



Missouri Department of Natural Resources Air Pollution Control Program

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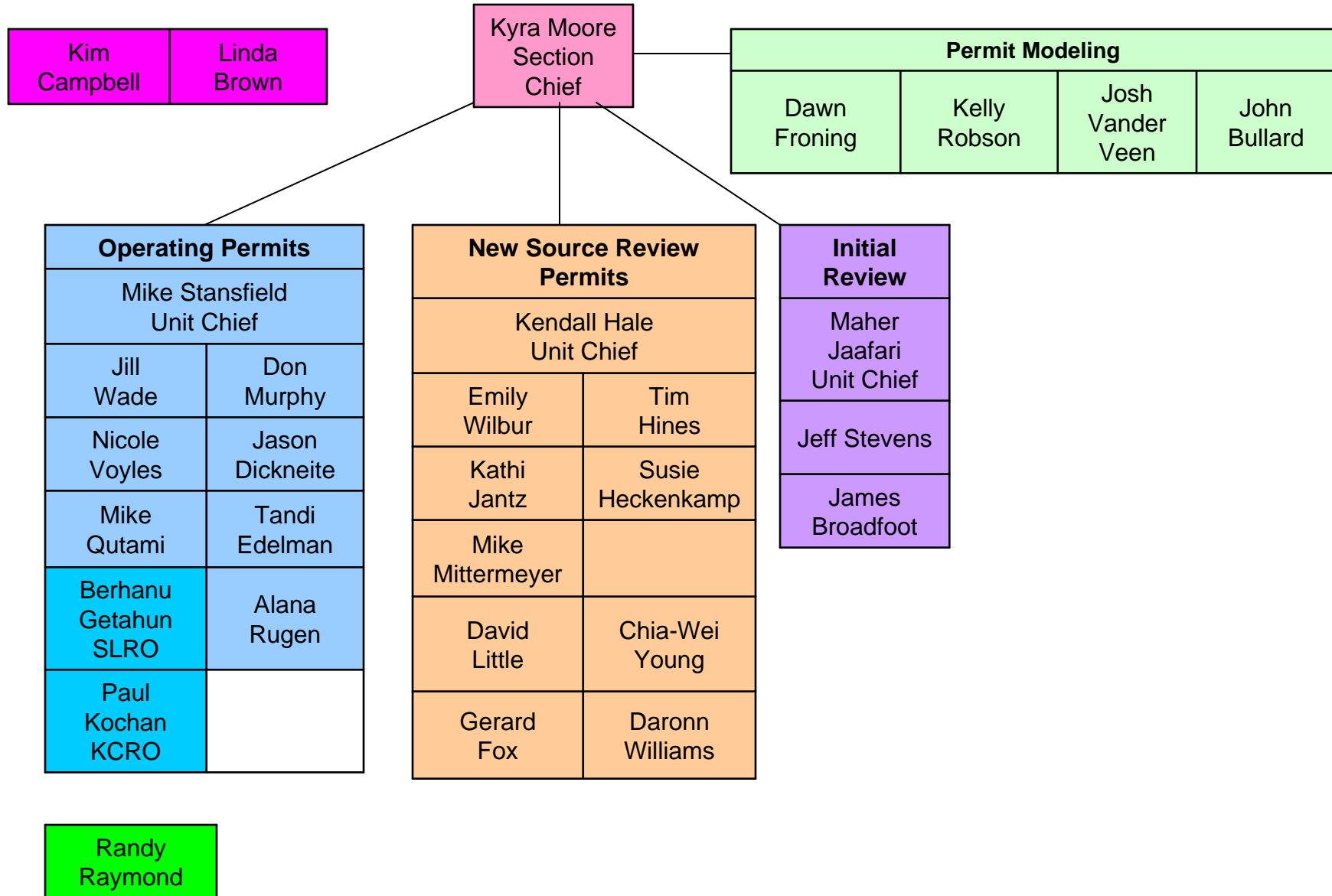
Permits Section Chief

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November 2009

Air Pollution Control Program - Permits Section



November 2009

Missouri Air Permitting

Two types of permits

- New Source Review (Construction) Permit
 - Permit required prior to commencing construction
- Operating Permit/Title V
 - Required within 30 days, 90 days or 12 months of commencing operation - dependent on type of operating permit required.

