

 VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT	ENGINEERING DIVISION Policies and Procedures
Issued: July 10, 2002	Subject: Air Toxics Review During Permit Renewal
Revised: July 10, 2002	

Policy Statement

During the permit renewal process, each permit will be reviewed by the Air Toxics Section to determine if the facility’s Air Toxics Hot Spots program status needs to be revised.

Each facility that is currently subject to the program (a “full program” or “tracking” facility) will be reviewed to determine if its status should be revised based on its current permit. Each “industry wide” facility will be reviewed to determine if it should be exempted from the program.

Each facility that is currently not subject to the program (including an “exempt” or “conditionally exempt” facility) will be reviewed to determine if it should be made subject to the program based on its current permit.

These reviews are to be conducted based on criteria developed by the Air Toxics Section. The criteria may be revised as necessary based on the experience gained during implementation of this policy. The criteria may include, but are not required to include, obtaining emission data, pollutant release parameters, or receptor information from the facility. The criteria may also include conducting health risk assessments for selected facilities.

Background

The Air Toxics Hot Spots program applies to existing facilities that have routine and predictable emissions of air toxic contaminants. The purpose of the program is to identify facilities that may pose a significant health risk to the public, to notify the public of the potential risk, and to reduce any identified significant risk.

Discussion

A facility may initially be subject to the Air Toxics Hot Spots program because of a number of criteria. The criteria are listed in the Air Resources Board *Emission Inventory Criteria and Guidelines* document. Under certain conditions, a facility initially subject to the program can be exempted from the program. Similarly, under certain conditions, a facility that has been exempted from the program can be re-included in the program.

The *Emission Inventory Criteria and Guidelines* document also includes a general criterion that allows a District to include any facility in the program if the District has made a written determination that there is a “reasonable basis” for determining that the facility may pose a significant risk to public health.

Therefore, in order to determine whether a facility is subject to the Air Toxics Hot Spots program or not, each facility must be reviewed on a regular basis. Since the District reviews and

renews all Permits to Operate on an annual basis, it is logical to include a review of the facility's Air Toxics Hot Spots program status as part of the permit renewal process.

Signed:

Karl E. Krause, Manager
Engineering Division