

# Preliminary Review Checklist

Guiding Principle: The preliminary review is limited to those tasks necessary to assure that the District has obtained all of the necessary information to perform the final evaluation.

Facility I.D. Number			
Project Number			
Company Name			
Location			
Process Engineer			
Date			
Application Type	Permit Unit Number(s)		
<input type="checkbox"/> New emissions units			
<input type="checkbox"/> Modify existing emissions units			
Project Proposal (complete and concise description)			
Application Content		Yes	No
	Is it obvious (with minimal effort/calculations) that the application's equipment is exempt from District permitting pursuant to Rule 2020?	<input type="checkbox"/> Discuss with your supervisor	<input type="checkbox"/>
1.	Does the application provide sufficient information to understand the applicant's proposal, the process flow, and the purpose of the project?	<input type="checkbox"/>	<input type="checkbox"/> Incomplete
2.	Does the application provide sufficient information to determine the permit unit boundaries?	<input type="checkbox"/>	<input type="checkbox"/> Incomplete
3.	Does the application contain adequate equipment descriptions for all emissions units, including info needed to determine appropriate fee schedules?	<input type="checkbox"/>	<input type="checkbox"/> Incomplete
4.	Does the application contain sufficient information to calculate potential emissions from new and modified emissions units?	<input type="checkbox"/>	<input type="checkbox"/> Incomplete
5.	Does the application contain alternate monitoring plan(s) or compliance plan(s) required by applicable prohibitory rules? <b>Not applicable</b> <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Incomplete
6.	Is a completed applicable supplemental application form included? <i>Check here if <b>not applicable</b> or if all information is provided without form.</i> <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Incomplete
7.	Do all units involved with the project meet all source-type-specific prohibitory rule emission limits? <b>Not applicable</b> <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Incomplete
8.	Do valid unimplemented ATCs exist for any units to be modified with this project?	<input type="checkbox"/>	<input type="checkbox"/> Skip to 10
9.	Does the application account for the disposition of each valid unimplemented ATC? (Cancelled? Implemented prior to, or concurrently with, this new proposal?)	<input type="checkbox"/>	<input type="checkbox"/> Incomplete

10.	Is the proposal subject to Rule 2201 (New emission unit, or “modification” pursuant to Rule 2201, 3.25?)	<input type="checkbox"/>	<input type="checkbox"/> Skip to 44
<b>SB288 and Federal Major Modification Applicability*</b> <small>Offroad engines don't count toward major source determination, or SB288 or federal major modifications.</small>		Yes	No
11.	Is this facility an existing major source for any pollutant as defined in Rule 2201?	<input type="checkbox"/>	<input type="checkbox"/> Skip to 19
12.	Is it obvious that all units involved in this project can be considered “fully offset” units <b>and</b> that there is no proposed increase in potential emissions?	<input type="checkbox"/> Skip to 19	<input type="checkbox"/>
13.	Is this project an exempt action under Federal NSR? If yes, check one box. <input type="checkbox"/> Use of an alternative fuel or raw material by reason of a natural gas curtailment plan pursuant to a Federal, state or local directive; <input type="checkbox"/> An increase in the hours of operation or in the production rate, unless such change is prohibited under any federally enforceable permit condition; <input type="checkbox"/> Any change in ownership at a stationary source; <input type="checkbox"/> Other actions specifically enumerated in 40 CFR 51.165(a)(1)(v)(C). <input type="checkbox"/> Involves <u>only</u> fugitive emissions from sources NOT specifically listed in 40 CFR 52.21(b)(1) (see Table A) & NOT subject to an NSPS or NESHAP promulgated before 8/7/80.	<input type="checkbox"/> Skip to 19	<input type="checkbox"/>
14.	Can this project be linked to any other projects at the facility where expansions are taking place?	<input type="checkbox"/>	<input type="checkbox"/>
15.	Does this project (and any related projects) have a combined PE2 greater than any of the SB288 Major Modification Thresholds?	<input type="checkbox"/>	<input type="checkbox"/> Skip to 18
16.	Did the applicant provide the necessary historical operating data on all relevant equipment to make the SB288 Major Modification Calculation?	<input type="checkbox"/>	<input type="checkbox"/> Incomplete
17.	Perform the SB288 Major Modification Calculation. Does this project constitute an SB288 Major Modification?	<input type="checkbox"/> SB288 Major Mod NSR PN Req'd	<input type="checkbox"/>
18.	Are there any increases in PE (for any permit unit(s) in this project) greater than the Federal Major Modification Thresholds for any pollutants for which this facility is a major source?	<input type="checkbox"/> Federal Major Mod NSR PN Req'd	<input type="checkbox"/>
<b>Prevention of Significant Deterioration (PSD)</b>		Yes	No
19.	Is this facility an existing major source for PSD for <u>any</u> pollutant (including attainment and non-attainment pollutants), per the PSD major source thresholds (100 or 250 tpy, or 100,000 tpy CO <sub>2e</sub> ), and will have both a significant increase <b>and</b> a significant <u>net</u> emissions increase for any attainment/unclassified pollutant subject to PSD? (Significance thresholds: NO <sub>2</sub> or SO <sub>2</sub> @ 40 tpy, PM @ 25 tpy, PM <sub>10</sub> @15 tpy, CO @ 100 tpy, GHG @ 75,000 tpy CO <sub>2e</sub> – all short tons)	<input type="checkbox"/> Subject to PSD Submit HRA/RMR request form Skip to 22	<input type="checkbox"/>
20.	Is this facility a new source that will be a major source for PSD for <u>any</u> pollutant, per the PSD major source thresholds, and will have a significant increase for any attainment/unclassified pollutant subject to PSD?	<input type="checkbox"/> Subject to PSD, submit HRA/RMR request form Skip to 22	<input type="checkbox"/>

