

**Bay Area Air Quality Management District**

939 Ellis Street  
San Francisco, CA 94109  
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**Permit Evaluation  
and  
Statement of Basis  
for  
RENEWAL of the**

**MAJOR FACILITY REVIEW PERMIT**

**for  
San Francisco Drydock, Inc.  
Facility #A3288**

**Facility Address:**  
Foot of 20<sup>th</sup> Street  
San Francisco, CA 94120

**Mailing Address:**  
P. O. Box 7644  
San Francisco, CA 94120

Application Engineer: Tamiko Endow  
Site Engineer: Tamiko Endow

Application: 11369

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## **Title V Statement of Basis**

### **A. Background**

This facility is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Title 40 of the Code of Federal Regulations (CFR), and BAAQMD Regulation 2, Rule 6, Major Facility Review because it is a major facility as defined by BAAQMD Regulation 2-6-212. It is a major facility because it has the “potential to emit,” as defined by BAAQMD Regulation 2-6-218, of more than 100 tons per year of a regulated air pollutant, than 10 tons per year of a hazardous air pollutant, or more than 25 tons per year on a combination of hazardous air pollutants.

Major Facility Operating permits (Title V permits) must meet specifications contained in 40 CFR Part 70 as contained in BAAQMD Regulation 2, Rule 6. The permits must contain all applicable requirements (as defined in BAAQMD Regulation 2-6-202), monitoring requirements, recordkeeping requirements, and reporting requirements. The permit holders must submit reports of all monitoring at least every six months and compliance certifications at least every year.

In the Bay Area, state and District requirements are also applicable requirements and are included in the permit. These requirements can be federally enforceable or non-federally enforceable. All applicable requirements are contained in Sections I through VI of the permit.

Each facility in the Bay Area is assigned a facility identifier that consists of a letter and a 4-digit number. This identifier is also considered to be the identifier for the permit. The identifier for this facility is A3288.

San Francisco Drydock received its initial Title V permit on June 1, 2000. This application is for a permit renewal. The current permit expired on May 31, 2005. The standard sections of the permit have been upgraded to include new standard language used in all Title V permits and all of the existing citations have been updated. The proposed permit shows all changes to the initial permit in strikeout/underline format.

### **B. Facility Description**

San Francisco Drydock is a marine repair facility located at the foot of 20<sup>th</sup> Street in San Francisco, CA. The facility performs maintenance, alterations, repair, and modernization of ships, including cruise liners, tankers, bulk carriers and container ships, military vessels, and local ships. Their operations include cleaning, welding, abrasive blasting, coating, and hand layup of polyester resin for touchup and repair. Emissions from this facility include particulate emissions from the blasting operations including lead from the removal of lead-based paint, volatile organic compound and volatile organic hazardous air pollutant emissions from the coating, polyester resin operations, and solvent cleaning operations, as well as combustion emissions from the emergency standby diesel engine, and exempt natural gas combustion

sources. There has been no significant change in emissions at this facility since the issuance of the initial Title V permit in 2000.

### **C. Permit Content**

The legal and factual basis for the permit follows. The permit sections are described in the order presented in the permit.

#### **I. Standard Conditions**

This section contains administrative requirements and conditions that apply to all facilities. If the Title IV (Acid Rain) requirements for certain fossil-fuel fired electrical generating facilities or the accidental release (40 CFR § 68) programs apply, the section will contain a standard condition pertaining to these programs. Many of these conditions derive from 40 CFR § 70.6, Permit Content, which dictates certain standard conditions that must be placed in the permit. The language that the District has developed for many of these requirements has been adopted into the BAAQMD Manual of Procedures, Volume II, Part 3, Section 4, and therefore must appear in the permit.

The standard conditions also contain references to BAAQMD Regulation 1 and Regulation 2. These are the District's General Provisions and Permitting rules.

