

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

**STAFF REPORT**

**Rule 202, NEW SOURCE REVIEW  
Rule 214, FEDERAL NEW SOURCE REVIEW  
Rule 217, PUBLIC NOTICE REQUIREMENTS FOR PERMITS**

**July 23, 2012**

**Prepared by:** Marc Cooley  
Associate Air Quality Engineer

**Reviewed by:** Kevin J. Williams, Ph.D.  
Program Coordinator

Aleta Kennard  
Program Supervisor

**Approved by:** Brigette Tollstrup  
Division Manager

## **BACKGROUND**

The District is currently designated as a nonattainment area for both state and federal ozone, PM10<sup>1</sup> and PM2.5<sup>2</sup> standards. A strategy to control air pollution is to reduce emissions from new and modified stationary sources through a New Source Review (NSR) program. The federal Clean Air Act (CAA) and its associated regulations contain requirements for the District to adopt and implement a State Implementation Plan (SIP)-approved NSR program for minor stationary sources and major stationary sources and major modifications. Similarly, the California Clean Air Act sets requirement to offset the impact of new sources. Under the California Health and Safety Code (HSC) and California Code of Regulations, the District is required to establish a no net increase program for emissions of nonattainment pollutants from all new or modified stationary sources which emit, or have the potential to emit, 10 tons or more per year.

Rule 202, NEW SOURCE REVIEW, was first adopted on September 20, 1976 and was last amended on October 28, 2010. Rule 202 applies to both minor and major sources. Until recently, the version of Rule 202 as amended on November 20, 1984, was the District's SIP-approved NSR rule. The 1984 version contained requirements mandated by the CAA for both NSR and Prevention of Significant Deterioration (PSD) programs.

In October 2010, the District adopted new Rule 214, FEDERAL NEW SOURCE REVIEW, which contains the NSR requirements for federal major sources. In January 2011, the District adopted amendments to Rule 203, PREVENTION OF SIGNIFICANT DETERIORATION. Both of these actions were necessary to meet deadlines established by the U.S. Environmental Protection Agency (EPA) for the District to submit rules for approval by EPA that are consistent with the current federal regulations for NSR and PSD. EPA took action to approve the SIP submittals, and effective August 19, 2011, Rules 214 and 203 replaced the 1984 version of Rule 202 in the SIP.

EPA's action on Rule 214 was a limited approval and a limited disapproval. EPA identified deficiencies in Rule 214 that prevent full approval. The limited disapproval does not prevent the District from implementing the rules as adopted. However, the limited disapproval started a sanctions clock. The sanctions clock requires the District to correct the rule deficiencies and obtain full SIP approval of the rule within 18 months (by February 19, 2013); otherwise, EPA is required to promulgate a Federal Implementation Plan (FIP) within 24 months (by August 19, 2013).

Staff proposes to stop the sanctions clock by amending Rule 214 to correct the deficiencies identified in EPA's evaluation. Staff is also proposing new Rule 217, PUBLIC NOTICE REQUIREMENTS FOR PERMITS, to make federally enforceable the public noticing requirements for new source review of minor sources, remedying a deficiency identified in EPA's evaluation of Rule 214. Finally, Staff is proposing similar amendments to Rule 202 to preserve consistency and numbering with Rule 214.

---

<sup>1</sup> Particulate matter with an aerodynamic diameter of 10 microns or less, 40 Code of Federal Regulations (CFR) 50.6.

<sup>2</sup> Particulate matter with an aerodynamic diameter of 2.5 microns or less, 40 CFR 50.7.

## HEALTH IMPACTS

Ground level ozone is a secondary pollutant formed from photochemical reactions of NO<sub>x</sub> and volatile organic compounds (VOCs) in the presence of sunlight. Ozone is a strong irritant that adversely affects human health and damages crops and other environmental resources. As documented by the U.S. Environmental Protection Agency (EPA) in the most recent Criteria Document for ozone (U.S. EPA 2006), both short-term and long-term exposure to ozone can irritate and damage the human respiratory system, resulting in:

- decreased lung function;
- development and aggravation of asthma;
- increased risk of cardiovascular problems such as heart attacks and strokes;
- increased hospitalizations and emergency room visits; and
- premature deaths.

According to the U.S. EPA, health studies have linked exposure to particulate matter, especially fine particles, to several significant health problems, including:

- increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing;
- decreased lung function;
- aggravated asthma;
- development of chronic bronchitis;
- irregular heartbeat;
- nonfatal heart attacks; and
- premature death in people with heart or lung disease.

Exposure to PM pollution can cause coughing, wheezing, and decreased lung function even in otherwise healthy children and adults. EPA estimates that thousands of elderly people die prematurely each year from exposure to fine particles. In addition, a recent study (Dominici et. al, 2006) of the correlation between PM<sub>2.5</sub> concentrations and hospital admission rates concluded that short-term exposure to PM<sub>2.5</sub> increases the risk of hospitalization for cardiovascular and respiratory diseases.

---

## LEGAL MANDATES

### Federal Mandates

Federal Clean Air Act requirements (general): The Clean Air Act<sup>3</sup> requires state implementation plans to include provisions to "...require permits for the construction and operation of new or modified major stationary sources anywhere in the nonattainment area<sup>4</sup>..." Sacramento County is nonattainment for federal ozone, PM<sub>10</sub>, and PM<sub>2.5</sub> standards.

---

<sup>3</sup> Including CAA Sections 110(a)(2)(C), 172(c)(5), 173, and 182(d)(2), codified at 42 USC 7410(a)(2)(C), 7502(c)(5), 7503, and 7511a(d)(2) respectively.

<sup>4</sup> 42 USC 7502(c)(5).

In addition to the provisions for major stationary sources, the Clean Air Act contains pre-construction requirements for minor sources. The minor source pre-construction requirements include public notice, public comment period, and a demonstration that a minor source will not contribute to a violation of any national standard or area control strategy for attainment<sup>5</sup>.

NSR Ozone Reclassification Requirements: The District's reclassification from "serious" to "severe-15" for the 1997 8-hour ozone standard was effective June 4, 2010<sup>6</sup>. EPA established deadline of June 4, 2011 for submittal of revisions to the SIP to meet the NSR requirements of a "severe-15" area. The District met this deadline with the submittal of Rule 214 (as adopted October 28, 2010), on December 7, 2010. Rule 214 satisfies the NSR requirements for a severe-15 ozone area.

EPA Comments and Approvability Issues: On August 19, 2011, EPA's rule for the limited approval and limited disapproval of Rule 214<sup>7</sup> became effective. EPA identified the deficiencies that resulted in the limited disapproval in a Technical Support Document<sup>8</sup> (TSD). The TSD examined the SIP-approvability of Rule 214. The changes to Rule 214 and new Rule 217 correct all the issues identified by EPA in the TSD. The deficiencies EPA identified are as follows:

- Missing definitions for the following terms: begin actual construction, federally enforceable, and necessary preconstruction approvals or permits;
- Missing public noticing requirements<sup>9</sup> for minor sources;
- Missing requirement<sup>10</sup> for sources or modifications that become major due to a relaxation of a federally enforceable limitation are subject to new source review "as though construction had not yet commenced";
- Missing requirements for NSR sources that may have an impact on visibility in any mandatory Class I Federal Area<sup>11</sup>; and
- A cross reference to Rule 207, TITLE V FEDERAL OPERATING PERMIT PROGRAM, must be removed because Rule 207 is not SIP approved nor has it been submitted for SIP approval.

EPA Sanction Clock: The August 19, 2011 effective date of EPA's final limited disapproval started a sanctions clock<sup>12</sup> triggering penalties unless EPA approves subsequent SIP revisions that correct the identified rule deficiencies within 18 months of the effective date (by February 19, 2013). An emission offset sanction, increasing the emission offset ratio to 2:1, will occur

---

<sup>5</sup> 40 CFR § 51.160 – 51.164.

<sup>6</sup> "Designations of Areas for Air Quality Planning Purposes; California; San Joaquin Valley, South Coast Air Basin, Coachella Valley, and Sacramento Metro 8-Hour Ozone Nonattainment Areas; Reclassification", Federal Register 75:86 (May 5, 2010) p. 24409.

<sup>7</sup> "Revisions to the California State Implementation Plan, Sacramento Metropolitan Air Quality Management District", Federal Register 76:97 (May 19, 2011) p. 28942.

<sup>8</sup> U.S. Environmental Protection Agency Region IX, Air Division. *Technical Support Document for EPA's Notice of Proposed Rulemaking for the California State Implementation Plan, Sacramento Metropolitan Air Quality Management District*. By Laura Yannayon. May 6, 2011.

<sup>9</sup> 40 CFR § 51.160 – 51.164.

<sup>10</sup> 40 CFR § 51.165(a)(5)(ii).

<sup>11</sup> 40 CFR § 51.307(b).

<sup>12</sup> Under authority of CAA sections 110(k)(3), codified at 42 USC 7410(k)(3), and 40 CFR 52.31.

first. The second sanction, a highway fund sanction, is applied 24 months after the effective date (August 19, 2013). Sacramento County would lose funding for transportation projects if the funds have not been obligated by the Federal Highway Administration by the date the highway sanctions are imposed. Projects that have already received approval to proceed and had funds obligated may proceed. In addition, EPA must promulgate a FIP unless the SIP revisions are approved by August 19, 2013.

## State Mandates

Chapter 4.5 Protect California Air Act 2003 / SB 288 Requirements: On December 21, 2002, the U.S. EPA promulgated regulations that substantially weakened the basic federal new source review program<sup>13</sup>. In an effort to minimize the impact of this regulation, the state legislature passed Senate Bill (SB) 288, the Protect California Air Act of 2003<sup>14</sup>. SB 288 is intended to minimize the impact of the relaxation of the federal new source review program on air quality in California.

