Mojave Desert Air Quality Management District
14306 Park Avenue, Victorville, CA 92392-2310
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Visit our web site: http://www.mdaqmd.ca.gov
Eldon Heaston, Executive Director

July 8, 2015

Re: Determination of Federally Reportable and Enforceable Facilities (Title V Major and Synthetic Minor-80 Statuses)

Dear Owner/Operator:

In July of 2014, the United States EPA released a revised *Clean Air Act Compliance Monitoring Strategy*. This document sets the monitoring policy for determining compliance of federally enforceable requirements for the following two source categories:
(1) Title V Major Sources (as defined in CAA §501(2)), and (2) Synthetic Minor-80 (SM-80) Sources.

Title V Major Sources are sources that emit or have the potential to emit at or above the Title V major source thresholds listed in Table 1, below:

Table 1. Major Source Thresholds:
A facility is a Major Source (Title V Source) if it has the potential to emit at or greater than the amounts indicated below.

Pollutant	*Potential to Emit (tons per year)*
NO_X	25
VOC	25
CO	100
PM_{10}	100
SO_X	100
Any single HAP*	10
Combination of any HAP*	25

*HAP = Hazardous Air Pollutant: An air pollutant listed pursuant to 42 U.S.C. §7412(b) (Federal Clean Air Act §112) or in regulations promulgated thereunder. Please refer to attachment A.

SM-80 Sources are synthetic minor sources that emit or have the potential to emit at or above 80 percent of the Title V major source thresholds listed in Table 1. The 80 percent threshold of the SM-80 designation was selected to ensure that those facilities that have the potential to emit, or actually emit, pollutants close to the major source thresholds are evaluated periodically. Both Title V Major Sources and SM-80 Sources are federally reportable and enforceable.
The District is sending you this letter because it is believed that your facility's potential to emit is less than 80 percent of the major source thresholds indicated in Table 1, above. The District

believes that your facility's potential to emit is, therefore, below the amounts listed in the Table 2, below, designating it as a Minor Source:

Table 2. SM-80 Sources: Potential to Emit Thresholds:

A facility is a SM-80 Source if it has the potential to emit greater than the amounts indicated below, but less than the amounts listed in Table 1, above.

Pollutant	*Potential to Emit (tons per year)*
NO_X	20
VOC	20
CO	80
PM_{10}	80
SO_X	80
Any single HAP*	8
Combination of any HAP*	20

*HAP = Hazardous Air Pollutant: An air pollutant listed pursuant to 42 U.S.C. §7412(b) (Federal Clean Air Act §112) or in regulations promulgated thereunder. Please refer to attachment A.

If you are in agreement with this determination, that is, if you believe that your facility does not have the potential to emit greater than the amounts indicated in Table 2 for any of the listed pollutants, you do not need to do anything further. This classifies your facility as a Minor Source, and your facility is; therefore, not federally reportable or enforceable (i.e. not a Title V Major Source, nor a SM-80 Source). Your current permit may be updated to include the proper physical and/or operational limits to ensure your potential to emit remains below the limits in Table 2.

However, if you do not agree that this determination is correct, and you believe that your facility, in fact, does have a potential to emit greater than the amounts indicated in Table 2, for any of the listed pollutants, please contact me at 760-245-1661 extension 6726, or Sheri Haggard at extension 1864 (shaggard@mdaqmd.ca.gov) as soon as possible. This subjects your facility to federally-enforceable monitoring and reporting requirements pursuant to USEPA's *Clean Air Act Compliance Monitoring Strategy*.

Sincerely,

Alan J. De Salvio
Deputy Director, Mojave Desert Operations

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Enclosure: Attachment A – HAP List

