



## MEMO

TO: Engineering Division Staff  
FROM: Michael Goldman *MG*  
SUBJ: Revised Policy and Procedures  
DATE: August 25, 2016

---

With today's adoption of the New Source Review regulation and associated rules, our policy and procedures required revisions to address three main areas:

1. Remove all references to outdated text, processes and requirements. Examples include: removal of the terms GSD/MSD and NEI. Also, deleted or revised policies that provided direction and/or clarification to the NEI calculation and processes that are no longer used (e.g., use of fax machines).
2. Simplifying our permit process by removing or modifying policies and/or procedures that made the permit process time consuming, complex, and difficult to implement or enforce by our inspection staff. One example is the revision of P&P 6100.072 to no longer allow for the use of the FHC correlation equation methodology for new permitting actions. These changes were made to go hand-in-hand with our overall approach with the revised NSR rules revisions by simplifying and making our permit process less complex and more predictable.
3. Adding new policy and procedures to address issues due to the revised NSR regulation. Two new policies were added. New P&P 6100.074 addressed guidance for performing calculations for PM<sub>2.5</sub> and P&P 6100.075 addressed ERCs for equipment specifically exempted by our rules from offset requirements.

The Engineering Division Policy and Procedures and the Table of Content are both located online at <https://www.ourair.org/eng/dl/permitting-policy-and-procedures/>.

The attached table summarizes the revisions made.

| NUMBER   | TITLE                                                                          | CHANGES                                                                                                                                                             |
|----------|--------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 6100.001 | Increment Fee Determination                                                    | Deleted. The rules no longer provide for fee options.                                                                                                               |
| 6100.003 | Contiguous or Adjacent Properties                                              | Revised to reference the oil lease geographic boundary.                                                                                                             |
| 6100.005 | Applicant Request to Waive Permit Conditions                                   | Revised text to correct proper procedures for ATC and PTO permit holders.                                                                                           |
| 6100.007 | Testing of Emergency Equipment                                                 | Deleted. Outdated due to ATCM requirements.                                                                                                                         |
| 6100.015 | Application of New Source Review to Affected Pollutants                        | Revised the text and table to add clarity and update the table.                                                                                                     |
| 6100.016 | Processing of Project Modifications Occurring Between ATC & PTO                | Revised to remove NEI references and update text.                                                                                                                   |
| 6100.017 | Resolving Conflicts Between Rules and Permit Conditions                        | Revised to fix wording and references. Removed text that was not relevant to the purpose of the policy.                                                             |
| 6100.018 | Calculation of Emission Reduction Credit Baseline                              | Revised to fix rule reference and change title.                                                                                                                     |
| 6100.019 | Permit Cancellations                                                           | Deleted. The District no longer requires a policy to guide staff in how to proceed with the cancellation process.                                                   |
| 6100.020 | Handling of Confidential Information                                           | Revised to update processing related tasks and reference revised Form -01.                                                                                          |
| 6100.021 | NEI Contribution from Exempt Equipment                                         | Deleted. The NEI calculation is no longer used.                                                                                                                     |
| 6100.023 | Emission Limits for Reevaluated Permits                                        | Revised to reflect current practices.                                                                                                                               |
| 6100.025 | Exemption of Air Pollutant Emitting Equipment at Wholesale Nurseries           | Deleted. This policy contained inaccurate references as well as not comporting to changes in State law. Wholesale Nurseries are now subject to SB-700 requirements. |
| 6100.026 | Informing Applicant/Permittee of Right to Appeal Permits Issued                | Revised to update the permit appeal time to 30 days and text updates.                                                                                               |
| 6100.028 | Rule 210.V.A.2. (Penalty for Nonpayment of Fees Other Than Cost Reimbursement) | Deleted. The text of this policy conflicts with the requirements detailed in Rule 210 that clearly delineate the process that is followed when payment is not made. |
| 6100.029 | Arrangements for Partial Payment Created by Personal Hardship                  | Revised to address process revisions and final approval authority.                                                                                                  |
| 6100.030 | Fixed Roof Tank Vapor Control System Efficiency                                | Revised text for clarity.                                                                                                                                           |
| 6100.031 | Removal of Oil and Gas Wells from Permits and I&M Programs                     | Revised to remove NEI references.                                                                                                                                   |
| 6100.035 | Allowable Changes to Permits During the Reevaluation Process                   | Revised to remove NEI references and made text fixes.                                                                                                               |
| 6100.036 | Engineering Boilerplate Adoption/Revision Procedure                            | Deleted. This process is outdated.                                                                                                                                  |
| 6100.040 | Elimination of Testing for Sulfur Content in Auto & Aviation Fuel at VAFB      | Deleted. This policy is outdated and no longer needed.                                                                                                              |
| 6100.042 | Managing the Source Compliance Demonstration Period                            | Revised text to match rule revisions and changes in District processes                                                                                              |
| 6100.044 | Recordkeeping Consistency Pertaining to                                        | Revised to fix outdated references and clarify text.                                                                                                                |

