

**San Joaquin Valley
Unified Air Pollution Control District**

**Guideline for Expedited Application Review (GEAR)
Ethylene Oxide (ETO) Sterilizers and Aerators**

Approved By: <u> Signed </u> Seyed Sadredin Director of Permit Services	Date: <u> 8/3/98 </u>
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Purpose: To outline the procedures for expedited processing of Authority to Construct (ATC) applications for Ethylene Oxide (ETO) Sterilizers and Aerators. These procedures will apply to processing of applications received over the counter or through the mail.

I. Applicability

This guideline applies to processing of applications for Authority to Construct new and modified Ethylene Oxide (ETO) Sterilizers and aerators.

II. Permit Application and Supplementary Forms

The applicant must complete a regular ATC application form.

III. Priority Processing

The applications will be processed on an expedited basis if a complete application, a complete supplemental form, and a \$60 filing fee for each permit unit are submitted.

In order to meet the expedited time frame, the engineer assigned for preliminary review will deem the application complete (if appropriate), write the application review, and finalize the project. The application review and final ATC will be submitted to the [lead engineer/supervisor/manager] for review and signature.

Final action on all projects will occur within 14 days after the submittal of the complete application package over the counter. If all necessary items are provided through the mail, the application will be prioritized for issuance within 2 weeks.

The priority processing will be preempted if:

- The application is subject to any public noticing requirements, including school notice per CH&SC 42301.6 (within 1,000 feet of any K-12 school), or
- The application is part of a stationary source project where issuance of the permit will affect the outcome of the stationary source project.
- The public noticing provisions of the Hazardous Material Emissions regulations (AB3205 and AB928) apply.

IV. Application Review

In order to standardize the application reviews for this source category, the application review found in [G:/per/gear/eto_rv.doc] will be used as a base document. The following pages are a hard copy version of this standard review. This hard copy version for the GEAR Policy Manual includes a copy of the standard ATC conditions (Attachment I) and any applicable checklists (Attachment II). These attachments will be referred to, but will not be included in the actual application review done for the pending application. The actual application review will only have a draft ATC attached to it. This will minimize the number of pages for the expedited review.

The use of this standard Application Review will ensure:

- A. That the proposed project complies with the Best Available Control Technology (BACT) requirements as specified in the District's current BACT Clearinghouse.
- B. That the proposed project will not trigger offset requirements.
- C. That the PTO has enforceable daily emission limitations (DELs).
- D. That the proposed project complies with all applicable prohibitory rules.

V. Equipment Description

To ensure uniformity, the following standard description will be used in the database:

ETHYLENE OXIDE STERILIZER WITH ACME MODEL ETO-ZAPPER STERILIZER, ACME MODEL PURGE-IT AERATOR, AND ACME DESTRUCT-IT CATALYTIC OXIDIZER.

VI. Health Risk Assessment

Per results of CARB-approved health risk assessment for ETO sterilizers, the following results are the maximum allowable ETO consumption rates which would result in insignificant (or de minimus) level of health risks:

A. Single-story buildings:

Assumptions: 1. Sterilizer complies with ATCM (99% control or better)
 2. Residents located within 100 meters
 3. Exhaust stack is 7 meters above grade, with a rain cap

Results: Maximum allowable ETO consumption rate is 100 lb/yr.

B. Multi-story buildings:

Assumptions: 1. Sterilizer complies with ATCM (99% control or better)
 2. Residents located within 100 meters
 3. Exhaust stack is 11.5 meters above grade, with a rain cap

Results: Maximum allowable ETO consumption rate is 500 lb/yr.

For sources meeting the above criteria, no further health risk assessment is necessary in the application review. However, if the parameters are different than the above, a health risk assessment must be performed by District's Technical Services staff.

VII. Authority to Construct Conditions

To ensure uniformity, a standard set of conditions will be used as a base for all applications (See Attachment I). Additional requirements may be required on a site specific basis due to New Source Review Rule.