

Air Pollution Control District County of San Diego

NESHAP ZZZZ Training Workshop January 30, 2013

(Slides Updated February 21, 2013)



NESHAP ZZZZ Training Workshop

SDAPCD Workshop

- Permit Modifications
- Source Testing
- Compliance Information

ARB Training Course

- Overview of NESHAP ZZZZ Requirements
- Overview of NSPS III & NSPS JJJ Requirements
- Classroom Exercises

NESHAP ZZZZ Requirements

Stationary engines are subject to NESHAP ZZZZ requirements such as:

- Emission Limits
- Source Testing
- Continuous Monitoring
- Maintenance Schedule
- Operating Limits
- Notification and Reporting
- Recordkeeping

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Permit Modification

- Permit modification application required for:
 - Non-emergency (prime) stationary diesel engine greater than 300 hp.
 - Non-emergency (prime) stationary 4-stroke lean burn engine greater than 500 hp.
 - Non-emergency (prime) stationary 4-stroke rich burn engine greater than 500 hp.
 - Non-emergency (prime) stationary engine that commenced construction after 4/12/2006.
- No permit modification application required for:
 - Emergency stationary engines, any portable engines, landfill gas or digester gas engines, and prime engines not listed above.

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Permit Modification

- Submit permit modification application and applicable fees on or before April 22, 2013.
- Obtain Authority to Construct (ATC) for control equipment, if any.
- Install control equipment, if any.
- Schedule source test with SDAPCD.
- Revised permit issued.

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Application Forms (non-emergency engines):

- Permit/Registration Application (Form APCD 116)
- Supplemental Information (Fee Schedule 34A–J)
 - Fully describe how you intend on complying with the RICE NESHAP emissions and/or monitoring requirements.

Application Fee (non-emergency engines):

- \$2,132 if you are District fee schedule 34A, 34B, 34D; or
- \$1,988 if you are District fee schedule 34G, 34W; and
- \$3,202 source test fee (CO emission limit test).

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| Business Name | Permit ID | RICE NESHAP Cat. | # Engines | HP | Fee Code | Source Test Fee | Permit Mod. Fee |
|---------------|-----------|------------------|-----------|-----|----------|-----------------|-----------------|
| ABC | PTO-000 | 4SRB | 1 | 854 | 34A | \$3,202 | \$2,132 |
| LMN | PTO-555 | CI | 2 | 854 | 34D | \$3,202 | \$2,132 |

Example 1: ABC

- Currently performs annual source test for CO emission limit.
- Must install CPMS to monitor catalyst inlet temperature.
- Fees = \$0 (source test) + \$ 2,132 (permit mod.) = \$2,132

Example 2: LMN (two engines)

- Must install controls, CPMS, and perform source test for CO.
- Fees = [\$3,202 (source test) + \$2,132 (permit mod.)] x 2 (# engines)
= \$10,668

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Source Test

- SDAPCD must perform or be present at all source tests to certify results
 - Schedule 60 days in advance of source test.
- SDAPCD will source test for all applicable limits.

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Compliance Information

- A Compliance Advisory will be issued for the permit modification application deadline of April 22, 2013.
- A Compliance Advisory will be distributed prior to enforcement of all NESHAP ZZZZ standards.

Useful Links

EPA NESHAP ZZZZ Implementation Web Site:

<http://www.epa.gov/ttn/atw/rice/ricepg.html>

EPA Region I NESHAP ZZZZ Web Site:

<http://www.epa.gov/region1/rice/>

San Diego APCD RICE NESHAP Implementation Information:

http://www.sdapcd.org/homepage/public_part/neshap/rice_neshap.pdf

Contact Information

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