

Title V Stakeholder Meeting

PSD Look Back Discussion
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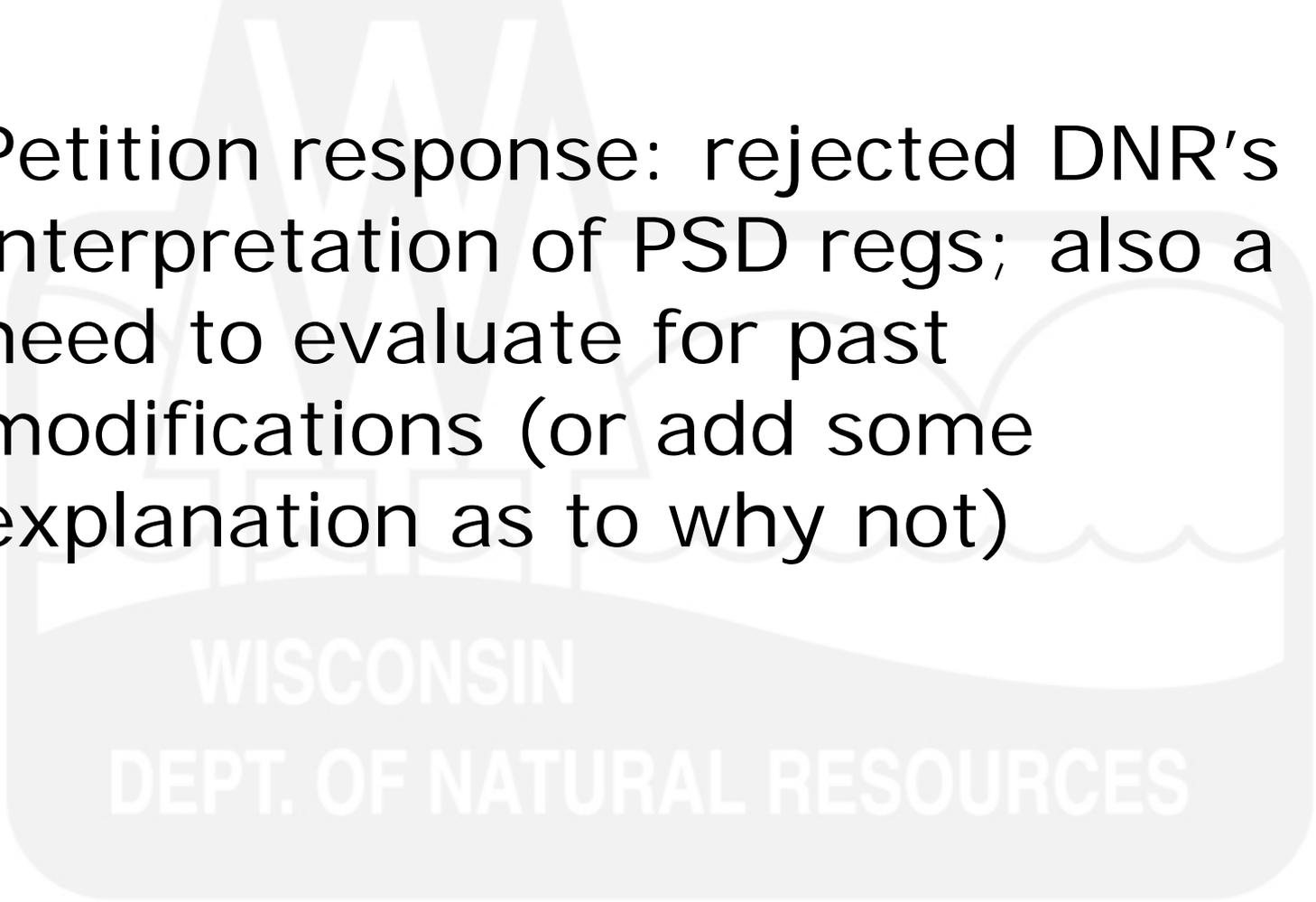
PSD Look Back

- Issue
 - Unresolved PSD/regulatory application issues
 - Unreported changes to process
 - Incomplete PSD analyses (ATF analyses)
 - Incorrect emission limitations based on past modifications



PSD Look Back

- Petition response: rejected DNR's interpretation of PSD regs; also a need to evaluate for past modifications (or add some explanation as to why not)



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PSD Look Back

- Issues:
 - When should PSD/modification look backs be done?
 - What is sufficient look back analysis
 - Clarification of EPA interpretation of PSD regs for actual-to-actual emission increase calculations

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PSD Look Back

- Process for discussion
 - Reviewer receives comment
 - Reviewer notifies supervisor, permit section chief & NSR team leader
 - Assignment is made to NSR staff to review allegation (shifts workload)
 - NSR staff
 - Clarifies allegation
 - Requests additional substantiation as needed



PSD Look Back

- Reviews information
 - Commenter
 - Permit holder
 - Case file
 - EPA
- Within 90 days from close of comment period make determination as to whether information is adequate to determine PSD/regulation applicability



PSD Look Back

- Review may conclude:
 - No applicability
 - Other rules applied
- If other rules applied renewed permit may include:
 - New requirements
 - Compliance schedule

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PSD Look Back

- Processing
 - Operation permit writer would proceed to resolve all other outstanding issues
 - If PSD/regulation applicability was not resolved by the later of 90 days or resolution of all other issues decision would be made to either:
 - Put renewal on hold pending analyses
 - Proceed with renewal with appropriate language in Response to Comment memo and permit



PSD Look Back

- Discussion
 - How much substantiation is needed to justify program review?
 - Is 90 days from end of comment period adequate time for program to request, receive and review information prior to making a determination on PSD applicability?
 - Should the PSD/regulation applicability review be completely separate from renewal process?



PSD Look Back

- Next Steps
 - Evaluate stakeholder feedback
 - Develop program guidance
 - Share guidance with permit & compliance staff
 - Make recommendations to Air Management Team
 - Finalize & implement guidance