

APPENDIX

Example Application of Streamlining Process 4/11/96

1. Particulate Emissions from Wood Waste Boilers

Step One: determine which requirements to streamline

NSPS subpart Db for Industrial, Commercial & Institutional Boilers
District NSR permit
PSD permit issued by U.S. EPA

Step Two: determining most stringent emission limit

NSPS:	0.1 lb/mmBtu PM
NSR permit:	0.012 gr/dscf @ 12 CO ₂ for solid PM 0.015 gr/dscf @ 12 CO ₂ for solid and condensable PM
PSD permit:	7.25 lbs/hr or 0.015 gr/dscf @ 12 CO ₂ for PM10

Discussion: In determining the most stringent emission limit, the following needs to be considered: U.S. EPA test method vs. ARB test method; PM vs. PM10; and difference in units between emission standards. Based upon these considerations, we can show that by satisfying the NSR permit limit, the other limits are also satisfied.

Step Three: evaluate work practice requirements

NSPS:	None
NSR permit:	Good maintenance of equipment
PSD permit:	Good maintenance of equipment

Discussion: The streamline work practice requirement will be the work practice associated with the most stringent emission limit. The other work practice requirements are considered subsumed.

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Step Three: evaluate work practice requirements

Rule 216	Work practice requirements that affect the operation of the degreaser, such as covering the degreaser when not in use
NSR permit	Work practice requirement that supports the emission limit of Rule 219

Discussion: Because the work practice requirements from the two regulations are dissimilar, they cannot be streamlined. Streamlining did not reduce the number of work practice requirements.

Step Four: evaluate monitoring requirements

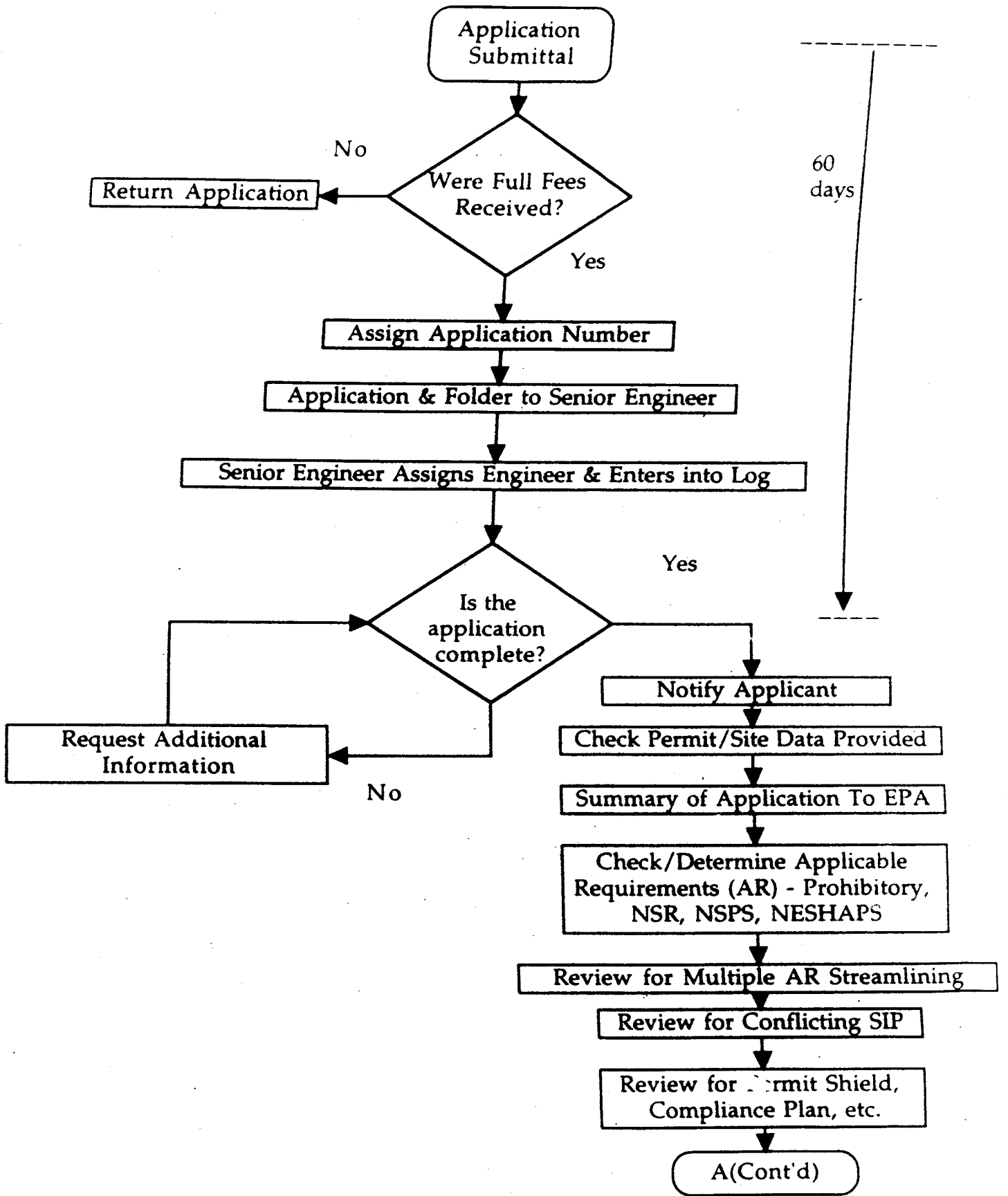
See next step since all monitoring requirements are based upon recordkeeping requirements