Changes to permit:

- The dates of adoption and approval of rules in Standard Condition 1.A have been updated.
- The following language was added to Standard Condition I.B: "If the permit renewal has not been issued by [ ], but a complete application for renewal has been submitted in accordance with the above deadlines, the existing permit will continue in force until the District takes final action on the renewal application." This is the "application shield" pursuant to BAAQMD Regulation 2-6-407.
- Standard Condition I.B.11, which requires the responsible official to certify all documents submitted, was added to conform to changes in Regulation 2, Rule 6.
- The following language was added as Standard Condition I.B.12: "The permit holder is responsible for compliance, and certification of compliance, with all conditions of the permit, regardless whether it acts through employees, agents, contractors, or subcontractors. (Regulation 2-6-307)." The purpose is to reiterate that the Permit Holder is responsible for ensuring that all activities at the facility comply with all applicable requirements.
- Standard Condition I.E.1 requiring the permit holder to provide any information, records, and reports requested or specified by the APCO, was added because it was omitted in error.
- Standard Condition I.H was modified to conform to the current standard.
- Standard Condition I.J has been added to clarify that the capacity limits shown in Table II-A are enforceable limits.

## **II. Equipment**

This section of the permit lists all permitted or significant sources. Each source is identified by an “S” and a number (e.g., S-1). Permitted sources are those sources that require a BAAQMD operating permit pursuant to BAAQMD Rule 2-1-302.

Significant sources are those sources that have a potential to emit of more than 2 tons of a “regulated air pollutant,” as defined in BAAQMD Rule 2-6-222, per year or 400 pounds of a “hazardous air pollutant,” as defined in BAAQMD Rule 2-6-210, per year.

All abatement (control) devices that control permitted or significant sources would be listed in this section. SF Drydock does not operate any non-integral abatement devices, therefore there is no such list.

The equipment section is considered to be part of the facility description. It contains information that is necessary for applicability determinations, such as fuel types, contents or sizes of tanks, etc. This information is part of the factual basis of the permit.

Each of the permitted sources has previously been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. These permits are issued in accordance with state law and the District’s regulations. The capacities in the permitted sources table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-403.

Following are explanations of the differences in the equipment list between the initial Title V permit and the proposed permit renewal:

### **Devices Permitted Since Application was submitted:**

- S-13, an existing Emergency Standby Diesel Engine, lost its permit exemption and has been permitted since issuance of the initial Title V permit. It has been added to the Title V permit proposed for renewal.

### **Devices with Changed Permit Status:**

- S-4 and S-5 has been switched to aqueous cleaning solutions and have been designated exempt from District permit requirements. They have therefore been removed from the Title V permit.

## **III. Generally Applicable Requirements**

This section of the permit lists requirements that generally apply to all sources at a facility including insignificant sources and portable equipment that may not require a District permit. If a generally applicable requirement applies specifically to a source that is permitted or significant, the standard will also appear in Section IV and the monitoring for that requirement will appear in Sections IV and VII of the permit. Parts of this section apply to all facilities (e.g., particulate, architectural coating, odorous substance, and sandblasting standards). In addition, standards that apply to insignificant or unpermitted sources at a facility (e.g., refrigeration units that use more than 50 pounds of an ozone-depleting compound) are placed in this section.

Unpermitted sources are exempt from normal District permits pursuant to an exemption in BAAQMD Regulation 2, Rule 1. They may, however, be specifically described in a Title V permit if they are considered significant sources pursuant to the definition in BAAQMD Rule 2-6-239. There are no exempt significant sources at this facility.

Changes to permit:

- Language has been added to Section III to clarify that this section contains requirements that may apply to temporary sources. This provision allows contractors that have "portable" equipment permits that require them to comply with all applicable requirements to work at the facility on a temporary basis, even if the permit does not specifically list the temporary source. Examples are temporary sand-blasting or soil-vapor extraction equipment.
- Section III has been modified to say that SIP standards are now found on EPA's website and are not included as part of the permit.
- The note regarding SIP information from the Rule Development Section has been deleted since the SIP standards are now found on EPA's website.

