

Issue Statement:

How to Handle Information from Permit Applications and Old/Previous Permit Conditions in Title V Operating Permits

Sub issue 1: Capacity, Throughputs and Descriptions from Applications.

Sub-issue 2: Incorporating Changes and Conditions from Previous Permits, Orders and Other Legal Documents.

PROPOSAL:

- Three (3) changes to current Practice and Permit Policy are proposed along with two (2) guidance pieces:
 1. Inclusion of a table in each permit to provide a detailed description of the emission units;
 2. Provide guidance for when maximum capacity of an emission unit may be considered an applicable requirement;
 3. Separating out the emission limitations according to each applicable requirement;
 4. Inclusion of a section in the preliminary determination to highlight changes from previous review;
 5. Provide examples of the types of changes to occur in a review and appropriate responses

1. Include a *detailed* of the description of each emission unit to include maximum capacity; throughput and fuels to be included in each permit. Rename the existing Stack and Process Index

- **“Description of Emission Units Table”**

- *Note: The information describing the processes listed below is descriptive information for the units and stacks covered under this permit action and does not constitute an enforceable condition:.*

A. Processes P10 and P11/Control Device C10, Stacks S10 — (2) Anaerobic Digesters: with Biogas Treatment System. Digesters are each 1.36 million gallon concrete vessels with membrane covers. Hydrogen sulfide removal by an iron sponge system, C10.

B. Process P02, Stack S02 – Dual Fuel Fired Engine Generator Set: 1175 horsepower engine model year 2011. P02 is a Dual Fuel GE-Jenbacher engine. Natural gas is the secondary fuel.

C. Boiler B06, Stack S01, Control Devices C03, C05 – Pulverized Coal Fired Boiler with rated heat input capacity of 875 mmBTU/hr. Controlled by an electrostatic precipitator, C03 and flue gas conditioning system, C05, installed 1984

2. Provide Guidance for When Descriptions and Capacity become Applicable Requirement and Inclusion as Conditions within the Body of the Permit

Petitions to reference for additional information: information on Petitions can be found at US EPA Region 7 Title V Petition Database: <http://www.epa.gov/region07/air/title5/petitiondb/petitiondb.htm>

The database can be searched several ways to find specific Petitions or subjects.

East Kentucky Power Cooperative, Inc. – William Dale Power Station.
Portland Generating Station – Upper Mount Bethel Township –
Northampton Pennsylvania

Additional examples to be added as they occur....

3. Separate out Emission Limits in permit according to each Applicable Requirement.

- See example permit limitation in handout

4. Inclusion of a section in the preliminary determination to highlight changes from previous review.

- New Section to Preliminary Determination:
 - **“CHANGES RESULTING FROM THIS PERMIT ACTION”**
- a) CONSTRUCTION PERMIT DESCRIPTION, APPLICABILITY, and PRELIMINARY DETERMINATION FOR
< YY-INT_### list permit being revised, or exemption and assign /log into WARP >

The section will include the following subsections:

- a) Construction Permit Description – includes date of application, type of actions and permit number
- b) Applicability – includes a statement of the reason the modification meets the requirements for exemption, revision, modification. Example for a Revision: The project is not a modification of the source under s. 285.01(26), Wis. Stats., because there is no physical change and/or no increase in emissions
- c) New or Changed Applicable Requirements – provide a description of the applicable requirements resulting from the changes.
- d) Affect on Source Status – if the change will affect the status of the facility under Title V or as an EPA Class Code
- e) Preliminary Determination – statement that the construction permit action will be included with the public notice for the operation permit meets the requirements for Department approval

5. Examples of common changes to address in operation permit reviews.

1. Conditions in previous permits for emission units which no longer exist
2. New applicable requirements because of changes to the emission unit(s)
3. New or changed applicable requirements because of changes in regulations
4. Conditions for general limitations which are now contained in Part II of the permit
5. Changes to applicable requirements based on Air Management Policy (examples, limits previously set for allocation of air resource; what constitutes Good Combustion, changes resulting from use of new air dispersion modeling (AERMOD), etc.)