

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

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Topic:	<u>Processing of Project Modifications occurring Between ATC &amp; PTO</u>		
Distribution:	<u>Engineering Division 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 may result in the issuance of a Notice of Violation (NOV) to the applicant.

Required procedures for processing 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) The District may issue a modified ATC permit or authorize the modification by letter and incorporate the modified operating assumption(s) into the PTO.
- (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.).

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

- (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.
  - (b) District processes ATC Modification. Additional conditions are added to the ATC permit as necessary. The potential to emit (PTE) is recalculated. The District may, at its discretion, issue the ATC modification concurrently with the permit to operate in a single document.
- (3) Request is for installation of new equipment not included in the ATC.
- (a) Applicant applies for ATC modification.
  - (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 may 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) The District, at its discretion, either issues a modified ATC permit or authorizes the modification by letter and incorporates change into PTO application. An authorizing letter shall reflect the changes in emission calculations for future reference in project file.
- (5) Increases to fugitive hydrocarbon piping component leak path count due to actual as-built verified counts will be handled on a case-by-case basis by the Supervisor of the Permitting program.

**General Procedure:**

All modifications shall be based on the rules in effect on the date the District issues the final permit.

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.