

SMAQMD PERMITTING PROCESS

Joe Carle, Air Quality Engineer, Permitting

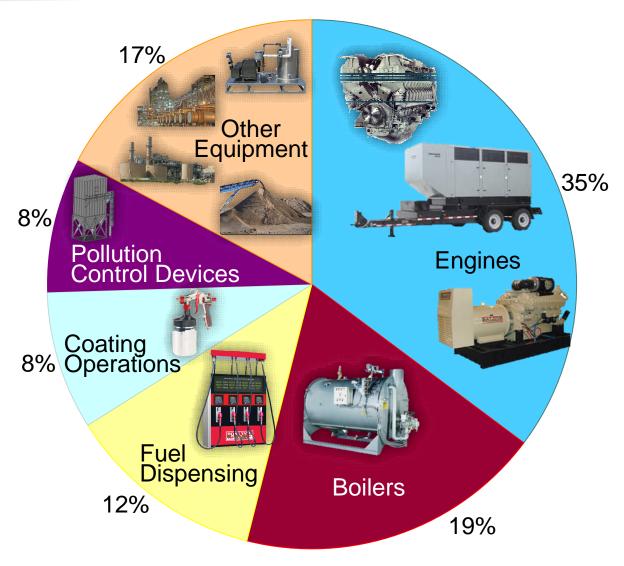
Who Needs A Permit?



- Engines > 50 hp
- Boilers ≥ 1,000,000 Btu/hr (if fired exclusively on natural gas or LPG)
- Boilers using other fuels
- Coating operations using a combined total of more than 1 gallon per day
- Landfills
- Commercial composting operations
- Anaerobic digesters
- Grinding, crushing, or screening operations
- Pollution control equipment (bag houses, flares, carbon adsorbers, etc.)
- Storage tanks with a capacity > 6,076 gallons, storing liquids with a vapor pressure > 77.5 mm Hg @ 20°C
- Equipment capable of emitting ≥ 2 pounds in any 24-hr period

Types of Permitted Equipment

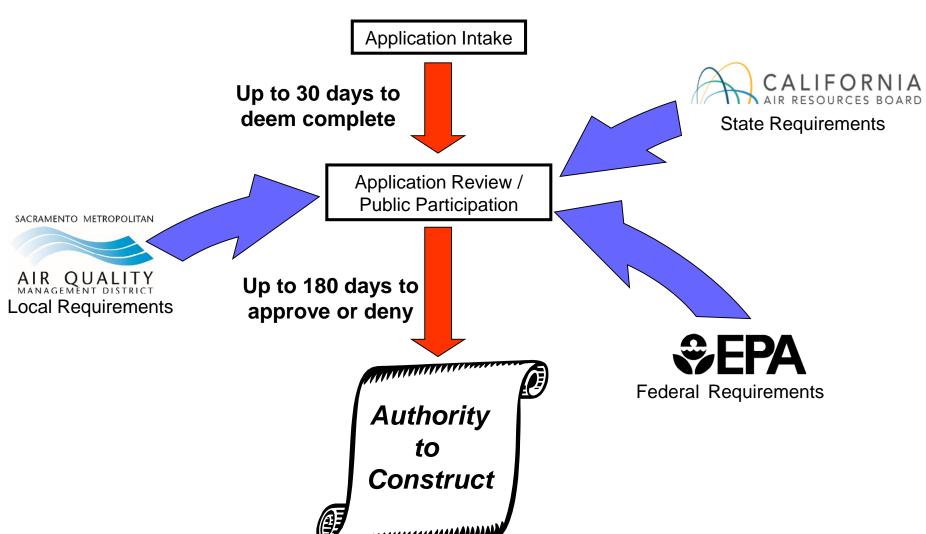




The Permitting Process



Authority to Construct



Application Review



- Identify emission points
- Identify type and amount of pollutants emitted
- Based on type of equipment and type and amount of pollutants emitted, identify all applicable Federal, State and local air quality requirements
- Verify compliance with all applicable requirements
- Issue a conditional permit to construct that includes:
 - A list of all applicable requirements
 - Conditions to ensure compliance with all applicable requirements
 - All recordkeeping and reporting requirements necessary to verify compliance with all applicable requirements

Control of Criteria Pollutants

Applicable Local Regulations:



- New Source Review (Rules 202 and 214)
 - Best Available Control Technology (BACT)
 - Offsets

