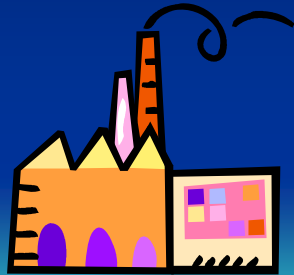


DAQEM Permitting Update



Richard D. Beckstead
Permitting Manager



Overview

- Why are changes being made now???
- Old methodology to process major Part 70 permitting actions
- Current methodology to process major Part 70 permitting actions
- Section 502(b)(10) changes



Overview

(continued)

- Source-wide emissions caps
- Short-term Emission Limits
- VLPs
- Generalized Permits
- Questions & Answers



Why Change Now ???

- Comments from attorneys, consultants, and stakeholders during RIP
- EPA's recent audit of Clark County's Title V Program
- Nation-wide push for Air Agencies to streamline their permitting processes



Old Methodology

- Issue Title V Operating Permit – 5 year term
- Issue NSR Permits with Section 16 Operating Permits for modifications / revisions (ATC/OP)
- Update Title V in accordance with 40 CFR 70.7(f) “Reopening for Cause”
 - Reopened Title V to add new applicable requirements when permit term of 3 or more years remaining
 - Less than 3 years required no reopening unless the action was a significant revision
- Otherwise update Title V upon Renewal



Current Methodology

- Issue Title V Operating Permit – 5 year term
- If New Source Review is required, the source will apply for Authority to Construct (Sec. 12)
- Notify DAQEM when construction is complete
- The Source shall file a complete application to obtain the Part 70 Permit or permit revision within twelve (12) months after commencing operation [AQR 19.3.1.1(b)]



Current Methodology

- Where an existing Part 70 permit would prohibit such construction or change in operation, the source must obtain a permit revision before commencing operation [AQR 19.3.1.1(b)]
- The source shall operate in accordance with the terms and conditions outlined within the Authority to Construct (ATC) until it has submitted a complete application for the permit revision, where upon it shall operate under the proposed terms and conditions of the application until the permit revision is issued



Section 502(b)(10) changes

- A source may make changes in operations that will affect emissions without a permit revision provided:
 - The changes are not modifications under any provision of Title 1 of the Act, including NSR, NSPS, and NESHAPS
 - The changes do not contravene federally enforceable permit terms and conditions pertaining to monitoring, record-keeping, reporting, or compliance certification requirement



Section 502(b)(10) changes (continued)

- The changes do not exceed the emissions allowable under the permit
- For each such change, the source shall provide written notice of the proposed changes seven (7) days in advance and attach such notice to their permit
- The Part 70 source provides the EPA and the DAQEM with written notification at least seven (7) days in advance of implementation of the proposed changes



Source Wide Emissions Cap

- Permit language that establishes a source-wide emissions cap should be reviewed by all major sources and other significant and synthetic minor sources to determine if this is what was intended
- Unintended emissions caps may have huge timing implications for permit revisions for Part 70 sources



Short-Term Emission Limits

- Section 12 requires PTE be enforced in the terms and conditions of the operating permit
- Federally, PTE is calculated on an annual basis
- The short-term emission calculations are being removed from the NSR documents upon request by the source, *except where it is required for performance testing*
- Once removed from the NSR permit, the conditions can be removed from the Title V Operating Permit



Various Location Permits

- Past
 - Submit Attachment 1 (notice of location change)
 - Reissue VLP for each location with site specific terms and conditions
- Current
 - Reissue VLP with annual limitations and new conditions for location changes
 - Submit Attachment 1 (notice of location change).
 - No further action required until next location change



Generalized Gasoline Dispensing Facilities Permit

- First “Template Type” ATC/OP for Minor Sources
- Terms and Conditions are found in the body of the permit
- The body of the permit is the same for all sources who qualify for this type of permit
- Only cover page and source specific information sheets vary from source to source



Other Generalized Permits

- Surface Coaters
 - Dry Cleaners
 - Granite and Marble Shops
 - Commercial Buildings
- *Generally the less complex sources*



Any Questions?

Please contact
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UPDATE: Rule Improvement Process

- DAQEM to submit proposed minor source NSR Rules to EPA next week
- DAQEM to submit proposed major source NSR and Part 70 Permit Rules to EPA before the end of January



UPDATE: Rule Improvement Process (continued)

- All Proposed Revisions to Air Quality Regulations may be found at:
 - <http://www.accessclarkcounty.com/depts/daqem/aq>
 - Click on the Rules tab on the left.
- Stakeholder Meeting to be scheduled soon after submittal
- Recommend all interested parties attend

UPDATE: Rule Improvement Process (continued)

- To update your contact information, contact Russell Roberts (RIP Project Manager)
 - rroberts@co.clark.nv.us
 - Phone: (702) 455-1611
 - FAX: (702) 383-9994
 - *His business cards are available while supply lasts*