Attachment A – HAP List

Chemical Name	CAS Registry Number
ACETALDEHYDE	75-07-0
ACETAMIDE	60-35-5
ACETONITRILE	75-05-8
ACETOPHENONE	98-86-2
2-ACETYLAMINOFLUORENE	53-96-3
ACROLEIN	107-02-8
ACRYLAMIDE	79-06-1
ACRYLIC ACID	79-10-7
ACRYLONITRILE	107-13-1
ALLYL CHLORIDE	107-05-1
4-AMINOBIPHENYL	92-67-1
ANILINE	62-53-3
ANTIMONY	7440-36-0
ANTIMONY COMPOUNDS	ADQ500
ARSENIC	7440-38-2
ASBESTOS (FRIABLE)	1332-21-4
BENZENE	71-43-2
BENZIDINE	92-87-5
BENZOIC TRICHLORIDE	98-07-7
BENZYL CHLORIDE	100-44-7
BERYLLIUM	7440-41-7
BERYLLIUM COMPOUNDS	BFQ500
BETA-PROPIOLACTONE	57-57-8
BIPHENYL	92-52-4
(1,1'-BIPHENYL)-4,4'-DIAMINE, 3,3'-DIMETHYL-	119-93-7
BIS(2-CHLOROETHYL) ETHER	111-44-4
BIS(2-ETHYLHEXYL)PHTHALATE	117-81-7
BIS(CHLOROMETHYL) ETHER	542-88-1
1,3-BUTADIENE	106-99-0
1,2-BUTYLENE OXIDE	106-88-7
CADMIUM	7440-43-9
CADMIUM COMPOUNDS	CAE750
CALCIUM CYANAMIDE	156-62-7
CAMPHECHLOR	8001-35-2
CAPTAN	133-06-2
CARBARYL	63-25-2
CARBON DISULFIDE	75-15-0
CARBON TETRACHLORIDE	56-23-5
CARBONYL SULFIDE	463-58-1
CATECHOL	120-80-9
2-CHLOR-1,3-BUTADIENE	126-99-8
CHLORAMBEN	133-90-4
CHLORDANE	57-74-9
CHLORINE	7782-50-5
CHLOROACETIC ACID	79-11-8
2-CHLOROACETOPHENONE	532-27-4
CHLOROBENZENE	108-90-7
CHLOROBENZILATE	510-15-6
CHLOROETHANE	75-00-3
CHLOROFORM	67-66-3
CHLOROMETHANE	74-87-3
CHLOROMETHYL METHYL ETHER	107-30-2
CHROMIUM	7440-47-3
CHROMIUM COMPOUNDS	CMJ500
COBALT	7440-48-4
COBALT COMPOUNDS	CNB850
COKE OVEN EMISSIONS	1066
CRESOL (MIXED ISOMERS)	1319-77-3
CUMENE	98-82-8
CYANIDE COMPOUNDS	1073
2,4-D	94-75-7
DDE	72-55-9
2,4-DIAMINOTOLUENE	95-80-7
DIAZOMETHANE	334-88-3
DIBENZOFURAN	132-64-9
1,2-DIBROMO-3-CHLOROPROPANE (DBCP)	96-12-8
1,2-DIBROMOETHANE	106-93-4
DIBUTYL PHTHALATE	84-74-2
1,4-DICHLOROBENZENE	106-46-7
3,3'-DICHLOROBENZIDINE	91-94-1
1,1-DICHLOROETHANE	75-34-3
1,2-DICHLOROETHANE	107-06-2
1,1-DICHLOROETHYLENE	75-35-4
DICHLOROMETHANE	75-09-2
1,2-DICHLOROPROPANE	78-87-5
1,3-DICHLOROPROPENE (MIXED ISOMERS)	542-75-6
DICHLORVOS	62-73-7
DIETHANOLAMINE	111-42-2
DIETHYL SULFATE	64-67-5
3,3'-DIMETHOXYBENZIDINE	119-90-4
1,1-DIMETHYL HYDRAZINE	57-14-7
DIMETHYL PHTHALATE	131-11-3
DIMETHYL SULFATE	77-78-1
4-DIMETHYLAMINOAZOBENZENE	60-11-7
DIMETHYLCARBAMOYL CHLORIDE	79-44-7
4,6-DINITRO-O-CRESOL	534-52-1
2,4-DINITROPHENOL	51-28-5
2,4-DINITROTOLUENE	121-14-2
1,4-DIOXANE	123-91-1
1,2-DIPHENYLHYDRAZINE	122-66-7
EPICHLOROHYDRIN	106-89-8
ETHYL ACRYLATE	140-88-5
ETHYLBENZENE	100-41-4
ETHYLENE GLYCOL	107-21-1
ETHYLENE GLYCOL MONOETHYL ETHER	110-80-5
ETHYLENE GLYCOL MONOMETHYL ETHER	109-86-4
ETHYLENE OXIDE	75-21-8
ETHYLENE THIOUREA	96-45-7
ETHYLENEIMINE	151-56-4
FORMALDEHYDE	50-00-0
GAMMA-LINDANE	58-89-9
GLYCOL ETHERS	EDF-109
HEPTACHLOR	76-44-8