Table III has also been updated by adding the following rules and standards to conform to current practice:

- BAAQMD Regulation 2, Rule 1, General Requirements
- BAAQMD 2-1-429, Federal Emissions Statement
- SIP Regulation 2, Rule 1, General Requirements
- SIP Regulation 5, Open Burning
- Regulation 8, Rule 2, Miscellaneous Operations
- BAAQMD Regulation 8, Rule 15 Emulsified and Liquid Asphalts
- BAAQMD Regulation 8, Rule 40 Aeration of Contaminated Soil and Removal of Underground Storage Tanks
- BAAQMD Regulation 8, Rule 47, Air Stripping and Soil Vapor Extraction Operations
- SIP Regulation 8, Rule 51, Adhesive and Sealant Products
- BAAQMD and SIP Regulation 9, Rule 1, Sulfur Dioxide
- SIP Regulation 12, Rule 4, Miscellaneous Standards of Performance - Sandblasting
- California Health and Safety Code Section 41750 et seq., Portable Equipment
- California Health and Safety Code Section 44300 et seq., Air Toxics "Hot Spots" Information and Assessment Act of 1987
- 40 CFR Part 61, Subpart M, National Emission Standards for Hazardous Air Pollutants – National Emission Standard for Asbestos
- 40 CFR Part 82, Subpart F, Section 156, 161, and 166, Protection of Stratospheric Ozone

The dates of adoption or approval of the rules and their "federal enforceability" status in Table III have also been updated.

#### **IV. Source-Specific Applicable Requirements**

This section of the permit lists the applicable requirements that apply to permitted or significant sources. These applicable requirements are contained in tables that pertain to one or more sources that have the same requirements. The order of the requirements is:

- District Rules

- SIP Rules (if any) are listed following the corresponding District rules. SIP rules are District rules that have been approved by EPA for inclusion in the California State Implementation Plan. SIP rules are “federally enforceable” and a “Y” (yes) indication will appear in the “Federally Enforceable” column. If the SIP rule is the current District rule, separate citation of the SIP rule is not necessary and the “Federally Enforceable” column will have a “Y” for “yes”. If the SIP rule is not the current District rule, the SIP rule or the necessary portion of the SIP rule is cited separately after the District rule. The SIP portion will be federally enforceable; the non-SIP version will not be federally enforceable, unless EPA has approved it through another program.
- Other District requirements, such as the Manual of Procedures, as appropriate.
- Federal requirements (other than SIP provisions)
- BAAQMD permit conditions. The text of BAAQMD permit conditions is found in Section VI of the permit.
- Federal permit conditions. The text of Federal permit conditions, if any, is found in Section VI of the permit.

Section IV of the permit contains citations to all of the applicable requirements. The text of the requirements is found in the regulations, which are readily available on the District’s or EPA’s websites, or in the permit conditions, which are found in Section VI of the permit. All monitoring requirements are cited in Section IV. Section VII is a cross-reference between the limits and monitoring requirements. A discussion of monitoring is included in Section C.VII of this Permit Evaluation/Statement of Basis.

Changes to permit:

- Section IV has been modified to say that SIP standards are now found on EPA's website and are not included as part of the permit.
- The permit condition citations for S-1 have been corrected to include all 4 parts of Condition 3419, which were all included in the permit condition section of the initial permit.
- The table for sources S-4 and S-5 has been deleted, since these sources are no longer included in the permit.
- The permit condition citations for S-10 have been updated to reflect the changes to the permit conditions discussed in more detail in Section VI below.
- The dates of adoption or approval of the rules and their "federal enforceability" status in Section IV have also been updated.

In addition, the citations of Regulation 6, Sections 310 and 311 have been removed from the abrasive blasting operations, Tables IV-A and IV-B for S-1 and S-2, respectively. These sections apply to operations having defined emission points, which is not true for S-1 or S-2. The blasting permitted at these sources is surface preparation of ships and ship parts and have no defined emission points such as stacks or vents.

