

TO: Permit Services Division Staff

FROM: Seyed Sadredin  
Director of Permit Services

DATE: September 1, 1993

RE: **POLICY MEMO - EMISSION LIMITING CONDITIONS**

The purpose of this memorandum is to provide guidance on the appropriate use of conditions for limiting emissions from new and modified emissions units. The scope of this policy applies to projects that trigger Rule 2201 (New and Modified Stationary Source Review).

Each permit must have the following types of emission limits:

1. A short term enforceable emission limit. This limit must be enforceable at any time by source testing or other monitoring and record keeping methods. PPM limits, lbs/mmBtu, control efficiency and other performance based emission limits are examples of such conditions. These sorts of conditions would normally reflect the BACT requirements.
2. Each permit is required per rule 2201 to have a daily emission limit (DEL). A DEL can be represented by simply stating the allowable daily mass quantity of emissions (lbs/day), or it can be reflected through the use of a number of conditions which when combined together limit the daily emissions from the emissions unit. Limitations on throughput or fuel usage combined with appropriate emission factors are examples of the latter scenario.

In deciding how to represent the DEL, a case-by-case analysis must be made and the option that affords the source the greatest operational flexibility while retaining enforceability by the District must be chosen.

Do not use redundant conditions. If DEL is already established by other conditions, do not write additional conditions intended to do the same thing.

3. A quarterly emission limit may be necessary for projects triggering the offset requirements and for which the applicant is not providing sufficient offsets to cover everyday operation at the maximum daily emission limit.

CC: Mark Boese, Deputy APCO