

**Guidelines for Using
Air Contaminant Discharge Permit (ACDP)
Series AQ200 Forms**

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PURPOSE

Form Series AQ200, Devices/Processes, collects information on the regulated air pollutant-emitting devices and processes (e.g., boilers, incinerators, coating operations, etc.) at the facility. The owner/operator is required to describe the pollutant-emitting devices/processes at the facility on the appropriate forms (e.g., crematory incinerators on Form AQ209).

The detailed descriptions of the devices/processes captured on these forms provide the LRAPA permit writers valuable information to help them set the facility's Plant Site Emission Limit (PSEL), which is the annual quantity that the facility is allowed to emit of a given regulated air pollutant (e.g., 20 tons per year of NO_x). The information is also used to determine the emissions limits and standards that apply to the devices/processes.

AQ200 FORMS

Provided below is a list of the forms for specific devices/processes. If there is not a form for a device or process at the facility, Form AQ230 should be used to provide the information about the device or process.

Form Number	Description
AQ202	Asphalt Plants
AQ203	Rock Crusher
AQ204	Ready-mix Concrete Plant
AQ205	Volatile Organic Liquid Storage Tanks
AQ206	Material Dryers/Ovens (For facilities other than wood products facilities)
AQ207	Coffee Roasters
AQ208	Boilers (other than hogged fuel boilers)
AQ209	Crematory Incinerator
AQ210	Internal Combustion Engines and Gas Turbines
AQ211	Surface Coating Operations (painting, coating, solvents)
AQ212	Grain/Seed/Animal Feed
AQ213	Power Generators
AQ214	Solvent Usage
AQ216	Bakeries
AQ220	Wood Products Facility Data
AQ221	Veneer Dryers
AQ222	Wood Particle Dryers
AQ223	Wood Panel Presses
AQ224	Hogged Fuel Boilers
AQ225	Wood Drying Kilns
AQ226	Wood Product Process Cyclone
AQ230	Miscellaneous Device or Process
AQ231	Operation and Maintenance

GUIDANCE

Identification Numbers

LRAPA asks that the owner/operator assign identification numbers to each device/process described in the AQ200 forms. These identification numbers may be in whatever format the owner/operator considers appropriate and convenient (e.g., boilers could be identified as “boiler 1”, “boiler 2”, etc.). These identification numbers should be used consistently throughout the application materials whenever a “device/process ID number” is requested. The identification numbers will help both the owner/operator and LRAPA tie the permit application materials together and will also help with referencing in discussions between LRAPA and the owner/operator.

“Identical” Devices

The device forms provide an option for recording information for multiple *identical* devices on a single form, rather than repeating the same information for each identical device. For example, if there are several identical boilers at the facility, the owner/operator could complete one Form AQ208 to describe all of the boilers. This is appropriate, however, only when the devices *truly* are *identical*. Identical is defined as devices that have the same design capacity and burn the same fuels, dry the same wood species, or store the same materials, as appropriate to the device. For equipment to be considered identical, they should also have approximately the same installation date.

Example: There are two identical crematory incinerators at the facility. They have the same capacity and burn the same waste. The owner/operator may consider these devices identical and report them on a single AQ209 Form.

Example: There are two veneer dryers at the facility. Although the two veneer dryers have the same design and capacity, one is always used to dry Douglas Fir veneer and the other is always used to dry Ponderosa Pine veneer. Because the two dryers are used to dry different species of wood, which will result in different emissions, the applicant will need to record the information for the devices on two separate AQ221 Forms.

Existing versus future

The applicant will note that the AQ200 Forms offer the option to provide information on devices/processes that are to be installed later during the permit term. If, for example, the owner/operator anticipates installing a boiler in two years, then the owner/operator could build that boiler into the permit at this time and avoid having to submit a permit modification at a later date. If the owner/operator wants to identify “future” devices/processes, he/she should do so by indicating “future” in the question about “existing or future” on the relevant AQ200 Form. The rest of the form should be completed as thoroughly as possible with the available information.

“Design” and Maximum Projected Operation

Note: Before proceeding with the AQ200 Forms, it is recommended that the applicant review the guidelines for Form Series AQ400 to get a better understanding of how Plant Site Emissions Limits are established.