For S-1 and S-10, the marine coating operations subject to Subpart II of the National Emission Standards for Hazardous Air Pollutants, the General Provisions in Subpart A were mistakenly omitted from the initial Title V permit. The General Provisions have been added to Section IV for these sources in the Title V permit proposed for renewal. In addition, slightly more detail has been specified for Subpart II citations for consistency.

Section 302 of Regulation 8, Rule 50 has been removed from the table for S-12. S-12 is a hand layup Polyester Resin Operation. The resin is applied with rollers. Since no spray equipment is used, Section 302 does not apply.

A table for the newly permitted S-13, Emergency Standby Diesel Generator has been added to the permit. Since the version of Regulation 1 in the District's SIP still includes the exclusion for emergency internal combustion engines, which has been deleted from the current version of Regulation 1, the remaining applicable regulations cited in this table have been designated non-federally enforceable for this source.

## **V. Schedule of Compliance**

A schedule of compliance is required in all Title V permits pursuant to BAAQMD Regulation 2-6-409.10 which provides that a major facility review permit shall contain the following information and provisions:

“409.10 A schedule of compliance containing the following elements:

- 10.1 A statement that the facility shall continue to comply with all applicable requirements with which it is currently in compliance;
- 10.2 A statement that the facility shall meet all applicable requirements on a timely basis as requirements become effective during the permit term; and
- 10.3 If the facility is out of compliance with an applicable requirement at the time of issuance, revision, or reopening, the schedule of compliance shall contain a plan by which the facility will achieve compliance. The plan shall contain deadlines for each item in the plan. The schedule of compliance shall also contain a requirement for submission of progress reports by the facility at least every six months. The progress reports shall contain the dates by which each item in the plan was achieved and an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.”

The BAAQMD Compliance and Enforcement Division has conducted a review of compliance over the past year and has no records of compliance problems at this facility during the past year. The compliance report is contained in Appendix A of this permit evaluation and statement of basis.

The phrase “on a timely basis” has been added to the schedule of compliance for consistency with BAAQMD Regulation 2-6-504.8.2.

## **VI. Permit Conditions**

Each permit condition is identified with a unique numerical identifier, up to five digits. The existing permit conditions are derived from previously issued District Authorities to Construct (A/C) or Permits to Operate (P/O). Permit conditions may also be imposed or revised as part of the annual review of the facility by the District pursuant to California Health and Safety Code (H&SC) § 42301(e), through a variance pursuant to H&SC § 42350 et seq., an order of abatement pursuant to H&SC § 42450 et seq., or as an administrative revision initiated by District staff.

The regulatory basis is listed following each condition. The regulatory basis may be a rule or regulation. The District is also using the following terms for regulatory basis:



- **BACT:** This term is used for a condition imposed by the Air Pollution Control Officer (APCO) to ensure compliance with the Best Available Control Technology in Regulation 2-2-301.
- **Cumulative Increase:** This term is used for a condition imposed by the APCO which limits a source's operation to the operation described in the permit application pursuant to BAAQMD Regulation 2-1-403.
- **Offsets:** This term is used for a condition imposed by the APCO to ensure compliance with the use of offsets for the permitting of a source or with the banking of emissions from a source pursuant to Regulation 2, Rules 2 and 4.
- **PSD:** This term is used for a condition imposed by the APCO to ensure compliance with a Prevention of Significant Deterioration permit issued pursuant to Regulation 2, Rule 2.
- **TRMP:** This term is used for a condition imposed by the APCO to ensure compliance with limits that arise from the District's Toxic Risk Management Policy.

