

Authority to Construct Application Review New Chain-Driven Charbroiler with Catalytic Oxidizer

Processing Engineer: [Engineer's Name]
Lead Engineer: [Lead Engineer]
Date: October 31, 2019 (RMR)

Facility Name: [Facility Name]
Mailing Address: [Mailing Address]
[City, State, Zip]

Contact Name: [Contact Name]
Phone: [Phone]

Project Number: [Project Number]
Permit Number: [Permit Number]
Deemed Complete: [Completion Date]

I. PROPOSAL

[Facility Name] is in the fast food restaurant business. The applicant is applying for an Authority to Construct for the installation of a new chain-driven charbroiler served by a catalytic oxidizer.

II. APPLICABLE RULES

Rule 2201 New and Modified Stationary Source Review Rule
(August 15, 2019)
Rule 4101 Visible Emissions (November 15, 2001)
Rule 4102 Nuisance (December 17, 1992)
Rule 4201 Particulate Matter Concentration (December 17, 1992)
Rule 4692 Commercial Charbroiling (March 21, 2002)
Rule 4801 Sulfur Compounds (December 17, 1992)
CH&SC 41700 Health Risk Assessment
CH&SC 42301.6 School Notice
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. PROJECT LOCATION

The project is located at [Street Address] in [City], California. The applicant states that the equipment is **not** located within 1,000 feet of a K-12 school. The District has verified that the equipment **is not** located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is **not** applicable to this project.

IV. PROCESS DESCRIPTION

This facility is a food handling and preparation facility that primarily serves the public. A chain-driven charbroiler is a semi-enclosed natural gas-fired cooking device that provides heat to cook food as it moves through the device while resting on the moving, chain-driven grated grill.

V. EQUIPMENT LISTING

[Permit Number]: COMMERCIAL CHARBROILER: [BURNER RATING] MMBTU/HR [MANUFACTURER'S NAME] MODEL [NUMBER] NATURAL GAS-FIRED CHAIN-DRIVEN CHARBROILER SERVED BY [MANUFACTURER] MODEL [NUMBER] CATALYTIC OXIDIZER.

VI. EMISSION CONTROL TECHNOLOGY EVALUATION

In this process' exhaust stream, PM₁₀ and VOCs are mixed with air before entering the flameless reactor vessel. The air mixture is evenly distributed into a bed of inert ceramic material coated with a metal catalyst. This bed provides complete mixing of the PM₁₀ and VOC with oxygen. The PM₁₀ and VOC adsorb on the surface of the ceramic bed are oxidize into carbon dioxide and water vapor once the polluted exhaust stream reaches operating temperature of 600-800°F. The scrubbed exhaust stream leaves the ceramic bed flowing out through the stack.

Proper cleaning and maintenance of the catalytic oxidizer is very important for effective oxidation of VOCs and PM₁₀. Visible emissions are also indicators of proper oxidation catalyst efficiency. Testing in the South Coast Air basin has shown an overall VOC and PM₁₀ removal efficiency of 86% and 83%, respectively. To ensure optimal removal efficiencies, visible emissions from the catalyst should be Ringelmann 0 or 0% opacity. Catalyst manufacturers' have recommended cleaning at least once per month with materials that do not damage the catalytic coating, such as a warm water bath.

VII. CALCULATIONS

A. Assumptions:

- The charbroiler will be fired on natural gas as fuel (per applicant).
- Worst-case Operating Schedule: 24 hours/day, 365 days/year.
- Maximum Burner Rating: [BURNER RATING] MMBtu/hr.
- Catalytic Oxidizer has a PM₁₀ control efficiency of 83% (SCAQMD testing).
- Catalytic Oxidizer has a VOC control efficiency of 86% (SCAQMD testing).
- F-Factor: 8,578 dscf/MMBtu @ 60°F (STP) (40 CFR, Part 60, Appendix A).
- Exhaust Flow Rate: [Flow Rate] cfm (per applicant).
- Daily Maximum Meat Cooked: [Daily Meat] lbs/day (per applicant).

B. Emission Factors:

The emission factors for NO_x, SO_x and CO are from AP-42 (10/96), Table 1.4-1 and 1.4-2 for natural gas combustion (burners – 0.3 MMBtu/hr or less).

