

# San Joaquin Valley Unified Air Pollution Control District

## Expedited Processing of Applications to Change the Sequence of Implementation of Authorities to Construct

Approved By: <u>                    Signed                    </u> Date: <u>  10/24/05  </u> Dave Warner Director of Permit Services
--

### I. PURPOSE

The purpose of this policy is to establish the procedure and timeline for expedited processing of applications to re-issue Authority to Construct (ATC) documents when the only change is to the implementation order of the ATCs.

### II. APPLICABILITY

This policy applies to requests for a re-issuance of two or more unimplemented ATCs solely because the order of implementation of the ATCs is different than the order of implementation used when the ATCs were issued. No other alterations to the equipment or conditions may be made to qualify for expedited processing under this policy. In addition, the subject project must not result in a new major source or major modification, nor can the facility SSPE go from a level below to a level above the offset thresholds and the change in implementation order shall not affect the offset quantity that would be required for any other ATC if that ATC were being processed with the new implementation order in place. If different equipment, emissions, or conditions are proposed, the applications for ATC re-issuance shall not be expedited under this policy. This policy does not apply to un-issued applications already on file with the District except that the expected implementation order of those un-issued applications can be considered in the ATCs for which the request for re-issuance has been made.

### III. PROCEDURE

The applicant for ATC re-issuance shall, in the application submittal, specify:

1. that the applications are for expedited re-issuance of ATCs due solely to a change in the order of implementation;

2. that they be processed under this policy;
3. all un-converted (issued ATCs which have been implemented but for which a Permit to Operate (PTO) has not yet been issued by the District), all un-implemented (ATCs which have been issued but have not yet initiated operation), and all ATC applications applied for but not yet issued for each permit unit for which re-issued ATCs are requested;
4. the order the ATCs were supposed to be implemented at the time the ATCs were issued or proposed and the new order of implementation;
5. by ATC number and condition number, all equipment descriptions and conditions which require modification in the re-issued ATCs and shall propose the new language to appear in the re-issued ATC's.

Failure to provide all of the necessary information will disqualify the applications from being expedited pursuant to this policy.

The applications shall be assigned one project number (an exception must be made when ATCs from more than one facility number are proposed to be re-issued as in the case where more than one facility number has been issued to a stationary source) and shall be assigned for preliminary review in the same or subsequent working day it is received. The preliminary review engineer will log in the applications in the Permit Administration System (PAS) with new modification numbers and determine if the project qualifies for processing under this policy by independently determining that all 5 items required in the application for re-issuance and listed previously in this policy have been adequately addressed, and that none of the ATC projects involved situations where offset or major source thresholds were crossed.

If the preliminary review engineer determines that the project does not qualify for expedited processing under this policy the preliminary review engineer shall discuss that determination with the lead engineer for the project. If they both concur the project does not conform to this policy, the Permit Services Manager shall be so advised. Upon the Manager's concurrence that the project does not qualify for expedited processing under this policy, the applicant shall be notified by telephone of the basis of this determination. The applicant shall have the opportunity to amend the proposal to conform to this policy or to request to have the project processed under another appropriate processing track. If the applicant does not revise the proposal to conform to this policy, the project shall be put into another appropriate processing track and a normal preliminary review shall be completed.

Once a project is found to qualify for processing under this policy the normal preliminary review process will cease and the preliminary review engineer shall be assigned as the final review engineer. The engineer shall prepare a concise application review consisting of the following:

1. a description of the proposed project identifying all ATC's to be canceled and identifying the new order of implementation of the re-issued ATCs;
2. a description of how the project qualifies for processing under this policy;
3. copies of the proposed ATCs for re-issuance and of the ATCs to be canceled;

The re-issued ATCs (with a new modification number) shall be issued with the same issuance date (Project Final date) as the ATCs being canceled (Rule 2050 regulates the extension of previously issued ATCs) and shall include a condition canceling the ATC(s) being replaced. The engineer shall ascertain whether the applicant wants to delay re-issuance of the ATCs by reviewing the draft ATCs. Once the applicant approves proceeding, the engineer shall finalize the re-issued ATCs and cancel the replaced ATCs in PAS. The engineer shall forward the re-issued ATCs to the lead engineer for supervisory review, duplication, mailing, filing and cancellation of the canceled ATCs in the appropriate facility files.

#### **IV. TIMELINE**

Once the project has been received it shall be identified as an expedited project under this policy and shall be assigned for preliminary review before the end of the subsequent working day. Within two working days of being assigned the preliminary review engineer shall make a determination whether the project qualifies for expedited processing under this policy. If the determination is negative, the preliminary review engineer shall immediately bring this conclusion to the lead engineer and the procedure described above shall be followed.

If the project qualifies for processing under this policy, the engineer shall follow the procedure previously described and the re-issued ATCs shall be forwarded to the lead engineer within 5 working days from the date the project was found to qualify for expedited processing under this policy unless the applicant has asked for additional time to review the draft ATCs. The lead engineer shall have the re-issued ATCs mailed out before the end of the subsequent working day.