| NUMBER   | TITLE                                                                                                                                                        | CHANGES                                                                                                                            |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
|          | Rules/Policies/Permits                                                                                                                                       |                                                                                                                                    |
| 6100.045 | Rule 331 Emission Reduction Allowance for Fugitive Hydrocarbon I&M Programs                                                                                  | Deleted. This policy is no longer needed.                                                                                          |
| 6100.047 | Preparation of Hearing Board Staff Report for Permit Appeals                                                                                                 | Revised to update appeal period timeline and formatting updates.                                                                   |
| 6100.050 | Processing of Permit Exemption Request Form                                                                                                                  | Deleted. This policy is no longer needed.                                                                                          |
| 6100.051 | Reduction of Permit Processing Time                                                                                                                          | Deleted. This policy is no longer needed.                                                                                          |
| 6100.052 | Storage of Diluent and Application of Rules 325 and 326                                                                                                      | Revised. Changed to match current permit processing procedures.                                                                    |
| 6100.054 | Fast Track Permitting                                                                                                                                        | Deleted. This policy is no longer needed.                                                                                          |
| 6100.056 | Conditional Final Permit Issuance                                                                                                                            | Deleted. The District no longer uses this process.                                                                                 |
| 6100.057 | Re-Use of Existing Emission Reduction Credits                                                                                                                | Revised to address the ability to re-register ERCs for projects that occurred after August 25, 2016 as well as short-term ERC use. |
| 6100.058 | Continuous Emission Monitoring (CEM) Enforcement                                                                                                             | Revised. Updated to reflect current District practices.                                                                            |
| 6100.059 | Implementation of Revised ROC Definition                                                                                                                     | Revised to remove references to older FAQ.                                                                                         |
| 6100.060 | Calculation of Fugitive Hydrocarbon Emissions at Oil and Gas Facilities by the CARB/KVB Method - Modified for the Revised ROC Definition                     | Revised. Removes NEI references and revised the text to match the process used with the new rules.                                 |
| 6100.061 | Determination of Fugitive Hydrocarbon Emissions at Oil and Gas Facilities Through the Use of Facility Component Counts – Modified for Revised ROC Definition | Revised. Removes NEI references and revised the text to match current permit processing procedures.                                |
| 6100.062 | Source Test Observation and Enforcement                                                                                                                      | Revised. Updated to reflect current District practices.                                                                            |
| 6100.063 | Tracking Cost Reimbursable Project APCD Costs vs. Annual Budget                                                                                              | Deleted. The District no longer employs dedicated Project Managers.                                                                |
| 6100.064 | Best Available Control Technology                                                                                                                            | Revised. Updated to reflect rule revisions and current District practices.                                                         |
| 6100.065 | Use of FAX Machine for Submitting Permit Applications                                                                                                        | Deleted. The District no longer accepts any documents via FAX machine.                                                             |
| 6100.066 | Permitting Time Limits - Application Filing Fee Refunds                                                                                                      | Deleted. Due to fiscal constraints and staffing cut-backs, this policy is no longer used.                                          |
| 6100.067 | The Source Register                                                                                                                                          | Revised. Updated to reflect updated NSR rules and current practices.                                                               |
| 6100.068 | Converting Existing Hourly Mass Emission Rates to Daily Mass Emission Rates                                                                                  | Revised. Revised to remove NEI references and update the PTE definition.                                                           |
| 6100.070 | Combined ATC/PTO Permits                                                                                                                                     | Revised. Clarified the text to match current permitting practices.                                                                 |
| 6100.071 | New Source Review – Public Noticing of Permits                                                                                                               | Revised. Update to correct rule references and update text.                                                                        |

| NUMBER   | TITLE                                                                                            | CHANGES                                                                                                                                                  |
|----------|--------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|
| 6100.072 | Using Correlation Equation Methodology to Estimate Mass ROC Emission Emissions at O&G Facilities | Revised. The District is no longer allowing the use of this methodology for new projects. This was done in order to greatly simplify the permit process. |
| 6100.073 | Equivalent Routine Replacement                                                                   | Revised. Removed NEI references and made some updates to the examples to make current.                                                                   |
| 6100.074 | Emission Calculations for PM <sub>2.5</sub>                                                      | New. New guidance was added to calculate PM <sub>2.5</sub> emissions.                                                                                    |
| 6100.075 | ERCs for Offset Exempt Equipment/Processes                                                       | New. New guidance to address ERCs for projects exempted from NSR offset requirements.                                                                    |