General Permitting Procedure For Air Pollution Sources

- Facility obtains a New Source Review (Construction) Permit
- Facility constructs or adds equipment
- Facility submits an Operating Permit Application with 30 days, 90 days or 12 months of commencing operation (depends on type of operating permit required)
- Facility obtains operating permit, if applicable – renewal due in 5 years
 - Renewal application due within 6 months of expiration, acts as shield

Air Permitting

- Change in procedure to determine **construction** permit applicability
- Effective July 1, 2009

Construction Permit Applicability Determinations – Effective July 1, 2009

- Calculate Potential Emissions of new installation or new project at an existing installation
 - Utilize control equipment efficiency only if it is a regulatory requirement (charcoal kilns) or inherent to process

Note: Once permit is issued with special condition requiring operation of control equipment, can utilize control when calculating potential emissions of installation

Inherent Control

- Moisture content in rock for limestone quarrying operations is inherent
- Very little else passes as inherent control
 - Baghouse used for process equipment, maybe
 - Installation needs to make justification that control is inherent, we will obtain concurrence from EPA

Air Permitting Exemptions

New policy does not change

- It is important to note there are several exemptions to air permitting requirements. A full listing of exemptions is listed at 10 CSR 10-6.061 *Construction Permits Exemptions*.
 - Emergency Generators
 - Like Kind Replacements

Existing “No Permit Letters”

- If issued prior to July 1, 2009 – letter is still valid and the installation does not need to obtain a permit
- We will treat the “No Permit Letter” as a permit for compliance purposes

Installation made “self-determination”

- If the installation made the determination that no permit was required (not required by regulation to obtain determination from MDNR)
 - If there is documentation in their files, we will treat same as a “No Permit Letter” from MDNR – no permit needed
 - If no documentation (but they still cite our old policy) a permit is needed

Operating Permit Determination

- Type of operating permit based on potential emissions with control (control set forth in construction permit or regulation)
 - Part 70
 - Intermediate (voluntary limit)
 - Basic
 - No Operating permit required

Why does it take so long to
get an air permit?

Many reasons...some
good, some not.....

Average Number of Air Permit Projects Processed per year

Total = 900

- Construction Permit Projects = 520
 - Includes De Minimis, Minor, PSD, applicability, local agency reviews
- Operating Permit Projects = 380
 - Includes Basic, Intermediate, P70, applicability, local agency reviews

Open APCP Permit Projects

August 2007 - 2009

Construction Permits	2007	2008	2009
De Minimis/Minor	110	98	69
Major	6	3	8
Amendments	41	39	19
Permit By Rule	0	0	0
Temporary Permits	1	1	1
Relocate to New Site	7	5	6
Relocate to Approved Site	0	0	1
Applicability Determinations	35	27	14
Local Construction Permit	16	1	1
Banking Requests	0	0	0
Sales Tax Requests	45	14	0
Confidentiality Requests	3	5	3
NSR/Construction Permit Total	264	193	122

Operating Permits	2007	2008	2009
Initial Basic	71	23	24
Basic Renewal	149	67	55
Basic Amendment	43	17	17
Initial Intermediate	50	39	35
Intermediate Renewal	226	143	134
Intermediate Amendment	40	24	28
Initial Part 70	27	16	17
Part 70 Renewal	148	132	125
Part 70 Amendment	40	26	20
Part 70 Administrative/Off Permit	40	28	29
112 J MACT Applications	8	0	0
NOx Banking and Allowance Requests	24	2	0
CAIR Applications	34	24	5
Acid Rain Permits	21	1	8
Applicability Determinations	15	3	9
Operating Permit Total	936	545	506

	2007	2008	2009
Total Open Projects (CP & OP)	1200	738	617

Permit Projects Received while trying to reduce pending project numbers.....

Permit Projects Received	CP	OP
January - July 2007	321	352
January - July 2008	268	274
January - July 2009	267	179

Operating Permits – Progress! (and continuing)

	June 2008	October 2009
Received Prior to 1-1-05	152	37*
Received 2005-2006	193	49
Received 2007	214	61
Open Projects Recd prior 1-1-08	559	147

*Goal - complete (or public notice) as many of the projects older than 5 years before end of 2009.

Realistically – over half possible

Bottom Line – Contact Us!

- If you have a question on the status of a permit
 - Call
 - Email
 - (573) 526-3835

Permitting Related – Regulatory Changes

- 10 CSR 10-6.060 Construction Permits Sections (7) & (12)
 - Non Attainment NSR Reform Rules; Plantwide Applicability Limits (PALs)
 - Public Notice Procedures for PSD permits
- 10 CSR 10-6.400, Process Weight
 - Added new exemptions
 - Corrected reference citations
- 10 CSR 10-6.061, Permit Exemption
 - Added exemption for exceptional events for grain storage

Web Addresses

- Forms – application forms, instructions and supplemental information:

<http://www.dnr.mo.gov/forms/index.html>

- Under headings Air Pollution/Construction Permits (New Source Review) or Operating Permits

- Air Permits page:

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

- Issued Permits
- Permits on Public Notice
- Pending Projects – **New!** (Searchable)
- Completed Projects – **New!** (Searchable)

Web Addresses – cont.

- Rules in development:

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

- Rules on public notice:

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

- Sunshine Requests:

<http://www.dnr.mo.gov/sunshinerequests.htm>

Other Permitting Issues

- PM 2.5
- Greenhouse Gases

Questions?