SB 288 requires that a district's NSR program cannot be relaxed from the NSR rule that had been adopted by the district governing board on or prior to December 30, 2002, and that had been submitted to the EPA by the state board for inclusion into the SIP<sup>15</sup>. California Air Resources Board website<sup>16</sup> indicates that the February 26, 1991 version of Rule 202 is the District's NSR baseline rule for SB 288. The requirements of SB 288<sup>17</sup> prevent the District from amending Rule 202 to be less stringent than the baseline rule. Amendments or revisions cannot exempt, relax or reduce the obligations of a stationary source for any of the requirements listed below:

- Applicability determination for NSR
- Definition of modification, major modification, routine maintenance, or replacement
- Calculation methodology, thresholds or other procedures of NSR
- Any definitions or requirements of the NSR regulations
- Any requirements to obtain NSR or other Permits to construct
- Any requirements for BACT, Air Quality Impact Analysis, recordkeeping or public participation
- Any requirements for regulating any air pollutant covered by the NSR rules and regulations

The purpose of these amendments is to address EPA comments on rule approvability. As part of the amendments, the noticing procedures of Rule 202 will be moved to Rule 217 as part of the District's New Source Review program. Moving the noticing procedures to a new rule under the District's New Source Review program is not a relaxation. The proposed amendments to the public noticing procedures are consistent with the existing requirements and the 1991 version of Rule 202. Additional public noticing requirements are proposed for the protection of Class I Areas that are needed to obtain EPA approval. The procedures to protect Class I areas

---

<sup>13</sup> 67 FR 80186, Dec. 31, 2002.

<sup>14</sup> HSC §42500 et seq.

<sup>15</sup> HSC §42505.

<sup>16</sup> California Air Resources Board, District NSR Rules as they existed on December 31, 2002, last accessed April 13, 2012, <http://www.arb.ca.gov/nsr/sb288/rules/rules.htm#24>.

<sup>17</sup> HSC §42504.

(including public noticing and an applicant provided analysis), and the minor source noticing procedures are not contained in the SB288 baseline rule. In addition, to streamline the final notification procedures, the written notification to the applicant, the California Air Resources Board (ARB), and EPA is maintained. The written publication of the final action will be placed onto the District's website.

As part of the proposed amendments to Rules 202 and 214, several definitions are proposed needed to meet federal requirements. These terms are already in use in the current rule but EPA is requiring the terms to be defined. None of these definitions were in the 1991 version of Rule 202. Adding these definitions does not make the proposed rule amendments less stringent than the 1991 version of Rule 202.

The following chart summarizes and compares the SB288 baseline rule (the 1991 Rule 202 version) with the proposed rules and discusses why the proposed amendments do not violate SB288:

<b>Requirement</b>	<b>SB288 Baseline Rule (1991)</b>	<b>Proposed Rules and Discussion</b>
Additional definitions	Definitions were not contained in the 1991 rule.	None of the definitions were in the 1991 rule and all pertain to the definition of major source. The 1991 rule referred to "EPA definition" for major source (see Section 103). The definitions for these terms were not changed by the NSR Reform efforts by EPA in 2002. Definitions included match the pre 2002 versions and are consistent with 40 CFR Section 51.165.
Minor source noticing	Noticing was required unless emissions were less than 100 pounds per day (lbs/day) nitrogen oxides (NOx), sulfur oxides (SOx), and volatile organic compounds (VOC); 80 lbs/day particulate matter of 10 microns or less (PM10); and 550 lbs/day carbon monoxide (CO).	The proposed Rule 217 has quarterly exemption thresholds rather than daily exemption thresholds used in the 1991 rule. Assuming 92 days per quarter, the 1991 exemption thresholds would be less than 9,200 lbs/qtr NOx, SOx, and VOC; 7,360 lbs/qtr PM10; and 50,600 lbs/qtr CO.  The proposed Rule 217 has exemption thresholds of less than 5,000 lbs/qtr NOx and VOC; 9,200 lbs/qtr SOx; 7,300 lbs/qtr PM10; and 49,500 lbs/qtr CO. These thresholds are at least as stringent as the 1991 version of Rule 202. In addition, any source that is required to provide offsets must also provide a public notification.
Final action notification	Publication in a newspaper of general circulation was required for both the preliminary decision and	The proposed Rule 217 will maintain public inspection procedures and final action notification in writing to same

Requirement	SB288 Baseline Rule (1991)	Proposed Rules and Discussion
	final decision in the 1991 rule. All supporting documents were required to be available for public inspection and provided to ARB, EPA, and to any party that requests such information.	parties as the 1991 required. The publication of final action will be published on the District's website. Notification on the District's website has been considered an equivalent alternative <sup>18</sup> when maintaining newspaper publication for the preliminary decision as is required by state law.
PM2.5 interpollutant offset ratios	Only PM10, not PM2.5, was regulated by the 1991 rule.	PM2.5 interpollutant offset ratios removed as required by EPA guidance. Interpollutant trading is unchanged for PM10. The proposed rule is more stringent by removing the option for interpollutant offset trading of PM2.5.
Visibility requirements for sources that may affect a Class I Areas	Visibility requirements were not contained in the 1991 rule.	Visibility requirements add more evaluation and notification procedures for potential impacts. The added visibility requirements are consistent with 40 CFR 51.307(b).
Definition of major stationary source	Definition of major stationary source was not contained in the 1991 rule. The 1991 rule referred to "major stationary sources or major modifications under the <i>EPA definition</i> ."	Added to the major source definition the list of source types for which fugitive emissions must be included to determine if a source is major. The fugitive emissions categories were not changed by 2002 NSR Reform <sup>19</sup> .
Applicability for stationary sources that become major due to a relaxation in any federally enforceable limitation	Requirement was not included in the 1991 rule.	Adding this requirement to Rule 202 makes the rule more stringent than 1991 rule by treating "sham" permit modifications as new sources <sup>20</sup> . This applicability requirement is identical to 40 CFR 51.165(a)(5)(ii).

<sup>18</sup> McCabe, Janet. "Minor New Source Review Program Public Notice Requirements under 40 CFR 51.161(b)(3)." Memo to Regional Administrators, Regions 1 – 10. Environmental Protection Agency, Washington D.C., April 17, 2012.

<sup>19</sup> "Prevention of Significant Deterioration (PSD) and Nonattainment New Source Review (NSR) Final Rule and Proposed Rule", Federal Register 67:251 (December 31, 2002) p. 80186.

<sup>20</sup> Hunt, Terrell E., & Setiz, John S. Memo to Addressees. Environmental Protection Agency, Washington, D.C. June 13, 1989.

In conclusion, the proposal is not relaxing any NSR requirement that existed in the SB 288 baseline rule. In fact, the additional requirements are more stringent than the SB 288 baseline rule and therefore the proposal satisfies the requirements of SB 288.

---

## SUMMARY OF PROPOSED AMENDMENTS

Overview: The proposed amendments are:

- Added definitions for:
  - Begin actual construction
  - Class I area
  - Federal Land Manager (FLM)
  - Federally enforceable
  - Necessary preconstruction approvals or permits
- Revised exemption in Rule 214 from only PM10 to exempt all regulated air pollutant and its precursors that Sacramento County has been designated as attainment or unclassified for a National Ambient Air Quality Standard (NAAQS). Sacramento County attained the 2006 PM2.5 NAAQS in 2011 and anticipates submitting a redesignation request to EPA in 2012. Attainment pollutants are subject to Prevention of Significant Deterioration not non-attainment New Source Review.
- Added the list of the 28 source categories where fugitive emissions are included in the determination to definition of major stationary source. In Rule 214, reference is made to this list in the definition of potential to emit.
- Added 40 tons per year of nitrogen oxides as a precursor emission of PM2.5. This is consistent with EPA's implementation of NSR for PM2.5<sup>21</sup>. The precursor definition already included nitrogen oxides as PM2.5 precursor consistent with Federal regulation, see Rule 214, Section 239.
- Added requirements for sources affecting Class I areas to provide a visibility analysis when submitting a permit application. Additional procedures must be followed for sources that may have an impact to Class I areas pursuant to 40 CFR § 51.307 and 51.166. These procedures require new major sources or major modifications to provide the Air Pollution Control Officer with an analysis of impairment to visibility to any Class I areas, noticing to the applicable officials and agencies related to any affected Class I area, and permit denial procedures for proposed sources or modifications with an adverse impact to visibility in a Class I area.
- Revised applicability such that any source that becomes major due to a relaxation in any federally enforceable limitation, such as hours of operation, or the capacity of the source to emit, the source must be subject to the requirements of New Source Review as though construction of the source has not yet commenced. This is required by 40 CFR 51.165(a)(5)(ii). EPA has issued guidance documents interpreting this requirement<sup>22, 23</sup>.
- Removed interpollutant offset ratios for NOx and SOx to PM2.5 consistent with EPA's

---

<sup>21</sup> "Implementation of the New Source Review (NSR) Program for Particulate Matter Less Than 2.5 Micrometers (PM<sub>2.5</sub>)", Federal Register 73:96 (May 16, 2008) p. 28321.

<sup>22</sup> Hunt, Terrell E., & Setiz, John S. "Guidance on Limiting Potential To Emit in New Source Permitting." Memo to Addressees. Environmental Protection Agency, Washington, D.C. June 13, 1989.