Step Five: evaluate recordkeeping/reporting

Rule 216	None, but refers to Rule 410
Rule 219	Based on daily recordkeeping of solvent usage
Rule 410	General recordkeeping requirements
NSR permit	Based on daily recordkeeping of solvent usage

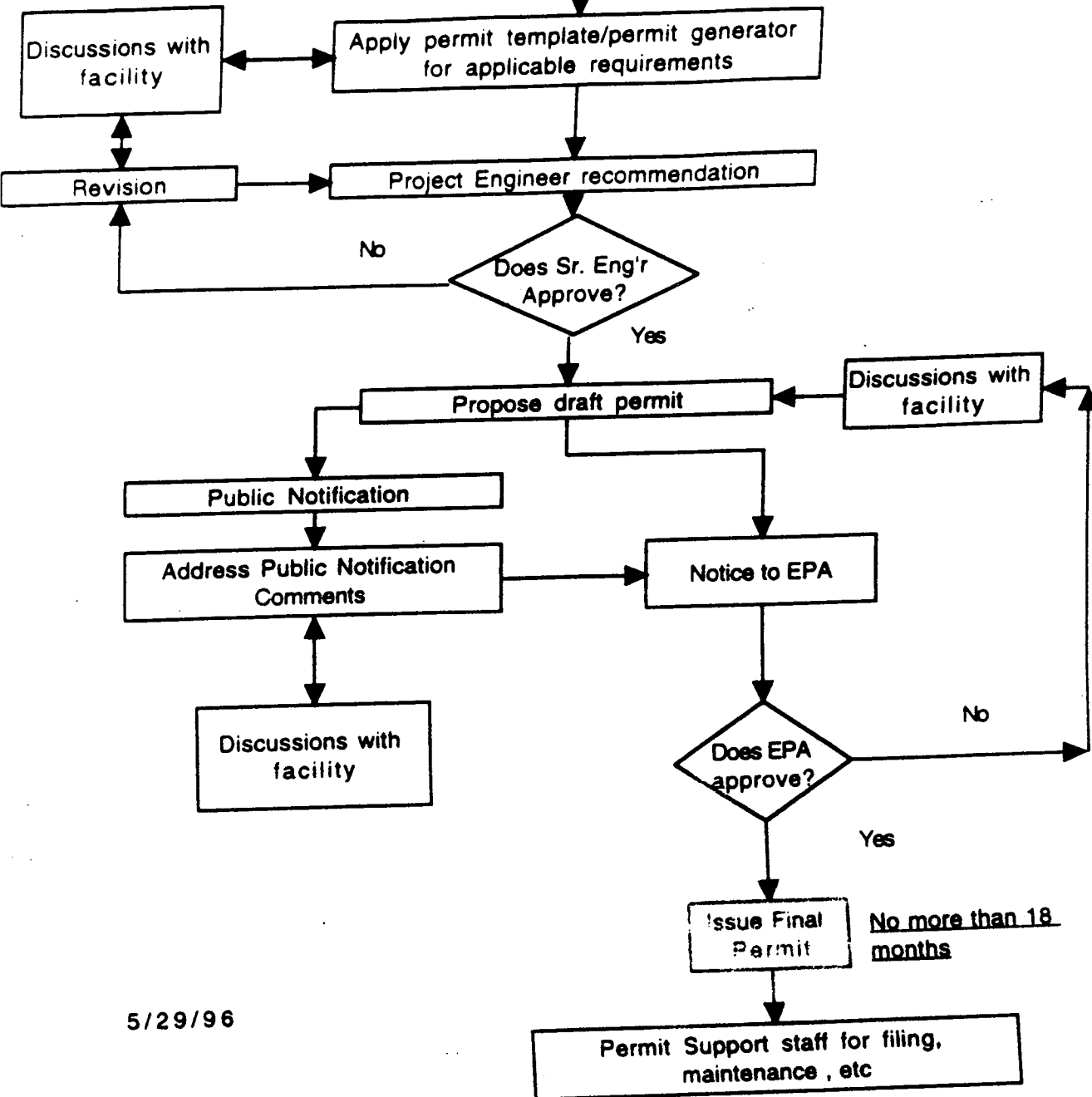
Discussion: Because the recordkeeping is the basis of monitoring, the recordkeeping associated with the most stringent emission limit should be used. The recordkeeping requirements associated with Rule 219 will be the streamline recordkeeping requirement. Again, the MACT recordkeeping requirements would also apply.

