

SANTA BARBARA COUNTY
AIR POLLUTION CONTROL DISTRICT
POLICIES AND PROCEDURES

Policy No.	<u>6100.023.1990</u> Div Pol Yr	Draft _____
Supersedes No.	_____ Div Pol Yr	Final <u>x</u>
Date:	<u>June 15, 1990 (Revised Oct 25,2000)</u>	Pages <u>2</u>
Topic:	<u>Emission Limits for Reevaluated Permits</u>	
Distribution:	<u>APCD Staff</u>	

The following policy should be followed for 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 Prohibitory Rule is more stringent. However, staff should confirm that the regulatory basis for setting that emission limit was valid.
2. 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.
3. 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 of the complete application).

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.

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- 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 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).