



BAY AREA AIR QUALITY MANAGEMENT DISTRICT
PERMIT DIVISION

Major Facility Review Advisory

June 30, 1995

To: Facilities Subject to Title V of the Federal Clean Air Act

From: Peter Hess, Deputy Air Pollution Control Officer

Subject: Title V Interim Approval

The Bay Area Air Quality Management District wishes to announce the interim approval of the District's Major Facility Review (Title V) Program effective on July 24, 1995.

The U.S. Environmental Protection Agency published three notices in the Federal Register concerning approval of the BAAQMD's Major Facility Review (Title V) program on June 23, 1995. The first notice approves the program as it was amended in October, 1994. This approval is final on July 24, 1995.

The second notice approves the amendments to the program that were approved by the District Board on February 1, 1995, and April 5, 1995. This approval is final on August 22, 1995 unless adverse public comment is received. The amendments provide relief to industry in preparing the emission inventories that must be submitted with the applications.

If adverse comment is received, the third notice proposes approval of the amendments. The public comment is then considered, and the schedule for approval is uncertain.

The synthetic minor operating permit provisions have also been approved into the State Implementation Plan (SIP). This allows the District to publish public notices for and to issue synthetic minor permits after June 23, 1995. The synthetic minor program has also been approved for emission limits for hazardous air pollutants pursuant to §112(l) of the federal Clean Air Act.

The other major points made in the notice are:

- Facilities will not be subject to 112(g) (MACT hammer) until EPA promulgates the 112(g) regulations.
- If the 112(g) regulations allow a transition period, the District's normal preconstruction review for toxics will be sufficient to satisfy the 112(g) requirements during the transition period.
- Reliable emission factors can be used for the emission inventories submitted with the applications.

If the February 1st and April 5th amendments to the program are approved:

- emission reporting for the exempt sources in the November 3, 1993 version of Regulation 2, Rule 1 will not be required;

- emission reporting for any regulated air pollutant emitted at a source in a quantity less than two tons per year will not be required;
- emission reporting for any hazardous air pollutant emitted at a source in a quantity less than 1000 pounds per year will not be required; and
- use of the permit shield will be allowed.

Deadlines

The deadlines for applications will be based on the "program effective date" of July 24, 1995. Applications for facilities with fewer than 50 permitted sources are due on October 24, 1995. Applications for facilities with 50 or more permitted sources are due on July 24, 1996.

The following information is included to assist industry in preparing applications.

SIP (State Implementation Plan)

Major Facility Review permits must contain all federally enforceable requirements including all applicable District rules that appear in the SIP. There is generally some lag time before an amended rule is approved into the SIP. This means that a conflict can exist between a current District rule and the rule in the SIP. Fortunately, most of the current versions of the VOC rules have been recently approved into the SIP.

A list of current rules that have been adopted into the SIP since March 1, 1994, when the SIP was published, is attached to this advisory. The March 1, 1994 version is available from the District's Public Information and Education Division.

Exempt sources

The list of exempt sources for which emission reporting will not be required appears in Sections 113-128 of BAAQMD Regulation 2, Rule 1 as amended on November 3, 1993, and June 15, 1994. The June 15, 1994 version of Regulation 2, Rule 1, was approved into the SIP on June 2, 1995.

This rule was then amended on June 7, 1995. The list of exemptions has been revised extensively in the new version. However, the Title V notice specifies that the list of exemptions that was submitted to EPA in November, 1993, is the list of exemptions that EPA will accept as insignificant activities. The program will be amended to include the new list within two years.

Accidental Releases

Most of the Accidental Releases (112(r)) regulations have not yet been promulgated. However, the targeted compounds and the threshold values have been. This is enough information to determine whether the facility or a source is subject to these regulations. 40 CFR 68 should be cited on the "Applicable Requirements and Compliance Summary Form" for these sources, with an unknown future effective date.

HAP List

Caprolactam will be deleted from the 112(b) HAP list. EPA guidance has stated that facilities may proceed as if deletion has already occurred.

