

Preliminary Review Checklist

Guiding principle: The preliminary review is limited to those tasks necessary to assure that the District has obtained all necessary information to perform the final evaluation.

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|-----------------------------|--|
| Facility I.D. Number | |
| Project Number | |
| Company Name | |
| Location | |
| Process Engineer | |
| Date | |

| Application Type | Permit Unit Number(s) |
|--|-----------------------|
| <input type="checkbox"/> New emissions units | |
| <input type="checkbox"/> Modify existing emissions units | |

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| Project Proposal (complete and concise description) |
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| Application Content | | Yes | No |
|---------------------|---|--------------------------|--|
| 1. | Does the application provide sufficient information to understand the applicant's proposal, the process flow, and the purpose of the project? | <input type="checkbox"/> | <input type="checkbox"/> Incomplete |
| 2. | Does the application provide sufficient information to determine the permit unit boundaries? | <input type="checkbox"/> | <input type="checkbox"/> Incomplete |
| 3. | Does the application contain adequate equipment description for all emissions units, including info needed to determine appropriate fee schedules? | <input type="checkbox"/> | <input type="checkbox"/> Incomplete |
| 4. | Does the application contain sufficient information to calculate potential emissions from new and modified emissions units? | <input type="checkbox"/> | <input type="checkbox"/> Incomplete |
| 5. | Does the application contain alternate monitoring plan(s) or compliance plan(s) required by applicable prohibitory rules? Not applicable <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> Incomplete |
| 6. | Is a completed applicable supplemental application form included? <i>Check here if this is not applicable or if all information is provided without form.</i> <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> Incomplete |
| 7. | Do all units involved with the project meet all source-type-specific prohibitory rule emission limits? Not applicable <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> Incomplete |
| 8. | Do valid unimplemented ATCs exist for any units to be modified with this project? | <input type="checkbox"/> | <input type="checkbox"/> Skip to 10 |
| 9. | Does the application account for the disposition of each valid unimplemented ATC? (cancelled? implemented prior to, or concurrently with, this new proposal?) | <input type="checkbox"/> | <input type="checkbox"/> Incomplete |
| 10. | Is the proposal subject to Rule 2201 (new emission unit, or "modification" per Rule 2201 definition 3.26)? | <input type="checkbox"/> | <input type="checkbox"/> Skip to 37 |

| Major Modification Applicability | | Yes | No |
|----------------------------------|---|---|---|
| 11. | Is this facility an existing Major Source for any pollutant as defined in Rule 2201? | <input type="checkbox"/> Send PSD letter | <input type="checkbox"/> Skip to 22 |
| 12. | Is it obvious that all units involved in this project can be considered “fully offset” units and that there is no proposed increase in potential emissions? | <input type="checkbox"/> Skip to 21 | <input type="checkbox"/> |
| 13. | Is it obvious that this project, by itself, does NOT result in emissions increases (PE-BE, major source pollutants only) greater than a major modification threshold? | <input type="checkbox"/> Skip to 21 | <input type="checkbox"/> |
| 14. | Is this project an exempt action under Federal NSR as defined in Policy APR-1125? If yes, check one box: <input type="checkbox"/> Routine maintenance, repair and replacement; <input type="checkbox"/> Use of an alternative fuel or raw material by reason of a natural gas curtailment plan pursuant to a Federal, state or local directive; <input type="checkbox"/> An increase in the hours of operation or in the production rate, unless such change is prohibited under any federally enforceable permit condition; <input type="checkbox"/> Any change in ownership at a stationary source; <input type="checkbox"/> The addition, replacement or use of a pollution control project of an existing unit as defined in District Policy APR-1125; <input type="checkbox"/> Other actions specifically enumerated in 40 CFR 51.165(a)(1)(v)(C). <input type="checkbox"/> Involves <u>only</u> fugitive emissions from sources NOT specifically listed 40 CFR 52.21(b)(1) (see Table A) and NOT subject to an NSPS or NESHAP promulgated before 8/7/80. | <input type="checkbox"/> Skip to 21 | <input type="checkbox"/> |
| 15. | Is it obvious that this project, by itself, DOES result in emissions increases (PE-BE, major source pollutants only) greater than any major modification threshold? | <input type="checkbox"/> Skip to 17 | <input type="checkbox"/> |
| 16. | Has the applicant provided actual emissions and historical operation data, and supporting records, for all units involved in the project (only for Major Source pollutants)? | <input type="checkbox"/> Skip to 21 | <input type="checkbox"/> Incomplete, Skip to 21 |
| 17. | Are the units involved in this project located on one or more properties wholly within the Western or Central Kern County Oil Fields, or Fresno County Oil Fields? | <input type="checkbox"/> | <input type="checkbox"/> Skip to 20 |
| 18. | Has the applicant provided a list of all emission units located on the contiguous and adjacent properties on which the proposed new/modified units are located (use this list for defining the Federal Stationary Source)? | <input type="checkbox"/> | <input type="checkbox"/> Incomplete |
| 19. | Based on the potential to emit of all emissions units located on the above-mentioned contiguous and adjacent properties, are the emissions units involved in this project part of a Federal Major Source as defined in District Policy APR-1125? | <input type="checkbox"/> | <input type="checkbox"/> Skip to 21 |
| 20. | Has the applicant provided all of the following information and supporting records (only for Major Source pollutants)? <ul style="list-style-type: none"> Actual emissions and historical operation data for all units involved in the project, Actual emissions and historical operation data for emissions units located on the Federal Stationary Source modified within the five years preceding the date of the application, and are creditable as defined in District Policy APR-1125. | <input type="checkbox"/> | <input type="checkbox"/> Incomplete |

