitoring requirements otherwise required by this permit. [District Rule 4306]

A source test to demonstrate compliance with the NO_x and CO emission limits shall be performed within 60 days of recommencing operation of the dormant emissions unit. [District Rule 4306]

There are no other District rules in affect that have a future compliance date for which the units are non-compliant. Therefore, no additional conditions will be added that prohibit operation after such a future compliance date.

Rule 4351 Boilers, Steam Generators and Process Heaters – Phase I

This rule applies to boilers, steam generators, and process heaters at NO_x Major Sources that are not located west of Interstate 5 in Fresno, Kings, or Kern counties. If applicable, the emission limits, monitoring provisions, and testing requirements of this rule are satisfied when the unit is operated in compliance with Rule 4306. Therefore, compliance with this rule is expected.

Rule 4801 Sulfur Compounds

This rule specifies the maximum allowable concentration of SO₂ in the exhaust as 2,000 ppmv. Gas fired equipment readily complies with this requirement. Continued compliance is expected

California Health & Safety Code 42301.6 (School Notice)

Without consideration if the emission unit is located within 1,000 feet of a school, there is not an increase in emissions of any hazardous air pollutants with this project. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable.

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Issue ATC(s) subject to the permit conditions on the attached draft ATC(s). Conditions have been added to enforce the dormant status of the unit(s) pursuant to District Policy SSP 1705.

X. Billing Information

Application filing fees have been received. No change in annual fees will result with this project.

Revise fee wording as necessary

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
X-XXXX-X-X	3020-02-H	25,000 kBtu/hr boiler	\$882.00

Attachments

- A: Current Permit Requirements
- B: Compliance Certification Form (if being processed with a COC)
- C: Draft ATC(s)

Appendix A
Current Permit Requirements

Appendix B
Compliance Certification Form

Appendix C
Draft ATC(s)

For reference only – not to be included in application review

Leave all existing conditions and add the following at the beginning of ATC.

Conditions for non-compliant DEUs:

ATCs with COC

{1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Y

{1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Y

ATCs without COC

{1829} The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Y

All ATCs

No modification to this unit shall be performed without an Authority to Construct for such modification(s), except for changes specified in conditions below. [District Rule 2010]

The fuel supply line shall be physically disconnected from this unit. [District Rule 4306] or

The hour-meter shall not exceed a reading of XXX hours. [District Rule 4306] or Other APCO approved method to ensure the unit is not operated [District Rule 4306].

This equipment shall not be operated for any reason until an Authority to Construct permit is issued approving all necessary retrofits required to comply with the applicable requirements of District Rule 4306 and all other applicable District regulations. [District Rule 4306]

Conditions for compliant DEUs:

ATCs with COC

{1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Y

{1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Y

ATCs without COC

{1829} The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Y

All ATCs

The permittee shall notify the District at least seven calendar days prior to the designation of this permit unit as a dormant emissions unit or an active emissions unit. [District Rule 1070]

When designated as a dormant emissions unit the fuel supply line shall be physically disconnected from the emissions unit. [District Rule 4306]

When designated as a dormant emissions unit, the permittee shall not be required to perform source testing or monitoring requirements otherwise required by this permit. [District Rule 4306]

A source test to demonstrate compliance with the NO_x and CO emission limits shall be performed within 60 days of recommencing operation of the dormant emissions unit. [District Rule 4306]