The AQ200 Forms help LRAPA understand the maximum operating capacity and typical operating levels of the pollutant-emitting devices/processes at the facility. This information in turn helps LRAPA establish the PSELs for the facility. PSELs are established on annual basis for each 12-consecutive calendar month period. In general, emissions are related to device/process operations (e.g., the amount of fuel burned, the amount of widgets produced, or the amount of materials processed) and any limit on pollutant emissions will essentially be a limit or restriction on the device/process operations. Therefore, to ensure operational flexibility, it is important to consider both the design capacity and the projected maximum operations of the device or process.

For the short term, if a short term PSEL is required, it is important to identify the maximum design capacity of the device or process or the maximum operating rate, if greater than the design capacity. Although the device/process may be routinely operated at a rate less than the maximum design capacity, it is important to set the PSEL at a level

that will allow the device or process to be operated at the maximum capacity at any given time. In some cases, however, it may be appropriate to specify a short term rate less than the maximum design capacity; especially if the device or process has been de-rated or it is practically impossible to operate at the design capacity.

For the long term (e.g., annual period), devices or processes are not typically operated at their maximum design capacity throughout the entire year. Therefore, the projected maximum operations should correspond to the expected operations, taking into consideration maintenance downtime, product demand, and seasonal operations.

For these reasons, LRAPA needs to understand both the *design* and *projected maximum* level that a device/process could operate for any given time period.

- Design refers to the manufactured rating for the device/process in question. In providing the requested design information, the owner/operator should include any assumptions underlying the design rating (e.g., if operational design is set assuming “40°F weather conditions”). Further, the owner/operator should indicate if the device/process is capable of operating *above* the design capacity.
- Projected maximum refers to the highest level of operation that the device/process in question would ever be expected to attain during the pending permit term on an annual basis. This should be a *realistic* expectation because unrealistically high projections, while allowing for considerable flexibility, may trigger other permitting requirements, such as New Source Review and the LRAPA Title V Operating Permit program.

Please note that LRAPA recognizes that some guesswork is required. For many devices and processes, it is extremely difficult to anticipate future operations because of variables like weather and seasonal operations. The owner/operator may need to look at historic data and project future operations. The owner/operator should use his/her best judgement. The owner/operator is encouraged to consult with the LRAPA permit writer for further guidance, if necessary. In all cases, the owner/operator should be providing information about how the device/process is likely to operate *during the pending permit term* so that LRAPA can set the PSEL appropriately given how the owner/operator wants the facility to be able to operate.

New Source Review

New Source Review (NSR), described in LRAPA Title 38, Section 38-0010 through 38-0060, is a regulatory review process conducted when an owner/operator proposes a major modification or construction of a major source in a non-attainment or maintenance area (see the definitions of “major source” and “major modification” in LRAPA Title 12). The review is intended to ensure that the modification or construction does not further deteriorate the air quality of an area that is or was in non-attainment with national ambient air quality standards. If a facility has previously undergone or is currently subject to New Source Review, then the device/process at the facility may be subject to a Lowest Achievable Emission Rate (LAER) limit that does or will require special control equipment to comply with the limit. If this is the case, the owner/operator is asked to identify the pollution control equipment and describe the equipment on an appropriate AQ300 Series Form.

Prevention of Significant Deterioration

Prevention of Significant Deterioration (PSD), described in LRAPA Title 38, Section 38-0070, is a regulatory review process conducted when an owner/operator proposes a major modification or construction of a major source in an attainment or unclassified area (see the definitions of “major source” and “major modification” in LRAPA Title 12). The review is intended to ensure that the modification or construction does not significantly deteriorate the air quality of an area that currently is in attainment with national ambient air quality standards. If a facility has previously undergone or is currently subject to PSD, then the device/process at the facility may be subject to a Best Available Control Technology (BACT) limit that does or will require special control equipment to comply with the limit. If this is the case, the owner/operator is asked to identify the pollution control equipment and describe the equipment on an appropriate AQ300 Series Form.

New Source Performance Standards

New Source Performance Standards (NSPS), described in LRAPA Title 46, are source-specific standards (e.g., unique standards for petroleum refineries versus incinerators, etc.) imposed on sources that meet the definition of “new”. In this case, “new” means any source whose manufacture took place, or whose construction or installation *commenced*, on or after the date that the applicable NSPS was proposed by EPA. The term *commenced* refers to the date on which the owner/operator of the facility made a financial commitment to construct or install the source. LRAPA needs to know the date of manufacture or the date that construction or installation commenced so that it can determine whether new source performance standards apply to the device/process.