Table 1. Natural Gas Emission Factors	
Pollutant	EF _(Natural Gas) (lb/MMBtu)
NO _x	0.0940
SO _x	0.0029
PM ₁₀	See Note (1)
CO	0.0210
VOC (non-methane)	See Note (1)

(1) PM₁₀ and VOC emissions from combustion are included within the emission factors for meat cooking discussed below.

The following uncontrolled emission factors for meat cooked were obtained from the South Coast Air Quality Management District (SCAQMD) and are based on source test results of similar units:

- EF_{PM10} = 7.42 lb-PM₁₀/10³ lb-Meat Cooked (Uncontrolled)
- EF_{VOC} = 2.27 lb-VOC/10³ lb-Meat Cooked (Uncontrolled)

C. Emissions Calculations:

For NO_x, SO_x and CO, the potentials to emit are calculated based on the quantity of natural gas combusted. For PM₁₀ and VOC, the potentials to emit are calculated based on the quantity of meat cooked.

1. Pre-Project Potential to Emit (PE1)

Daily, Annual, and Quarterly PE

Since this is a new emissions unit, PE1 = 0 for all criteria pollutants.

2. Post-project Potential to Emit (PE2)

PM₁₀ and VOC Emissions from Chain-driven Charbroiler:

Max. Meat Cooked (Daily) = [Daily Meat] lb/day

$$\begin{aligned}
 PE_{PM10\text{-Meat Cooked}} &= EF_{PM10} \text{ (lb-PM}_{10}\text{/10}^3\text{ lb-Meat Cooked)} \times \text{Max. Meat Cooked (lb/day)} \times (1 - CE) \\
 &= (7.42 \text{ lb-PM}_{10}\text{/10}^3\text{ lb-Meat Cooked}) \times ([\text{Daily Meat}] \text{ lb/day}) \times (1 - 0.83) \\
 &= \mathbf{0.0 \text{ lb-PM}_{10}\text{/day}}
 \end{aligned}$$

Facility's Name
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 Project Number: [Project Number]

$$\begin{aligned}
 PE_{\text{VOC-Meat Cooked}} &= EF_{\text{VOC}} (\text{lb-VOC}/10^3 \text{ lb-Meat Cooked}) \times \text{Max. Meat Cooked (lb/day)} \times (1 - CE) \\
 &= (2.27 \text{ lb-VOC}/10^3 \text{ lb-Meat Cooked}) \times ([\text{Daily Meat}] \text{ lb/day}) \times (1 - 0.86) \\
 &= \mathbf{0.0 \text{ lb-VOC/day}}
 \end{aligned}$$

Emissions from the Combustion of Natural Gas:

Max. Burner Rating: [BURNER RATING] MMBtu/hr
 Operating Hours: 24 hr/day

$$PE_{\text{Natural Gas}} (\text{lb/day}) = \text{Max. Natural Gas Usage (MMBtu/hr)} \times \text{Emission Factor (lb/MMBtu)} \times 24 \text{ hr/day}$$

Table 2. Natural Gas Combustion Emissions Summary				
Pollutant	EF _(Natural Gas) (lb/MMBtu)	Max Burner Rating (MMBtu/hr)	Hours of Operation (hr/day)	PE (lb/day)
NO _x	0.0940	[BURNER RATING]	24	0.0
SO _x	0.0029	[BURNER RATING]	24	0.0
PM ₁₀	See Note (1)			N/A
CO	0.0210	[BURNER RATING]	24	0.0
VOC (non-methane)	See Note (1)			N/A

(1) PM₁₀ and VOC emissions from combustion are included within the emission factors for the meat cooked.

Total Emissions from the chain-driven charbroiler:

$$PE_{\text{Total}} = PE_{\text{Meat Cooked}} + PE_{\text{Combustion}}$$

$$\text{Annual PE} = PE_{\text{Total}} \times 365 \text{ days/year}$$

$$\text{Quarter PE} = \text{Annual PE} \div 4 \text{ qtr/yr}$$

Table 3. Post-Project Potential to Emit (PE2) Summary					
Pollutant	PE _{Meat Cooked} (lb/day)	PE _{Combustion} (lb/day)	PE _{Total} (lb/day)	Annual PE (lb/year)	Quarter PE (lb/qtr)
NO _x	---	0.0	0.0	0	0
SO _x	---	0.0	0.0	0	0
PM ₁₀	0.0	---	0.0	0	0
CO	---	0.0	0.0	0	0
VOC	0.0	---	0.0	0	0

3. Pre-Project Stationary Source Potential To Emit (SSPE1)

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

Since this is a new facility, there are no valid ATCs, PTOs, or ERCs at the Stationary Source; therefore, the SSPE1 will be equal to zero.

