



Missouri
Department of
Natural Resources

New Source Review (NSR) Permitting

Kendall Hale, New Source Review Unit Chief

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 or 12 months of commencing operation - dependent on type of operating permit required.

De Minimis Levels

- CO 100.0 tons/yr
- NO_x 40.0 tons/yr
- PM₁₀ 15.0 tons/yr
- SO₂ 40.0 tons/yr
- VOC 40.0 tons/yr
- HAPS 10.0/25.0 tons/yr

Construction Permit Types

- De Minimis/Section (5)
- Minor/Section (6)
- PSD/Section (8) - Attainment Areas
- PSD/Section (7) - Non-attainment Areas
- Section (9) – Case-by-case MACT

Pre-construction Waiver

- Project can not be a major review prior to any
- Construction can not have begun
- Company accepts all liability associated with possible denial of permit application
- A proposed schedule of construction activities has been provided
- A permit application has been received

Recent Issues of Interest

- Named vs. Non-named installation –
10 CSR 10-6.020(3)(B)
- Exempt Emission Units
- Well Defined Project Emissions
- Increment
- Hazardous Air Pollutants (HAPS)

Hazardous Air Pollutant (HAP) Compounds

- Major Source Applicability – Entire compound's weight needs to be counted
- Modeling/RAL – Case-by-case depending on how RAL is established

NSR Application's Path to Issuance

- Initial Review Unit
- New Source Review Unit
- Final Clerical Preparation
- Executive Review
- Fees
- Permit Issuance

How Can NSR Permitting in MO be Improved?

- Understanding of everyone's needs and goals
- Better communication
- Sharing of information and knowledge
- Well defined application and review procedure

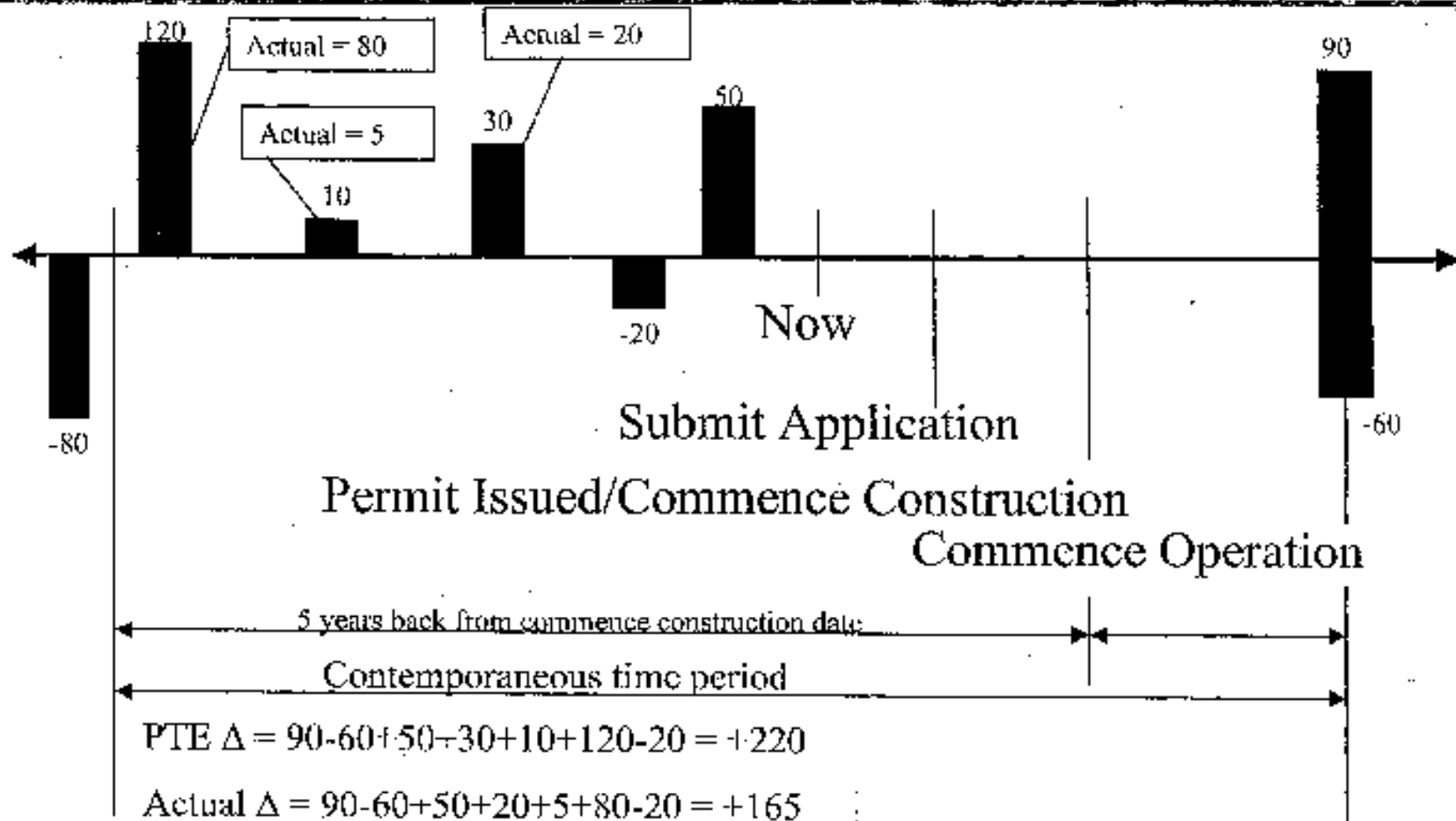
Prevention of Significant Deterioration (PSD) Applicability

- Significant Emissions Increase
 - Actual-to-Projected-Actual Test
 - Actual-to-Potential Test
- Significant Net Emissions Increase
 - Netting Analysis

Replacement Units

- Can be considered an existing unit
 - Must be a re-constructed unit per the meaning in §60.15(b)(1) or completely take the place of the existing unit
 - Identical to or functionally equivalent
 - Does not alter basic design parameters of the process unit
 - Replaced unit must be permanently removed or disabled

Creditable emissions netting



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)

- Issued Permits

http://www.dnr.mo.gov/env/apcp/air_permits.htm

- Permits on Public Notice

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

Air Program Contacts

Permitting Questions

- Kyra Moore, Permit Section Chief
- Kendall Hale, NSR Unit Chief
- Mike Stansfield, Operating Permit Unit Chief

Permit Modeling Questions

- Dawn Froning
- Kelly Robson
- Josh Vander Veen
- John Bullard

Phone - 573-526-3835

E-mail - *first name.last name*@dnr.mo.gov