

San Joaquin Valley
Unified Air Pollution Control District

APR 1025
Permit Unit Determination

Approved by:	 Arnaud Marjollet Director of Permit Services	Date:	<u>Aug. 06-2014</u>
--------------	--	-------	---------------------

Purpose: To provide procedures for determining the boundaries of a permit unit and determine what articles, machines, contrivances, and operations are included in the permit unit.

I. Background:

This policy applies to all source operations that are required by District Rule 2010 to obtain Authorities to Construct (ATC) or Permits to Operate (PTO). The Permit Services Department staff shall determine the boundaries of permit units at the time of issuance of the ATC. A Permit Unit may include one or more emissions units.

II. Definitions:

Emission Unit: A unit, which has the potential to emit or results in emissions of any affected pollutant directly or as fugitive emissions. A control device associated with an operation or a process shall **not** be considered as an emissions unit.

Permit Unit: A single or group of emissions units that operate independently of any other permitted unit. The permit unit includes all associated control device(s) and material transport devices that serve the emissions unit or emission units.

Continuous Process: A process involving more than one emission unit connected physically (by conveyors, pipes, ducts, etc.) that operates as a single functioning unit to produce a product.

Independent Operation: An operation where the material output on one emission unit or permit unit does not force the operation of another emission unit or permit unit.

Shared Equipment: Equipment that operates as part of more than one permit unit without operating independently.

Source Operation: the last operation preceding the emission of any air contaminant which:

- 1) results in the separation of the air contaminant from the process materials or in the conversion of the process materials into air contaminants (as in the combustion of fuels), and
- 2) is not an air pollution abatement operation, and
- 3) is any operation, article, machine, equipment or other contrivance.

Spare or Standby Equipment: equipment that operates as a spare or standby shall be a separate permit unit. Standby equipment shall operate only when another permit unit is not operating.

Storage Equipment: a storage vessel may be included as part of the permit unit from which it receives material if:

- 1) the vessel receives material from only one permit unit, and
- 2) the vessel and the permit unit are physically united (by a chute, conveyor, etc.), and
- 3) the vessel is not used for loadout that can be operated independently of the permit unit.

III. Permit Unit Determination Process:

When making a determination for the boundaries of a permit unit, consider the following:

- 1) Can the emission unit be operated independently? If no, then combine with the other process.
- 2) Does the emission unit serve a continuous process? If yes, then combine with the other process.
- 3) Can the emission unit be shared with other emitting equipment? If yes, then include this emissions unit with each permit unit that it is shared.

The following examples and flowchart are intended to assist engineers when determining permit unit boundaries. In general, most source operations permit boundaries will be defined by this policy, however there may be occasional times when management discretion will dictate. Guidelines for Expedited Application Review (GEAR) policies may also specify what determines a permit unit boundary for a particular category of source. Clearly identified examples and exceptions to this policy are identified in the following sections.

IV. Examples:

- A. *Asphalt batch plants* have a rock hopper receiver and feed bins as a permit unit. The rotary drum heater and mixer shall be considered as a separate permit unit. The hot asphalt elevator, storage, and loadout shall be considered as another permit unit.
- B. *Continuous coating operations* where a common product connects coating, baking (oven) and curing shall be considered one permit unit.
- C. *Feed mills* have multiple operations for which a received material may be processed by, each with separate emissions units (points). Truck or rail receiving, grinding (hammermills), mixing, pelletizing, sacking, bulk storage tanks, and shipping (loadout) shall be considered as a separate permit units.
- D. *Flares* operated as a control device are included with the emissions unit.
- E. *Large commercial printing operations* where each press or line operates independently on a single product (regardless of control system) shall have each press or line as a permit unit.
- F. *Petroleum production operations* generally consist of steam generators, turbines, well heads, casing collection systems, and each storage tank being a permit unit. If tanks have a common vapor recovery system it will be listed on one tank and referenced on the other tanks. If steam generators have a common scrubber, the scrubber is listed on one steam generator and referenced on the others.

V. Exceptions:

- A. *Cotton Gins*: Each Gin Line is considered one permit unit.
- B. *Loading racks* are considered a separate permit unit even though they may serve multiple storage tanks.
- C. *Small print shops* where multiple presses are generally operated manually by one or two persons shall have all presses included as one permit unit.
- D. *Woodworking operations* where multiple source operations (table saws, jointers, band saws, etc.) are controlled by a common dust collection system shall be considered as one permit unit. Multiple wood working operations located in separate buildings would receive multiple permits, even if they are served by a common control device.

- E. *Mineral products processing* that have multiple operations for which a raw material is processed into several different products (sand, gravel, sized rock, etc.) for use in infrastructure and related construction activities: please see District Policy SSP 1610 (Aggregate Permit Processing) for permit unit determination guidance.
- F. *Fumigation operations* may consist of chambers, silos, shipping containers, covered bins, and/or covered piles.
- Multiple chambers located in the same enclosed building shall be considered as one permit unit.
 - Chambers located in separate enclosed buildings shall not be considered one permit unit.
 - Multiple silos in one location (group of silos) within a facility shall be considered as one permit unit.
 - Silos in separate locations (different group of silos) within a facility shall not be considered one permit unit.
 - All fumigation operations which take part outside of chambers/silos (i.e. covered bins, covered piles, shipping containers) shall be combined and considered as one permit unit

VI. Fees:

When multiple fee schedules can be established, the schedule that results in the highest fee amount shall be used. The equipment rating for shared equipment shall be divided equally among the equipment it serves.

Permit Unit Determination

