

Air Quality Permit Options

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Presented by
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NAQS Environmental Experts **Our Role & Background**

ORGANIZATIONAL POSITION

- **Our Vision:** The preeminent leader in air quality, water quality, hazardous waste, and risk management.
- **Our Purpose:** Partner with clients to provide value added environmental solutions that ensure:
 - Regulatory Compliance
 - Increased Operational Flexibility
 - Successful Project Planning
 - Liability Identification, Reduction

SERVICES

- Permitting –
 - Applications
 - Strategies
 - Draft Permits
 - Permit Reviews
- Compliance Assistance
- Regulatory Analysis
- Emissions Inventories
- Compliance Certifications
- Deviation Reports
- Stack Testing Assistance
- Litigation Support
- Training
- Audits
- Compliance Management
- Executive Training
- Risk Management Planning
- GHG Inventories and Management
- Strategic Project Planning
- Dispersion Modeling
- Hazardous Waste



Air Quality Permitting *Operating Permits*

Operating Permits

- Operating Permits – What's the Point???
- Summarize all requirements for a facility into one document



Operating Permit Classification

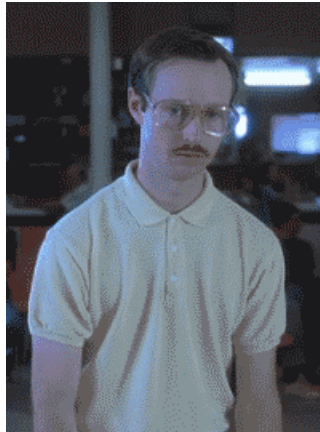
- Major Source
 - Title V Operating Permits
 - Potential emissions greater than:
 - 100 tons per year criteria pollutants (PM10)
 - 10 tons per year individual Hazardous Air Pollutant
 - 25 tons per year combined Hazardous Air Pollutants
- Minor Source
 - State Operating Permits
 - Potential emissions less than major source levels

Operating Permits

- Do I Have to Get an Operating Permit???
 - “_(ツ)_/” *It Depends...*
- Are You a Major Source?
 - Get a site-specific operating permit
- Are You a Minor Source?
 - You’ve got options!

Minor Source Operating Permits

- Exemptions
 - Check with your permitting authority
 - Exemption criteria is highly variable
 - Example: Nebraska vs. Iowa



Minor Source Operating Permits

- I'm Exempt: Now What???



Other Operating Permit Options

- Registration Permits
 - Based on emissions totals
 - Usually require periodic emissions reporting to the permitting authority
 - Not all states have registration programs

Other Operating Permit Options

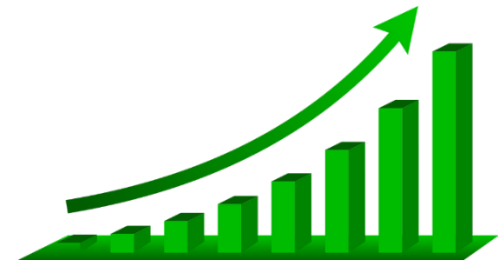
- **Permit by Rule (PBR)**
 - Requirements established in state regulations (hence “by rule”)
 - Generally must notify state or otherwise apply for coverage
 - Generally contain grain throughput restrictions
 - Example: 11,200,000 bushels per year in Indiana
- Check with consultant or read your specific air regulations!

Other Operating Permit Options

- General Permits
 - Issued to specific source categories
 - Must apply for coverage under the permit
 - Permit periodically reviewed and reissued by permitting authority
 - Will need to renew coverage!
 - Most likely contains throughput limitations and other monitoring/recordkeeping requirements
 - Not all states have General Permits for grain elevators

Pros/Cons of Registrations, PBRs, and General Permits


- **Pros** ✓
 - Short applications
 - Quick permit issuance
 - Generally leads to fewer inspections
- **Cons** ✗
 - Generally less flexible
 - Need to project throughput
 - Can lead to violations if rules require you to have a site-specific permit



Site-Specific Operating Permits

- Obtain Site-Specific Permit if Other Options are Not Available
 - Submit detailed application about your individual plant
 - Permitting authority will craft permit based on details in your application
 - Process takes time!

Pros/Cons of Site-Specific Operating Permit

- Pros 
 - Opportunity to negotiate permit terms
 - Example: Truck vs. Rail Shipping
- Cons 
 - Take more time
 - More costly
 - Application prep
 - Application fees
 - Greater scrutiny from regulators



Air Quality Permitting *Construction Permits*

Construction Permits

- Are You Planning To Make Changes to Your Existing Elevator?
 - New Receiving Pits, Loadout Spouts, Grain Piles, etc.
- Operating Permit/Operating Permit Exemption May not Excuse You from Obtaining a Construction Permit