21.	Is this facility an existing non-major source for PSD, per the PSD major source thresholds, and the project will have an increase for any attainment/unclassified pollutant subject to PSD that by itself is greater than the PSD major source thresholds?	<input type="checkbox"/> Subject to PSD, submit HRA/RMR request form Skip to 22	<input type="checkbox"/> Skip to 23
22.	Is the facility within 10 km of a Class I Area?	<input type="checkbox"/> Impact on Class I area analysis required Skip to 26	<input type="checkbox"/> Skip to 26
23.	Is the facility within 10 km of a Class I Area and either:  a) an existing major source for PSD for <u>any</u> pollutant (including attainment and non-attainment pollutants), per the PSD major source thresholds (100 or 250 tpy, or 100,000 tpy CO <sub>2e</sub> – all short tons)?  Or  b) a new source that will be a major source for PSD for <u>any</u> pollutant, per the PSD major source thresholds	<input type="checkbox"/>	<input type="checkbox"/> Skip to 29
24.	Has Tech Services determined the project's impact on the Class I area?	<input type="checkbox"/>	<input type="checkbox"/> Incomplete Submit HRA/RMR Request form
25.	Is the impact on the Class I area $\geq 1 \mu\text{g}/\text{m}^3$ for any attainment/unclassified pollutant subject to PSD?	<input type="checkbox"/> Subject to PSD	<input type="checkbox"/> Skip to 29
26.	Has Tech Services indicated that all necessary modeling and impact analysis* files are complete? Project cannot be deemed complete until Tech Services concurs that modeling and analyses are acceptable. Note that modeling and analysis files are not needed for GHG increases.  *Analyses include the project's impacts on visibility, soils and vegetation, and of the impacts in the area resulting from general commercial, residential, industrial and other growth associated with the project	<input type="checkbox"/>	<input type="checkbox"/> Incomplete
27.	Is the source within 100 km of a Class I Area? <i>(See map posted on AirNet)</i>	<input type="checkbox"/> Send notification to Federal Land Managers	<input type="checkbox"/>
28.	If the project triggers a PSD modification for GHG emissions, has the applicant supplied the information needed to perform a PSD BACT analysis?  <b>Not applicable</b> <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Incomplete
<b>Best Available Control Technology (BACT)</b>		<b>Yes</b>	<b>No</b>
29.	Is it obvious (with minimal effort/calculations) that BACT is triggered?	<input type="checkbox"/>	<input type="checkbox"/> Skip to 38
30.	Is there an existing BACT guidance?	<input type="checkbox"/> Attach copy of BACT guidance	<input type="checkbox"/> Skip to 40

