

FAQ: Rule 102 – Definitions

DATE: October 10, 2016

REV: 2.0

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Abandonment Projects

Q: Are demolition or abandonment projects considered construction?

A: No.

Class I Areas

Q: Are there any Class I Impact Areas in Santa Barbara County?

A: Yes. We have the 143,000-acre San Rafael Wilderness Area in the Los Padres National Forest (see Figure 1).

Definition Conflicts

- Q: What if there is a conflict between a <u>Rule 102</u> definition and a definition in a Prohibitory Rule or other District regulation?
- A: Definitions in a specific District rule or regulation have precedent over Rule 102 definitions.

Emission Unit Definition

- Q: Under the definition of emission unit, what is meant by "activity"?
- A: An activity is an aggregation of components dependent upon each other to perform a necessary function. Typically, activities are composed of production or process lines within the source. Examples of an activity are: cogeneration system; auto body spray booth (including associated prep/touch-up and solvent usage); non-metallic mineral processing line (e.g., crusher, furnace, calciner, classifier, packing); sulfur recovery train (e.g., amine unit, sulfur recovery unit, tail gas unit).

Modification Definition

- Q: It is not clear to me how the exceptions to the definition of modification work. Please clarify?
- A: There are three cases (items 1, 2 and 3 of the definition) where a change in the method of a source's operation is not considered a modification and thus is not subject to Regulation VIII (New Source Review). In any case, however, the exceptions do not apply if any underlying permit limits the source's operation. For example, if a source has an enforceable permit condition limiting production rate, then an increase in production rate above the permit condition's limit would be considered a change in the method of operation. Further, in the item (1) term "...if such increase does not exceed..." the word increase means the resulting value that the production rate or hours of operation increases to and is not to be interpreted as the increase by itself.

New Source Definition

- Q: Suppose an existing auto body shop is permitted to emit ROCs. They now wish to install a gas-fired booth heater which is subject to ATC and PTO requirements. Does this constitute a "new source" per the definition in Rule 102?
- A: Yes. Since NOx will be emitted for the first time at this source, it is considered a new source.

Process/Process Line Definition

- Q: Since an emission unit may be defined as an activity, and an activity is a production or process line, what does "process" or "process line" mean?
- A: The APCD uses the following definitions of process and process line:
 - "Process" means any method, reaction, or operation wherein materials are handled or whereby materials undergo physical change (i.e., the size, shape, appearance, temperature, state or other physical property of the materials is altered) or chemical change (i.e., a substance or substances with different chemical composition or properties are formed or created). A process includes all of the equipment and facilities necessary for the handling of materials or the completion of the transformation of the materials to produce a physical or chemical change. There may be several processes in series or in parallel necessary to manufacture or produce a product.

"Process Line" means one or more pieces of equipment linked by the process flow to produce a product or perform a service such that the product cannot be produced or the service cannot be performed if any piece of equipment is removed or not functioning.

Process Line - Oil and Gas Production Field

- Q: For an oil and gas production field, how are the production or process lines defined?
- A: The objective of an oil and gas production facility is to prepare the oil and gas for pipeline (or tank truck for oil) transport. The process line for an oil and gas production field starts at the production well(s) and ends at the LACT unit. As such, the process line includes (but is not limited to): well-head(s), pumping unit(s), phase separators, emulsion breaking equipment, water treatment equipment, gas dehydration and compression equipment, and oil storage tanks and transfer units.

Source Size Definitions

- Q: Are "large sources" and "major sources" one and the same?
- A: No. There is a significant difference in what these two terms mean and how they are used. The term "large" source is specific to our rules and was added in response to the California Permit Streamlining Act in which the APCD was required to set up criteria for processing small, medium and large sources of pollution. Rule 102 contains definitions for each of these three categories. A large source is any source with a potential to emit over 10 tons per year of any pollutant (except for CO which is 25 tons per year). Rule 208 provides the APCD's permit streamlining timelines for small, medium and large sources. "Major" sources, on the other hand, are defined consistent with federal law. Being a moderate nonattainment area, our County uses 100 tons per year (potential to emit) to classify a source as major or not. See Rule 102 for the definition of major source.