

**APPENDIX E**

**Rule Consistency Analysis  
For Proposed Amendments to Rule 4905**

**November 18, 2014**

**SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT**

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**RULE CONSISTENCY ANALYSIS  
FOR PROPOSED AMENDMENTS TO RULE 4905**

**I. REQUIREMENTS FOR RULE CONSISTENCY ANALYSIS**

Pursuant to Section 40727.2 of the California Health and Safety Code, prior to adopting, amending, or repealing a rule or regulation, the District is required to perform a written analysis that identifies and compares the air pollution control elements of the rule or regulation with corresponding elements of existing or proposed District and United States Environmental Protection Agency (EPA) rules, regulations, and guidelines that apply to the same source category. The elements analyzed are emission standards, monitoring and testing requirements, and recordkeeping and reporting requirements. The analysis is discussed in Section II below.

**II. RESULTS OF ANALYSIS**

**A. District Rules**

There is no other District prohibitory rule or regulation tailored specifically for natural gas-fired, fan-type central furnaces (4354 applies to glass melting furnaces). Sources could be subject to other District rules including:

- Rule 1020 Definitions
- Rule 1140 Applicability of Emissions Limits
- Rule 4301 Fuel Burning Equipment
- Rule 6150 Enforcement

The requirements of the rules listed above are not in conflict with, nor are they inconsistent with the requirements of Proposed Rule 4905.

**B. Federal Rules, Regulations, and Policies**

There are no applicable Control Technique Guidelines (CTG), Alternative Control Techniques (ACT), New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), Best Available Control Technology (BACT), or Maximum Achievable Control Technology (MACT) guidelines for natural gas-fired, fan-type central furnaces with a rated heat input capacity less than 175,000 Btu/hr or, for combination heating and cooling units, a rated cooling capacity less than 65,000 Btu/hr.

1. Control Technique Guidelines (CTG)

District review of the EPA CTG list indicates that there is no CTG for natural gas-fired, fan-type central furnaces of this size.

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2. EPA Alternative Control Techniques (ACT) Document

District review of the EPA ACT list indicates that there is no ACT for natural gas-fired, fan-type central furnaces of this size.

3. EPA New Source Performance Standard (NSPS)

District review of 40 CFR 60 (NSPS) indicates that there is no NSPS for natural gas-fired, fan-type central furnaces of this size.

4. National Emission Standard for Hazardous Air Pollutants (NESHAP) and Maximum Achievable Control Technology (MACT)

District review of 40 CFR 61 (NESHAP) and 40 CFR 63 (MACT) indicates that there is no NESHAP or MACT for natural gas-fired, fan-type central furnaces of this size.

5. EPA Best Available Control Technology (BACT) Requirements

District review of EPA BACT requirements indicates that there are no BACT requirements listed for natural gas-fired, fan-type central furnaces of this size.

6. EPA Policy on Recordkeeping

EPA has a policy that mandates stationary sources keep and maintain records for at least five years; however, as a point-of-sale rule, natural gas-fired, fan-type commercial and residential central furnaces of this size are not permitted sources and are thus not required to follow specific recordkeeping guidelines. Therefore, units subject to Rule 4905 are not subject to EPA's Policy on Recordkeeping.

### III. CONCLUSION

Based on the above analysis, District staff found that the proposed amendments to Rule 4905 would not conflict with any District or federal rules, regulations, or policies covering similar stationary sources.