Preliminary Review Checklist

Guiding Principle: The preliminary review is limited to those tasks necessary to assure that the District has obtained all of the 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) | | |
|  | | New emissions units | |  | | |
|  | | Modify existing emissions units | |  | | |
| Project Proposal(complete and concise description) | | | | | | |
|  | | | | | | |
| Application Content | | | | | Yes | No |
|  | Is it obvious (with minimal effort/calculations) that the application’s equipment is exempt from District permitting pursuant to Rule 2020? | | | | Discuss with your supervisor |  |
| 1. | Does the application provide sufficient information to understand the applicant’s proposal, the process flow, and the purpose of the project? | | | |  | Incomplete |
| 2. | Does the application provide sufficient information to determine the permit unit boundaries? | | | |  | Incomplete |
| 3. | Does the application contain adequate equipment descriptions for all emissions units, including info needed to determine appropriate fee schedules? | | | |  | Incomplete |
| 4. | Does the application contain sufficient information to calculate potential emissions from new and modified emissions units? | | | |  | Incomplete |
| 5. | Does the application contain alternate monitoring plan(s) or compliance plan(s) required by applicable prohibitory rules?  ***Not applicable*** | | | |  | Incomplete |
| 6. | Is a completed applicable supplemental application form included?  *Check here if* ***not applicable*** *or if all information is provided without form.* | | | |  | Incomplete |
| 7. | Do all units involved with the project meet all source-type-specific prohibitory rule emission limits?  ***Not applicable*** | | | |  | Incomplete |
| 8. | Do valid unimplemented ATCs exist for any units to be modified with this project? | | | |  | 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?) | | | |  | Incomplete |
| 10. | Is the proposal subject to Rule 2201 (New emission unit, or “modification” pursuant to Rule 2201, 3.25?) | | | |  | Skip to 44 |
| SB288 and Federal Major Modification Applicability\*  Offroad engines don’t count toward major source determination, or SB288 or federal major modifications. | | | | | Yes | No |
| 11. | Is this facility an existing major source for any pollutant as defined in Rule 2201? | | | |  | Skip to 19 |
| 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? | | | | Skip to 19 |  |
| 13. | Is this project an exempt action under Federal NSR? If yes, check one box.  Use of an alternative fuel or raw material by reason of a natural gas curtailment plan pursuant to a Federal, state or local directive;  An increase in the hours of operation or in the production rate, unless such change is prohibited under any federally enforceable permit condition;  Any change in ownership at a stationary source;  Other actions specifically enumerated in 40 CFR 51.165(a)(1)(v)(C).  Involves only fugitive emissions from sources NOT specifically listed in 40 CFR 52.21(b)(1) (see Table A) & NOT subject to an NSPS or NESHAP promulgated before 8/7/80. | | | | Skip to 19 |  |
| 14. | Can this project be linked to any other projects at the facility where expansions are taking place? | | | |  |  |
| 15. | Does this project (and any related projects) have a combined PE2 greater than any of the SB288 Major Modification Thresholds? | | | |  | Skip to 18 |
| 16. | Did the applicant provide the necessary historical operating data on all relevant equipment to make the SB288 Major Modification Calculation? | | | |  | Incomplete |
| 17. | Perform the SB288 Major Modification Calculation. Does this project constitute an SB288 Major Modification? | | | | SB288 Major Mod  NSR PN Req’d |  |
| 18. | Are there any increases in PE (for any permit unit(s) in this project) greater than the Federal Major Modification Thresholds for any pollutants for which this facility is a major source? | | | | Federal Major Mod  NSR PN Req’d |  |
| Prevention of Significant Deterioration (PSD) | | | | | Yes | No |
| 19. | Is this facility an existing major source for PSD for any pollutant (including attainment and non-attainment pollutants), per the PSD major source thresholds (100 or 250 tpy, or 100,000 tpy CO2e), and will have both a significant increase **and** a significant net emissions increase for any attainment/unclassified pollutant subject to PSD?  (Significance thresholds: NO2 or SO2 @ 40 tpy, PM @ 25 tpy, PM10 @15 tpy, CO @ 100 tpy, GHG @ 75,000 tpy CO2e – all short tons) | | | | Subject to PSD Submit HRA/RMR request form  Skip to 22 |  |