<sup>23</sup> U.S. EPA, "New Source Review Workshop Manual, Prevention of Significant Deterioration and Nonattainment Area Permitting." Page c.6. October 1990.

revised policy reconsidering interpollutant trading provisions for PM<sub>2.5</sub><sup>24</sup>. Ratios for interpollutant trading for primary PM<sub>2.5</sub> are not allowed for any pollutants unless an offset ratio is established in either a PM<sub>2.5</sub> attainment demonstration or maintenance plan, in case of PM<sub>2.5</sub> attainment, approved by EPA into the State Implementation Plan.

- Proposed new Rule 217, PUBLIC NOTICE REQUIREMENTS FOR PERMITS, containing the public notice requirements needed to satisfy federal and state requirements. Removed the public noticing requirements from Rule 202 and Rule 214 and replaced with reference that all applications are subject to the requirements of Rule 217. Rule 217 will be submitted to the SIP which will require minor sources to issue public notices as a federal requirement.

Rule 217, Public Notice Requirements for Permits: Federal regulations<sup>25</sup> require a SIP rule that provides public an opportunity to comment on non-major permit decisions. Rule 214 only applies to major stationary sources and consequently did not meet the minor source noticing requirement. Staff is proposing Rule 217 to provide the necessary SIP public noticing procedures for both major and non-major sources.

Rule 217 includes notification procedures relevant to new major sources and major modifications that may affect visibility of any Class I area. According to a letter dated March 9, 2011 from EPA Region 4 to the North Carolina Department of Environment and Natural Resources<sup>26</sup>, notification to the Federal Land Manager (FLM) must be provided for any proposed new major stationary source or major modification that would be located within 100 kilometers of Class I area. Additional notifications may be required for other sources that would be located further than 100 km from a Class I area when other factors (such as the proposed source's size) raise concerns about potential visibility impacts. Guidance provided by the FLMs' Air Quality Related Values Work Group (FLAG)<sup>27</sup> states that, "the permitting authority should notify the FLM of all new or modified major facilities proposing to locate within 100 kilometers of a Class I area."

The proposed rules satisfy the federal and state mandates, and correct the deficiencies identified by EPA in the Technical Support Document.

---

## **COST IMPACTS**

Section 40703 of the California Health and Safety Code requires that the District consider and make public its findings relating to the cost effectiveness of implementing an emissions control measure.

---

<sup>24</sup> McCarthy, Gina. "Memo to the Regional Air Division Directors, Regions 1-10," Environmental Protection Agency, Washington, D.C. July 21, 2011.

<sup>25</sup> 40 CFR 51.161(a).

<sup>26</sup> Banister, Beverly H., Letter to Ms. Shiela C. Holamn, North Carolina Department of Environment and Natural Resources. March 9, 2011.

<sup>27</sup> U.S. Department of the Interior. "Federal Land Managers' Air Quality Related Values Work Group (FLAG) Phase I report – Revised (2010)." October 7, 2010.

**Impact on Businesses in Sacramento:** The impact of the proposed rule amendments is not expected to be a burden to businesses. The rule amendments implement administrative procedures that are already required by federal regulations. Some of these procedures are already required under Rule 202.

Public noticing requirements for minor sources are in Rule 202 but are not in Rule 214. Minor sources that trigger public notification will be moved from Rule 202 to Rule 217 which will be submitted as a SIP revision and therefore be subject to the Clean Air Act's requirements for federal enforcement. Since these sources were required to notice under the previous version of Rule 202, this change has no cost impact to businesses. The lowering of the SOx public notification exemption thresholds does not have an impact to business. Most likely, any source that would exceed the SOx threshold levels would already have triggered a public notification under the NOx threshold (which has not been changed). NOx and SOx emissions are formed when fuel is burned, with SOx emissions associated with the burning of fuels containing sulfur.

Additional noticing requirements are required for major sources or major modifications that may impact a Class I area. For these projects, the additional public noticing procedures include: 1) a mandatory public hearing allowing the public to appear and submit comments, 2) availability of all comments for inspection, 3) an enhanced public noticing timeline, and 4) public notification to all relevant officials and agencies having cognizance over any affected Class I area(s). In addition, the source must provide an analysis of the project's air quality impact to any Class I areas when submitting a permit application. These requirements have been mandated by federal regulations. The District has few sources that could possibly impact a Class I area<sup>28</sup> when making a significant modification, and any additional administrative procedures are not expected to be significant.

**Impacts on District:** There is no cost impact expected for the District. The adoption and subsequent SIP approval of Rule 217 will make federally enforceable public noticing procedures already required by Rule 202. In addition, the amendment requires final actions to be published on the District website. Website notifications of final actions are already being implemented. The level of effort required for notifications to Federal Land Managers are not expected to be significant in part due to very few if any sources that may trigger this notification. No additional staff time is needed.

---

## EMISSIONS IMPACT

There is no change to the emission standards in the proposed amendments.

---

---

<sup>28</sup> The Class I areas of concern to sources in Sacramento County are Desolation Wilderness in El Dorado County and Mokelumne Wilderness in Alpine County. These Class I areas are as close as approximately 75 kilometers from the eastern side of Sacramento County.

## **SOCIOECONOMIC IMPACT ANALYSIS**

HSC Section 40728.5 requires a district to perform an assessment of the socioeconomic impacts before adopting, amending, or repealing a rule that will significantly affect air quality or emission limitations. The District Board is required to actively consider the socioeconomic impacts of the proposal and make a good faith effort to minimize adverse socioeconomic impacts. The proposed amendments to Rule 202, Rule 214, and new Rule 217 are administrative in nature and do not affect air quality or emissions standards or limitations. Therefore, Section 40728.5 of the Health and Safety Code does not apply.

---

## **ENVIRONMENTAL REVIEW AND COMPLIANCE**

Staff finds that the adoption of the proposed rules is not subject to the California Environmental Quality Act because it is an activity that will not result in a direct or reasonably foreseeable indirect physical change in the environment<sup>29</sup>.

---

## **PUBLIC COMMENTS**

Staff held a public workshop to discuss the proposed amendments on July 10, 2010. A public notice was mailed and e-mailed to interested parties, including the affected sources, and was posted on the District website. The draft rules and staff report were available for public review at that time.

Staff received questions at the workshop and written EPA comments. All comments and responses are included in Appendix B. In response to EPA comments, Staff added the significance threshold for nitrogen oxides (for PM2.5 purposes) in the definition of major modification and made a few minor editorial and grammatical changes.

EPA comments requested an explanation of how and why the public noticing thresholds in Rule 217, Section 110 were selected. The thresholds match the current noticing threshold levels and are less than half the major source emission levels for all pollutants except carbon monoxide. Staff performed additional analysis of the minor source public noticing thresholds to characterize what those thresholds represent in terms of the contribution of emissions from permitted sources to Sacramento's air quality problems. The sources that will not be subject to noticing account for less than 5% of the total District emissions inventory for all pollutants except for SOx.

The analysis shows the amount of emissions from sources subject to public noticing requirements account for approximately 40% of the VOC, 62% of the NOx, 43% of the SOx, 39% of the CO, 40% of the PM10, and 29% of the PM2.5 of the total District permitted emissions.

Results of the analysis are shown in the table below. For more details about the calculation see Appendix C.

---

<sup>29</sup> Public Resources Code §21084(a) and Preliminary Review, State CEQA Guidelines §15060(c)(2).

		ROG (tpy)	NOx (tpy)	SO2 (tpy)	CO (tpy)	PM10 (tpy)	PM2.5 (tpy)
1	Public Noticing threshold <sup>30</sup>	10	10	18.4	99	14.6	10
2	Major source threshold <sup>31</sup>	25	25	100	100	100	100
3	Notification threshold is % of major source threshold (Line1/Line 2)	40%	40%	18%	99%	15%	10%
4	2010 Total Actual Emissions from all Permitted Sources <sup>32 &amp; 33</sup>	1559	567	68	1018	344	283
5	2010 Actual Emissions from sources w/ PTE at or above noticing thresholds <sup>32 &amp; 33</sup>	627	351	29	395	133	81
6	Total Emissions not subject to public noticing (Line 4-Line 5)	932	216	39	623	201	202
7	2010 Emissions Inventory <sup>34</sup>	21159	25414	237	113936	16474	5072
8	% of emissions inventory from permitted sources (Line4/Line7)	7.4%	2.2%	28.6%	0.9%	2.0%	5.6%
9	% of emissions from permitted sources not subject to public notification (Line 6/Line 7)	4.4%	0.9%	16.2%	0.5%	1.2%	4.0%
10	% of permitted emissions subject to notice (Line 5/Line 4)	40%	62%	43%	39%	40%	29%

The total emissions from all stationary sources that are not subject to public notification account for less than 5% of the total emissions inventory for Sacramento County for all pollutants except SO<sub>2</sub>. The SO<sub>2</sub> noticing thresholds are appropriate, in spite of the relatively higher percentage of non-noticed SO<sub>2</sub> permits, because Sacramento is attainment for SO<sub>2</sub> and because its precursor contribution to particulate matter pollution in Sacramento is very small. Sacramento County, in fact all of California, has been in attainment for the 1971 annual and 24-hour standards for SO<sub>2</sub> since the late 1980s. California has recommended that Sacramento be designated attainment/unclassifiable for the 1-hour standard of 75 ppb<sup>35</sup> because the SO<sub>2</sub> design value of Sacramento County is 4 ppb<sup>36</sup>. While SO<sub>2</sub> is a precursor to both PM10 and PM2.5, analyses indicate that the contribution of SO<sub>2</sub> to PM10 and PM2.5 levels in Sacramento County is very small, 1.3%<sup>37</sup> of PM10 and 2% on PM2.5<sup>38</sup>.