Title V Application Process

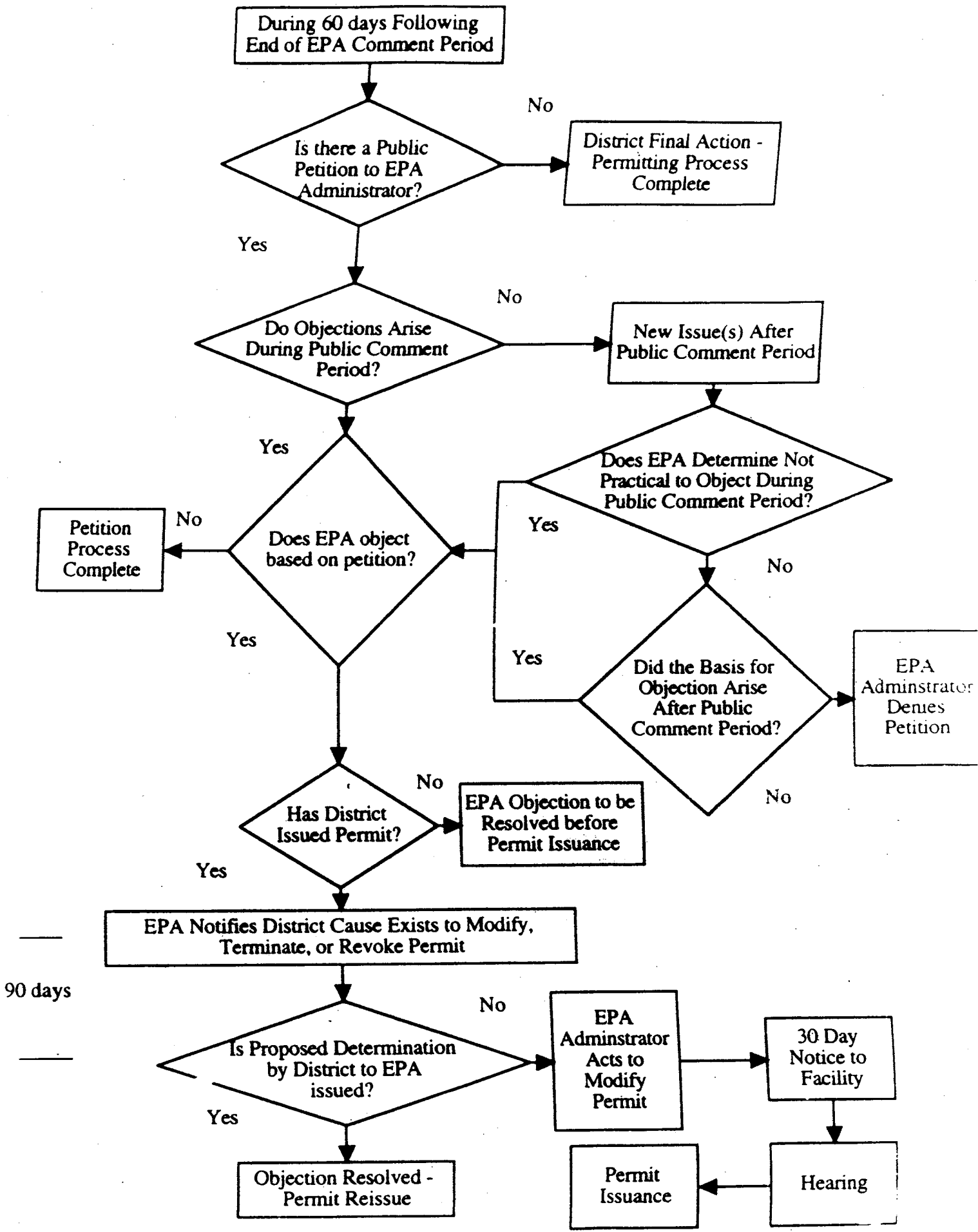


Title V Application Process (cont'd)

