

SANTA BARBARA COUNTY
AIR POLLUTION CONTROL DISTRICT
POLICIES AND PROCEDURES

Policy No.	<u>6100.023.2016</u>	Draft	<u> </u>
Div	<u>Pol Yr</u>		
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	<u>Div Pol Yr</u>		
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Topic:	<u>Emission Limits for Reevaluated Permits</u>		
Distribution:	<u>Engineering Division Staff</u>		

The following policy applies to setting emission limits on permits due for reevaluation.

1. For permits with existing emission limitations set on the permit, that emission limit is used, unless a local, state or federal rule or regulation is more stringent. In these cases, the emissions should be updated to reflect the newer standards. Further, staff should confirm that the regulatory basis for setting the original emission limit was valid. Staff should seek direction from the Engineering Supervisor if the validity of the original emission limits is in question.
2. The permit's emission limits may be updated if the emissions calculations were based on District or AP-42 emission factors that have been updated since the prior reevaluation.
3. For permits without emission limits, data contained in the original permit application is used as the basis for setting emission limits, unless a Prohibitory Rule is more stringent.
4. For permits without emission limits or adequate data in the original permit application, either one of the following two methods are used:
 - a. For a facility constructed after Nov. 15, 1990, and triggering NSR/PSD review, the appropriate NSR/PSD trigger level under which the application was evaluated is used as the emission limit, unless a Prohibitory Rule is more stringent. For example, a paint spray booth installed in 1998 did not supply any emission calculations and the engineering evaluation and permit clearly indicate that BACT was not required. In this case, our guidelines would place a 24.9 lb/day emission limit on this facility (just below the BACT trigger level in effect at the time the ATC permit was issued).
 - b. For a facility constructed prior to Nov 15,1990, the more stringent of either the maximum design capacity of the facility or the corresponding Prohibitory Rule is used to determine the appropriate emission limit. For the same example as above, a paint spray booth would be

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given the limitations set in either District Rule 317 or 330. For the case of Rule 317, two emission limits would be required. One for photochemically reactive solvents (as defined by Rule 102.FF) and one for reactive organic compounds (since there is a distinction in the Prohibitory Rules).