| 20. | Is this facility a new source that will be a major source for PSD for any pollutant, per the PSD major source thresholds, and will have a significant increase for any attainment/unclassified pollutant subject to PSD? | | | | Subject to PSD, submit HRA/RMR request form  Skip to 22 |  |
| 21. | Is this facility an existing non-major source for PSD, per the PSD major source thresholds, and the project will have an increase for any attainment/unclassified pollutant subject to PSD that by itself is greater than the PSD major source thresholds? | | | | Subject to PSD, submit HRA/RMR request form  Skip to 22 | Skip to 23 |
| 22. | Is the facility within 10 km of a Class I Area? | | | | Impact on Class I area analysis required  Skip to 26 | Skip to 26 |
| 23. | Is the facility within 10 km of a Class I Area and either:  a) an existing major source for PSD for any pollutant (including attainment and non-attainment pollutants), per the PSD major source thresholds (100 or 250 tpy, or 100,000 tpy CO2e – all short tons)?  Or  b) a new source that will be a major source for PSD for any pollutant, per the PSD major source thresholds | | | |  | Skip to 29 |
| 24. | Has Tech Services determined the project’s impact on the Class I area? | | | |  | Incomplete  Submit HRA/RMR Request form |
| 25. | Is the impact on the Class I area ≥ 1 µg/m3 for any attainment/unclassified pollutant subject to PSD? | | | | Subject to PSD | Skip to 29 |
| 26. | Has Tech Services indicated that all necessary modeling and impact analysis\* files are complete? Project cannot be deemed complete until Tech Services concurs that modeling and analyses are acceptable. Note that modeling and analysis files are not needed for GHG increases.  \*Analyses include the project’s impacts on visibility, soils and vegetation, and of the impacts in the area resulting from general commercial, residential, industrial and other growth associated with the project | | | |  | Incomplete |
| 27. | Is the source within 100 km of a Class I Area?  *(See map posted on AirNet)* | | | | Send notification to Federal Land Managers |  |
| 28. | If the project triggers a PSD modification for GHG emissions, has the applicant supplied the information needed to perform a PSD BACT analysis?  ***Not applicable*** | | | |  | Incomplete |
| Best Available Control Technology (BACT) | | | | | Yes | No |
| 29. | Is it obvious (with minimal effort/calculations) that BACT is triggered? | | | |  | Skip to 38 |
| 30. | Is there an existing BACT guidance? | | | | Attach copy of BACT guidance | Skip to 40 |
| 31. | Does the proposal meet the most stringent control that is listed as either “technologically feasible” or “achieved in practice”? | | | |  | Skip to 34 |
| 32. | Is there a more effective “alternative basic equipment or technology”? | | | |  | Skip to 41 |
| 33. | Has the applicant supplied (or does District already possess) up-to-date cost data to determine cost-effectiveness of the alternative? | | | | Skip to 41 | Incomplete |
| 34. | Did the applicant propose “achieved in practice” BACT? | | | |  | Skip to 36 |
| 35. | Is the facility a small emitter? | | | | Skip to 41 |  |
| 36. | Has the applicant supplied (or does District already possess) up-to-date cost data to determine cost-effectiveness of the technologically feasible options? *Check “Yes” if none are listed.* | | | |  | Incomplete  Need cost data |
| 37. | 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? *Check “Yes” if none are listed.* | | | | Skip to 41 | Incomplete  Need cost data.  Skip to 41 |
| 38. | Is it obvious that BACT is not triggered? | | | | Skip to 41 |  |
| 39. | Perform BACT trigger calculations. Is BACT triggered? | | | | Back to 30 | Skip to 41 |
| 40. | Has the applicant provided (or does District already possess) all data needed to perform a new and complete BACT analysis? (alternatives, current costs, etc.) | | | |  | Incomplete |
| Offsets | | | | | Yes | No |
| 41. | Is it obvious (with minimal effort/calculations) that offsets are NOT required? Consider the following:   * *Offset exemptions in 2201* * *PE to PE offset calcs for minor sources* * *BE to PE offset calcs for other majors* * *Are units Fully Offset, Highly Utilized and/or Clean?* | | | | Skip to 44 |  |
| 42. | Is it obvious (with minimal effort/calculations) that offsets are required? | | | |  | Skip to 44 |
| 43. | Has the applicant identified a source of offsets, and demonstrated that they have the right to use them?  If Yes, check one or more:  Applicant owns the certificates.  Submitted legal option to purchase.  Other: | | | |  | Incomplete |

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| Health Risk Assessment | | | Yes | No |