Changes to permit:

- In the initial Title V permit, the recordkeeping retention was changed in the permit conditions to 5 years as specified under Regulation 2, Rule 6. The citation of Section 2-6-501 has been added to the basis for all permit conditions to explain this change.
- The citation of Regulation 6-301 has been added to the basis for Conditions 3419 and 3420, since the particulate abatement requirements and visible emission checks are required to assure compliance with this rule.
- The citation of Regulation 2-6-503 has been added to the basis for Conditions 3419 and 3420 to delineate the additional monitoring conditions that were added during issuance of the initial Title V permit.
- 'Cumulative Increase' was removed from the basis for Part 2 of Condition 3420 for S-2, since that operation is grandfathered, and the permit condition was therefore not imposed to track cumulative facility emissions.
- Condition 7887 has updated from 356 day limits to 12-month limits to match the current recordkeeping guidelines and from 24-hour limits to daily limits due to the fact that was never an underlying hourly limit being enforced.
- The condition for sources S-4 and S-5 has been deleted, since these sources are no longer included in the permit.
- The condition for the newly permitted S-13 has been added to the permit. In addition, the permit condition has been modified to require 5 year record retention, as is required for Title V facilities.

During the initial Title V permit development, the District reviewed the existing permit conditions and revised the conditions for clarity and enforceability. Additional monitoring was added to the permit conditions at that time, as well as notation of the regulatory basis for each condition. The only additional monitoring added to the permit under this proposed renewal is monitoring of the sulfur content in the diesel fuel used at the newly permitted S-13..

All changes to the permit conditions as included in the initial Title V permit are clearly shown in permit proposed for renewal through "strike-out/underline" format. When the permit is issued, all 'strike-out' language will be deleted and all "underline" language will be retained, subject to consideration of comments received.

## **VII. Applicable Limits and Compliance Monitoring Requirements**

This section of the permit is a summary of numerical limits and related monitoring requirements for each source. The summary includes a citation for each monitoring requirement, frequency of monitoring, and type of monitoring. The applicable requirements for monitoring are completely contained in Sections IV, Source-Specific Applicable Requirements, and VI, Permit Conditions, of the permit.

Changes to permit:

- The standard language at the beginning of the section has been updated and a note has been added at the beginning of the section to clarify that this section is a summary of the limits and monitoring, and that in the case of a conflict between Sections I-VI and Section VII, the preceding sections take precedence.
- The headings at the top of the tables have been updated. "Emission Limit Citation" has been changed to "Citation of Limit" since not every limit is an emission limit. "Emission Limit" has been changed to "Limit" since not every limit is an emission limit.
- For BAAQMD 6-301, "Type of Limit" has been changed to "Opacity" since it is an opacity standard, and the description of the limit in Section VII has been corrected to say "for < 3 min/hr." This citation has been moved to the top of the table for S-1 so that the limits are in numerical order.
- The citation of Rule 6-305 has been removed from the tables for S-1 and S-2. This section is a public nuisance prohibition and is not a numerical limit, therefore does not belong in Section VII.
- The new VOC content limit for surface preparation solvents regulated under Rule 8-43 has been added to the tables for S-1 and S-10.
- The table for sources S-4 and S-5 has been deleted, since these sources are no longer included in the permit.
- A table for the newly permitted S-13 has been added to the permit.

Monitoring decisions are typically the result of a balancing of several different factors including: 1) the likelihood of a violation given the characteristics of normal operation, 2) degree of variability in the operation and in the control device, if there is one, 3) the potential severity of impact of an undetected violation, 4) the technical feasibility and probative value of indicator monitoring, 5) the economic feasibility of indicator monitoring, and 6) whether there is some other factor, such as a different regulatory restriction applicable to the same operation, that also provides some assurance of compliance with the limit in question.

These factors are the same as those historically applied by the District in developing monitoring for applicable requirements. It follows that, although Title V calls for a re-examination of all monitoring, there is a presumption that these factors have been appropriately balanced and incorporated in the District's prior rule development and/or permit issuance. It is possible that, where a rule or permit requirement has historically had no monitoring associated with it, no monitoring may still be appropriate in the Title V permit if, for instance, there is little likelihood of a violation. Compliance behavior and associated costs of compliance are determined in part by the frequency and nature of associated monitoring requirements. As a result, the District will generally revise the nature or frequency of monitoring only when it can support a conclusion that existing monitoring is inadequate.