4. Post-Project Stationary Source Potential To Emit (SSPE2)

Pursuant to Section 4.10 of District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

Table 4. Post-Project (SSPE2) Summary					
	NO _x (lb/yr)	SO _x (lb/yr)	PM ₁₀ (lb/yr)	CO (lb/yr)	VOC (lb/yr)
SSPE2	0	0	0	0	0
Major Source Threshold	20,000	140,000	140,000	200,000	20,000
New Major Source?	No	No	No	No	No
Offset Thresholds	20,000	54,750	29,200	200,000	20,000
Offsets Triggered?	No	No	No	No	No

5. Major Source Determination

Pursuant to Section 3.25 of District Rule 2201, a major source is a stationary source with post-project emissions or a Post Project Stationary Source Potential to Emit (SSPE2), equal to or exceeding one or more of the following threshold values. However, Section 3.25.2 states, “for the purposes of determining major source status, the SSPE2 shall not include the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

As you can see from Tables 4, the facility is not a major source, and calculations are not required.

6. Baseline Emissions (BE)

BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to Section 3.22

As this facility is a non-Major Source, **BE = PE1**.

7. SB 288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

As discussed in Section VII.C.5 above, this facility is not a major source for any of the pollutants addressed in this project; therefore, the project does not constitute a SB 288 Major Modification.

8. Federal Major Modification

District Rule 2201, Section 3.18 states that Federal Major Modifications are the same as "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

Since this facility is not a Major Source for any pollutants, this project does not constitute a Federal Major Modification. Additionally, since the facility is not a major source for PM₁₀ (140,000 lb/year), it is not a major source for PM_{2.5} (200,000 lb/year).

9. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. Detailed QNEC calculations are shown in the table below:

Table 8. Quarterly Net Emissions Change (QNEC) Summary						
Permit		NO _x	SO _x	PM ₁₀	CO	VOC
[Facility Number]-1	Qtr PE2 (lb/qtr)	0	0	0	0	0
	Qtr PE1 (lb/qtr)	0	0	0	0	0
	Qtr ΔPE (lb/qtr)	0	0	0	0	0

VIII. COMPLIANCE

Rule 2201 - New and Modified Stationary Source Review Rule

A. BEST AVAILABLE CONTROL TECHNOLOGY (BACT)

Per Rule 2201 Section 4.1, BACT shall be applied to a new emissions unit if potential to emit is greater than 2 lb/day for NO_x, PM₁₀, SO_x, VOC, or CO (Section 4.2.1 exempts CO emissions from BACT if the post project Stationary Source Potential To Emit (SSPE2) is less than 200,000 lb CO/year). For this project, emissions are less than 2 lb/day; therefore, BACT is not required.

B. OFFSETS

Stationary source emissions level shown in Section VII.C.6 do not exceed Stationary Source Offset thresholds, thus, offsets are not required.

C. PUBLIC NOTIFICATION

1. Applicability

Public noticing is required for:

- a. Any new Major Source, which is a new facility that is also a Major Source,
- b. Major Modifications,
- c. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- d. Any project which results in the offset thresholds being surpassed, and/or
- e. Any project with an SSPE2 of greater than 20,000 lb/year for any pollutant.

a. New Major Source

New Major Sources are new facilities, which are also Major Sources. As shown in Section VII.C.5 above, the SSPE2 is not greater than the Major Source threshold for any pollutant. Therefore, public noticing is not required for this project for new Major Source purposes.

b. Major Modification

As demonstrated in VII.C.7, this project does not constitute a Major Modification; therefore, public noticing for Major Modification purposes is not required.

c. PE > 100 lb/day?

Applications which include a new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. As seen in Section VII.C.2 above, this project does not include a new emissions unit which has daily emissions greater than 100 lb/day for any pollutant, therefore public noticing for PE > 100 lb/day purposes is not required.

d. Offset Threshold Exceeded?

As shown post-project emissions level in Section VII.C.6, this facility's annual emissions do not exceed offset thresholds for any criteria pollutant; therefore, public notification for offset threshold purposes does not apply.

e. SSIPE > 20,000 lb/yr?

