

INTER-OFFICE COMMUNICATION

PS Memo #: PS95-013 **REVISION NO. 1**

TO: Stationary Sources Program Staff and Local Agencies
FROM: Jim Geier, Dennis M. Myers
DATE: May 21, 1996 (**revised**) (**originally dated November 7, 1995**)
RE: Grouped APEN requirements

Regulation No. 3, Part A, II.B.4. lists specific guidelines for when a source can group multiple emission points from a single facility. This provision was intended to provide sources relief from filing numerous APENS and their associated fees. It also says that the Division may allow a source to deviate from the grouping criteria upon showing that an alternative is reasonable and will not compromise the overall goals of receiving accurate and verifiable emissions information. This memo will provide additional guidance as to when the Division will allow a source to group emission points on an APEN.

1. The option to group emission points is voluntary on the applicant's part. However, the Division can not allow a source to disaggregate emissions-producing equipment that may be part of an emission point in order to avoid the filing of an APEN.
2. If a source requests that emission points be grouped, we should first check to see if it meets the guidelines listed in Reg.3, Part A, II.B.4. If all of those guidelines are met, then the grouping should be allowed.
3. If the source does not meet all of the guidelines, the Division still may allow the source to group, if the Division believes that what the source has proposed is reasonable and will provide the Division with accurate, verifiable, and enforceable emission information. It needs to be understood by the source that this alternative is not automatically given, and determinations are made on a case-by-case basis by the Division and approved by the Construction Permit Unit Leader. The Division will make the determination on whether to allow an alternative grouping proposal.
4. One of the items the Division would require for an alternative grouping proposal is that all the emission points be located and operated at the same location. For portable sources such as crushing plants consisting of numerous screens, crushers, generators, conveyors, etc., this means that the source must be willing to accept permit conditions that all of the emission points submitted on

the grouped APEN will be used and relocated as a unit, and that individual emission points will not be located at different sites. If a source wants the flexibility to move specific emission points to different sites, then a separate APEN must be filed and a separate permit obtained for each emission point. The Division will not allow a source to submit the same emission points on different grouped APENS in order to get around this requirement.

As previously discussed in PS Memo 95-004, the Division will allow a source to group glycol dehydration units by “gathering field” as long as the gathering field does not extend across county line(s). If the gathering field does extend across county lines(s) then separate APENS must be filed for the common field in each county. The grouped APEN for glycol dehydration units must include a gas composition analysis of a representative well in the common gathering field, and should also include a copy of the GRI Gly-Calc print out for the units. If the source does not want to run Gly-Calc, then sufficient data must be included with the APEN to allow the Division to be able to run Gly-Calc.

5. In regard to AIRS coding, if the Division allows a source to group emission points, the emission points will be coded into one plant (for portable sources this will be in county 777). Each individual emission point will still need to be coded as a separate point under that plant, since throughput, stack parameters, etc. will vary.

6. If the source wants the flexibility to relocate individual emission points to different sites, then separate APENS and permits will be required, and as we have previously done, each emission point will continue to be coded into AIRS as a separate plant in county 777.

7. For purposes of this policy, an emissions point is the same as an emission unit as defined in Reg.3, Part A, Section I.B.21. A source owner may not disaggregate an emission point for purposes of avoiding APEN reporting or other applicable requirements including permitting. Generally, an emissions producing activity that operates within a facility will be considered to be a single unit for purposes of APEN reporting if the associated pieces of equipment operate together as a functional process within a contiguous discrete area of a facility, and emissions are commonly vented, or are collected and exhausted through a common stack.

8. If a source should have several emission points connected to a common stack, and wants to voluntarily submit separate APENS for each, the source should be allowed to do so as long as a filing fee for each APEN is also submitted. If by separating out the emission points, each emission point is less than the APEN de minimis level, then no APENS would be required.

Summary of revision #1: Previous version improperly referred to grouping of “equipment”. This revision uses the term emission point (emission unit) which is the wording contained in Regulation 3, Part A.