

San Joaquin Valley Unified Air Pollution Control District

Multiple Location Permit Policy

Approved By: _____ Signed _____ Date Revised: 8/28/2001
Seyed Sadredin
Director of Permit Services

Purpose: To detail the procedures for issuing Authorities to Construct for emission units which will be periodically relocated from one stationary source to another under the same ownership.

I. Applicability

This policy applies to two types of applications:

- a. Those which are proposing more than one distinct and specified location, and
- b. Those which are proposing to operate at various unspecified locations.

Since applications are not required for relocating equipment already granted multiple-location permits, this revised policy has no effect until such time that an application to modify the permit is submitted.

II. Discussion

Since 1993, the District has had a multiple location permitting policy that provides for issuance of a single permit for units operating at multiple locations. This policy is merely a streamlining measure and does not extend any special treatment to emissions units for compliance with NSR or prohibitory rules. ***The primary guiding principle is that the permitting action must ensure that the outcome and requirements would be the same had the applicant applied for several permits, one for each location, simultaneously.***

The August 20, 1998 version of the NSR rule that took effect on August 20, 2001 expanded BACT applicability to require BACT for units relocating from one

stationary source to another. Therefore, from this point on, the addition of any new location to a permit would trigger BACT if the unit's potential emissions exceed 2 pounds per day.

This revised policy addresses the latest changes to the NSR and clarifies other issues raised in implementing the existing policy.

III. BACT Requirements

- a. Unless a specific exemption applies, BACT must be required for all units triggering BACT under Rule 2201.
- b. Unless a specific exemption applies, BACT will be triggered when a new or additional location is added to an existing permit. Changing an existing permit with specific locations to a permit allowing operation at various unspecified locations is synonymous with adding a location to an existing permit.
- c. When site-specific limitations are used as the basis for rejecting the most stringent control option as BACT due to cost or technological feasibility, the permit must only be issued for specific locations sharing the limitation. The permit must not be issued for various unspecified locations.

IV. Offset Requirements

- a. Offsets require site-specific analysis. Therefore, permits with various unspecified locations can only be issued for units that are exempt from offsets or have emissions below offset trigger levels. Since facilitywide emissions can trigger offset requirements, an emissions unit with various unspecified locations must be prevented (by permit condition – see section V.b) from becoming part of another stationary source.
- b. For units triggering offset requirements, multiple location permits identifying specific locations can be issued provided that offset requirements are satisfied at each specific location. This does not mean that separate offsets should be provided at each location, rather, the quantity of offset must be sufficient to satisfy requirements (i.e., distance ratios) for each location.

V. Units Moving to Existing Stationary Sources

- a. An emissions unit with multiple location permits becomes part of a stationary source if all of the following conditions are met:

1. the unit is under same or common control, ownership, or operation, or is owned or operated by entities that are under common control as the rest of the stationary source; and
 2. the unit belongs to the same industrial grouping by virtue of falling within the same two-digit standard industrial classification code or by virtue of being part of a common industrial process, manufacturing process, or connected process involving a common raw material.
- b. Certain requirements such as offsets and Title V applicability require site-specific analysis. Therefore, multiple location permits which are not limited to specific locations must contain the following condition preventing the unit from becoming a part of another stationary source.

“This unit must not be located and operated at an existing facility or operation such that it becomes part of an existing stationary source as defined by District Rule 2201.” [District Rule 2201]

Applicants desiring to operate as a part of another stationary sources must specify such locations and demonstrate compliance with all applicable requirements at each specified location.

VI. Risk Management Review

For permits that do not contain specific locations, risk assessment must be based on worst case maximum impact. If worst case risk is significant, then permit conditions must be added to ensure that a less-than-significant health risk will result at each authorized location by specifying a minimum receptor distance and maximum period of operation.

For permits identifying specific locations, a separate risk management review in accordance with District policies must be conducted for each location.

VII. School Notification

For compliance with Health and Safety Code Section 42301.6, the equipment must be prohibited from being located at any site within 1000 feet of a school unless adequate noticing for the specific site was conducted at the time of permitting. Relocation to a different site within 1000 feet of a school will require a separate permitting action.

VIII. Engineering Evaluation

The engineering evaluation (EE) for multiple-site permits does not differ significantly from an EE performed for stationary sources. The compliance section is used to establish that compliance with District Rules and Regulations is expected at any site allowed by the permit. The issues discussed above must be addressed in each engineering evaluation.

In addition to the typical items covered in any EE, the review must consider and address items that may vary with a change in locations. For instance, an aggregate processing plant may handle material with varying moisture and silt contents at varying locations and the availability of water and electricity may differ at each site. Conditions must be included in the permit to ensure compliance at each location.

IX. Permit Terms and Permit Conditions

Consistent with the above guidance, the location specified on the permit should be "VARIOUS LOCATIONS, SJVUAPCD" unless specified locations are proposed by the applicant in which case conditions should be included which define the locations, such as:

"Approved locations for this equipment: 1234 Park Place, Fresno; 5678 Fifth Ave., Modesto; 9012 Broadway Blvd., Bakersfield." [District Rule 2201]

Other permit conditions required for multiple location permits, include:

- a. Unit shall not be located within 1000 feet of any K-12 school. [CH&SC 42301.6]
- b. Permittee shall notify the District Compliance Division to arrange a start-up inspection at the initial location of the unit. [District Rule 1070]
- c. Permittee shall notify the District Compliance Division of each location at which the unit is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070]

Also add other conditions when necessary as discussed above.

X. Director Review

Because equipment such as this may be operating in all regions of the Valley, each multiple-location permit must be reviewed by the Director of Permit Services after the issuing region has approved the draft documents. Once issued, an e-mail announcing the multiple-location permit must be sent by the issuing region to each Regional Permit Services Manager.