As shown in Section VII.C.7, this facility's SSIPE is less than 20,000 lb/yr thresholds for all criteria pollutants; therefore, public notification for SSIPE purposes does not apply.

2. Public Notice

As shown above, Public notification thresholds are not exceeded; therefore public noticing is not required prior to Authority to Construct issuance.

D. DAILY EMISSION LIMITS

Section 5.7.2 requires a daily emissions limitation to be included on the Permit to Operate (PTO). For this project, the DEL is stated in the form of emission factors, maximum burner capacity, and maximum daily process rate of pounds of meat per day.

E. COMPLIANCE ASSURANCE

• **Source Testing**

Annual source testing is not required for NO_x, CO, VOC, PM₁₀ and SO_x emissions, since the uncontrolled emissions from this unit is less than 30 pounds per day for any pollutant.

- **Monitoring**

There is no monitoring required for this emission device.

- **Recordkeeping**

Daily records will be maintained of the amount of meat cooked. Monthly records will be maintained of the amount of meat purchased. Also, records will be maintained of the date of installation or changing of any catalyst. These records will be retained on the restaurant premises for a period of at least five years and made available to the District upon request.

- **Reporting**

No reporting is required for charbroilers.

Rule 4101 - Visible Emissions

Per Section 5.0, no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour, which is dark or darker than Ringelmann 1 (20% opacity). According to manufacturers' data, visible emissions in excess of Ringelmann 0 or 0% opacity are not expected, and inspections will be performed annually to confirm this. Therefore, compliance is expected.

Rule 4102 - Nuisance

Section 4.0 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of this operation, provided the equipment is well maintained.

A permit condition will be listed on the permit as follows:

- {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

California Health & Safety Code 41700 (Health Risk Assessment)

Discuss the results of the HRA, including any special conditions to consider when issuing the ATC(s).

District Policy APR 1905 – *Risk Management Policy for Permitting New and Modified Sources* specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

Example (a): (For a project with a Prioritization score ≤ 1 .)

An HRA is not required for a project with a total facility prioritization score of less than or equal to one. According to the Technical Services Memo for this project (**Appendix A**), the total facility prioritization score including this project was less than or equal to one. Therefore, no further analysis is required to determine the impact from this project and compliance with the District's Risk Management Policy is expected.

Example (b): (For a project with a Prioritization score > 1 .)

An HRA is not required for a project with a total facility prioritization score of less than one. According to the Technical Services Memo for this project (**Appendix A**), the total facility prioritization score including this project was greater than one. Therefore, an HRA was required to determine the short-term acute and long-term chronic exposure from this project.

The cancer risk for this project is shown below:

HRA Summary		
Unit	Cancer Risk	T-BACT Required
X-XXXX-X-X	XX per million	Yes/No

Discussion of T-BACT

Discuss whether a T-BACT is or is not triggered and the requirements which satisfy T-BACT (if any).

Example (a): (For a project where T-BACT not triggered.)

BACT for toxic emission control (T-BACT) is required if the cancer risk exceeds one in one million. As demonstrated above, T-BACT is not required for this project because the HRA indicates that the risk is not above the District's thresholds for triggering T-BACT requirements; therefore, compliance with the District's Risk Management Policy is expected.

Example (b): (For a project where T-BACT is triggered [for PM₁₀ and VOC] – Motor vehicle coating operation.)

BACT for toxic emission control (T-BACT) is required if the cancer risk exceeds one in one million. As demonstrated above, T-BACT is required for this project because the HRA indicates that the risk is above the District's thresholds for triggering T-BACT requirements.

For this project T-BACT is triggered for PM₁₀ and VOC. T-BACT is satisfied with BACT for PM₁₀ and VOC (see Appendix EX), which is the use of HVLP spay guns, coatings compliant with District Rules, enclosed paint gun cleaners, and a spray booth with exhaust filters; therefore, compliance with the District's Risk Management Policy is expected.

Also discuss whether the project has acute or chronic indices, or a cancer risk greater than the District's significance levels.

For example: (For most projects.)

District policy APR 1905 also specifies that the increase in emissions associated with a proposed new source or modification not have acute or chronic indices, or a cancer risk greater than the District's significance levels (i.e. acute and/or chronic indices greater than 1 and a cancer risk greater than 20 in a million). As outlined by the HRA Summary in Appendix X of this report, the emissions increases for this project was determined to be less than significant.