During the initial Title V permit development, the District reviewed the existing monitoring and the following additional monitoring was added to the permit at that time.

<b>S# &amp; Description</b>	<b>Emission Limit Citation</b>	<b>Federally Enforceable Emission Limit</b>	<b>Monitoring</b>
S-1, Paint Spray/Abrasive Blasting Operations	BAAQMD 6-301	Ringelmann #1 Limitation	Visible Emission Checks
S-2, Sandblasting Operations	BAAQMD 6-301	Ringelmann #1 Limitation	Visible Emission Checks

Under this proposed renewal, the only new limits added to the permit are the VOC content limit for surface preparation materials regulated under Rule 8-43 for S-1 and S-10, and the emission limits that apply to the newly permitted S-13, Emergency Standby Diesel Generator. Since the solvent VOC content limit in Rule 8-43 is already adequately monitored through the recordkeeping required by that rule, only the emission standards that apply to S-13 warrant monitoring review.

There are 5 numerical limits for S-13. The first, an hourly limit on reliability-related activities, is already adequately monitored with either a fuel meter or meter that records hours of operation as required by permit condition. The remaining limits are derived from Regulation 6 and Regulation 9, Rule 1, as indicated below:

<b>S# &amp; Description</b>	<b>Emission Limit Citation</b>	<b>Federally Enforceable Emission Limit</b>	<b>Monitoring</b>
S-13, Emergency Standby Diesel Engine	BAAQMD 6-303	Ringelmann #2 Limitation	None
	BAAQMD 6-310	PM: 0.15 gr/dscf	None
	BAAQMD 9-1-301	Ground level concentrations of SO <sub>2</sub> shall not exceed: 0.5 ppm for 3 consecutive minutes AND 0.25 ppm averaged over 60 consecutive minutes AND 0.05 ppm averaged over 24 hours	None
	BAAQMD 9-1-304, Condition 18943, Part 2	Sulfur content of fuel ≤ 0.5% by weight	Fuel Certification

**BAAQMD Regulation 6-303, 6-310**

The Emergency Standby Generator is diesel-fueled. The particulate emissions are calculated below.

$$(0.998 \text{ g PM/bhp-hr})(320 \text{ hp})(\text{lb}/453.6 \text{ g})(7000 \text{ gr/lb})(\text{hr}/60 \text{ min})/(720 \text{ dscfm}) = 0.11 \text{ gr/dscf}$$

The source complies with the grain loading standard in Regulation 6, Section 310. Due to the periodic and restricted nature of its use (for backup power in case of emergencies only), no monitoring had been deemed necessary for the visible and particulate emission standards.

### BAAQMD Regulation 9-1-301, 9-1-304

Area monitoring to demonstrate compliance with the ground level SO<sub>2</sub> concentration requirements of Regulation 9-1-301 is at the discretion of the APCO (per BAAQMD Regulation 9-1-501). Since this generator is an insignificant source of sulfur dioxide due to the periodic and restricted nature of its use, ground level monitoring has not been required.

Section 304 limits the liquid fuel sulfur content to no more than 0.5% by weight, unless the use of such fuel does not result in an emission stream containing more than 300 ppm, dry, of sulfur dioxide. The Emergency Standby Generator is diesel-fueled. California diesel contains no more than 0.05% sulfur by weight, therefore compliance with this standard is assured as long as California diesel is used. Permit condition 18943 has been modified to require that fuel certifications be maintained to demonstrate the section 304 limit is met.

### **VIII. Test Methods**

This section of the permit lists test methods that are associated with standards in District or other rules. It is included only for reference. In most cases, the test methods in the rules are source test methods that can be used to determine compliance but are not required on an ongoing basis. They are not applicable requirements. If a rule or permit condition requires ongoing testing, the requirement will also appear in Section IV of the permit.

