

PERMIT REVIEW WORKSHOP

I. PURPOSE OF PERMITS

II. TYPES OF PERMITS

- A. Registration
- B. Construction
- C. Operating
- D. Combined Construction/Operating

III. PERMIT PROCESSING ACTIVITIES

- A. Administrative
 - 1. Permit application forms
 - 2. Applicability
 - 3. Completeness
 - 4. Permit processing
 - 5. Public notice and comment
 - 6. Permit modification/issuance/denial
- B. Technical
 - 1. Process description
 - 2. Details concerning construction, modification, or operation
 - 3. Basis for emission estimates
 - 4. Control equipment selection and justification
 - 5. Comparison with known or available parameters
 - 6. Ambient impacts (dispersion modeling inputs/outputs)
 - 7. Draft permit conditions, regulatory limitations and rationale (technical memorandum)

IV. COMPONENTS OF A PERMIT

- A. Legal Authority
- B. Technical Specifications
- C. Compliance Determinations (Methods)
- D. Excess Emissions
- E. Recordkeeping, Reporting, and Administrative Requirements
- F. Site-Specific Permit Conditions

V. GUIDELINES FOR DEVELOPING PERMIT CONDITIONS

- A. Cite Overall Legal Authority that Applies to all Emission Units
- B. List Processes and Control Equipment Regulated Under Permit
- C. Specify Emission Limits for each Emission Unit and Regulatory Citation, Where Applicable, Including Averaging Times
- D. Specify Compliance Test Methods to be Used and Include Frequency and Test Protocol Requirements
- E. Specify Operating Parameters and Surrogate Parameters
- F. Specify Recordkeeping and Reporting Requirements
- G. Enforceable Permit Conditions

Note: Two different approaches are generally used to develop permits. The first method is to develop entire sets of permit conditions for each emission unit under one large permit. The second method has separate sections (i.e., Emission Limitations) in the permit with all emission sources discussed under a single heading.

VI. PERMITS AND REGULATORY PROGRAMS

- A. Prevention of Significant Deterioration (PSD)
- B. Nonattainment Area New Source Review (NSR)
- C. New Source Performance Standards (NSPS)
- D. National Emission Standards For Hazardous Air Pollutants (NESHAPs)

- E. Clean Air Act Amendments of 1990 (Title III)
- F. Clean Air Act Amendments of 1990 (Title V)

VII. EXAMPLE PERMITTING EXERCISE