Permitting Issues

November 3, 2009
SCR Meeting
Permitting Issues

• Who am I?
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Permitting Issues

• **Plans**
  – MPAP
  – QA/QC
  – Fugitive dust

• **Inadequate monitoring**
  – Frequency
  – Relation to compliance with limitations
Permitting Issues

• Requirements from old permits and permit applications
  – Heat input rates
  – Power output rates
  – Material (fuel) input rates

• Unresolved PSD/reg application issues
  – Unreported changes to processes
  – Incomplete PSD analyses (ATF analyses)
  – Incorrect emission limitations based on past modifications
Permitting Issues

• Plans
  – Petition response:
    • Emission limitations and standards that assure compliance with applicable requirements need to be included in permits. Also need to be able to evaluate compliance with requirements

• Plan issues
  – Public comment
  – At DNR (availability of plans)
  – Determining compliance with plans
  – In permit or “off” permit
  – Changes to plans
Permitting Issues

• Inadequate Monitoring
  – Petition response: Need to explain how monitoring is adequate (ESP’s, baghouses,…)
  – Monitoring issues:
    • Are s. NR 439.055, Wis. Adm. Code, requirements adequate to demonstrate compliance (developed in 1992-1992)
    • Correlation between monitoring and compliance/emission rates
Permitting Issues

• Old permit/application issues
  – Do all older permit conditions need to be included in the Title V permit
  – Do application “limitations” need to be included in Title V permits
    • Heat input rates
    • Material input rates
    • Output limitations
Permitting Issues

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