### **IX. Permit Shield:**

The District rules allow two types of permit shields. The permit shield types are defined as follows: (1) A provision in a major facility review permit explaining that specific federally enforceable regulations and standards do not apply to a source or group of sources, or (2) A provision in a major facility review permit explaining that specific federally enforceable applicable requirements for monitoring, recordkeeping and/or reporting are subsumed because other applicable requirements for monitoring, recordkeeping, and reporting in the permit will assure compliance with all emission limits. The second type of permit shield is allowed by EPA's White Paper 2 for Improved Implementation of the Part 70 Operating Permits Program. The District uses the second type of permit shield for all streamlining of monitoring, recordkeeping, and reporting requirements in Title V permits. The District's program does not allow other types of streamlining in Title V permits.

This facility has no permit shields.

### **X. Revision History**

A revision history section has been added to the permit.

### **XI. Glossary**

The glossary was updated.

### **XII. Appendix A - State Implementation Plan**

This section has been deleted. The address for EPA's website is now found in Sections III and IV.

### **D. Alternate Operating Scenarios:**

No alternate operating scenario has been requested for this facility.

**E. Compliance Status:**

An office memorandum dated 5-26-05 from the Director of Compliance and Enforcement to the Director of Permit Services presents a review of the compliance record of San Francisco Drydock (Site #A3288). The Compliance and Enforcement Division staff has reviewed the records for San Francisco for the period between May 1, 2004 and May 1, 2005. This review was initiated as part of the District evaluation of an application from San Francisco Drydock for a Title V permit renewal. During the period subject to review, activities known to the District include:

- There were no Notices of Violation issued during this review period.
- The District did not receive any alleged complaints.
- The facility is not operating under a Variance or an Order of Abatement from the District Board.
- There were no monitor excesses or equipment breakdowns reported or documented by District staff.

The owner certified that all equipment was operating in compliance on December 3, 2004. No non-compliance issues have been identified to date.

**F. Differences between the Application and the Proposed Permit:**

The Title V permit renewal application was received by the District on December 6, 2004. This application and the initial Title V permit were the basis for constructing the proposed Title V permit renewal. Changes to the initial permit including the source list, generally applicable requirements, source-specific applicable requirements, permit conditions, applicable emission limits and compliance monitoring tables have been described in the preceding sections of the Permit Evaluation/Statement of Basis.

**APPENDIX A**  
**BAAQMD COMPLIANCE REPORT**

**APPENDIX B**  
**GLOSSARY**

**ACT**

Federal Clean Air Act

**APCO**

Air Pollution Control Officer

**ARB**

Air Resources Board

**BAAQMD**

Bay Area Air Quality Management District

**BACT**

Best Available Control Technology

**BARCT**

Best Available Retrofit Control Technology

**Basis**

The underlying authority which allows the District to impose requirements.

**CAA**

The federal Clean Air Act

**CAAQS**

California Ambient Air Quality Standards

**CAPCOA**

California Air Pollution Control Officers Association

**CEM**

A "continuous emission monitor" is a monitoring device that provides a continuous direct measurement of some pollutant (e.g. NO<sub>x</sub> concentration) in an exhaust stream.

**CEQA**

California Environmental Quality Act

**CFR**

The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

**CO**

Carbon Monoxide

**Cumulative Increase**

The sum of permitted emissions from each new or modified source since a specified date pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91) and SIP Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95). Cumulative increase is used to determine whether threshold-based requirements are triggered.



**District**

The Bay Area Air Quality Management District

**DWT**

Dead Weight Ton

**dscf**

Dry Standard Cubic Feet

**E 6, E 9, E 12**

Very large or very small number values are commonly expressed in a form called scientific notation, which consists of a decimal part multiplied by 10 raised to some power. For example, 4.53 E 6 equals  $(4.53) \times (10^6) = (4.53) \times (10 \times 10 \times 10 \times 10 \times 10 \times 10) = 4,530,000$ . Scientific notation is used to express large or small numbers without writing out long strings of zeros.

