What Permit Writers Want You To Know
Air Permit Types

Two major permitting programs

Construction Permit Program
- Issue construction permit/approval/PSD
- Required prior to any on-site construction of a permanent nature

Operating Permit Program
- Issue Class I and Class II operating permits
- New or Revisions to operating permits – must apply within 12 months of becoming operational or subject to the program
- Renewals (Class I Operating Permits) – must apply not less than 6 months and not more than 18 months before the expiration date of the permit
Construction Thresholds

Construction Approval
- \( \geq 5 \text{ lb/hr PM} \)
- \( \geq 5 \text{ lb/hr PM, including PM}_{10} \) for agriculture
- \( \geq 2 \text{ lb/hr PM}_{10}, \text{ SO}_X \)
- \( \geq 50 \text{ lb/24-hr CO, VOC, NO}_X \)
- \( \geq 0.1 \text{ lb/hr lead} \)
- Subject to Federal Regulation

Construction Permit
- \( \geq 25 \text{ tpy PM} (\geq 100 \text{ tpy PM, including PM}_{10} \) for agriculture\)
- \( \geq 15 \text{ tpy PM}_{10} \)
- \( \geq 10 \text{ tpy direct PM}_{2.5} \)
- \( \geq 40 \text{ tpy SO}_X, \text{ NO}_X, \text{ VOC} \)
- \( \geq 0.6 \text{ tpy lead} \)
- \( \geq 10 \text{ tpy single HAP} \)
- \( \geq 25 \text{ tpy combined HAPs} \)
Does Your Facility Need an Air Permit?

1. List all air pollution-emitting equipment or operations (Emission Unit or Source)
2. Calculate potential air pollution emissions for your facility or project (PTE)
3. Compare PTE with regulatory thresholds to determine type of permit required
4. Apply for permit/approval if PTE exceeds the regulatory thresholds, or otherwise required to obtain an permit/approval.
5. If your facility is not required to obtain a permit/approval, maintain records of your initial assessment, continue to track emissions, and provide records to KDHE upon request.
What Needs to Be Submitted

• Cover Letter
• Notification of Construction/Modification Form
• Equipment Form(s)
• PTE Calculations
• Other info (MSDS, Manufacturer’s Data Sheets, Engine Certification, etc.)
• Application Fee
What Permit Writers Want You To Know

Common Errors or Omissions

• Potential to Emit (PTE) Calculations
• Cover letter/project description
• Process/equipment description
• Safety data sheets or environmental safety sheets
• Sending in payment
• Emission factors
What Would Be Helpful

• Citing exemptions
• Explanation of what you are proposing
• Flow charts and site diagrams
What Permit Writers Want You To Know

Delivering Factors

• Phone and email communication
• Irrelevant information
• Facility wide PTE for True B sources
• Changing something that has other requirements
What Permit Writers Want You To Know

Submitting Permit Drafts

• Can be helpful if changes are clearly marked
• Minor changes or modifications
• Title V renewals
• Boilerplate (General Provisions)
What Permit Writers Want You To Know

Construction Application

• Cover Letter
• Notification of Construction/Modification Form
• Equipment Form(s)
• PTE Calculations
• Other info (MSDS, Manufacturer’s Data Sheets, Engine Certification, etc.)
• Application Fee
• Submit Applications through KEIMS

https://keims.kdhe.ks.gov/nsuite/ncore/external/home
What Permit Writers Want You To Know

Helpful Tools

• Air Permit, Bureau of Air Website
  http://www.kdheks.gov/air-permit/indexPrmt.html

• SBEAP Website
  https://www.sbeap.org/aqrules
Thank you/Questions
AIR QUALITY PERMITTING
WHAT APPLICANTS WANT YOU TO KNOW

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WHAT APPLICANTS WANT YOU TO KNOW

1. PROJECT DEVELOPMENT
2. APPLICATION PREPARATION
3. WAITING FOR THE PERMIT
4. COMMUNICATION IS KEY
PROJECT DEVELOPMENT

• Sample of considerations / business planning
  • Project timing
    • Type of permit
    • Time to permit receipt / construction
    • Scheduling vendors / contractors
  • Location
    • Economics, employment, neighbors, etc.
    • Ease & timing for permit issuance
    • Location on the facility site
PROJECT DEVELOPMENT

• Who is involved?
  • Engineering / Projects
  • Environmental
  • Design/EPC Consultants
  • Env. Consultants

• Initial concept – discuss environmental
  • Management of change procedure

• Schedule air quality permit in project timeline
  • Estimate type of permit that is needed
  • PSD vs. state-level
APPLICATION PREPARATION

Gathering information
- Project design
- Equipment specs
- Control equipment specs
- Prior permits
- Site plans
- Flow diagrams

Determine emission sources
- Not all equipment changes have an effect on emissions
- Determine rate limiting processes / “bottlenecks”

Develop emissions calculations
- What resources are available: similar units, vendor data, stack tests, CEMS, AP-42, etc.
- PTE increase
- Actual emissions increases

Determine regulation applicability
- NSPS
- NESHAPs
- State rules
- PSD applicability

Develop application materials
- Submittal letter
- Forms
- Emission calcs
- Site plans
- Diagrams
- Draft permit
- If required: Modeling, BACT, additional impacts
APPLICATION PREPARATION

How much time?
- PSD: several months+
- State-level: weeks-months
- Permit applicability: weeks

Who is involved?
- Environmental
- Engineering/projects
- EPC & Env Consultant
- Plant management
- Corporate
- Vendors
WHAT HAPPENS AFTER APPLICATION IS SUBMITTED?

Plant Manager: When will we get the permit?

Management: Have you heard anything about the permit?

Projects: What is the status of the permit?

EPC Consultant: When will we get the permit?

CFO: How much longer until we get the permit?

Where is the permit?

Where is the permit?
WAITING FOR THE PERMIT...

• How can we make the permitting process smoother?

→ Communicate

• Pre-application meeting (even for non-PSD)
  • Discuss project plans, calcs & modeling methods
  • Discuss how info will be presented/submitted

• Help educate permit writers about operations / permit writers ask questions
  • Facility is the expert on their own operations
  • Propose times to discuss info submitted – face-to-face or phone is best

• Communicate policy changes
  • This affects application timing/cost -- Consultant + Permit Writer
  • Side note: think about how this may affect compliance/reporting

• Timing estimates – this might be difficult, but very helpful
**COMMUNICATION IS KEY**

- **Respond to phone calls**
  - Acknowledge receipt even if an answer is not ready yet

- **Acknowledge emails**
  - “Got it, I will review later this week”

- **Facility probably made a decision for a reason**
  - Ask BEFORE making big changes

- **Ask questions**
THE PERMIT IS ISSUED!

• Hooray!
• Back to work...
  • Construction
  • Compliance
  • Testing
  • Etc.
THANK YOU!

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