

**SANTA BARBARA COUNTY**  
**AIR POLLUTION CONTROL DISTRICT**  
**POLICIES AND PROCEDURES**

Policy No.	<u>6100.016.1989</u> Div Pol Yr	Draft	_____
Supersedes No.	<u>6100.002.1987</u> Div Pol Yr	Final	<u>x</u>
Date:	<u>August 23, 1989</u>	Pages	<u>3</u>
Topic:	<u>Processing of Project Modifications occurring Between ATC &amp; PTO (Revised Oct. 25, 2000)</u>		
Distribution:	<u>APCD Staff</u>		

This procedure provides guidance as to the processing of project modifications that are proposed by an applicant after issuance of an ATC permit and prior to the issuance of a PTO. These procedures do not apply after the issuance of a PTO.

Prior to undertaking project modifications which deviate from construction and operational assumptions used in the issuance of an ATC permit, the applicant must notify the District in writing and receive written approvals for the modification. Failure to receive the required written approvals in advance of implementing the change will result in the issuance of a Notice of Violation (NOV) to the applicant.

Required procedures for processing of modification requests are dependent upon the type of request and upon the results of the District analysis, as indicated below:

- (1) Request is for modification of operating assumptions only and District's analysis concludes that there will be no construction of equipment. Additionally, there will be no increase in emissions or impacts (including those due to modified stack parameters or stack locations), and that no changes in the mitigation or monitoring conditions (offsets, controls, etc.) are required.
  - (a) Applicant provides written request for modification.
  - (b) District conducts analysis to confirm that there is no increase in emissions or impacts and that no change in the mitigation or monitoring conditions is required.
  - (c) District authorizes modification by letter and incorporates modified operating assumption into the PTO application.
- (2) Request is for modification of operating assumptions only that increase emissions or impacts, or necessitates a change in mitigation or monitoring conditions (offsets, controls, etc.).
  - (a) District conducts an analysis and concludes that there is an increase in emissions or impacts or that a change in mitigation or monitoring conditions is necessary. District notifies applicant that additional mitigation or monitoring conditions are required prior to District approval of the requested modification and that an ATC application must be submitted.

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Policies and Procedures Memoranda are intended to provide agency staff, applicants and the public guidance relative to standardized District procedures. These policies and procedures shall not be interpreted in conflict with District Rules and Regulations or administrative policies, and may be modified or updated periodically without advance notice.

- (b) District processes ATC Modification. Additional conditions are added to ATC permit as necessary. NEI and ESE are recalculated. If a company desires to implement the modified operating assumption prior to receiving a District approved ATC modification and having the additional mitigation or monitoring in place, then a variance must be obtained from the Hearing Board per Regulation V (if applicable).
- (3) Request is for installation of new equipment (not included in the ATC) that when controlled, pollutes or has the potential to pollute.
- (a) Applicant applies for ATC modification. (Regular permit processing time-clock applies).
  - (b) District processes ATC application.
  - (c) Applicant receives modified ATC permit (with appropriate conditions) prior to construction. (If the equipment was constructed without a permit, an NOV will be issued.)
  - (d) New equipment list is included in the PTO.
  - (e) If the new equipment is not permitted, constructed and fully tested within the SCDP provided for in the original ATC, the applicant must either
    - (1) Obtain a modified ATC permit from the District; or
    - (2) Discontinue operation of the facility (to the extent operation is inconsistent with the original ATC), until a modified ATC is issued; or,
    - (3) Where the new equipment is permitted and constructed, but testing is incomplete, the District may allow testing to occur following PTO issuance (based on PTO conditions). This alternative shall only be followed if the District finds the remaining testing is routine in nature.
    - (4) Request is to remove equipment or to modify operating assumptions that reduce project emissions and impacts.
      - (a) Applicant provides request in letter to District.
      - (b) District conducts an analysis to confirm reduction in emissions and impacts.
      - (c) District authorizes modification by letter and incorporates change into PTO application. Authorizing letter reflects changes in emission calculations for future reference in project file.

**General Procedure:**

All modifications shall be based on the rules in effect on the date the District finds the request for modification is complete.

In determining whether an increase in emissions or impacts would occur by a modification, the District shall base the analyses on maximum design capacity and associated emission calculations, unless the applicant agrees to enforceable permit conditions that limit the emission levels.

When adding or removing exempt equipment, the District must be notified in advance to confirm exemption status and to update project file to reflect changes in exempt equipment.

If a certified component count is not available prior to a modification request that affects fugitive ROC emissions, District approval should be conditional pending availability of the certified count.

Adjustments in component counts prior to PTO issuance that affect only fugitive ROC computations will be addressed following the procedures identified in (1) and (2) above.