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| 21. | Has the applicant proposed (or is it obvious) that all units involved in this project should be considered “Fully Offset”, “Highly Utilized”, and/or “Clean” emission units? <i>(answer referred to in offset section, question #34)</i> | <input type="checkbox"/> | <input type="checkbox"/> |
|-----|---|--------------------------|--------------------------|

| Best Available Control Technology (BACT) | | Yes | No |
|---|--|--|--|
| 22. | Is it obvious (with minimal effort/calculations) that BACT is triggered? | <input type="checkbox"/> | <input type="checkbox"/> Skip to 31 |
| 23. | Is there an existing BACT guidance? | <input type="checkbox"/> Attach copy of BACT guidance | <input type="checkbox"/> Skip to 33 |
| 24. | Is it obvious that the applicant’s proposal meets the most stringent control that is listed as “technologically feasible” (or as “achieved in practice”, if more stringent than “technologically feasible” options)? | <input type="checkbox"/> | <input type="checkbox"/> Skip to 27 |
| 25. | Is there a more effective “alternative basic equipment or technology”? | <input type="checkbox"/> | <input type="checkbox"/> Skip to 34 |
| 26. | Has the applicant supplied (or does District already possess) up-to-date cost data to determine cost-effectiveness of the alternative? | <input type="checkbox"/> Skip to 34 | <input type="checkbox"/> Incomplete |
| 27. | Did the applicant propose “achieved in practice” BACT? | <input type="checkbox"/> | <input type="checkbox"/> Skip to 29 |
| 28. | Is the facility a small emitter? | <input type="checkbox"/> Skip to 34 | <input type="checkbox"/> |
| 29. | Has the applicant supplied (or does District already possess) up-to-date cost data to determine cost-effectiveness of the technologically feasible options? <i>Check “Yes” if none are listed.</i> | <input type="checkbox"/> | <input type="checkbox"/> Incomplete – need cost data |
| 30. | Has the applicant supplied (or does District already possess) up-to-date cost data to determine cost-effectiveness of the alternative basic equipment or technology? <i>Check “Yes” if none are listed.</i> | <input type="checkbox"/> Skip to 34 | <input type="checkbox"/> Incomplete – need cost data. Skip to 34 |
| 31. | Is it obvious that BACT is not triggered? | <input type="checkbox"/> Skip to 34 | <input type="checkbox"/> |
| 32. | Perform BACT trigger calculations. Is BACT triggered? | <input type="checkbox"/> Back to 23 | <input type="checkbox"/> Skip to 34 |
| 33. | Has the applicant provided (or does District already possess) all data needed to perform a new and complete BACT analysis? (alternatives, current costs, etc.) | <input type="checkbox"/> | <input type="checkbox"/> Incomplete |

| Offsets | | Yes | No |
|----------------|---|--|--|
| 34. | Is it obvious (with minimal effort/calculations) that offsets are NOT required? <i>Consider:</i> <ul style="list-style-type: none"> • <i>offset exemptions in 2201</i> • <i>PE to PE offset calcs for minor sources, or “Yes” answers to question #21 of this worksheet</i> • <i>AE to PE offset calcs for other majors</i> | <input type="checkbox"/> Skip to 37 | <input type="checkbox"/> |
| 35. | Is it obvious (with minimal effort/calculations) that offsets are required? | <input type="checkbox"/> | <input type="checkbox"/> Skip to 37 |