| 44. | Does the project result in any of the following:   * Any increase in HAPs/TACs for any emissions unit? * A change in the location of any emissions unit (such as the transfer of location within a stationary source)? * A change in the stack/exhaust parameters (e.g. stack height, stack diameter, exhaust flow rate, etc.)? | | HRA Required | Skip to 47 |
| 45. | Is all of the following information provided (as applicable)? | |  | Incomplete |
| * Receptor distances * Stack velocity * Stack height | * Stack temperature * MSDS * Other (for area sources) |
| 46. | If this project triggers public noticing, has the applicant provided the fence line distances for the AAQA (from the stack to the fence line in each direction (for non-VOC-only projects))? ***Not applicable*** | |  | Incomplete |
| Certificate of Conformity (COC) | | | Yes | No |
| 47. | Does this facility hold a Title V Permit? | |  | Skip to 50 |
| 48. | Has the applicant requested that the ATC be issued with a COC? | | Check the “COC” box in the PAS Project Details screen. | Explain to facility the permitting advantages of a COC. Skip to 50 |
| 49. | Has the applicant included a signed and initialed Title V CC form (TVFORM-009)? | |  | Incomplete |
| Notification Requirements | | | Yes | No |
| 50. | Is it obvious that notification is required (Rule 2201, Rule 2410, COC, or school)?  Rule 2201 (Public Notice)  Rule 2410 (Public Notice)  COC (EPA Notice)  School Notice (If HRA is required, verify if the facility is located within 1,000 ft of a K-12 school using online mapping service and further research, if necessary, and attach.) | | Check the associated boxes in the PAS Project Details Screen. | Skip to 52 |
| 51. | Does the **Notifications** tab in PAS’s Facility Details screen contain any entries for individuals/parties who wish to be notified of public notice actions for this facility? | | Ensure the final review engineer sends copies of the public notification documents to each individual and/or interested party identified in PAS (see [**FYI-349**](file:///\\South1\shared\Intranet_Files\PER\policies\fyi\docs\349.docx)). |  |

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| Preliminary CEQA Significance Determination | | Yes | No |
| 52. | Does this project trigger BACT? |  |  |
| 53. | Is the project occurring at an **EXISTING facility**? | This is an  **EXISTING FACILITY** | This is a NEW FACILITY Skip to 55 |
| 54. | Has the applicant indicated on the ATC Application Form that the proposed equipment or project is allowed by the current CUP,  by other Land Use permit, or by Right? | District is likely the Lead Agency for CEQA  Skip to 57 | Discuss with your  supv & Tec Svcs supv.  Skip to 78 |
| 55. | Has the applicant completed the CEQA Information form? |  | Incomplete  Send CEQA Information form to the applicant.  Skip to 62 |
| 56. | Is the District the Lead Agency for CEQA purpose? |  | District is a Responsible Agency for CEQA &  has NO authority over GHG. Use APR1010  GHG Sig Determination Skip to 62 |
| Preliminary CEQA Significance Determination – GHG Emissions | | Yes | No |
| 57. | Is it obvious that the project GHG emission increase **≤** 230 metric tons-CO2e/year? | Project < significant for GHG. Use APR1010  GHG Sig Determination Skip to 62 |  |
| 58. | Is there a District Draft or Approved **BPS** for this Class and Category of permitted unit? |  | Skip to 60 |
| 59. | Has the applicant proposed **BPS**? | Project < significant for GHG. Use APR1010  GHG Sig Determination Skip to 62 |  |
| 60. | Does the project achieve **29% GHG emission reductions** compared to Business as Usual (Is there a unit shut down, mitigation, ERCs, etc)? | Project < significant for GHG. Use APR1010  GHG Sig Determination Skip to 62 |  |
| 61. | Does the project comply with an **approved** GHG Plan such as Cap-and-trade, etc.? | Project < significant  for GHG.  Use APR1010  GHG Sig Determination | Incomplete  Project may have significant GHG.  Discuss with your supv  & Tec Svcs supv |

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| Preliminary CEQA Significance Determination – Other Criteria | | | Yes | No |
| 62. | Is it obvious that the project **SSIPE** would exceed any of the CEQA significance thresholds for Criteria Pollutants?  *(10 ton-NOx/year, 10 ton-VOC/year, 27.4 tons ton-SOx/year, or 15 ton-PM10/year)* | |  | Skip to 64 |
| 63. | Has the applicant completed the CEQA Information form? | | Please forward the form to Tec Svcs supv  AND  Discuss with your  supv & Tec Svcs supv.  Skip to 78 | Incomplete  Send CEQA Information form to the applicant.  Skip to 78 |
| 64. | Is the project occurring at an **EXISTING facility?** | | District is likely the Lead Agency for CEQA | This a NEW FACILITY Skip to 66 |