31.	Does the proposal meet the most stringent control that is listed as either “technologically feasible” or “achieved in practice”?	<input type="checkbox"/>	<input type="checkbox"/> Skip to 34
32.	Is there a more effective “alternative basic equipment or technology”?	<input type="checkbox"/>	<input type="checkbox"/> Skip to 41
33.	Has the applicant supplied (or does District already possess) up-to-date cost data to determine cost-effectiveness of the alternative?	<input type="checkbox"/> Skip to 41	<input type="checkbox"/> Incomplete
34.	Did the applicant propose “achieved in practice” BACT?	<input type="checkbox"/>	<input type="checkbox"/> Skip to 36
35.	Is the facility a small emitter?	<input type="checkbox"/> Skip to 41	<input type="checkbox"/>
36.	Has the applicant supplied (or does District already possess) up-to-date cost data to determine cost-effectiveness of the technologically feasible options? <i>Check “Yes” if none are listed.</i>	<input type="checkbox"/>	<input type="checkbox"/> Incomplete Need cost data
37.	Has the applicant supplied (or does District already possess) up-to-date cost data to determine cost-effectiveness of the alternative basic equipment or technology? <i>Check “Yes” if none are listed.</i>	<input type="checkbox"/> Skip to 41	<input type="checkbox"/> Incomplete Need cost data. Skip to 41
38.	Is it obvious that BACT is not triggered?	<input type="checkbox"/> Skip to 41	<input type="checkbox"/>
39.	Perform BACT trigger calculations. Is BACT triggered?	<input type="checkbox"/> Back to 30	<input type="checkbox"/> Skip to 41
40.	Has the applicant provided (or does District already possess) all data needed to perform a new and complete BACT analysis? (alternatives, current costs, etc.)	<input type="checkbox"/>	<input type="checkbox"/> Incomplete
<b>Offsets</b>		<b>Yes</b>	<b>No</b>
41.	Is it obvious (with minimal effort/calculations) that offsets are NOT required? Consider the following: <ul style="list-style-type: none"> <li>• <i>Offset exemptions in 2201</i></li> <li>• <i>PE to PE offset calcs for minor sources</i></li> <li>• <i>BE to PE offset calcs for other majors</i></li> <li>• <i>Are units Fully Offset, Highly Utilized and/or Clean?</i></li> </ul>	<input type="checkbox"/> Skip to 44	<input type="checkbox"/>
42.	Is it obvious (with minimal effort/calculations) that offsets are required?	<input type="checkbox"/>	<input type="checkbox"/> Skip to 44
43.	Has the applicant identified a source of offsets, and demonstrated that they have the right to use them? If Yes, check one or more: <input type="checkbox"/> Applicant owns the certificates. <input type="checkbox"/> Submitted legal option to purchase. <input type="checkbox"/> Other: _____	<input type="checkbox"/>	<input type="checkbox"/> Incomplete

Health Risk Assessment		Yes	No
44.	Does the project result in any of the following: <ul style="list-style-type: none"> <li>Any increase in HAPs/TACs for any emissions unit?</li> <li>A change in the location of any emissions unit (such as the transfer of location within a stationary source)?</li> <li>A change in the stack/exhaust parameters (e.g. stack height, stack diameter, exhaust flow rate, etc.)?</li> </ul>	<input type="checkbox"/> HRA Required	<input type="checkbox"/> Skip to 47
45.	Is all of the following information provided (as applicable)? <ul style="list-style-type: none"> <li>Receptor distances</li> <li>Stack temperature</li> <li>Stack velocity</li> <li>MSDS</li> <li>Stack height</li> <li>Other (for area sources)</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/> Incomplete
46.	If this project triggers public noticing, has the applicant provided the fence line distances for the AAQA (from the stack to the fence line in each direction (for non-VOC-only projects))? <b>Not applicable</b> <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Incomplete
Certificate of Conformity (COC)		Yes	No
47.	Does this facility hold a Title V Permit?	<input type="checkbox"/>	<input type="checkbox"/> Skip to 50
48.	Has the applicant requested that the ATC be issued with a COC?	<input type="checkbox"/> Check the "COC" box in the PAS Project Details screen.	<input type="checkbox"/> Explain to facility the permitting advantages of a COC. Skip to 50
49.	Has the applicant included a signed and initialed Title V CC form (TVFORM-009)?	<input type="checkbox"/>	<input type="checkbox"/> Incomplete
Notification Requirements		Yes	No
50.	Is it obvious that notification is required (Rule 2201, Rule 2410, COC, or school)? <ul style="list-style-type: none"> <li><input type="checkbox"/> Rule 2201 (Public Notice)</li> <li><input type="checkbox"/> Rule 2410 (Public Notice)</li> <li><input type="checkbox"/> COC (EPA Notice)</li> <li><input type="checkbox"/> School Notice (If HRA is required, verify if the facility is located within 1,000 ft of a K-12 school using online mapping service and further research, if necessary, and attach.)</li> </ul>	<input type="checkbox"/> Check the associated boxes in the PAS Project Details Screen.	<input type="checkbox"/> Skip to 52
51.	Does the <b>Notifications</b> tab in PAS's Facility Details screen contain any entries for individuals/parties who wish to be notified of public notice actions for this facility?	<input type="checkbox"/> Ensure the final review engineer sends copies of the public notification documents to each individual and/or interested party identified in PAS (see <a href="#">FYI-349</a> ).	<input type="checkbox"/>