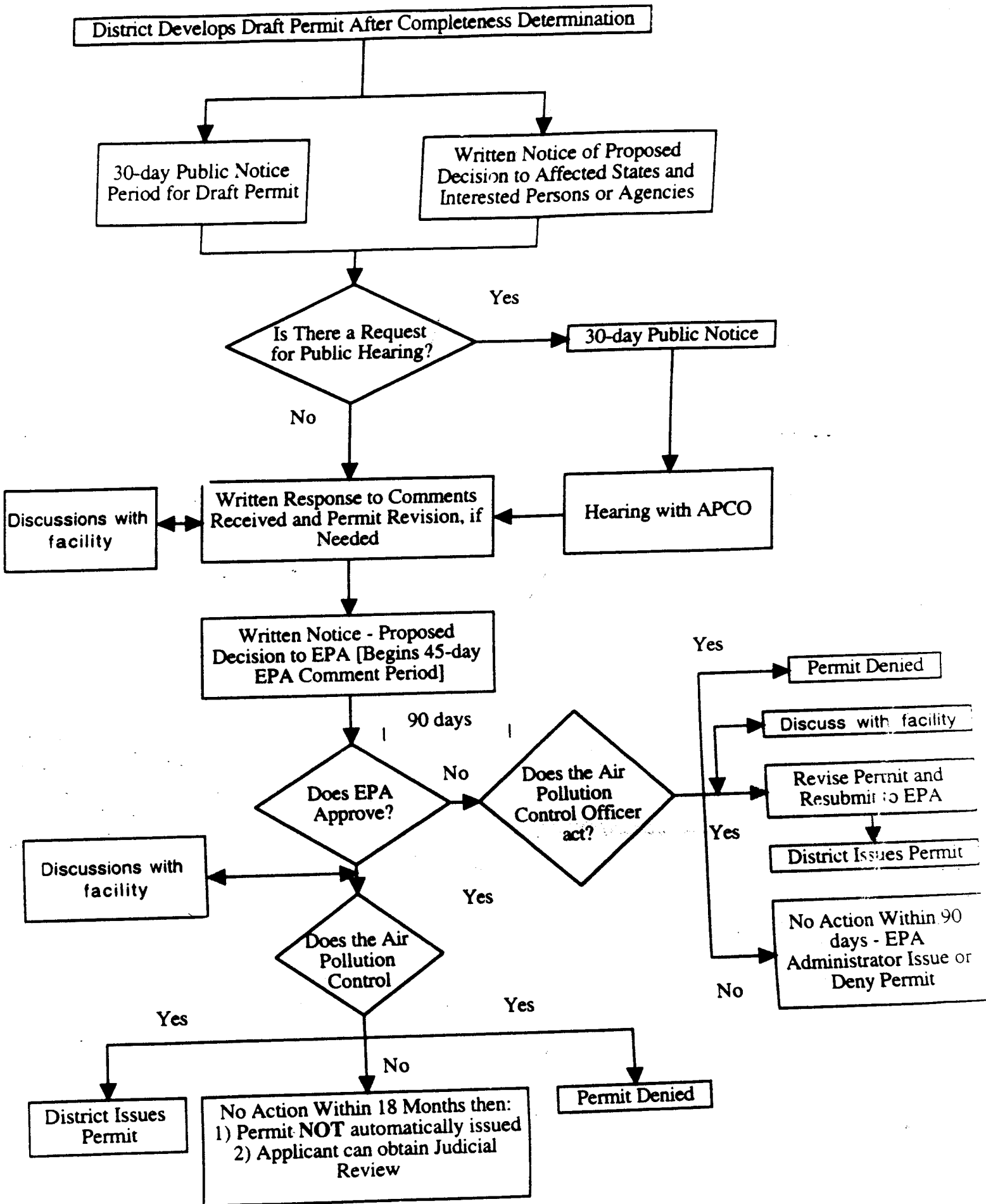
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5/29/96