**EPA**

The federal Environmental Protection Agency.

**Excluded**

Not subject to any District regulations.

**Federally Enforceable, FE**

All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60 (NSPS), Part 61 (NESHAPs), Part 63 (MACT), and Part 72 (Permits Regulation, Acid Rain), including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

**FP**

Filterable Particulate as measured by BAAQMD Method ST-15, Particulate.

**FR**

Federal Register

**GLM**

Ground Level Monitor

**grains**

1/7000 of a pound

**HAP**

Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by 40 CFR Part 63.

**Major Facility**

A facility with potential emissions of: (1) at least 100 tons per year of regulated air pollutants, (2) at least 10 tons per year of any single hazardous air pollutant, and/or (3) at least 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity of hazardous air pollutants as determined by the EPA administrator.

**MFR**

Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Federal Clean Air Act and implemented by District Regulation 2, Rule 6.

**MOP**

The District's Manual of Procedures.

**MSDS**

Material Safety Data Sheet

**NA**

Not Applicable

**NAAQS**

National Ambient Air Quality Standards

**NESHAPS**

National Emission Standards for Hazardous Air Pollutants. See in 40 CFR Parts 61 and 63.

**NMHC**

Non-methane Hydrocarbons (Same as NMOC)

**NMOC**

Non-methane Organic Compounds (Same as NMHC)

**NO<sub>x</sub>**

Oxides of nitrogen.

**NSPS**

Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Federal Clean Air Act, and implemented by 40 CFR Part 60 and District Regulation 10.

**NSR**

New Source Review. A federal program for pre-construction review and permitting of new and modified sources of pollutants for which criteria have been established in accordance with Section 108 of the Federal Clean Air Act. Mandated by Title I of the Federal Clean Air Act and implemented by 40 CFR Parts 51 and 52 and District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

**O<sub>2</sub>**

The chemical name for naturally-occurring oxygen gas.

**Offset Requirement**

A New Source Review requirement to provide federally enforceable emission offsets for the emissions from a new or modified source. Applies to emissions of POC, NO<sub>x</sub>, PM<sub>10</sub>, and SO<sub>2</sub>.

**Phase II Acid Rain Facility**

A facility that generates electricity for sale through fossil-fuel combustion and is not exempted by 40 CFR 72 from Titles IV and V of the Clean Air Act.

**POC**

Precursor Organic Compounds

**PM**

Particulate Matter

**PM10**

Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

**PSD**

Prevention of Significant Deterioration. A federal program for permitting new and modified sources of those air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

**SIP**

State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.

**SO2**

Sulfur dioxide

**THC**

Total Hydrocarbons (NMHC + Methane)

**therm**

100,000 British Thermal Unit

**Title V**

Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

**TOC**

Total Organic Compounds (NMOC + Methane, Same as THC)

**TRMP**

Toxic Risk Management Plan

**TSP**

Total Suspended Particulate

**TVP**

True Vapor Pressure

**VOC**

Volatile Organic Compounds

**Units of Measure:**

bhp	=	brake-horsepower
btu	=	British Thermal Unit
cfm	=	cubic feet per minute
g	=	grams
gr	=	grains
gal	=	gallon
gpm	=	gallons per minute
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inches
M	=	thousand
max	=	maximum
m <sup>2</sup>	=	square meter
Mg	=	mega-gram, one thousand grams
μg	=	micro-gram, one millionth of a gram
min	=	minute
mm	=	million
MMbtu	=	million btu
MMcf	=	million cubic feet
ppmv	=	parts per million, by volume
ppmw	=	parts per million, by weight
psia	=	pounds per square inch, absolute
psig	=	pounds per square inch, gauge
scfm	=	standard cubic feet per minute
yr	=	year

**Symbols:**

<	=	less than
>	=	greater than
≤	=	less than or equal to
≥	=	greater than or equal to