

SANTA BARBARA COUNTY
AIR POLLUTION CONTROL DISTRICT
POLICIES AND PROCEDURES

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Topic:	<u>Implementation of Revised ROC Definition</u>		
Distribution:	<u>Engineering Division Staff</u>		

APPLICABILITY: This policy and procedure applies to activities where the definition of reactive organic compounds is used.

POLICY:

Adoption of the revised ROC definition (Rule 102 - Definitions) on July 18, 1996 has resulted in the exclusion of compounds that were previously considered reactive organic compounds ("ROCs"). Of particular note, acetone and ethane have been delisted as ROC compounds. Since this change affects most aspects of the APCD's daily operations, this policy provides guidance on how to implement the new definition

PERMITS

The main points regarding the permit process involve: emission factors, permitted emissions, BACT, offsets and the process for updating the permitted emission limits.

Emission Factors: For acetone and the other delisted solvents (PCBTF and VMS compounds) the emission factors currently in use will not change if these substances are not used in a mixture. However if the emission factor reflects a mixture (e.g., a coating, glue, resin), then the amount of exempt compounds must be backed out and a new emission factor should be established using mass balance techniques. For ethane-based factors, the emission factors must be recalculated using the original calculation methodology for the factor along with the original reactivity profile. The non-ethane fraction from the reactivity profile is used for the recalculation of the emission factor. For fugitive hydrocarbon emissions, see P&P #6100.060 (*Calculation of Fugitive Hydrocarbon Emissions at Oil and Gas Facilities by the CARB/KVB Method*) and P&P #6100.061 (*Determination of Fugitive Emissions at Oil and Gas Facilities through the Use of Facility Component Counts*).

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.

Permitted Emissions: In general, the permitted emissions for ROC will need to be reduced such that the delisted compounds are no longer included in the allowable ROC limits for the permit. The primary exception to this rule is for small solvent sources where the APCD has set facility-wide emissions limits based on any mix of solvents, in which case no adjustment to the ROC limits is necessary. However, if there are line item permitted limits for any delisted compound, then the total permitted emissions will be reduced accordingly.

BACT: If BACT was triggered and implemented for a facility prior to the definition change, then the source is still required to maintain and implement the controls. The applicability of BACT in the future will be based on the new ROC definition and the applicable thresholds in the NSR rules. A source that is no longer subject to Rule 331 may be subject to BACT if the resulting emission increase exceeds the BACT threshold.

Offsets: If offsets were required for a permit prior to the ROC definition change, then those offsets must remain dedicated to the project. While the emission liability may be reduced due to the change of ROC definition, the ERCs remain unaffected by the change. In order to “re-use” an existing ERC, the ERC must be requalified using the rules in effect at the time of an application to use them is deemed complete. See P&P 6100.057 (*Re-Use of Existing Emission Reduction Credits*).

Process for Updating Emission Limits: The process for updating emission limits varies depending on the wishes of the permit holder. The default practice will be to wait until the next permit reevaluation. At reevaluation, the APCD will adjust the emission factors and permitted emissions as necessary and a draft permit will be issued for review. If a Permit to Operate has not yet been issued, then these changes will be reflected in the first PTO. An application may be submitted by permit holders that wish to have the permitted emissions and emission factors adjusted before the permit reevaluation. A PTO Modification application is required and, depending on the level of effort, fees may be assessed on a cost reimbursable basis. If the application requests an increase in emissions, then an ATC permit application will be required.

COMPLIANCE

The main points regarding compliance involve: will permit limits be enforced prior to the permit reevaluation and can the de-listed compounds be used immediately.

How to Enforce Existing Permits: Permits requirements will be enforced as normally done (i.e., according to established criteria and policies) until the permit is revised. If there is a specific limit for one of the delisted compounds, that limit will remain in effect.

Can Delisted Compounds be Used Immediately: This question applies to solvent-using facilities, since there are no known facilities that would “use” ethane. The general rule is if there are no specific limits in the existing permit, then the delisted solvent (e.g., acetone) may be used immediately. However, if there is a specific permit limit on the newly delisted solvent, the permit holder will be limited to that amount until the permit is revised.

EMISSION INVENTORY AND CAP FEES

The main points regarding the emission inventory and related fees involve: how will actual emissions be calculated and how will the CAP fees be assessed.

How will Emission Fees be Calculated: The annual emission fees will be calculated using the ROC definition in place at the time the emission based fee invoices are prepared. Emission inventory staff in the Technology and Environmental Assessment Division should coordinate their efforts with the Engineering Division staff to ensure the revised emission factors are accurate.

How will CAP Emission Fees be Assessed: For sources with an operating permit issued prior to 1988, the actual emissions will be used (see above response). For sources permitted after January 1, 1988, the permitted emission values will be used. The fee will be based on the permitted emissions as listed in the permit(s) for the stationary source.