HEXACHLORO-1,3-BUTADIENE	87-68-3
HEXACHLOROBENZENE	118-74-1
HEXACHLOROCYCLOPENTADIENE	77-47-4
HEXACHLOROETHANE	67-72-1
HEXAMETHYLENE-1,6-DIISOCYANATE	822-06-0
HEXAMETHYLPHOSPHORAMIDE	680-31-9
HYDRAZINE	302-01-2
HYDROCHLORIC ACID	7647-01-0
HYDROFLUORIC ACID	7664-39-3
HYDROGEN CYANIDE	74-90-8
HYDROQUINONE	123-31-9
INORGANIC ARSENIC COMPOUNDS	EDF-222
ISOPHORONE	78-59-1
LEAD	7439-92-1
LEAD COMPOUNDS	LCT000
M-CRESOL	108-39-4
M-XYLENE	108-38-3
MALEIC ANHYDRIDE	108-31-6
MANGANESE	7439-96-5
MANGANESE COMPOUNDS	MAR500
MERCURY	7439-97-6
MERCURY COMPOUNDS	EDF-033
METHANAMINE, N-METHYL-N-NITROSO	62-75-9
METHANOL	67-56-1
METHOXYCHLOR	72-43-5
METHYL BROMIDE	74-83-9
METHYL ETHYL KETONE	78-93-3
METHYL HYDRAZINE	60-34-4
METHYL IODIDE	74-88-4
METHYL ISOBUTYL KETONE	108-10-1
METHYL ISOCYANATE	624-83-9
METHYL METHACRYLATE	80-62-6
METHYL TERT-BUTYL ETHER	1634-04-4

4,4'-METHYLENEBIS(2-CHLOROANILINE)	101-14-4
1,1'-METHYLENEBIS(4-ISOCYANATOBENZENE)	101-68-8
4,4'-METHYLENEDIANILINE	101-77-9
MINERAL FIBERS	1136
N,N-DIMETHYLANILINE	121-69-7
N,N-DIMETHYLFORMAMIDE	68-12-2
N-HEXANE	110-54-3
N-NITROSO-N-METHYLUREA	684-93-5
N-NITROSOMORPHOLINE	59-89-2
NAPHTHALENE	91-20-3
NICKEL	7440-02-0
NICKEL COMPOUNDS	NDB000
NITROBENZENE	98-95-3
4-NITROBIPHENYL	92-93-3
4-NITROPHENOL	100-02-7
2-NITROPROPANE	79-46-9
O-ANISIDINE	90-04-0
O-CRESOL	95-48-7
O-TOLUIDINE	95-53-4
O-XYLENE	95-47-6
P-CRESOL	106-44-5
P-PHENYLENEDIAMINE	106-50-3
P-XYLENE	106-42-3
PARATHION	56-38-2
PENTACHLOROPHENOL	87-86-5
PHENOL	108-95-2
PHOSGENE	75-44-5
PHOSPHINE	7803-51-2
PHOSPHORUS COMPOUNDS	PHQ000
PHTHALIC ANHYDRIDE	85-44-9
POLYCHLORINATED BIPHENYLS	1336-36-3
POLYCYCLIC ORGANIC MATTER (POM)	EDF-047
PROPANE SULTONE	1120-71-4

PROPIONALDEHYDE	123-38-6
PROPOXUR	114-26-1
PROPYLENE OXIDE	75-56-9
PROPYLENEIMINE	75-55-8
QUINOLINE	91-22-5
QUINONE	106-51-4
QUINTOZENE	82-68-8
RADIONUCLIDES	1165
SELENIUM	7782-49-2
SELENIUM COMPOUNDS	SBP500
STYRENE	100-42-5
STYRENE OXIDE	96-09-3
2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN (TCDD)	1746-01-6
1,1,2,2-TETRACHLOROETHANE	79-34-5
TETRACHLOROETHYLENE	127-18-4
TITANIUM TETRACHLORIDE	7550-45-0
TOLUENE	108-88-3
TOLUENE-2,4-DIISOCYANATE	584-84-9
TRANS-1,3-DICHLOROPROPENE	10061-02-6
TRIBROMOMETHANE	75-25-2
1,2,4-TRICHLOROBENZENE	120-82-1
1,1,1-TRICHLOROETHANE	71-55-6
1,1,2-TRICHLOROETHANE	79-00-5
TRICHLOROETHYLENE	79-01-6
2,4,6-TRICHLOROPHENOL	88-06-2
2,4,5-TRICHLOROPHENOL	95-95-4
TRIETHYLAMINE	121-44-8
TRIFLURALIN	1582-09-8
2,2,4-TRIMETHYLPENTANE	540-84-1
URETHANE	51-79-6
VINYL ACETATE	108-05-4
VINYL BROMIDE	593-60-2
VINYL CHLORIDE	75-01-4
XYLENE (MIXED ISOMERS)	1330-20-7