

**INTER-OFFICE COMMUNICATION**

PS Memo #: PS96-4 **Revision 1**

TO: Stationary Sources Program and Local Agency Staff

FROM: Dennis M. Myers

DATE: August 19, 1996 **revised March 17, 1997**

RE: Guidance on process equipment that may also control emissions, control equipment vented back into a building, and uncontrolled actual emissions

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**NOTE: Based on the attached June 19, 1978 guidance from EPA and per my phone call with John Dale on March 13, 1997 to confirm that the guidance is still current the following change (listed below in bold print) will be made to how uncontrolled actual emissions and PTE is determined. Process equipment that also functions as air pollution control equipment can be counted in determining a source's PTE and its uncontrolled actual emissions if that equipment is "vital" to the activity. Equipment is considered "vital" if a source could not produce its normal product or operate without it.**

Regulation No. 3 states that both APEN and permitting requirements be based on uncontrolled actual emissions. In most cases determining uncontrolled actual emissions is a straightforward process in which the emissions are determined prior to benefit of control equipment. There are a couple of areas though, where the procedure is not clear.

The first case involves venting of control equipment back into a building. In this case uncontrolled actual emissions must still be determined without benefit of either the control device or the building for reducing emissions. It doesn't matter what type of control device is used, since uncontrolled actual emissions will be determined prior to the control device.

The second case involves process equipment that may also be pollution control equipment. An example of this type of source would be a woodworking operation that uses a cyclone as part of their air system. **In this example, the cyclone has an integral process function in addition to acting as a pollution control device. The cyclone would be considered "vital" to the source, since the air handling of material could not occur without it, and the source would not be able to produce its normal product without**

**the air handling system. Therefore in this case both the source's PTE and its uncontrolled actual emissions should also be calculated including the benefit of the process equipment(cyclone). In addition, if the design of a piece of equipment (such as certain types of internal combustion engines, and certain types of external combustion burners) inherently limits emissions, then determination of PTE and actual uncontrolled emissions can factor in that design. Since this type of determination may not be straightforward, the construction permit unit leader should be consulted prior to using this procedure to determine a source's PTE or its uncontrolled actual emissions.**