

**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT
OFFICE MEMORANDUM**

DATE: May 14, 2008
TO: Permit Services Staff
FROM: David Warner, Director of Permit Services
SUBJECT: Revised BACT Cost Effectiveness Thresholds

The following are revised BACT cost effectiveness thresholds and a revised methodology for determining the calculated emission reduction used in cost effectiveness analyses.

All applications for ATC deemed complete after May 16, 2008 will be subject to the revised cost effectiveness thresholds and emission reduction calculation methodology.

Cost Thresholds:

Recommended Cost Thresholds (\$/ton)				
NOx	CO	VOC	SOx	PM10
24,500	300	17,500	18,300	11,400

The cost effectiveness (annual cost per ton of pollutant reduced) for a given technologically feasible control option is equal to the annual cost divided by the calculated emission reduction.

Annual costs are equal to annualized cost of utilizing technologically feasible BACT controls on an emission unit that already meets District standard emissions. Annual costs do not include costs necessary to meet District standard emissions.

Methodology for determining the emission reduction used in cost effectiveness analyses:

$$\text{Emission Reduction} = \text{District Standard Emissions} - \text{Emissions (w/ tech feas BACT)} \text{ (ton/year)}$$

For new emission units, District standard emissions are equal to the emissions level allowed by applicable SJVAPCD rule requirements once the compliance date, i.e. the date at which the emission unit must meet a specific emission requirement, for the rule has passed. For rules with a phased compliance schedule, the earliest compliance date which applies to the equipment being analyzed shall be used. The emission limits in the applicable SJVUAPCD prohibitory rule shall be those that the particular emission unit is subject to. Please note that if the applicable rule has both a standard and

enhanced compliance option, the emission level and earliest compliance date required by the standard compliance option shall be used.

For existing emission units, District standard emissions are equal to the emissions level allowed by the current PTO.

If there is no SJVAPCD prohibitory rule emission limit that applies to the particular new emission unit or if the existing emission unit does not have permitted emission limits, District standard emissions for the unit are equal to the emissions from similar equipment that is commonly available in the District. In no case shall the emissions used be higher than that allowed by State or Federal requirements. If insufficient information is available to make a determination regarding emissions from common available equipment in the District, District standard emissions will be estimated based on EPA's Compilation of Air Pollutant Emission Factors (AP-42), or other references as determined by the SJVAPCD to be appropriate.