

# 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