(Note: List all conditions necessary to ensure that the equipment is operated in the manner assumed when the RMR was performed.)

Rule 4201 - Particulate Matter Concentration

Section 3.0 requires emissions of dust, fumes, or particulate matter not to exceed 0.1 grain per cubic foot of gas at dry standard conditions. The PM emission concentration will be calculated based on the following parameters:

PM₁₀-to-PM Ratio: 50% PM₁₀/PM (Rule 2201, Section 4.11.2)

Exhaust Flow Rate = [Flow Rate] cfm

Typical Operating Schedule (worst-case) = 1,440 min/day

$$\begin{aligned} \text{PM Concentration} &= \frac{(\text{PM}_{10} \text{ Emission Rate}) \times (7,000 \text{ gr/lb})}{(\text{Air Flow Rate}) \times (1,440 \text{ min/day}) \times (0.50 \text{ PM}_{10}/\text{PM})} \\ &= \frac{(0.0 \text{ lb-PM}_{10}/\text{day}) \times (7,000 \text{ gr/lb})}{([\text{Flow Rate}] \text{ cfm}) \times (1,440 \text{ min/day}) \times (0.50 \text{ PM}_{10}/\text{PM})} \end{aligned}$$

Concentration = !Zero Divide **gr/scf**

The calculated emissions are well below the allowable emissions level. It can be assumed that under dry conditions emissions will not exceed the allowable 0.1 gr/dscf. Therefore, compliance with this rule is expected.

The following condition will be placed on the permit to ensure compliance with rule:

- {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

Rule 4692 - Commercial Charbroiling

The purpose of this rule is to limit VOC and PM-10 emissions from commercial chain-driven charbroilers.

Section 5.3 states, Catalytic oxidizers or other control devices shall be maintained in good working order to minimize visible emissions to the atmosphere and operated, cleaned, and maintained in accordance with the manufacturer's specifications in a maintenance manual or other written materials supplied by the manufacturer or distributor of the catalyst or other control device, or chain-driven charbroiler.

The following conditions insure compliance with this section:

- *{1927} The catalytic oxidizer shall be installed and maintained in good operating condition, in accordance with manufacturer's specifications. [District Rule 4692]*
- *{1954} The catalytic oxidizer shall be cleaned, with materials that do not damage the catalytic coating, at least once per month, when the charbroiler is not operating. Such cleaning shall be performed in accordance with instructions in a maintenance manual, bulletin, or memo prepared by the manufacturer or distributor of the catalyst or catalytic oxidizer. A copy of the cleaning instructions must be maintained on site. [District Rule 2201]*

Section 6.1 states, Owners and operators of chain-driven charbroilers equipped with control equipment shall maintain records of the date of installation or changing of any catalyst or, if applicable, other approved control device; and the date and time of cleaning and maintenance performed for the catalyst or, if applicable, other approved control device. Records of such actions shall be retained for a period of not less than five years, and made available to a District representative upon request.

The following condition insures compliance with this section:

- *{1953} Daily records shall be maintained of the amount of meat cooked. Monthly records shall be maintained of the amount of meat purchased. Also, records shall be maintained of the date of installation or changing of any catalyst, and date and time of cleaning or replacement of, and maintenance performed on, the catalyst. These records shall be retained on the restaurant premises for a period of at least five years and made available to the District upon request. [District Rules 2201 and 4692]*

Therefore, compliance with the rule is expected.

Rule 4801 - Sulfur Compounds

Section 3.1 prohibits emissions of sulfur compounds as SO₂ in excess of 0.2% by volume (2,000 ppmv).

From Table 1 of this evaluation, SO_x emissions when firing on natural gas (PUC quality) are calculated based on an emission factor of 0.0029 lb-SO_x/MMBtu.

$$\begin{aligned} \text{lb-SO}_x/\text{exhaust vol.} &= (\text{lb-SO}_x/\text{MMBtu}) \div (\text{F factor}) \\ &= (0.0029 \text{ lb-SO}_x/\text{MMBtu}) \div (8,578 \text{ dscf/MMBtu}) \end{aligned}$$