<sup>30</sup> Rule 217, Section 110 - shown in tons per year (tpy) here

<sup>31</sup> 40CFR51.165(a)(1)(iv)(A)

<sup>32</sup> SMAQMD. "Consolidated Active Permits with Emissions.xlsx", July 19, 2012.

<sup>33</sup> SMAQMD. "Backup Information for Permitted Emissions Calculations.xlsx", July 23, 2012.

<sup>34</sup> Annual average emissions for 2010, tons per day times 365 days/year, CEPAM: 2009 Almanac – Standard Emissions Tool. California Air Resources Board. April 13, 2009. Web. July 18, 2012. <http://www.arb.ca.gov/app/emsinv/fcemssumcat2009.php>

<sup>35</sup> "Primary National Ambient Air Quality Standard for Sulfur Dioxide; Final Rule", Federal Register 75:119 (June 22, 2010) p. 35520.

<sup>36</sup> California Air Resources Board. "Recommended Area Designations for the 2010 Federal Sulfur Dioxide (SO<sub>2</sub>) Standard Staff Report." June 2011.

<sup>37</sup> SMAQMD, "PM10 Implementation/Maintenance Plan and Redesignation Request for Sacramento County", October 28, 2010, Table 6.3

<sup>38</sup> SMAQMD, "Staff Report – Rule 421 Mandatory Episodic Curtailment of Wood and Other Solid Fuel Burning" September 9, 2009, page 16

No changes to the public notification thresholds were made as a result of this analysis.

---

## **FINDINGS**

The California Health and Safety Code (HSC), Division 26, Air Resources, requires local districts to comply with a rule adoption protocol as set forth in Section 40727 of the Code. This section has been revised through legislative mandate to contain six findings that the District must make when developing, amending, or repealing a rule. These findings, effective January 1, 1992, and their definitions are listed in the next several tables.

**Rule 202 – Required Findings**

Finding	Finding Determination
<b>Authority:</b> The District must find that a provision of law or of a state or federal regulation permits or requires the District to adopt, amend, or repeal the rule.	The District is authorized to adopt and amend Rule 202 by California Health and Safety Code (HSC) Sections 40001, 40702, 41010, and 42300. [HSC Section 40727(b)(2)]
<b>Necessity:</b> The District must find that the rulemaking demonstrates a need exists for the rule, or for its amendment or repeal.	Rule 214, Federal New Source Review is being amended to gain full approval by EPA into the State Implementation Plan. It is necessary to adopt the proposed amendments to maintain the consistency of Rule 202 with Rule 214 to avoid conflicting requirements for sources that are subject to both rules. [HSC Section 40727(b)(1)]
<b>Clarity:</b> The District must find that the rule is written or displayed so that its meaning can be easily understood by the persons directly affected by it.	Staff has reviewed the proposed rule and determined that it can be understood by the affected parties. In addition, the record contains no evidence that people directly affected by the rule cannot understand the rule. [HSC Section 40727(b)(3)]
<b>Consistency:</b> The rule is in harmony with, and not in conflict with or contradictory to, existing statutes, court decisions, or state or federal regulations.	The proposed rule does not conflict with, and is not contradictory to, existing statutes, court decisions, or state or federal regulations. [HSC Section 40727(b)(4)]
<b>Non-Duplication:</b> The District must find that either: 1) The rule does not impose the same requirements as an existing state or federal regulation; or (2) that the duplicative requirements are necessary or proper to execute the powers and duties granted to, and imposed upon the District.	The proposed rule implements federal regulations for permitting programs (40 CFR Part 51.165). Rule 214, Federal New Source Review, contains duplicative requirements that are necessary in order to execute the powers and duties imposed upon the District because the federal Clean Air Act (42 USC 7410(a)(2)(c)) requires New Source Review to be included in the State Implementation Plan. Rule 202, which contains the federal as well as state requirements, is necessary to execute the power and duties imposed upon the District, and Rule 202 is being amended to maintain consistency with Rule 214. [HSC Section 40727(b)(5)].
<b>Reference:</b> The District must refer to any statute, court decision, or other provision of law that the District implements, interprets, or makes specific by adopting, amending or repealing the rule.	In adopting the proposed rule, the District is implementing the requirements of HSC Sections 40919, 41010(b) and 42504, and the federal Clean Air Act (42 USC 7410(a)(2)(C), 7502(c)(5), 7503, and 7511a(d)(2)). [HSC Section 40727(b)(6)]
<b>Additional Informational Requirements:</b> In complying with HSC Section 40727.2, the District must identify all federal requirements and District rules that apply to the same equipment or source type as the proposed rule or amendments.	The proposed rule does not impose a new emission limit or standard, make an existing emission limit or standard more stringent, or impose new or more stringent monitoring, reporting, or recordkeeping requirements. Therefore, a written analysis of federal regulations and other District rules is not required. [HSC Section 40727.2(g)]

**Rule 214 – Required Findings**

Finding	Finding Determination
<b>Authority:</b> The District must find that a provision of law or of a state or federal regulation permits or requires the District to adopt, amend, or repeal the rule.	The District is authorized to adopt and amend Rule 214 by California Health and Safety Code (HSC) Sections 40001, 40702, 41010, and 42300. [HSC Section 40727(b)(2)]
<b>Necessity:</b> The District must find that the rulemaking demonstrates a need exists for the rule, or for its amendment or repeal.	It is necessary to adopt the proposed amendments to Rule 214 to correct the deficiencies identified in EPA's technical support document, and thus comply with 40 CFR 51 and the federal Clean Air Act (42 USC 7410). This will allow the rule to be fully approved by EPA under the federal Clean Air Act (42 USC 7410(l)). [HSC Section 40727(b)(1)]
<b>Clarity:</b> The District must find that the rule is written or displayed so that its meaning can be easily understood by the persons directly affected by it.	Staff has reviewed the proposed rule and determined that it can be understood by the affected parties. In addition, the record contains no evidence that people directly affected by the rule cannot understand the rule. [HSC Section 40727(b)(3)]
<b>Consistency:</b> The rule is in harmony with, and not in conflict with or contradictory to, existing statutes, court decisions, or state or federal regulations.	The proposed rule does not conflict with, and is not contradictory to, existing statutes, court decisions, or state or federal regulations. [HSC Section 40727(b)(4)]
<b>Non-Duplication:</b> The District must find that either: 1) The rule does not impose the same requirements as an existing state or federal regulation; or (2) that the duplicative requirements are necessary or proper to execute the powers and duties granted to, and imposed upon the District.	The proposed rule duplicates federal regulations for permitting programs (40 CFR Part 51.165). The duplicative requirements are necessary in order to execute the powers and duties imposed upon the District because the federal Clean Air Act (42 USC 7410(a)(2)(c)) requires New Source Review to be included in the State Implementation Plan. [HSC Section 40727(b)(5)]
<b>Reference:</b> The District must refer to any statute, court decision, or other provision of law that the District implements, interprets, or makes specific by adopting, amending or repealing the rule.	In adopting the proposed rule, the District is implementing the requirements of the federal Clean Air Act (42 USC 7410(a)(2)(C), 7502(c)(5), 7503, and 7511a(d)(2)). [HSC Section 40727(b)(6)]
<b>Additional Informational Requirements:</b> In complying with HSC Section 40727.2, the District must identify all federal requirements and District rules that apply to the same equipment or source type as the proposed rule or amendments.	The proposed rule does not impose a new emission limit or standard, make an existing emission limit or standard more stringent, or impose new or more stringent monitoring, reporting, or recordkeeping requirements. Therefore, a written analysis of federal regulations and other District rules is not required. [HSC Section 40727.2(g)]

### Rule 217 – Required Findings

Finding	Finding Determination
<b>Authority:</b> The District must find that a provision of law or of a state or federal regulation permits or requires the District to adopt, amend, or repeal the rule.	The District is authorized to adopt Rule 217 by California Health and Safety Code (HSC) Sections 40001, 40702, 41010, and 42300. [HSC Section 40727(b)(2)]
<b>Necessity:</b> The District must find that the rulemaking demonstrates a need exists for the rule, or for its amendment or repeal.	It is necessary to adopt Rule 217 to correct the deficiencies identified in EPA's technical support document, and thus comply with 40 CFR 51 and the federal Clean Air Act (USC 7410). This will allow the District's New Source Review program to be fully approved by EPA under the federal Clean Air Act (42 USC 7410(l)). [HSC Section 40727(b)(1)]
<b>Clarity:</b> The District must find that the rule is written or displayed so that its meaning can be easily understood by the persons directly affected by it.	Staff has reviewed the proposed rule and determined that it can be understood by the affected parties. In addition, the record contains no evidence that people directly affected by the rule cannot understand the rule. [HSC Section 40727(b)(3)]
<b>Consistency:</b> The rule is in harmony with, and not in conflict with or contradictory to, existing statutes, court decisions, or state or federal regulations.	The proposed rule does not conflict with and is not contradictory to existing statutes, court decisions, or state or federal regulations. [Health & Safety Code Section 40727(b)(4)]
<b>Non-Duplication:</b> The District must find that either: 1) The rule does not impose the same requirements as an existing site or federal regulation; or 2) that the duplicative requirements are necessary or proper to execute the powers and duties granted to, and imposed upon the District.	The proposed rule duplicates federal regulations for permitting programs (40 CFR Part 51 Sections 160 through 164). The duplicative requirements are necessary in order to execute the powers and duties imposed upon the District because the federal Clean Air Act (42 USC 7410(a)(2)(c)) requires minor source New Source Review to be included in the State Implementation Plan. [HSC Section 40727(b)(5)]
<b>Reference:</b> The District must refer to any statute, court decision, or other provision of law that the District implements, interprets, or makes specific by adopting, amending or repealing the rule.	In adopting the proposed rule, the District is implementing the requirements of the federal Clean Air Act (42 USC 7410(a)(2)(C), 7502(c)(5), 7503, and 7511a(d)(2)). [HSC Section 40727(b)(6)]
<b>Additional Informational Requirements:</b> In complying with HSC Section 40727, the District must identify all federal requirements and District rules that apply to the same equipment or source type as the proposed rule or amendments.	The proposed rule does not impose a new emission limit or standard, make an existing emission limit or standard more stringent, or impose new or more stringent monitoring, reporting, or recordkeeping requirements. Therefore, a written analysis of federal regulations and other District rules is not required. [HSC Section 40727.2(g)]

## REFERENCES

Banister, Beverly H. Letter to Ms. Shiela C. Holman, North Carolina Department of Environment and Natural Resources. March 9, 2011.