***** Attachments *****

- Recent SIP Approvals
- Alternative California Test Methods
- Major Facility Review Application Checklist

RECENT SIP APPROVALS

REGULATION	Date Of Amendment	SIP APPROVAL
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8-1	6/15/94	5/22/95
8-2	6/15/94	5/22/95
8-4	6/01/94	5/22/95
8-6	2/2/94	6/2/95
8-7	6/01/94	5/22/95
8-8	6/15/94	10/28/94
8-11	6/15/94	2/7/95
8-12	6/15/94	5/22/95
8-13	6/15/94	5/26/95
8-14	6/1/94	5/26/95
8-15	6/01/94	5/22/95
8-16	6/15/94	2/7/95
8-17	9/5/90	7/25/94
8-18	3/4/92	3/20/95
8-19	6/15/94	6/2/95
8-20	6/15/94	5/22/95
8-22	6/1/94	4/17/95
8-23	6/15/94	5/26/95
8-24	6/15/94	5/22/95
8-25	6/1/94	5/8/95
8-28	6/1/94	2/7/95
8-29	6/1/94	6/2/95
8-30	6/15/94	5/22/95
8-31	6/01/94	5/22/95
8-32	7/06/94	5/22/95
8-33	6/1/94	6/2/95
8-34	6/15/94	5/22/95
8-35	6/15/94	5/22/95
8-38	6/15/94	6/2/95
8-39	6/1/94	6/2/95
8-40	6/15/94	5/22/95
8-41	6/01/94	5/22/95
8-42	6/1/94	5/8/95
8-43	6/1/94	5/26/95
8-45	11/02/94	5/22/95
8-47	6/15/94	5/26/95
8-49	8/21/92	5/22/95
8-50	6/15/94	5/8/95

***ALTERNATIVE CALIFORNIA TEST METHODS**
(April 7, 1995)

Method #	Title
BAAQMD 13	Determination of the Reid Vapor Pressure of Petroleum Products
BAAQMD 21	Compliance for Air-Dried Arch., Water Based Coatings
BAAQMD 22	Compliance, Air-Dried Solvent Based Coatings
BAAQMD 23	Determination of Volatile Emissions from Polyester Resins
BAAQMD 26	Determination of Volatile Weight Loss of Gel Coats
BAAQMD 29	Determination of Ethanol Bakery Effluents
BAAQMD 31	Paint Strippers for Aerospace/Component Coating
BAAQMD 33	Determination of Dissolved Critical VOCs in Wastewater Separator
BAAQMD 35	VOC in Solvent Based on Aerosol Paints
BAAQMD 36	VOC in Water Based Aerosol Paints
BAAQMD 37	Determination of Perchloroethylene in Dry Cleaning Filtration Wastes
BAAQMD 38	Determination of Petro. Solvent in Dry Cleaning Filtration Wastes
BAAQMD ST- 1B	Ammonia, Continuous Sampling
BAAQMD ST- 3	Bulk Plants Emission Factor Determination
BAAQMD ST- 27	Gasoline Dispensing Facility - Dynamic Back Pressure
BAAQMD ST- 30	Gasoline Dispensing Facility - Leak Test Procedure
BAAQMD ST- 32	Ethanol, Integrated Sampling
BAAQMD ST- 33	Gasoline Cargo Tanks
BAAQMD ST- 34	Bulk Gasoline Distribution Facilities - ER Unit or C Adsorption
CARB 202	Certification and Test Procedures for Vapor Recovery Systems at Gasoline Bulk Plants
CARB 203	Certification and Test Procedures for Vapor Recovery Systems at Gasoline Terminals
CARB 401	Determination of the Weight Percent of VOC in Waste Products
CARB 422	Exempt Halogenated VOCs in Gases
CARB 432	Exempt Halogenated VOC in Liquids

*Note: These alternative test methods are referenced in the SIP-approved rules. These methods may be used to determine compliance with these rules.