| | | | |
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| 36. | Has the applicant identified a source of offsets, and demonstrated that they have the right to use them? If Yes, check one or more: <input type="checkbox"/> Applicant owns the certificates. <input type="checkbox"/> Submitted legal option to purchase. <input type="checkbox"/> Other: _____ | <input type="checkbox"/> | <input type="checkbox"/> Incomplete |
|-----|---|--------------------------|--|

| Health Risk Assessment | | Yes | No |
|------------------------|--|--|--|
| 37. | Does the project result in <u>any</u> increase in hazardous air pollutants for <u>any</u> emission unit, or for <u>any</u> location (such as a transfer of location within a stationary source)? | <input type="checkbox"/> HRA Required | <input type="checkbox"/> Skip to 40 |
| 38. | Is all of the following information provided (as applicable)? <ul style="list-style-type: none"> • Receptor distances • Stack velocity • Stack height • Stack temperature • MSDS • Other (for area sources) | <input type="checkbox"/> | <input type="checkbox"/> Incomplete |
| 39. | Is it obvious that TBACT is required and not proposed? | <input type="checkbox"/> Incomplete - Ask for TBACT proposal, provide guidance for determining TBACT. | <input type="checkbox"/> |

| Certificate of Conformity (COC) | | Yes | No |
|---------------------------------|---|---|--|
| 40. | Is this a new emissions unit or modification to a Title V Permit? | <input type="checkbox"/> | <input type="checkbox"/> Skip to 43 |
| 41. | Has the applicant requested that the ATC be issued with a COC? | <input type="checkbox"/> Make sure to check the "COC" box in the PAS Project Details screen. | <input type="checkbox"/> Contact facility to explain the permitting advantages of requesting a COC. If the facility chooses to process without a COC, Skip to 43 |
| 42. | Has the applicant included a signed and initialed Title V CC form (TVFORM-009)? | <input type="checkbox"/> | <input type="checkbox"/> Incomplete |

| Notification Requirements | | Yes | No |
|---------------------------|---|--|--------------------------|
| 43. | Is it obvious that notification is required (NSR, COC, or school)?* <input type="checkbox"/> NSR (Public Notice) <input type="checkbox"/> COC (EPA Notice) <input type="checkbox"/> School Notice (If an HRA is required ("Yes" to 37), verify if the facility is located within 1,000 ft of a K-12 school using yahoo/mapquest and further research, if necessary, and attach). | <input type="checkbox"/> Make sure to fill the following items in the PAS Project Details screen 1) estimated time, 2) check the "COC", "School Notice" or "Public Notice" box Skip to 45 | <input type="checkbox"/> |

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| 44. | Is it obvious that notification is NOT required (NSR, COC, or school)? | <input type="checkbox"/> | <input type="checkbox"/> Add to completeness letter: "If upon further evaluation it is determined that this project is subject to public noticing requirements, we will provide you with an estimated cost for processing your permitting application." |
|-----|--|--------------------------|---|

* Preliminary Review hours are billed for all Notification Projects, except for School Notice.

| Reimbursable Overtime Fees | | Yes | No |
|-----------------------------------|---|--|--|
| 45. | Has the applicant requested reimbursable overtime processing? | <input type="checkbox"/> <ul style="list-style-type: none">• If requested, include estimated cost for engineering time in the completeness letter.• Send HRA request to Tech Services before deeming complete. | <input type="checkbox"/> Skip to 47 |
| 46. | Has the applicant provided a weekend contact, weekend phone number, etc.? | <input type="checkbox"/> | <input type="checkbox"/> Incomplete |

| Filing Fees | | Yes | No |
|--------------------|-------------------------------------|--------------------------|---|
| 47. | Have all the filing fees been paid? | <input type="checkbox"/> | <input type="checkbox"/> Incomplete, unless RO |

| Completeness Determination | |
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| <p>If the application is incomplete by any of the questions in this preliminary review form, the missing information must be obtained. If the information is too comprehensive to obtain by phone, or attempts to gather the information by phone have been unsuccessful as of your due-date, then deem the application incomplete and send an incompleteness letter detailing the missing information and/or fees. OTHERWISE, deem the application complete and see questions 43, 44, and 45 for possible additions to completeness letter.</p> | |

| Comments and References | |
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