California Air Resources Board, "New Source Review Permitting Programs."  
<http://www.arb.ca.gov/nsr/nsr.htm>

California Air Resources Board. "Recommended Area Designations for the 2010 Federal Sulfur Dioxide (SO<sub>2</sub>) Standard Staff Report." June 2011.

California Emissions Projection Analysis Model (CEPAM): 2009 Almanac – Standard Emissions Tool. California Air Resources Board. April 13, 2009. Web. July 18, 2012.  
<<http://www.arb.ca.gov/app/emsinv/fcemssumcat2009.php>>.

"Clean Air Act Attainment Finding; Bullhead City and Payson Nonattainment Areas, AZ; Sacramento and San Bernardino Nonattainment Areas, CA; Particulate Matter of 10 Microns or Less (PM-10)", Federal Register 67:32 (February 15, 2002) p. 7082.

"Designations of Areas for Air Quality Planning Purposes; California; San Joaquin Valley, South Coast Air Basin, Coachella Valley, and Sacramento Metro 8-Hour Ozone Nonattainment Areas; Reclassification", Federal Register 75:86 (May 5, 2010) p.24409.

Hunt, Terrell E., & Setiz, John S. "Guidance on Limiting Potential to Emit in New Source Permitting." Memo to Addressees. Environmental Protection Agency, Washington, D.C. June 13, 1989.

"Implementation of the New Source Review (NSR) Program for Particulate Matter Less Than 2.5 Micrometers (PM<sub>2.5</sub>)", Federal Register 73:96 (May 16, 2008) p. 28321.

McCabe, Janet. "Minor New Source Review Program Public Notice Requirements under 40 CFR 51.161(b)(3)." Memo to Regional Administrators, Regions 1 – 10. Environmental Protection Agency, Washington D.C., April 17, 2012.

McCarthy, Gina. "Revised Policy to Address Reconsideration of Interpollutant Trading Provisions for Fine Particles (PM<sub>2.5</sub>)." Memo to the Regional Air Division Directors, Regions 1-10. Environmental Protection Agency, Washington, D.C. July 21, 2011.

Monterey Bay Unified Air Pollution Control District, "Rule 207. Review of New or Modified Sources", April 20, 2011.

Placer County Air Pollution Control District, "Rule 502, New Source Review", October 13, 2011.

"Prevention of Significant Deterioration (PSD) and Nonattainment New Source Review (NSR) Final Rule and Proposed Rule", Federal Register 67:251 (December 31, 2002) p. 80186.

"Primary National Ambient Air Quality Standard for Sulfur Dioxide; Final Rule", Federal Register 75:119 (June 22, 2010) p. 35520.

"Revisions to the California State Implementation Plan, Sacramento Metropolitan Air Quality Management District", Federal Register 76:97 (May 19, 2011) p. 28942.

"Revisions to the California State Implementation Plan, Sacramento Metropolitan Air Quality Management District", Federal Register 76:139 (July 20, 2011) p. 43183.

Sacramento Metropolitan Air Quality Management District. "Backup Information for Permitted Emissions Calculations.xlsx", July 23, 2012. File.

Sacramento Metropolitan Air Quality Management District. "Consolidated Active Permits with Emissions.xlsx", July 19, 2012. File.

Sacramento Metropolitan Air Quality Management District, "PM10 Implementation/Maintenance Plan and Redesignation Request for Sacramento County", October 28, 2010.

Sacramento Metropolitan Air Quality Management District, "Staff Report – Rule 421 Mandatory Episodic Curtailment of Wood and Other Solid Fuel Burning" September 9, 2009.

San Joaquin Valley Unified Air Pollution Control District, "Rule 2201 New and Modified Stationary Source Review Rule", March 17, 2011.

South Coast Air Quality Management District, "Rule XIII – New Source Review", Various Dates.

U.S. Department of the Interior. "Federal Land Managers' Air Quality Related Values Work Group (FLAG) Phase I report – Revised (2010)." October 7, 2010.

U.S. EPA, 40 CFR 51.165, Permit Requirements.

U.S. EPA, 40 CFR 51.166, Prevention of Significant Deterioration of Air Quality.

U.S. EPA, 40 CFR 51.307, New Source Review (Subpart P – Protection of Visibility).

U.S. EPA, 40 CFR 51, Appendix S to Part 51 – Emission Offset Interpretative Ruling.

U.S. EPA, 40 CFR 52.28, Protection of visibility from sources in nonattainment areas.

U.S. EPA, 40 CFR 52.281, Visibility protection.

U.S. EPA, "New Source Review Workshop Manual, Prevention of Significant Deterioration and Nonattainment Area Permitting." October 1990.

U.S. EPA, Region IX, Air Division. "Technical Support Document for EPA's Notice of Proposed Rulemaking for the California State Implementation Plan, Sacramento Metropolitan Air Quality Management District." By Laura Yannayon. May 6, 2011.

**APPENDIX A**

**LIST OF CHANGES TO RULES  
 Rule 202 – New Source Review**

<b>NEW SECTION NUMBER</b>	<b>EXISTING SECTION NUMBER</b>	<b>PROPOSED CHANGES</b>
102	Same	Added requirement to applicability that any source or modification that becomes a major source or major modification solely due to a relaxation in a federally enforceable limitation, then that source or modification is subject to the rule as though the source or modification had not yet commenced construction. This requirement is consistent with 40 CFR 51.165(a)(5)(ii) and EPA comment #12 in the TSD.  In addition, updated the applicability note to include that all sources are subject Rule 217 since the amendments remove the noticing requirements from this rule and put those requirements into new Rule 217 as part of the District New Source Review program.
111.3	Same	Revised section reference.
N/A	113	Moved section to Rule 217.
113	114	Section renumbered and revised section reference.
114-115	115-116	Sections renumbered.
116	117	Section number reserved to maintain section references consistent with Rule 214 (adding a new exemption for all attainment and unclassified pollutants, see Section 116 in Rule 214).
117	N/A	Added exemption from visibility analysis requirements (Sections 309 and 413) for all non-major sources and non-major modifications.
204	N/A	Added "Begin Actual Construction" definition for the term used in the definition of construction commences. This definition is consistent with both the 2002 and the current version of 40 CFR 51.165(a)(1)(xv).
205-207	204-206	Sections renumbered.
208	N/A	Added "Class I Area" definition for the term used in the requirements for sources impacting Class I areas pursuant to Section 416. This definition is consistent with the Clean Air Act Section 162(a) and all of 40 CFR Part 81 Subpart D (including 40 CFR 81.405.)
209-212	207-210	Sections renumbered.
213.3b	211.3b	Added requirement that creditable emission decreases for all major stationary sources be "federally enforceable" consistent with EPA comment #8c in the TSD.
214	212	Section renumbered and revised section reference.
215	213	Section renumbered.
216	214	Section renumbered and revised section reference.
217-218	215-216	Sections renumbered.

NEW SECTION NUMBER	EXISTING SECTION NUMBER	PROPOSED CHANGES
219	N/A	Added "federal land manager" definition consistent with 40 CFR 51.165(a)(1)(xlii). This term is used in Sections 309 and 416.
220	217	Section renumbered and revised section references.
221	N/A	Added "federally enforceable" definition consistent with both the 2002 and the current version of 40 CFR 51.165(a)(1)(xiv) and EPA comment #8c in the TSD. This term only applies to major stationary sources and will be utilized in addition to the term "enforceable as a practical matter" as needed to address EPA comments in the TSD. The District's new source review rules in the SIP include Rule 203, Prevention of Significant Deterioration.
222-226	218-222	Section renumbered and revised section references.
227	223	Revised the introductory language to mirror the definition of modification to remove ambiguity and circular reference. In addition, revised section number, references, and grammar.
227.3b	N/A	Added nitrogen oxides to the list of precursors for PM2.5 under the definition of major modification. Nitrogen oxides are correctly listed as a precursor in the definition of precursor (Section 229).
227.3c-e	223.3b-d	Sections renumbered.
227.6	N/A	Added list of changes that are not considered a major modification (or modification) for the purposes of the rule. This is identical language as in Section 229.3.
228	224	Removed reference to Rule 207 and replaced with the list of 28 source categories for which fugitive emissions are included in the determination of major stationary source. The list of the 28 source categories is consistent with 40 CFR 51.165(a)(1)(iv)(C). This is consistent with EPA comment #14 in the TSD.
229	225	Added reference to the definition of "historic potential emissions." In some cases, historic potential emissions will be historic actual emissions. Also, section renumbered and revised section reference.
230	N/A	Added "necessary preconstruction approvals or permits" definition consistent with both the 2002 and the current version of 40 CFR 51.165 (a)(1)(xvii) and EPA comment #8c in the TSD. This term is used in the definition of 'construction commences' (Section 210).
231-233	226-228	Sections renumbered.
234	229	Changed the term "enforceable as a practical matter" to "federally enforceable" consistent with EPA comment #8c in the TSD. In addition, this section only applies to major stationary sources; therefore, "federally enforceable" is the correct term.
235-236	230-231	Revised to match EPA's recent change in the federal test method to include condensable emissions for particulate matter (see 77 FR 15656).
237	232	Section renumbered.
238	233	Revised "potential to emit" definition to be consistent with EPA