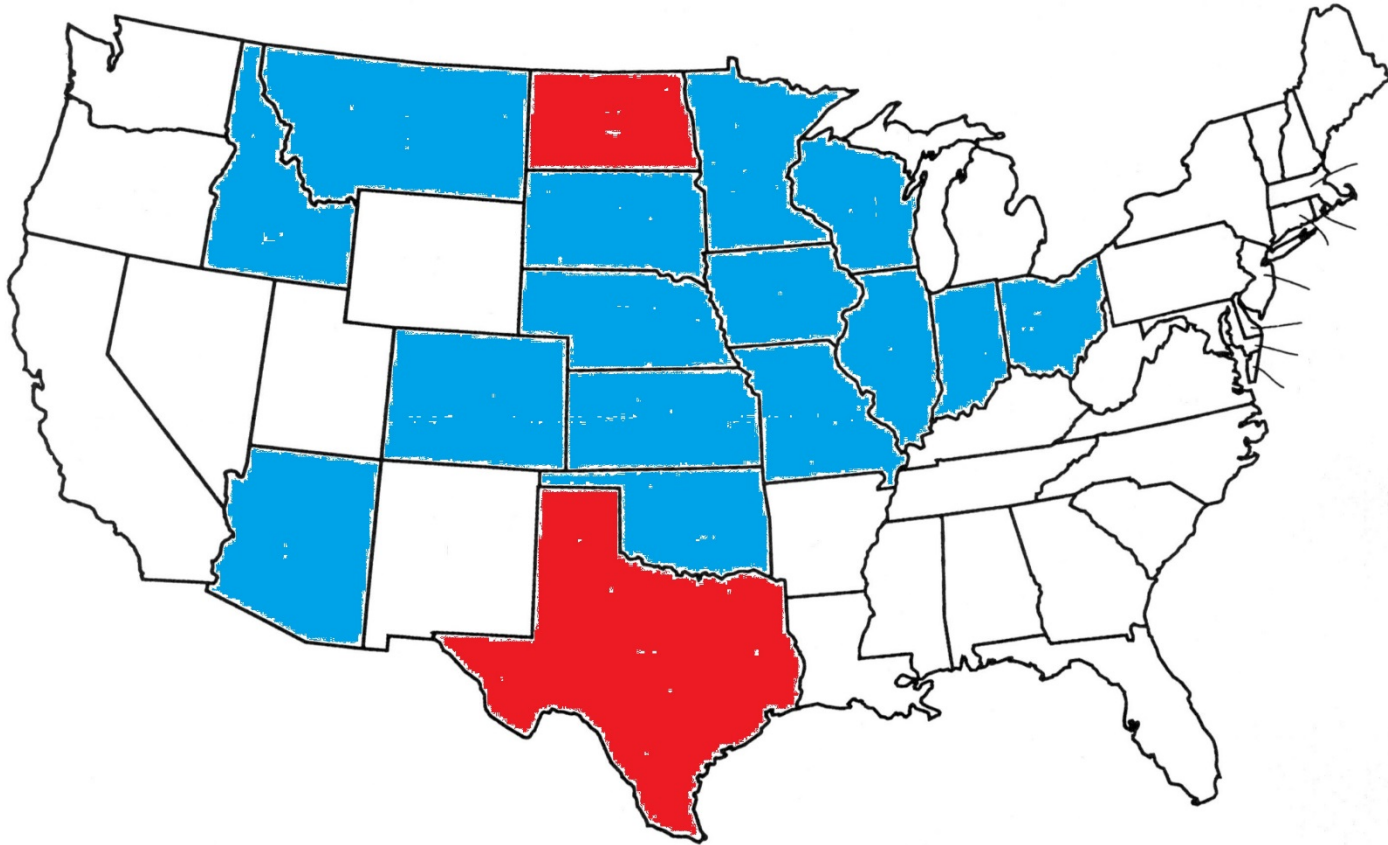
Construction Permits

- Construction Permits Can Be Time Consuming
 - Begin evaluation as soon as possible
 - If permits are required, generally need permit before construction can begin

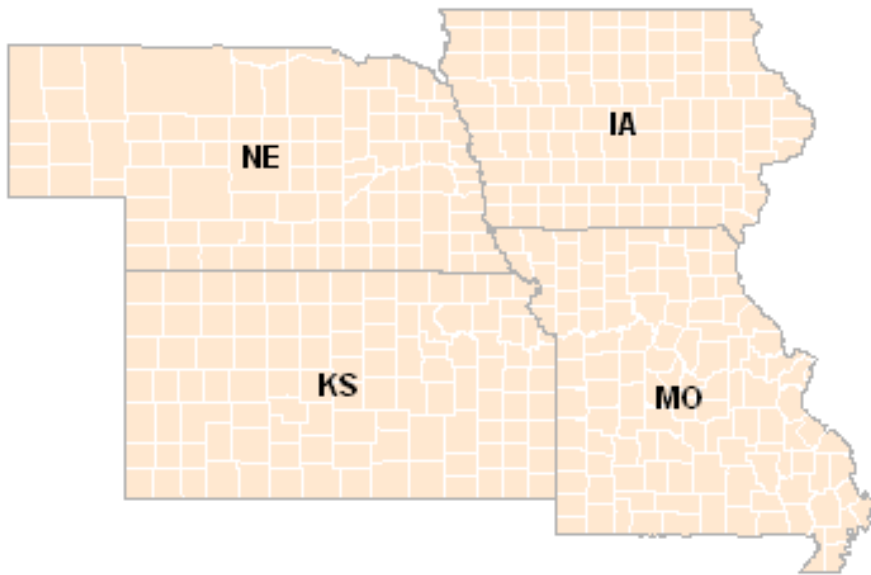
Construction Permit Exemptions

- Most States Offer Construction Permit Exemptions
 - Almost always based on potential emissions
 - Highly variable among the states!

Construction Permit Exemptions



Construction Permit Exemptions



Potential Emissions CP Threshold

Nebraska – 15 tpy PM10

Kansas – 25 tpy PM, 15 tpy PM10

Iowa – SUE: 5 tpy PM, 2.5 tpy PM10

Missouri – 1.0 lb/hr PM10

Construction Permits

- Project Not Exempt from Construction Permitting?
 - Few options: Almost always need to apply for and obtain a project-specific construction permit

Construction Permits

- Remember to Check Your Operating Permit Status!



- Construction projects can require you to change operating permit options

Thank You!!!

Any Questions???



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