Facility's Name
Permit Number: [Permit Number]
Project Number: [Project Number]

$$= 3.38 \times 10^{-7} \text{ lb-SO}_x/\text{dscf}$$

Volume SO_x/exhaust vol. = nRT/P,

Where n = moles SO_x = (3.38 × 10⁻⁷ lb-SO_x/dscf) ÷ (64 lb-SO₂/lb-mol)
= 5.0 × 10⁻⁹ lb-mol/dscf

R = Universal gas constant = 10.73 psi-ft³/lb-mol-°R

T = 60°F standard temperature = 520° Rankine, and

P = Standard atmospheric pressure = 14.7 psi

$$\begin{aligned} \text{Volume SO}_2/\text{exhaust vol.} &= (5.0 \times 10^{-9} \text{ lb-mol/dscf}) \times (10.73 \text{ psi-ft}^3/\text{lb-mol-}^\circ\text{R}) \times \\ &\quad (520^\circ\text{R}) \div (14.7 \text{ psi}) \\ &= 2.0 \times 10^{-6} \text{ dscf/dscf exhaust} \\ &= 2.0 \text{ ppmv} \ll 2,000 \text{ ppmv} \end{aligned}$$

Since 2.0 ppmv is ≤ 2000 ppmv, this charbroiler is expected to comply with Rule 4801.

California Health & Safety Code 42301.6 (School Notice)

Reference project location and its proximity to a school and state whether or not school notice is required for this project.

Example (a): (For a Non-School Notice project - > 1,000 feet.)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

Example (b): (For a Non-School Notice project – no increase in emissions)

The District has verified that this site is located within 1,000 feet of a school. However, pursuant to California Health and Safety Code 42301.6, since this project will not result in an increase in emissions, a school notice is not required.

Example (c): (For a School Notice project.)

The District has verified that this site is located within 1,000 feet of the following school:

School Name: [Name]

Address: [Address]

Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is required.

Prior to the issuance of the ATC for this equipment, notices will be provided to the parents/guardians of all students of the affected school, and will be sent to all residents within 1,000 ft of the site.

[If there is no school w/in ¼ mile of the emissions increase, include the following discussion, otherwise delete]:

Facility's Name
Permit Number: [Permit Number]
Project Number: [Project Number]

The District has verified that there are no additional schools within ¼ mile of the emission source.

[If there is a school w/in ¼ mile of the emissions increase, include the following discussion, otherwise delete]:

Since a school notice has been triggered (due to the above-listed school within 1,000 of the emission source), notices will also be provided to the parents/guardians of all students from all school sites within ¼ mile of the emission source. The following schools(s) are within ¼ mile of the emission source:

School Name: [Name]
Address: [Address]
(add additional schools if necessary)

(Note: Refer to FYI - 71 for guidance on how to process a School Notice project.)

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (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.

IX. RECOMMENDATION

Issue ATC #[Permit Number] with the conditions listed on the attached draft Authority to Construct.

X. BILLING

The billing for this operation is based on the burner rating in MMBtu/hr.

PERMIT NUMBER	FEE SCHEDULE	FEE DESCRIPTION	ANNUAL FEE
[Permit Number]	3020-02-A	0.0 MMBTU/HR	\$87

Appendices:

- Appendix A: HRA Summary
- Appendix B: Draft ATC
- Appendix C: Emission Profile

Appendix A: HRA Summary

DATE: October 8, 2002

TO: PSD Staff

FROM: Ester Davila, AQS Senior

SUBJECT: Chain-Driven Charbroiler

The process rates listed in the table below represent the natural gas throughput limits used by chain-driven charbroilers which would result in a prioritization score less than one, at the associated receptor distance. Pursuant to District Policy, a health risk assessment is not required when the prioritization score is less than one.

If a facility proposes a project with process rates less than the limits found in the table below, a health risk assessment is not required.

Prioritization Score Less Than One Requirements for Chain-Driven Charbroiler*					
Maximum Fuel Usage				Nearest Receptor Distance	
MMscf/hr	MMBtu/hr	MMscf/yr	MMBtu/yr	Meters	Feet
0.04	40	1,140	1,140,000	≤ 99	≈ 325
0.17	170	4,500	4,500,000	≥ 100	≈ 328
1.10	1100	28,500	28,500,000	≥ 250	≈ 820
4.00	4000	103,000	103,000,000	≥ 500	≈ 1,640

*To be used with natural gas-fired chain-driven charbroilers only.

Appendix B: Draft ATC

Appendix C: Emissions Profile