Preliminary CEQA Significance Determination		Yes	No
52.	Does this project trigger BACT?	<input type="checkbox"/>	<input type="checkbox"/>
53.	Is the project occurring at an <b>EXISTING</b> facility?	<input type="checkbox"/> <b>This is an EXISTING FACILITY</b>	<input type="checkbox"/> <b>This is a NEW FACILITY</b> Skip to 55
54.	Has the applicant indicated on the ATC Application Form that the proposed equipment or project is allowed by the current CUP, by other Land Use permit, or by Right?	<input type="checkbox"/> District is likely the Lead Agency for CEQA Skip to 57	<input type="checkbox"/> Discuss with your supv & Tec Svcs supv. Skip to 78
55.	Has the applicant completed the CEQA Information form?	<input type="checkbox"/>	<input type="checkbox"/> <b>Incomplete</b> Send CEQA Information form to the applicant. Skip to 62
56.	Is the District the Lead Agency for CEQA purpose?	<input type="checkbox"/>	<input type="checkbox"/> District is a Responsible Agency for CEQA & has NO authority over GHG. Use APR1010 GHG Sig Determination Skip to 62
Preliminary CEQA Significance Determination – <u>GHG Emissions</u>		Yes	No
57.	Is it obvious that the project GHG emission increase $\leq$ 230 metric tons-CO <sub>2</sub> e/year?	<input type="checkbox"/> Project < significant for GHG. Use APR1010 GHG Sig Determination Skip to 62	<input type="checkbox"/>
58.	Is there a District Draft or Approved <b>BPS</b> for this Class and Category of permitted unit?	<input type="checkbox"/>	<input type="checkbox"/> Skip to 60
59.	Has the applicant proposed <b>BPS</b> ?	<input type="checkbox"/> Project < significant for GHG. Use APR1010 GHG Sig Determination Skip to 62	<input type="checkbox"/>
60.	Does the project achieve <b>29% GHG emission reductions</b> compared to Business as Usual (Is there a unit shut down, mitigation, ERCs, etc)?	<input type="checkbox"/> Project < significant for GHG. Use APR1010 GHG Sig Determination Skip to 62	<input type="checkbox"/>
61.	Does the project comply with an <b>approved</b> GHG Plan such as Cap-and-trade, etc.?	<input type="checkbox"/> Project < significant for GHG. Use APR1010 GHG Sig Determination	<input type="checkbox"/> <b>Incomplete</b> Project may have significant GHG. Discuss with your supv & Tec Svcs supv

Preliminary CEQA Significance Determination – <u>Other Criteria</u>		Yes	No
62.	Is it obvious that the project <b>SSIPE</b> would exceed any of the CEQA significance thresholds for Criteria Pollutants? <i>(10 ton-NOx/year, 10 ton-VOC/year, 27.4 tons ton-SOx/year, or 15 ton-PM10/year)</i>	<input type="checkbox"/>	<input type="checkbox"/> Skip to 64
63.	Has the applicant completed the CEQA Information form?	<input type="checkbox"/> Please forward the form to Tec Svcs supv AND Discuss with your supv & Tec Svcs supv. Skip to 78	<input type="checkbox"/> Incomplete Send CEQA Information form to the applicant. Skip to 78
64.	Is the project occurring at an <b>EXISTING</b> facility?	<input type="checkbox"/> District is likely the Lead Agency for CEQA	<input type="checkbox"/> This a <b>NEW FACILITY</b> Skip to 66
65.	Has the applicant completed the CEQA Information form?	<input type="checkbox"/> Skip to 67	<input type="checkbox"/> Skip to 70
66.	Has the applicant completed the CEQA Information form?	<input type="checkbox"/> Please forward the form to Tec Svcs supv	<input type="checkbox"/> Incomplete Send CEQA Info form to the applicant. Skip to 78
67.	Did the applicant answer “YES” to 1 or more question on the CEQA Information form <u>Section 1</u> ?	<input type="checkbox"/> District is likely a Responsible Agency for CEQA	<input type="checkbox"/> District is likely the Lead Agency for CEQA Discuss with your supv & Tec Svcs supv. Skip to 78
68.	Did the applicant answer “YES” to 1 or more question on the CEQA Information form <u>Section 2</u> ?	<input type="checkbox"/> Discuss with your supv & Tec Svcs supv. Skip to 78	<input type="checkbox"/>
69.	Per District’s determination, is this project likely to generate <b>potential public concern</b> or is the facility identified on the District’s list of facilities with <b>potential public concern</b> ( <a href="#">see FYI 141</a> )?	<input type="checkbox"/> Discuss with your Supv & Tec Svcs supv Skip to 78	<input type="checkbox"/> Project < District CEQA signif. Thresholds. Use APR1010 CEQA Findings Skip to 78
70.	Is it obvious that the project would result in an increase in heavy-duty (HD) truck traffic to and from the facility of <b>at least 47</b> new HD truck one-way trips per day? (23 HD truck round trips per day)	<input type="checkbox"/> Incomplete Send CEQA Info form to the applicant	<input type="checkbox"/>
71.	Is it obvious that the project would result in an increase in employment of <b>350 or more, new employees</b> ?	<input type="checkbox"/> Incomplete Send CEQA Info form to the applicant	<input type="checkbox"/>
72.	Is it obvious that the project would result in an increase of <b>water demand</b> at the facility of more than 5,000,000 gallons per day?	<input type="checkbox"/> Incomplete Send CEQA Info form to the applicant	<input type="checkbox"/>
73.	Is it obvious that the project would result in noticeable off-site <b>nuisance odors</b> ?	<input type="checkbox"/> Incomplete Send CEQA Info form to the applicant	<input type="checkbox"/>

