

# San Joaquin Valley Air Pollution Control District Dormant Emissions Unit

Facility Name: Facility Name Date: June 1, 2016  
Mailing Address: Street Engineer: Name  
City, State , Zip Lead Engineer: Lead Engineers Name  
Contact Person: Contact Person  
Telephone: Contact's Phone Number  
Application #: ATC #(s)  
Project #: Project Number  
Complete: Date Deemed Complete

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## I. Proposal

Facility Name is requesting an Authority to Construct (ATC) to designate the equipment as a non-compliant/compliant dormant emissions unit (DEU). The applicant proposes to disconnect the fuel line (adjust as necessary) to ensure that the equipment does not operate while dormant.

Pursuant to District GEAR Policy, this application is administrative and not subject to District Rule 2201, *New and Modified Stationary Source Review Rule*.

### For non-compliant units

The unit is currently out of compliance with District Rule XXXX.

### For compliant units

The operator proposes to defer the established source testing requirements while the unit is dormant.

### [Delete the rest of this Section if this is not a Title V Source]

Facility Name received their Title V Operating Permit on Date. This modification can be classified as a Title V minor modification pursuant to Rule 2520, Section 3.20, and could be processed with a Certificate of Conformity (COC). However, the facility has / has not requested that this project be processed in that manner.

### If COC is not Requested

Therefore, the facility will be required to submit a Title V minor modification application prior to operating under the revised provisions of the ATC(s) issued with this project.

### OR if COC is Requested

Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the ATC(s), and the facility must apply to administratively amend their Title V Operating Permit to include the requirements of the ATC(s) issued with this project.

## II. Applicable Rules

Rule 1070 Inspections (12/17/92)

Rule 2010 Permits Required (12/17/92)

Rule 2080 Conditional Approval (12/17/92)

Rule 2520 Federally Mandated Operating Permits (8/15/19) **[Delete if not Applicable]**

## III. Project Location

The project is located at [Project Location](#).

## IV. Process Description

The [Equipment](#) performs [\[Add the basic function here\]](#) (e.g. **The steam generator generates steam for injection into oil bearing strata to make oil easier to pump, or The turbine unit spins an electrical generator to generate electricity.**)

## V. Equipment Listing

### Pre-Project Equipment Description

S-XXXX-XX-XX: [COPY AND PASTE THE CURRENT BASE DOCUMENT EQUIPMENT DESCRIPTION HERE.](#)

**Duplicate for each additional unit, and Delete this line.**

### Proposed Modification

#### **For non-compliant units**

The equipment is currently out of compliance with District Rule [XXXX](#).

S-XXXX-XX-XX: MODIFICATION OF [EQUIPMENT DESCRIPTION FROM ABOVE](#): DESIGNATE AS A NON-COMPLIANT DORMANT EMISSIONS UNIT (**This is the equipment description on the new ATC.**)

#### **For compliant units**

S-XXXX-XX-XX: MODIFICATION OF [EQUIPMENT DESCRIPTION FROM ABOVE](#): DESIGNATE AS A COMPLIANT DORMANT EMISSIONS UNIT (**This is the equipment description on the new ATC.**)

**Duplicate for each additional unit, and Delete this line.**

### Post-Project Equipment Description

S-XXXX-XX-XX: [COPY AND PASTE THE CURRENT BASE DOCUMENT EQUIPMENT DESCRIPTION HERE](#) (**Adjust as necessary. Please note that the term “dormant” does not appear in the permit equipment description.**)

**Duplicate for each additional unit, and Delete this line.**

## **VI. Emission Control Technology Evaluation**

There are no proposed physical changes to the equipment or any change in permitted emissions. Therefore there is no need to evaluate the emission control technology.

## **VII. General Calculations**

Since this project is not subject to Rule 2201, calculations are not required.

**Verify the PE of all units in this project, enter the data into the appropriate emissions profiles, and Delete this line.**

## **VIII. Compliance**

**PLEASE NOTE: In General, NO conditions are to be removed from the Permit. The following conditions are to be added at the top of the new ATC.**

**If Title V, use *one of the two* following sets of conditions, and Delete the other.**

- {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2520] Y
- {1831} Prior to operating with modifications authorized by this Authority to Construct, the permittee shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Y

**or**

- {1829} The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Y

**FOR NON-COMPLIANT UNITS- use the following 3 paragraphs and 3 conditions, otherwise delete.**

The unit will not be allowed to operate until the operator applies for and receives a valid ATC to bring the equipment back into compliance with all District Regulations prior to recommencing operation.

Nothing in this evaluation shall be construed to shield a unit that has operated out of compliance with any District, state or federal requirements. A unit designated as a DEU is subject to enforcement action for any and all violations.

The following conditions are listed on the permit to ensure compliance.

- {4558} Operation of the unit is not authorized until modifications are made to comply with District Rules as authorized by an Authority to Construct. [District Rule 2010]

- {4559} The fuel line shall be physically disconnected from the unit. **(Adjust as necessary)**  
[District Rule 2080]
- {4560} While dormant, normal source testing shall not be required. [District Rule 2080]

**FOR COMPLIANT UNITS - Use the following three paragraphs, otherwise delete**

While the equipment is dormant, the established source testing will not be required. Whenever the operator designates the equipment as active, the established source testing requirements will resume.

Nothing in this evaluation shall be construed to shield a unit that has operated out of compliance with any District, state or federal requirements. A unit designated as a DEU is subject to enforcement action for any and all violations.

The following conditions are listed on the permit to ensure compliance.

**For ALL UNITS use all of these conditions and delete this line.**

- {4561} While dormant, the fuel line shall be physically disconnected from the unit. **(Adjust as necessary)** [District Rule 2080]
- {4562} Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080]
- {4560} While dormant, normal source testing shall not be required. [District Rule 2080]
- {4563} Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080]
- {4564} Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080]
- {4565} Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070]

**IX. California Environmental Quality Act (CEQA)**

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001.

The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.

- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that the project qualifies for ministerial approval under the District's Guideline for Expedited Application Review (GEAR). Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

#### Indemnification Agreement/Letter of Credit Determination

According to District Policy APR 2010 (CEQA Implementation Policy), when the District is the Lead or Responsible Agency for CEQA purposes, an indemnification agreement and/or a letter of credit may be required. The decision to require an indemnity agreement and/or a letter of credit are based on a case-by-case analysis of a particular project's potential for litigation risk, which in turn may be based on a project's potential to generate public concern, its potential for significant impacts, and the project proponent's ability to pay for the costs of litigation without a letter of credit, among other factors.

As described above, the project requires only ministerial approval, and is exempt from the provisions of CEQA. As such, an Indemnification Agreement or a Letter of Credit will not be required for this project in the absence of expressed public concern.

#### **X. Recommendation**

Issue [ATC S-XXXX-XX-XX](#) subject to the permit conditions listed on the attached draft [ATC in Appendix B or C](#). **(Appendix B may be used for the CCF if this is a COC project.)**

#### **XI. Billing Information**

Billing Schedule			
Permit Number	Fee Schedule	Fee Description	Fee Amount
<a href="#">S-XXXX-X-X</a>	3020-2-g	10.5 MMBtu/hr	\$754

#### **Appendixes**

A: Current PTO

B. Compliance Certification Form **(Delete this line if this is not a COC project)**

C: Draft ATC

Appendix A  
Current PTO

Appendix B  
Draft ATC or Compliance Certification Form

**Appendix C**  
**Draft ATC (Delete this page if there is no CCF)**