

Air Pollution Control Program Permits Section

- Overview
- Guidance Available
- Current Issues

March 2011

Air Permitting

Two types of air permits:

- New Source Review/Construction Permit
 - Permit required prior to commencing construction
 - Allows construction and operation
 - Project Emissions
- Operating Permit/Title V
 - Required after commencing operation
 - Based on entire Installation emissions

General Air Permitting Procedure

- Installation obtains a Construction/New Source Review Permit for new installation or project at existing installation
- Installation constructs
- Installation obtains/amends Operating Permit
 - within 30 days, 90 days or 12 months of commencing operation - depends on type of operating permit required.

Air Permit Applicability

- Potential Emissions of equipment/installation determine type of permit needed, if any
- Potential Emissions are based on maximum design rate operating 8760 hours per year
- Emission Factors taken from EPA source, stack test or engineering data
- Control devices may be considered when determining potential to emit – only if issuing a permit with conditions requiring controls

Air Emission Permitting Thresholds

Pollutant	Insignificant Levels (lb/hr)	Regulatory <i>De Minimis</i> Levels (tpy)	Major Source Thresholds – named sources (tpy)	Major Source Thresholds – Non-named source (tpy)
PM ₁₀	1.0	15	100	250
SO _x	2.75	40	100	250
NO _x	2.75	40	100	250
VOC	2.75	40	100	250
CO	6.88	100	100	250
HAPs	0.5	10/25	10/25	10/25

Note: Need to also consider Greenhouse Gases, PM_{2.5} and HAPs screening level

Construction/New Source Review Permits

- Required for construction of a new air pollution source, or modification of existing source
 - Depending on potential emissions (PTE) of project, permit may not be required
 - Type of construction permit dependent upon PTE of project
- Timeframes – 90 days or 184 days
 - \$50/hr review fee charged for permit review
- Do not expire – must construct within 18 months or 24 months (dependent on permit type)

Types of Air Construction Permits

- Prevention of Significant Deterioration (PSD)
 - Major review – requires air quality analysis and control technology review
- Minor – requires air quality analysis
- De Minimis – Lowest emission thresholds, can take limit to these levels to avoid PSD review

Air Quality Analysis (computer model)

- Required for most PSD/major construction permits and some minor permits – depends on level and type of emissions
- Hazardous Air Pollutants
- National Ambient Air Quality Standards (NAAQS)
- Increment
 - PM10, PM2.5, SO2, and/or NOx
- Class I Analysis Depending on Location

Air Operating Permits

- Required after commencing operations
 - Type of operating permit depends on PTE of entire installation, may not need an operating permit
- Expires 5 years from Issuance Date
- Places all federal and state air regulations applicable to a installation in one document – tool for inspectors, facility and citizens
- Establishes provisions for testing, monitoring, recordkeeping and reporting to demonstrate compliance

Types of Air Operating Permits

- Part 70 – Installations with potential emissions greater than 100 tons of any criteria pollutant or greater than 10/25 of Hazardous Air Pollutants – GHGs
- Intermediate – Part 70 sources that take voluntary limit to less than Part 70 threshold
- Basic – Installations with potential emissions less than Intermediate thresholds

Air Permitting Information & Guidance

<http://www.dnr.mo.gov/env/apcp/permits.htm>

- Permits on Public Notice
- Issued Permits
- Search Pending Projects
- Search Completed Projects
- Air Construction Permit Guidance

Air Permitting Issues – Greenhouse Gases

Construction Permits

- Installations that have minor construction permits, but have not started construction by July 1, 2011 could trigger PSD/major air permitting for GHGs

Operating Permits

- Existing Intermediate/Basic or NO Operating permit sources could now require a Part 70 permit based solely on GHG emissions – required upon renewal of existing OP (or July 1, 2011 if NOP)

Air Permitting Issues – Greenhouse Gases

- If installations wants to avoid Title V/Part 70 Operating Permit

Options:

- Take GHG limit in Intermediate OP to less than major source levels of GHG
- Amend previous construction permit with fuel usage or other limits that would correspond to GHG emissions

Part 70 Operating Perimt – GHG requirements

- GHG Reporting Rule is not an applicable requirement – not needed in OP
- GHG Tailoring Rule – if facility has gone through PSD for GHGS – Part 70
- Starting July 1, 2011
 - Identify if installation is major for GHGs in Statement of Basis

GHG wording in Part 70

Greenhouse Gas Emissions

This installation is a major source for greenhouse gases. Major stationary sources are required by the Clean Air Act (CAA) to obtain Part 70 operating permits. While Part 70 permits generally do not establish new emissions limits, they consolidate applicable requirements, as defined in Missouri State Regulations 10 CSR 10-6.020(2)(A)23, into a comprehensive air permit. At the time of permit issuance, there were no applicable GHG requirements for this source.

Note that this source is subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO₂ emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO₂ emissions were not included within this permit. **An estimate of CO₂ emissions are included in the statement of basis.** The applicant is required to report the data directly to EPA. The public may obtain CO₂ emissions data for this installation by visiting **EPA's Clean Air Markets website at:**
<http://camddataandmaps.epa.gov/gdm/index.cfm>.

Questions?