NEW SECTION NUMBER	EXISTING SECTION NUMBER	PROPOSED CHANGES
		comment #8c in the TSD. The potential to emit must be incorporate as a permit condition that is “enforceable as a practical matter” and “federally enforceable” for all major stationary sources.
239	234	Section renumbered.
240	235	Section renumbered and revised section reference.
241-250	236-250	Sections renumbered.
301	Same	Revised section reference.
302.1-302.3	Same	Revised section references.
302.10	Same	Revised section reference.
300	Same	Revised section reference.
303.1-303.2	Same	Revised chart to remove ambiguity in applying offset ratios for non-major modifications at major sources. The offset ratio for minor modifications at major sources should either be 1.2 to 1.0 if < 15 miles from the source, or 1.0 to 1.0 for same source. This clarification does not change the applicability or intent and is consistent with the most recent changes to the NSR rules. Also revised section reference.
305	Same	Removed interpollutant offset ratios consistent with recent EPA policy (McCarthy, 2011). An offset ratio may be allowed if established and approved in an attainment demonstration, or maintenance plan, in the case of attainment and the ratio is approved by EPA.
309	N/A	Added section to allow the Air Pollution Control Officer to deny an Authority to Construct or Permit to Operate if the Air Pollution Control Officer finds that a proposed new major stationary source or major modification would have an adverse impact on visibility of a Class I area pursuant to 40 CFR 51.307(b). This requirement is consistent with EPA comment #13 in the TSD.
400	Same	Added requirement that all activities regulated by Rule 202 are subject to Rule 217. Moved all public noticing and comment requirements to Rule 217. All activities regulated by Rule 202 are subject to Rule 217 as part of the District’s New Source Review of all permit applications. Power plants also continue to be subject to the review requirements of Section 415.
401	Same	Revised section reference.
402-402.3	Same	Added administrative procedure to require major sources that may affect visibility of a Class I area to provide an analysis as part of a complete application. The analysis is necessary for a complete application when noticing the Federal Land Manager as required by Rule 217.
N/A	405.1	Moved section to Rule 217.
N/A	406 and 407	Moved sections to Rule 217

<b>NEW SECTION NUMBER</b>	<b>EXISTING SECTION NUMBER</b>	<b>PROPOSED CHANGES</b>
407 and 408	409 and 410	Revised section references.
N/A	409.2	Moved section to Rule 217.
408.3c	410.3c	Added the term “federally enforceable” consistent with EPA comment #8c in the TSD. In addition, this section only applies to major stationary sources; therefore, “federally enforceable” is the correct term.
409 and 410	411 and 412	Sections renumbered.
411	413	Sections renumbered and revised section references.
N/A	413.1	Moved section to Rule 217.
412	414	Section renumbered and revised section reference.
413	N/A	Added administrative requirement for applicants to provide the Air Pollution Control Officer with an analysis of impairment to visibility of any Class I area. This is consistent with 40 CFR 51.307 & 51.166(o).
414	415	Revised to maintain consistency of that the section applies to power plants that are over 50 megawatts.
414.3	415.3	Revised language to clarify the requirement that power plants are subject to all District rules and regulations that apply to applications for a permit to construct. For preconstruction review of a permit application the following rules would include, but are not limited to, Rules 202, 203, 214, and new Rule 217.
414.5	414.5	Revised language to clarify the reference for public notice and comment requirements that all District rule requirements must be met for a power plant to receive a determination of compliance. This change eliminates the ambiguous reference (i.e. “this” to the appropriate rule).

**Rule 214 – Federal New Source Review**

<b>NEW SECTION NUMBER</b>	<b>EXISTING SECTION NUMBER</b>	<b>PROPOSED CHANGES (All changes in proposed Rule 202 are similarly proposed for Rule 214. This table articulates the rationale for differences from the Proposed Rule 202 Language.)</b>
102	Same	Added note that Rule 217 applies to all sources subject to Rule 214. This is a reminder to applicants that the public notice requirements are applicable to permit applications subject to new source review.
116	117	Changed exemption to apply to any regulated air pollutant (or precursors to that pollutant) that Sacramento County has been designated or re-designated as attainment or unclassified for the federal NAAQS. Sources are subject to Prevention of Significant Deterioration for attainment pollutants and continue to be subject to the NSR requirements of Rule 202.

<b>NEW SECTION NUMBER</b>	<b>EXISTING SECTION NUMBER</b>	<b>PROPOSED CHANGES (All changes in proposed Rule 202 are similarly proposed for Rule 214. This table articulates the rationale for differences from the Proposed Rule 202 Language.)</b>
117	N/A	Added exemption from visibility analysis requirements (Sections 309 and 413) for non-major modifications. In Rule 214, this exemption is applicable to non-major modifications at major sources.
213.3b	211.3b	Changed the term “enforceable as a practical matter” to “federally enforceable” consistent with EPA comment #8c in the TSD.
238	233	Replaced reference to Rule 207 with reference to Section 228 that lists the 28 source categories required to consider fugitive emissions in the calculation of potential to emit.
303	Same	Revised section reference and grammar.

**Rule 217 – Public Notice Requirements for Permits**

<b>SECTION NUMBER</b>	<b>PROPOSED PROVISION</b>
101	Set the purpose of the rule to provide an administrative mechanism for public notification and review of permits.
102	Set the applicability of the rule to all sources that require a permit under Rule 201, GENERAL PERMIT REQUIREMENTS. The applicability section is consistent with Rule 202.
103	Set the severability section consistent with other District rules.
110	Added exemption from notification requirements, previously from Rule 202 and Rule 214, for any application for any new or modified emissions unit where the potential to emit from the project is less than the listed amounts. The exemption level for SOx has been lowered from 13,650 lbs/qtr to 9,200 lbs/qtr to be consistent with the 1991 version of the rule as required by SB288. The levels for exemption are lower than major source thresholds; therefore, this exemption complies with SB288 and EPA comment #9b in the TSD.
200	Added definition section incorporating definitions from Rule 101, Rule 201, and Rule 214 by reference. Rule 202 is not references because Rule 217 is going to be SIP submitted and Rule 202 will not be SIP submitted.
201	Added “final action” definition consistent with the procedures of Rule 202 and Rule 214. This definition is necessary to provide reference for the noticing sections that refer to procedures in the new source review rule.
202	Added “potential to emit” definition including fugitive emissions for all sources consistent with Rule 202. These noticing procedures of this rule match what were previously in Rule 202. This definition meets the federal definition of potential to emit found in 40 CFR 51.165(a)(1)(iii).
203	Added “preliminary decision” definition consistent with the procedures of Rule 202 and Rule 214. This definition is necessary to provide reference for the noticing sections that refer to other new source review administrative procedures.
401	Added “public notification, inspection, and review” section containing the noticing requirements, from Rule 202, Rule 214, and 40 CFR 51.161.

<b>SECTION NUMBER</b>	<b>PROPOSED PROVISION</b>
401.1	Added "preliminary decision notification" section containing the noticing procedures from Rule 202 and Rule 214 consistent with 40 CFR 51.161(b)(1) and (d).
401.2	Added "publication and public comment" section containing the publication and comment procedures from Rule 202 and 214, and is consistent with the procedures of 40 CFR 51.161(b)(2 & 3).
401.3	Added "public inspection" section containing the document inspection procedures from Rule 202 and Rule 214, and consistent with 40 CFR 51.161(a) and (b)(1).
401.4	Added "authority to construct, final action notification" section similar to the noticing procedures that were previously in Rule 202 and Rule 214. The final action notification will now be published on the District's website rather than in a newspaper of general circulation. Notification on the District's website is considered to be equivalent.
402	Added "notification for class I visibility and Federal Land Manager consultation section containing the additional procedures necessary for sources that require a visibility analysis to be prepared. This section follows the procedures of 40 CFR 51.307 – New Source Review. 40 CFR 51.307 requires review of any major stationary source or major modification shall be conducted in accordance with 40 CFR 51.166(o), p(1) through p(2), and (q). These are the same procedures utilized for visibility analyses required by Prevention of Significant Deterioration regulations.
402.1	Added section for Class I public hearing procedures. For applications that require a visibility analysis, a public hearing is required pursuant to 40 CFR 51.166(q)(2)(v). All comments at the public hearing must be documented for consideration as required by Section 402.3.
402.2	Added section for the addition public inspection procedures. In addition to the public inspection procedures of Section 401.3, the District must make available for public inspection all written comments as required by 40 CFR 51.166(q)(2)(vi). These additional written comments (beyond Section 401.3) include: all comments received at any public hearing(s) in making a final decision on the approvability of an application, these comments would include comment from the Federal Land Manager.
402.3	Added section for the written notification procedures. The additional procedures require sending the public notification to additional public officials and agencies as defined in 40 CFR 51.166(q)(2)(iv). These officials and agencies having cognizance over Class I areas include: any other state or local air pollution control agencies, the chief executives of the city and county where the source would be located, any comprehensive regional land use planning agency, and any State, Federal Land Manager, or Indian Governing body whose lands may be affected by emissions from the source or modification. The timing of this public notification is more stringent than a typical public notification.
403	Added "emission calculations" section containing the calculation procedures previously from Rule 202 and Rule 214 for determining exemption applicability of Section 113.

