



South Coast Air Quality Management District

Engineering & Compliance

*Policies &
Procedures*

Date: August 7, 2007
From: Mohsen Nazemi /s/ Mohsen via Electronic Mail
To: Engineering Division Staff
Subject: BACT Emission Limit Averaging Time

BACT emission limits on new permits for combustion equipment shall be imposed on a one hour averaging period. A different averaging period (shorter or longer) may be used as permit conditions and for purposes of compliance determination for other applicable rules and regulations (i.e. 15 minutes average for Regulations IV, XI, XX, or monthly limits for offsets, etc.) Also in some instances we have considered a longer averaging period with a lower emission limit to be equivalent to a shorter averaging period with a higher emission limit (i.e. for gas turbines we had worked with EPA to consider 2 ppm based on 3-hr averaging period to be BACT equivalent to 2.5 ppm based on a 1-hr averaging period.) This type of BACT equivalency determination, however, has to be made on a case by case basis.

The one hour averaging period will still allow us to evaluate NSR modeling compliance requirements with ambient one-hour standards (the shortest National and State AAQS). A shorter averaging time emission limit can be used as permit conditions for compliance with other rules and regulation, if applicable.

However, this does not automatically change any permits which have already been issued and which may have a shorter averaging time for BACT purposes. If some permit holders wish to change their BACT emission limit from a shorter averaging time to a one hour averaging time, they would have to file a new application for change of condition and if the hourly emission of the equipment is not increased it would probably not trigger an NSR event.