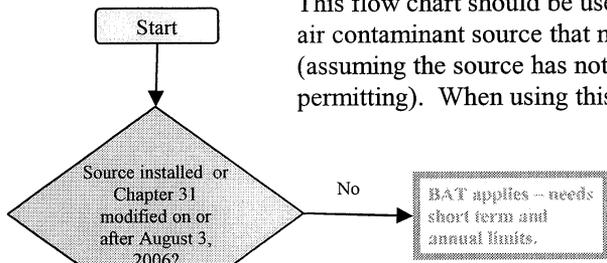
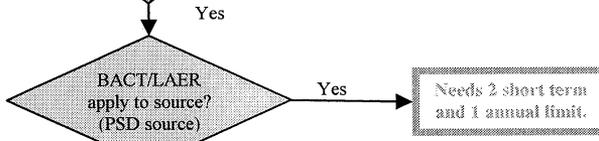


# BAT Decision Flowchart

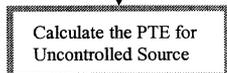
This flow chart should be used to decide what kind of PTI or PTIO emission limits are needed for an air contaminant source that might qualify for the less than 10 tons/yr BAT exemption threshold (assuming the source has not first been determined to be de minimus or otherwise exempt from permitting). When using this flowchart, each criteria pollutant should be evaluated separately.



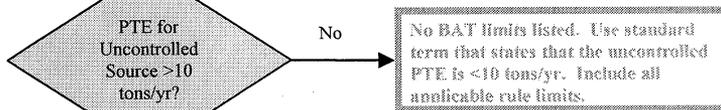
Standard methods for BAT should be used to develop limits. This means typically a short term limit is needed (like a lbs/hr) and an annual limit is needed with the usual exceptions for emissions units such as storage tanks and material storage piles where just annual limits are acceptable.



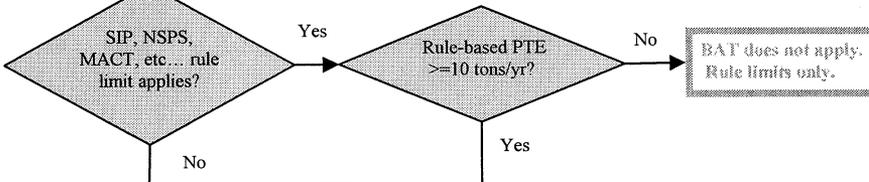
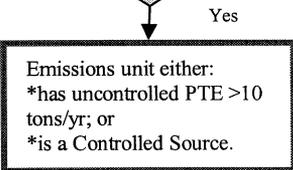
BACT/LAER with controls require both an emission rate limit (lbs/hr) and a technology limit (e.g., ppm) for short term limits. In addition, an annual limit is required. BAT is equivalent to BACT/LAER.



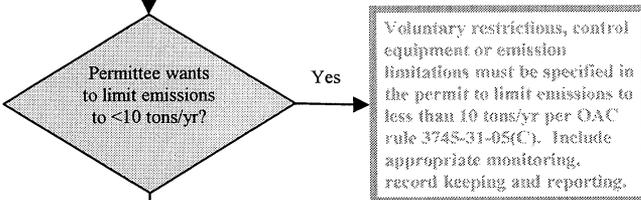
Perform this calculation for an uncontrolled source (controlled sources will be evaluated later in the flowchart). Assume worst case process variables (e.g., material usage, highest sulfur content, etc...) for the calculation. No monitoring, record keeping or reporting of these process variables would be necessary.



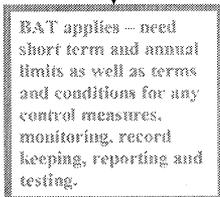
When a source is uncontrolled and the PTE is < 10 tons/yr, do not establish a BAT emission limit or any monitoring, record keeping or reporting terms per BAT. Instead, utilize the standard term that states that no BAT is required because the PTE is <10 tons/yr. List any applicable rule-based limits. (Note that the source could have a calculated PTE based on the rule limit of >10 tons/yr).



Since the rule limits annual emissions to less than 10 tons/yr, BAT does not apply. Instead, just list any applicable rule limits in the permit. Note: If/when an applicable rule that affects PTE is changed, BAT applicability must be re-evaluated (via administrative modification of the PTI or PTIO).



If the permittee wants to restrict emissions to below the 10 tons/yr BAT exemption threshold (e.g., by the use of an operating restriction on hours, material usage or using control equipment) then such voluntary restriction must be specified in the permit. Use the voluntary restriction term and condition. The permit also needs to specify an emission limit. To avoid Title V or major NSR, synthetic minor emission limits are needed (rolling 12-month). To avoid BAT, a straight tons/yr limit is sufficient (e.g., 9.9 tons/yr).



Standard methods for BAT should be used to develop limits. This means typically a short term limit is needed (like a lbs/hr) and an annual limit is needed with the usual exceptions for emissions units such as material storage tanks and material storage piles where just annual limits are acceptable.