## **Appendix B**

### **Public Comments**

#### **Public Workshop: July 10, 2012, 10:00 a.m.**

**Attendees:** Stu Husband, SMUD  
Chelsea Westerberg, Aerojet  
John Lane, Teichert  
Alfredo Nieto, Procter & Gamble

**Comment #1:** What is the specific emission offset ratio that would apply if the emission offset sanction is invoked by U.S. EPA?

**Response:** Under sanctions the ratio shall be at least 2 to 1 for all distances for major stationary sources and major modifications. This is required under Section 179(b)(2) of the Clean Air Act.

**Comment #2:** The U.S. EPA comments on Rule 214 (10/28/11 version) need to be addressed by February 18, 2013, right? Do you anticipate that the amendments will be approved?

**Response:** Yes. We are planning to submit rules that are approvable.

**Comment #3:** Can you show on a map the applicable Class 1 areas?

**Response:**



The Desolation Wilderness and the Mokelumne Wilderness are Class 1 areas within 100 kilometers of the eastern side of Sacramento County.

**EPA comments sent via email dated June 6, 2012**

**Comment #1 (Rule 202, Sections 309 & 413):** This rule does not apply to major sources or major modifications. Why not mark these sections as reserved?

**Response:** Rule 202 applies to all sources, both minor and major stationary sources. No change made.

**Comment #2 (Rule 214, Section 101):** The word “maintenance” must be retained as required by 40 CFR 51.160(a)(2).

**Response:** Change made, the word maintenance will be retained.

**Comment #3 (Rule 214, Section 113):** A threshold for PM2.5 should be added, otherwise a large increase in PM2.5 emissions may be exempted.

**Response:** The Section 113 thresholds are included solely due to State requirements (SB288) that prevent backsliding from the 1991 version of Rule 202. There were no PM<sub>2.5</sub> requirements in the 1991 version of Rule 202, therefore, no PM<sub>2.5</sub> thresholds are needed to prevent backsliding. Rule 214 meets federal requirements for significant increases in PM<sub>2.5</sub>. No change made.

**Comment #4 (Rule 214, Section 116):** Revise section to clarify that the rule does not apply when redesignated until the effective date of the redesignation.

**Response:** Staff disagrees. Section 116 specifies that Sacramento County must be designated unclassifiable or attainment “as codified in 40 CFR 81.305”. That codification will not occur until after the effective date of the designation or redesignation. No change made.

**Comment #5 (Rule 214, Section 221.3):** Remove reference to Rule 203 or reference all SIP approved rules.

**Response:** Reference to Rule 203 removed.

**Comment #6 (Rule 214, Section 227):** For PM<sub>10</sub> precursors, the Clean Air Act does not require aggregation for any pollutants except Ozone.

**Response:** Due to State requirements (SB288) the proposed rule must be at least as stringent as the 1991 version of Rule 202. The 1991 version of Rule 202 relied on the definition of major modification as was defined in 40 CFR 51.165. Therefore, the proposed rule must be at least as stringent as the 2002 version of 40 CFR 51.165. In the 2002 version of 40 CFR 51.165 the definition of a major modification was defined as a “... significant net emissions increase of any pollutant subject to regulation under the Act.” No definition is given for a “significant net emissions increase.” The definition of net emissions increase<sup>39</sup> includes aggregation for all pollutants. This definition is also consistent with EPA’s NSR guidance from the 1990 New Source Review Workshop Manual<sup>40</sup>.

In light of the above, no change made.

**Comment #7 (Rule 214, Section 227.2):** NO<sub>x</sub> and VOC are not considered PM<sub>10</sub> precursors, so why include them here?

**Response:** NO<sub>x</sub> and VOC are considered precursors in California and in the 1991 rule which listed these pollutants in the definition of precursor. As

---

<sup>39</sup> “Permit Requirements” 40 CFR 51.165(a)(1)(vi)(A), 2002 edition.

<sup>40</sup> U.S. EPA, “New Source Review Workshop Manual, Prevention of Significant Deterioration and Nonattainment Area Permitting.” Pages F.1- 9. October 1990.

required by SB288, Staff must retain both NO<sub>x</sub> and VOC as PM<sub>10</sub> precursors.

**Comment #8 (Rule 214, Section 227.3):** Why isn't NO<sub>x</sub> included here too? NO<sub>x</sub> is a presumed precursor for PM<sub>2.5</sub> and must be included.

**Response:** Staff agrees. Change made.

**Comment #9 (Rule 214, Section 227.6):** Add the word "otherwise" for clarity.

**Response:** Staff agrees. Change made.

**Comment #10 (Rule 214, Section 413):** What criteria will be used to determine if a project "may affect" a Class I area? Some criteria must be specified.

**Response:** Staff intends to follow the EPA guidance from EPA Region IV and the Federal Land Managers Air Group. These guidance documents state "that may affect" would include any new major stationary source or major modification that is within 100km of any Class I area and possibly sources further than 100km if other factors, such as the size of the stationary source cause concerns about possible visibility impacts to any Class I area.

**Comment #11 (Rule 214, Section 413):** Reference to 40 CFR 51.307 is incorrect because that section is a plan requirement. The requirement for the source is a visibility analysis following the procedures in 40 CFR 51.166(o).

**Response:** The reference to 40 CFR 51.307 is included to avoid confusion about why a reference to 40 CFR 51.166 Prevention of Significant Deterioration pertains to this rule which contains the nonattainment NSR requirements.

**Comment #12 (Rule 217, Section 110):** What is the basis for the public notification thresholds? Are these the values that were previously in the SIP? Please include a discussion in the staff report as to how and why these values were chosen.

**Response:** An analysis is provided in Appendix C and the Public Comments section in the Staff report.

**Comment #13 (Rule 217, Section 401):** Each of the following sections begins with the same sentence. Consider moving to the beginning of the section introduction paragraph.

**Response:** Staff agrees. Changes made.

**Comment #14 (Rule 217, Section 402.1):** A public hearing is optional based on the APCO determination of a need or public request.

Staff Report

Rule 202, NEW SOURCE REVIEW, Rule 214, FEDERAL NEW SOURCE REVIEW, and

Rule 217, PUBLIC NOTICE REQUIREMENTS FOR PERMITS

July 23, 2012

Page 29

**Response:**

Staff disagrees that the APCO may determine that there is no need for a public hearing, however we agree that our obligation is only to provide an opportunity for the public to request a public hearing. Section 402.1 has been changed to match 40 CFR 51.166(q)(2)(v) that requires an opportunity for a public hearing.

## Appendix C

### Public Noticing Threshold Analysis

Staff performed additional analysis of the minor source public noticing thresholds to characterize what those thresholds represent in terms of the contribution of emissions from permitted sources to Sacramento’s air quality problems. The sources that will not be subject to noticing account for less than 5% of the total District emissions inventory for all pollutants except for SOx.

The analysis (as seen in the following two charts and referenced Excel workbooks) shows the amount of emissions from sources subject to public noticing requirements account for approximately 40% of the VOC, 62% of the NOx, 43% of the SOx, 39% of the CO, 40% or the PM10, and 29% of the PM2.5 of the total District permitted emissions. Detailed emissions calculations can be found in two excel workbooks titled “Consolidated Active Permits with Emissions.xlsx” and “Backup Information for Permitted Emissions Calculations.xlsx”.

The following chart summarizes the analysis.

		ROG (tpy)	NOx (tpy)	SO2 (tpy)	CO (tpy)	PM10 (tpy)	PM2.5 (tpy)
1	Public Noticing threshold <sup>41</sup>	10	10	18.4	99	14.6	10
2	Major source threshold <sup>42</sup>	25	25	100	100	100	100
3	Notification threshold is ___% of major source threshold (Line1/Line 2)	40%	40%	18%	99%	15%	10%
4	2010 Total Actual Emissions from all Permitted Sources <sup>43 &amp; 44</sup>	1559	567	68	1018	344	283
5	2010 Actual Emissions from sources w/ PTE at or above noticing thresholds <sup>43 &amp; 44</sup>	627	351	29	395	133	81
6	Total Emissions not subject to public noticing (Line 4-Line 5)	932	216	39	623	201	202
7	2010 Emissions Inventory <sup>45</sup>	21159	25414	237	113936	16474	5072
8	% of emissions inventory from permitted sources (Line4/Line7)	7.4%	2.2%	28.6%	0.9%	2.0%	5.6%
9	% of emissions from permitted sources not subject to public notification (Line 6/Line 7)	4.4%	0.9%	16.2%	0.5%	1.2%	4.0%
10	% of permitted emissions subject to notice (Line 5/Line 4)	40%	62%	43%	39%	40%	29%

<sup>41</sup> Rule 217, Section 110 - shown in tons per year (tpy) here

<sup>42</sup> 40 CFR 51.165(a)(1)(iv)(A)

<sup>43</sup> SMAQMD. “Consolidated Active Permits with Emissions.xlsx”, July 19, 2012.

<sup>44</sup> SMAQMD. “Backup Information for Permitted Emissions Calculations.xlsx”, July 23, 2012.

<sup>45</sup> Annual average emissions for 2010, tons per day times 365 days/year, CEPAM: 2009 Almanac – Standard Emissions Tool. California Air Resources Board. April 13, 2009. Web. July 18, 2012. <http://www.arb.ca.gov/app/emsinv/fcemssumcat2009.php>

The following chart shows the total emissions from permitted sources listed by source category.

