

San Joaquin Valley  
Unified Air Pollution Control District

**Best Available Control Technology (BACT) Requirements for  
Modifications to Existing Emission Units**

Approved By: \_\_\_\_\_ <signed> \_\_\_\_\_ Date: 9/30/11  
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**PURPOSE**

The purpose of this policy is to clarify Rule 2201 New and Modified Stationary Source Review Rule requirements for Best Available Control Technology for modifications to existing emission units.

Rule 2201 section 4.1 specifies the requirements for BACT for new and modified emission units. Section 4.1.1 addresses new or relocated emission units, section 4.1.2 addresses modifications to existing emission units, and section 4.1.3 address BACT requirements for new and modified emission units that result in an SB288 Major Modification or a Federal Major Modification.

This policy addresses the BACT requirement in section 4.1.2 for modifications to existing emission units.

**BACKGROUND**

Rule 2201 section 4.1.2 states the following:

“... Unless exempted pursuant to Section 4.2, BACT shall be required for the following actions:

Modifications to an existing emission unit with a Valid Permit to Operate resulting an in Adjusted Increase in Permitted Emissions (AIPE) exceeding 2.0 pounds in any one day ...”

Section 4.1.2 requires BACT if the AIPE exceeds 2.0 lb in any one day. The phrase “any one day” indicates that if there is an AIPE in any day of the year that exceeds 2.0 lb/day, BACT is required.

The term “in any one day” was added to the BACT applicability criteria of Rule 2201 in the Rule amendments that were adopted on 6/21/01 and went into effect on 8/21/01

(and has remained in subsequent rule amendments). The intent of this phrase was to require BACT if an existing unit was being modified such that it had an AIPE greater than 2.0 lb in any day of the year.

The previous version of Rule 2201 (amended on 6/15/95) had different criteria for requiring BACT for modifications to existing emission units. In that version of Rule 2201, BACT was required if a modified emission unit resulted in an increase in permitted emissions greater than 2.0 lb/day. This version of Rule 2201 did not include the term “in any one day”.

Section 4.3 defines AIPE as follows,  $AIPE = PE2 - HAPE$ . Section 4.4 defines HAPE as follows,  $HAPE = PE1 \times (EF2/EF1)$ .

Taken together sections 4.3 and 4.4 establish BACT applicability requirements for existing emission units that have an increase in daily utilization, with or without a concurrent decrease in permitted emission factor. For such units, BACT is required if the increase in utilization, after accounting for any new emission factors, results in an increase in potential to emit greater than 2.0 lb in any day of the year.

#### **IMPLEMENTATION POLICY**

Modifications to existing emission units that result in permitted utilization such that the AIPE increases more than 2.0 lb in any one day, including, but not limited to, increasing daily permitted utilization, increasing the number of days or hours of annual operation, increasing annual throughput limitations, and increasing annual fuel use limitation, are required to satisfy the BACT requirements of Rule 2201 section 4.1.2.