90 days



EXAMPLES OF ALTERNATIVE OPERATING SCENARIOS

Alternative Operating Scenario: Backup Fuel

Description of Operating Mode: A company plans to use residual oil as a backup fuel to the main fuel.

Applicable Requirements Triggered/Avoided: A review of the facility's operating modes indicates that additional NSPS requirements are triggered because of the changes in operating modes.

Comments: Because new applicable requirements are triggered, an alternative operating scenario needs to be developed for each operating scenario. A main operating mode will be defined that will be based upon the operating mode that results in the most emissions. The application should clearly identify the variability in the facility's operation.

Alternative Operating Scenario: Operating Modes Which do not Trigger Additional Applicable Requirements

Description of Operating Mode: A chemical plant has several operating modes which depend upon the product that needs to be produced. Several products are produced throughout the year. Additionally, the raw material used will depend upon which product is produced.

Applicable Requirements Triggered/Avoided: A review of the facility's operating modes indicates that no additional applicable requirements are triggered solely because of the changes in operating modes.

Comments: Because no new applicable requirement is triggered, an alternative operating scenario need not be developed for each operating scenario. A main operating mode will be defined that will be based upon the operating mode that results in the most emissions. The application should clearly identify the variability in the facility's operation.

Alternative Operating Scenario: Avoiding Permit Revision Caused by Implementing Controls to Avoid MACT Requirements

Description of Operating Mode: A company operates a bulk gasoline terminal using external floating roof storage tanks with primary seals. A final MACT standard applies to the facility. The company is proposing to add control equipment to avoid the MACT standard and to submit an alternative operating scenario which will represent the future operation of the facility with the new control equipment.

Applicable Requirements Triggered/Avoided: A final MACT standard applies to the facility. The MACT standard can be avoided if the owner/operator can document that the emissions screening factor for the facility is less than one. The equation, as identified in the MACT standard, used to determine the screening factor assigns values depending on the seals used. The values for tanks with both primary and secondary seals is approximately half that of tanks with only primary seals. The company can avoid the MACT standard by adding secondary seals to the storage tanks.

Comments: The company will add seals to the tanks to avoid the MACT standard. However, at the time the Title V application is due, the company is unsure if the A/C authorizing the modification will be issued prior to the issuance of the Title V permit. Therefore, to avoid a permit during the permit term, the company will propose in its application an alternative operating scenario which will be based upon the tanks being equipped with primary and secondary seals. The main mode of operation will reflect the tanks being equipped with primary and secondary seals. The main mode of operation will reflect the tanks being equipped with primary seals only and the company will change over to the alternative operating scenario upon implementation of the A/C.

Alternative Operating Scenario: Limiting Applicability of a MACT Standard

Description of Operating Mode: A company currently uses halogenated solvents to clean a variety of airplane and other parts in degreasers. Because of the future applicability of the MACT standard for halogenated solvent cleaners, the company intends to switch to citrus-based cleaners and use halogenated solvents only when necessary.

Applicable Requirements Triggered/Avoided: The MACT standard for halogenated solvent cleaners only applies to certain halogenated solvents. Hence, to avoid the MACT standard, sources should use solvents not regulated by the standard. The company would like to avoid MACT requirements for typical operation by using citrus-based cleaners while reserving the ability to use halogenated solvents as the workload requires.

Comments: The main operating scenario will reflect the citrus-based cleaners that are not affected by the MACT standard. The alternative operating scenario will reflect the use of a solvent regulated by the MACT standard. The application and permit will need to address the additional MACT requirements triggered when halogenated solvents are used, including additional emission limits, monitoring, and recordkeeping/reporting requirements.