74.	Is it obvious that the project would include any demolition, excavation, and/or grading/ <b>construction activities</b> <u>outside</u> the perimeter of the existing facility?	<input type="checkbox"/> Incomplete Send CEQA Info form to the applicant	<input type="checkbox"/>
75.	Is this project part of a <b>larger development</b> activity at the facility that collectively would result in answering "YES" to any of the CEQA Significance Determination questions (62 or 70 to 74) listed above?	<input type="checkbox"/> Incomplete Send CEQA Info form to the applicant	<input type="checkbox"/>
76.	Has this facility or this project generated any <b>known public concern</b> ? <i>Public concern may be interpreted as concerns by local groups at public meetings, adverse media attention such as negative newspaper or other periodical publications, local news programs, environmental justice issues, etc.</i>	<input type="checkbox"/> Incomplete Send CEQA Info form to the applicant	<input type="checkbox"/>
77.	Per the District's Determination, is this project likely to generate <b>potential public concern</b> , or is the facility identified on the District's list of facilities with <b>potential public concern</b> ( <a href="#">see FYI 141</a> )?	<input type="checkbox"/> Discuss with your supv & Tec Svcs supv	<input type="checkbox"/> Project < District CEQA signif. Thresholds Use APR1010 CEQA Findings
Direct Convert		Yes	No
78.	Does this project qualify for Direct Convert (pursuant to <a href="#">FYI 313</a> )?	<input type="checkbox"/> Advise Supervisor to Check Direct Convert Box in PAS	<input type="checkbox"/>
Reimbursable Overtime			
79.	Has the applicant requested reimbursable overtime processing?	<input type="checkbox"/> Send HRA request to Tech Svcs <b>before</b> deeming complete.	<input type="checkbox"/> Skip to 81
80.	Has the applicant provided a weekend contact or phone number, etc.?	<input type="checkbox"/>	<input type="checkbox"/> Incomplete
Filing Fees		Yes	No
81.	Have all the filing fees been paid?	<input type="checkbox"/>	<input type="checkbox"/> Incomplete unless RO
Compliance Notification		Yes	No
82.	Was the ATC application submitted as the result of a Notice of Violation/Notice to Comply? (Check Item 12 of the Permit Application Form and/or the Project Screen in PAS)	<input type="checkbox"/>	<input type="checkbox"/>
<p>If Yes,</p> <ul style="list-style-type: none"> <li>• Send an email to the regional Compliance Manager and Supervisor(s) notifying them when the project is deemed complete with the following format: <ul style="list-style-type: none"> <li>○ Subject Line: <b>NOV number, Facility ID, Facility Name</b></li> <li>○ Body: "Project C-1153XXX was deemed complete on {Completeness Date}"</li> </ul> </li> </ul>			
Completeness Determination			
<p>If the application is incomplete by any of the questions in this preliminary review form, the missing information must be obtained. If the information is too comprehensive to obtain by phone or email, or if attempts to gather the information have been unsuccessful as of your due-date, then deem the application incomplete and send an incompleteness letter detailing the missing information and/or fees. OTHERWISE, deem the application complete.</p>			



Comments and References