| 65. | Has the applicant completed the CEQA Information form? | | Skip to 67 | Skip to 70 |
| 66. | Has the applicant completed the CEQA Information form? | | Please  forward the form to Tec Svcs supv | Incomplete  Send CEQA Info form  to the applicant.  Skip to 78 |
| 67. | Did the applicant answer “YES” to 1 or more question on the CEQA Information form Section 1? | | District is likely a Responsible Agency for CEQA | District is likely the Lead Agency for CEQA  Discuss with your  supv & Tec Svcs supv. Skip to 78 |
| 68. | Did the applicant answer “YES” to 1 or more question on the CEQA Information form Section 2? | | Discuss with your  supv & Tec Svcs supv. Skip to 78 |  |
| 69. | Per District’s determination, is this project likely to generate **potential public concern** or is the facility identified on the District’s list of facilities with **potential public concern** ([**see FYI 141**](file:///\\CENTRAL1\Shared\Intranet_files\PER\policies\fyi\docs\141(5-26-16).docx))? | | Discuss with your  Supv & Tec Svcs supv Skip to 78 | Project < District CEQA signif. Thresholds.  Use APR1010  CEQA Findings  *S*kip to 78 |
| 70. | Is it obvious that the project would result in an increase in heavy-duty (HD) truck traffic to and from the facility of **at least** 47 new HD truck one-way trips per day? (23 HD truck round trips per day) | | Incomplete  Send CEQA Info  form to the applicant |  |
| 71. | Is it obvious that the project would result in an increase in employment of **350 or more, new employees**? | | Incomplete  Send CEQA Info  form to the applicant |  |
| 72. | Is it obvious that the project would result in an increase **of water** **demand** at the facility of more than 5,000,000 gallons per day? | | Incomplete  Send CEQA Info  form to the applicant |  |
| 73. | Is it obvious that the project wouldresult in noticeable off-site **nuisance odors**? | | Incomplete  Send CEQA Info  form to the applicant |  |
| 74. | Is it obvious that the project wouldinclude any demolition, excavation, and/or grading/**construction activities** outside the perimeter of the existing facility? | | Incomplete  Send CEQA Info  form to the applicant |  |
| 75. | Is this project part of a **larger development** activity at the facility that collectively would result in answering “YES” to any of the CEQA Significance Determination questions (62 or 70 to 74) listed above? | | Incomplete  Send CEQA Info  form to the applicant |  |
| 76. | Has this facility or this project generated any **known** **public concern?**  *Public concern may be interpreted as concerns by local groups at public meetings, adverse media attention such as negative newspaper or other periodical publications, local news programs, environmental justice issues, etc.* | | Incomplete  Send CEQA Info  form to the applicant |  |
| 77. | Per the District’s Determination, is this project likely to generate **potential public concern,** or is the facility identified on the District’s list of facilities with **potential public concern** **(**[**see FYI 141**](file:///\\CENTRAL1\Shared\Intranet_files\PER\policies\fyi\docs\141(5-26-16).docx)**)**? | | Discuss with your supv  & Tec Svcs supv | Project < District CEQA signif. Thresholds  Use APR1010  CEQA Findings |
| Direct Convert | | | Yes | No |
| 78. | | Does this project qualify for Direct Convert (pursuant to [**FYI 313**](file:///\\north1\shared\Intranet_Files\PER\policies\fyi\docs\313.docx))? | Advise Supervisor to Check Direct Convert Box in PAS |  |
| Reimbursable Overtime | | |  |  |
| 79. | | Has the applicant requested reimbursable overtime processing? | Send HRA request to Tech Svcs **before** deeming complete. | Skip to 81 |
| 80. | | Has the applicant provided a weekend contact or phone number, etc.? |  | Incomplete |
| Filing Fees | | | Yes | No |
| 81. | | Have all the filing fees been paid? |  | Incomplete  unless RO |
| Compliance Notification | | | Yes | No |
| 82. | | Was the ATC application submitted as the result of a Notice of Violation/Notice to Comply? (Check Item 12 of the Permit Application Form and/or the Project Screen in PAS) |  |  |
| If Yes,   * Send an email to the regional Compliance Manager and Supervisor(s) notifying them when the project is deemed complete with the following format:   + Subject Line: **NOV number, Facility ID, Facility Name**   + Body: “Project C-1153XXX was deemed complete on {Completeness Date} | | | | |
| Completeness Determination | | | | |
| 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 email, or if attempts to gather the information 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. | | | | |
| Comments and References | | | | |
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