Row Labels	Sum of ROG	Sum of CO	Sum of NOX	Sum of PM10	Sum of SO2	Sum of PM2.5
ABRASIVE BLASTING	0.000	0.000	0.000	5.049	0.000	2.115
ADHESIVES	2.407	0.000	0.000	0.000	0.000	0.000
AGGREGATE OPERATION	0.000	0.000	0.000	0.000	0.000	0.000
AGGREGATE OPERATIONS	0.000	0.000	0.000	0.040	0.000	0.007
APC - BAGHOUSE	0.000	0.000	0.000	13.470	0.000	6.334
APC - CARBON ADSORPTION	0.000	0.000	0.000	0.000	0.000	0.000
APC - CONDENSER	0.000	0.000	0.000	0.000	0.000	0.000
APC - CYCLONE	0.000	0.000	0.000	0.219	0.000	0.164
APC - MISCELLANEOUS	0.008	0.126	4.615	0.751	0.000	0.751
APC - OXIDIZER	0.787	12.551	17.563	1.082	0.099	1.065
APC - SCR	0.000	0.000	0.000	0.000	0.000	0.000
APC - SCRUBBER	0.031	0.000	0.142	0.150	0.000	0.150
APC - SOIL	0.740	0.000	0.000	0.000	0.000	0.000
BAGHOUSE	0.000	0.000	0.000	22.668	0.000	21.127
ASPHALT PLANT	51.811	45.295	12.271	18.218	1.795	15.001
BOILER	0.024	0.370	0.251	0.033	0.003	0.033
BOILER/HEATER	10.210	144.117	84.698	14.685	1.394	14.685
BOILER/HEATER < 5 MMBTU	2.045	29.358	19.481	2.818	0.224	2.818
BOILER/HEATER = 5 MMBTU	0.036	0.552	0.374	0.050	0.004	0.050
BOILER/HEATER > 5 MMBTU	0.999	24.330	8.885	1.379	0.108	1.379
BOLER/HEATER	0.016	0.249	0.169	0.023	0.002	0.023
BRICK TUNNEL KILN	0.270	13.690	3.990	9.920	8.900	9.920
BULK TERMINAL	8.644	0.000	0.000	0.000	0.000	0.000
CARBON ADSORPTION	0.022	0.050	0.231	0.319	0.001	0.319
CARBON DRUMS	0.000	0.000	0.000	0.000	0.000	0.000
CEMENT STORAGE	0.000	0.000	0.000	0.076	0.000	0.076
CHEMICAL PROCESS	11.917	0.000	0.000	0.000	0.000	0.000
CHROME PLATING	0.000	0.000	0.000	0.000	0.000	0.000
CLAY HANDLING	0.000	0.000	0.000	0.090	0.000	0.090
CLEANUP - SOIL	26.640	0.000	0.000	0.000	0.000	0.000
CLEANUP - WATER	2.960	0.000	0.000	0.000	0.000	0.000
COATING - ADHESIVES	13.805	0.000	0.000	0.000	0.000	0.000
COATING - AEROSPACE	11.505	0.000	0.000	0.000	0.000	0.000
COATING - AUTO BODY	241.880	0.040	0.050	0.027	0.000	0.014
COATING - DEPAINT	0.016	0.000	0.000	0.000	0.000	0.000
COATING - GENERAL	26.530	0.000	0.000	0.593	0.000	0.296

Row Labels	Sum of ROG	Sum of CO	Sum of NOX	Sum of PM10	Sum of SO2	Sum of PM2.5
COATING - METAL	63.556	0.081	0.096	0.317	0.000	0.162
COATING - SOLVENT PREP	1.000	0.000	0.000	0.000	0.000	0.000
COATING - WOOD	74.250	0.000	0.000	0.000	0.000	0.000
COATING OPERATION	5.400	0.000	0.000	0.644	0.000	0.322
COFFEE ROASTER	0.211	3.008	3.049	0.371	0.018	0.371
CONCRETE BATCH PLANT	0.000	0.000	0.000	0.420	0.000	0.280
CONCRETE PLANT	0.000	0.000	0.000	16.964	0.000	11.309
CONDENSER	0.000	0.000	0.000	0.000	0.000	0.000
COOLING TOWER	0.000	0.000	0.000	3.273	0.000	2.090
CRUMB RUBBER PLANT	0.000	0.000	0.000	0.000	0.000	0.000
CYCLONE	0.000	0.000	0.000	0.000	0.000	0.000
DAIRY	28.050	0.000	0.000	0.000	0.000	0.000
DEGREASER	0.608	0.084	0.100	0.008	0.001	0.008
DRY CLEANING UNIT	8.680	0.000	0.000	0.000	0.000	0.000
DRYER	0.333	5.084	7.042	0.537	0.045	0.537
DRYER (NON PROCESS HTR)	0.014	0.210	0.292	0.019	0.002	0.019
DUST COLLECTOR	0.000	0.000	0.000	0.450	0.000	0.450
ELECTRIC TROMMEL SCREEN	0.000	0.000	0.000	0.000	0.000	0.000
ETCHING PROCESS	0.000	0.000	1.259	0.000	0.000	0.000
E-WASTE SHREDDING	0.000	0.000	0.000	0.116	0.000	0.062
FIBERGLASS OPERATION	12.220	0.000	0.000	0.000	0.000	0.000
FLARE	13.653	44.297	11.090	7.786	0.596	7.786
Fuel Dispensing (all GDFs)	510.506	0.000	0.000	0.000	0.000	0.000
FURNACE/SMELTER	0.113	0.267	0.397	1.016	0.002	0.961
GASEOUS MATERIAL - HANDLING	0.000	0.000	0.000	0.000	0.000	0.000
GASEOUS MATERIAL - STORAGE	5.000	0.000	0.000	0.000	0.000	0.000
IC ENGINE	0.019	0.070	0.197	0.008	0.000	0.007
IC ENGINE COMPRESSION - AG	3.386	8.887	10.206	0.519	0.021	0.507
IC ENGINE COMPRESSION- PRIME	6.556	23.169	23.769	3.269	0.149	3.193
IC ENGINE COMPRESSION- STANDBY	18.185	46.955	81.463	3.254	2.167	3.177
IC ENGINE SPARK - AG	0.003	0.045	0.032	0.002	0.005	0.002
IC ENGINE SPARK - PRIME	34.244	442.979	73.736	17.132	35.726	17.132
IC ENGINE SPARK - STANDBY	0.285	2.163	3.043	0.090	0.165	0.090
INCINERATOR	0.110	0.497	2.313	3.193	0.009	3.193
INCINERATOR/CREMATORY	0.198	0.895	4.163	5.748	0.334	5.748

Row Labels	Sum of ROG	Sum of CO	Sum of NOX	Sum of PM10	Sum of SO2	Sum of PM2.5
LANDFILL GAS COLLECTION	106.994	0.905	1.181	0.211	0.021	0.211
LOADING RACK	15.715	0.000	0.000	0.000	0.000	0.000
MANUFACTURING PROCESS	8.915	7.090	0.008	10.160	0.000	7.722
MATERIAL - HANDLING	1.005	0.081	0.096	2.486	0.000	2.260
MATERIAL - STORAGE	0.000	0.000	0.000	0.942	0.000	0.648
MINING - NONMETALLIC	0.000	0.000	0.000	32.127	0.000	22.873
MINING - NON-METALLIC	0.000	0.000	0.000	0.764	0.000	0.466
MISCELLANEOUS	103.966	30.031	34.997	41.089	3.552	29.092
ORGANIC LIQUID - LOADING	1.460	0.000	0.000	0.000	0.000	0.000
ORGANIC LIQUID - STORAGE	4.956	0.000	0.000	0.000	0.000	0.000
OVEN	0.052	0.791	0.942	0.072	0.006	0.072
OVEN/KILN	27.673	21.829	8.194	2.159	0.177	0.629
OXIDIZER	0.089	1.366	1.627	0.131	0.010	0.131
PHARMACEUTICAL PROCESS	2.124	0.000	0.278	0.000	0.000	0.000
PLASMA CUTTING PROCES	0.000	0.000	0.905	0.066	0.000	0.905
PLATING TANK	0.000	0.000	0.000	0.000	0.000	0.000
PRINTING PRESS	3.991	0.000	0.000	0.000	0.000	0.000
PRINTING PROCESS	25.095	0.000	0.000	0.000	0.000	0.000
ROCKET TESTING	0.001	0.411	0.026	0.639	0.000	0.383
SAWDUST HANDLING	0.000	0.000	0.000	0.630	0.000	0.410
SAWDUST HANDLING SYSTEM	0.000	0.000	0.000	4.660	0.000	3.090
SCR	0.000	0.000	0.000	0.000	0.000	0.000
SCRUBBER	0.000	0.000	0.013	0.240	0.000	0.240
SEWAGE HANDLING/TREATMENT	0.012	0.000	0.000	0.000	0.000	0.000
SHREDDER	0.000	0.000	0.000	0.666	0.000	0.355
SOIL MIXING/ BLENDING PROCESS	0.000	0.000	0.000	0.607	0.000	0.607
SOIL REMEDIATION	0.000	0.000	0.000	0.091	0.000	0.091
SOLVENT HANDLING	1.000	0.000	0.000	0.000	0.000	0.000
SOLVENT WASTE TANK	0.000	0.000	0.000	0.000	0.000	0.000
STERILIZER	5.750	0.000	0.000	0.000	0.000	0.000
STORAGE TANK	1.000	0.000	0.000	0.000	0.000	0.000
TANK STORAGE	16.249	4.330	1.990	0.000	0.000	0.000
TURBINE	33.036	102.138	141.820	78.616	12.276	78.538
WATER SPRAY	0.000	0.000	0.000	0.630	0.000	0.410
Totals	1559	1018	567	334	68	283