

TO: Permit Services Division Staff

FROM: Seyed Sadredin
Director of Permit Services

DATE: September 7, 1994

RE: **ADEQUATE CONDITIONS TO ENFORCE ACTUAL EMISSION
REDUCTIONS (AER)**

As you know, section 6.5.3 of the New Source Review Rule allows for calculation of AER using the control efficiency. For reductions due to installation of control device or more efficient process or material, this methodology is used in place of the traditional actual-to-potential test. As a result, the equipment's potential capacity is not "racheted" down.

This alternative was allowed by the rule based on the assumption that after modification, the equipment will perform at the proposed control efficiency level at all loads. To ensure that the intent of this provision is met, the following must be adhered to when AER is calculated in accordance with section 6.5.3 of rule 2201:

1. The permit, after modification, must contain adequate performance based limitations to ensure operation at the specified control level at all loads. Simple mass quantity emission rates (e.g. lbs/day) would not meet this requirements. Some examples of adequate performance based limits are control efficiency level, or pounds per million btu input.
2. The permit must state that the performance based limit was added to enforce the emission reductions (referring to the ERC number or project number). This wording is necessary to ensure that in reviewing future permitting actions, the District retains or adds adequate permit conditions so that the previously granted ERCs remain enforceable.

C: Mark Boese, Deputy APCO