	Trigger Level	
Pollutant	BACT	Offsets
Volatile Organic Compounds	>0 lb/day	≥ 5,000 lb/quarter
Nitrogen Oxides	>0 lb/day	≥ 5,000 lb/quarter
Sulfur Oxides	>0 lb/day	≥13,650 lb/quarter
PM10	>0 lb/day	≥ 7,300 lb/quarter
PM2.5	>0 lb/day	≥ 15 tons/year
Carbon Monoxide	> 550 lb/day	≥ 49,500 lb/quarter
Lead	> 3.3 lb/day	N/A

Toxics Review

Applicable Local Requirements



Toxics Review Includes:

- Cancer Risk
- Acute Health Effects
- Chronic Health Effects

Tools Used:

Dispersion model

OEHHA Guidance

District's Toxics Policy



Estimate Concentration

Estimate Health Risks

Health Risk Management

	T-BACT required if:	Project Risk Must Not Exceed
Excess Cancer Risk	≥ 1 in one million	10 in one million*
Acute Hazard Index	≥ 1.0	1.0
Chronic Hazard Index	≥ 1.0	1.0

^{*} APCO may allow a cancer risk of up to 100 in one million after reviewing a specific findings report submitted by the applicant, conducting a 30-day public review/comment period, and consulting with OEHHA.

Applicable Source Specific Standards Local, State & Federal Requirements



- Local Requirements: Air District Rules
- State Requirements: Air Toxic Control Measures (ATCMs)
- Federal Requirements:
 - New Source Performance Standards (NSPSs)
 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)
 - 40 CFR, Part 61: Pollutant-specific, based on health standards
 - 40 CFR, Part 63: Based on source category and maximum degree of reduction that is achievable (MACT Standard)

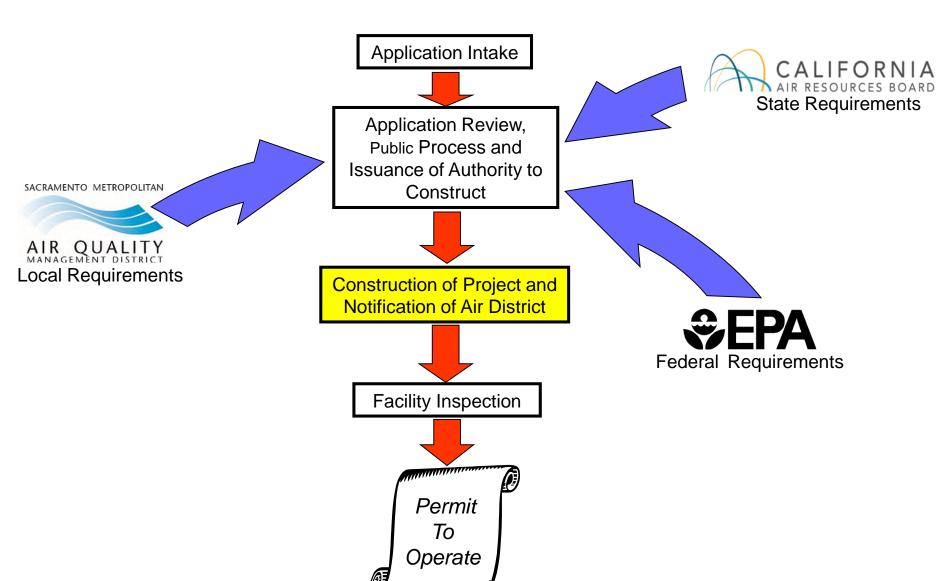
Other Requirements of Importance



- Public Notification (SMAQMD Rule 217)
 - Public, CARB, and EPA notification required if project emissions exceed specific pollutant thresholds (equivalent to offset thresholds for SMAQMD)
- H&S Code, §42301.6: School noticing
 - If source will emit toxics within 1,000 ft of a K-12 school boundary
 - Must notify parents/guardians of children for each school ¼ mile from source and all addresses within 1,000 ft of source
- California Environmental Quality Act
- Title V Permits
 - Required for Major Sources of pollution
 - Includes all applicable federally enforceable requirements
 - Reviewed every 5 years with requiring public and EPA review

The Permitting Process





After the Permit to Operate



- Emissions Inventory
- Air Toxics "Hot Spots" Program
- Title V Federal Operating Permit Program
- Annual Permit Renewals
- Ongoing Compliance Verifications (Inspections)

Links and Contact Info



Sac. Metro. Air Quality:
www.airquality.org
(916) 874-4800
777 12th St., 3rd Floor
Sacramento, CA 95814

California Air Resources Board:

ww2.arb.ca.gov/air-pollution-control-districts