



What Permit Writers Want You To Know



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

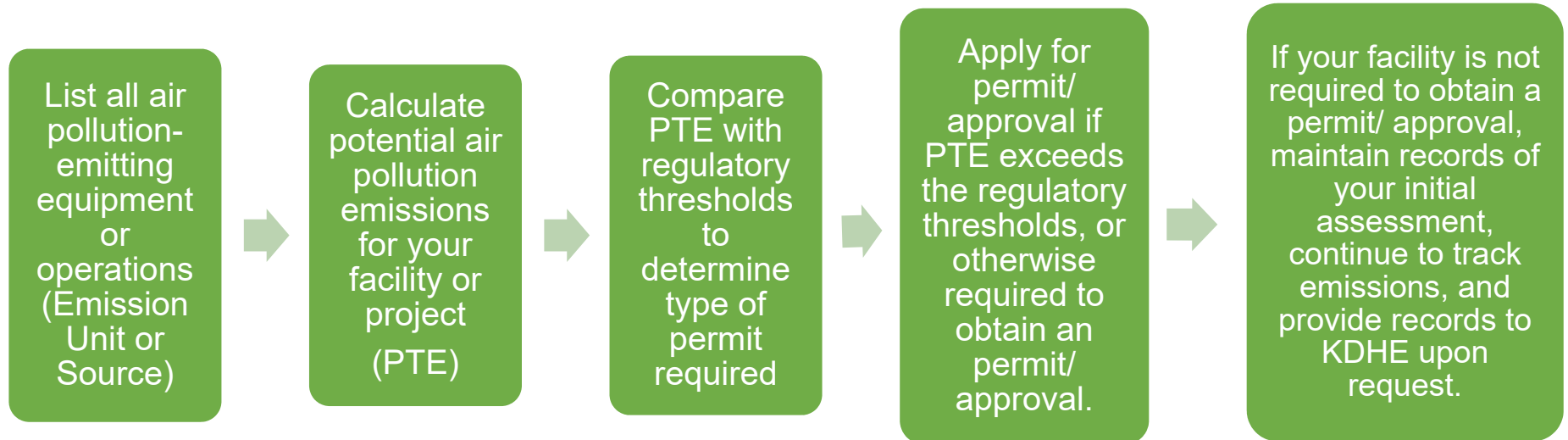
Construction Approval

- ≥ 5 lb/hr PM
- ≥ 5 lb/hr PM, including PM₁₀ for agriculture
- ≥ 2 lb/hr PM₁₀, SO_x
- ≥ 50 lb/24-hr CO, VOC, NO_x
- ≥ 0.1 lb/hr lead
- Subject to Federal Regulation

Construction Permit

- ≥ 25 tpy PM (≥ 100 tpy PM, including PM₁₀ for agriculture)
- ≥ 15 tpy PM₁₀
- ≥ 10 tpy direct PM_{2.5}
- ≥ 40 tpy SO_x, NO_x, VOC
- ≥ 0.6 tpy lead
- ≥ 10 tpy single HAP
- ≥ 25 tpy combined HAPs

Does Your Facility Need an Air Permit?





What Permit Writers Want You To Know

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 Permit Writers Want You To Know

What Would Be Helpful

- Citing exemptions
- Explanation of what you are proposing
- Flow charts and site diagrams



What Permit Writers Want You To Know

Delaying 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>



What Permit Writers Want You To Know

Thank you/Questions



Protect and improve the health and environment of all Kansans



AIR QUALITY PERMITTING WHAT APPLICANTS WANT YOU TO KNOW

Kelli Calhoon
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Midwest A&WMA Conference
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RAMBOLL

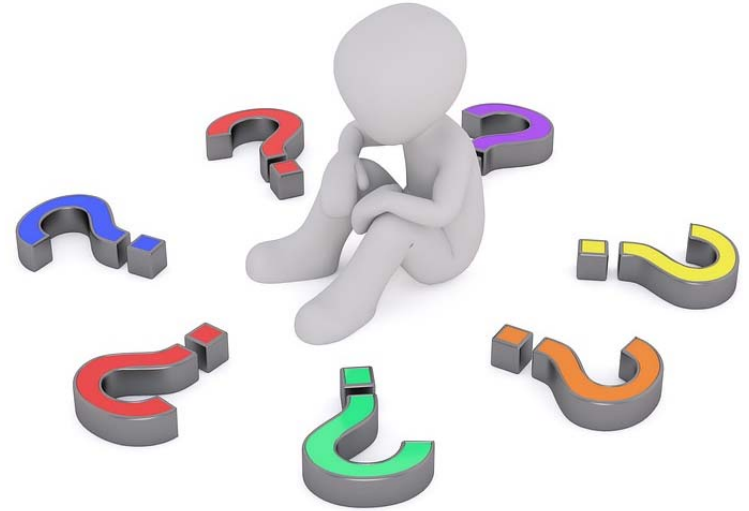
Bright ideas. Sustainable change.

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



RAMBOLL

- 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?



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"



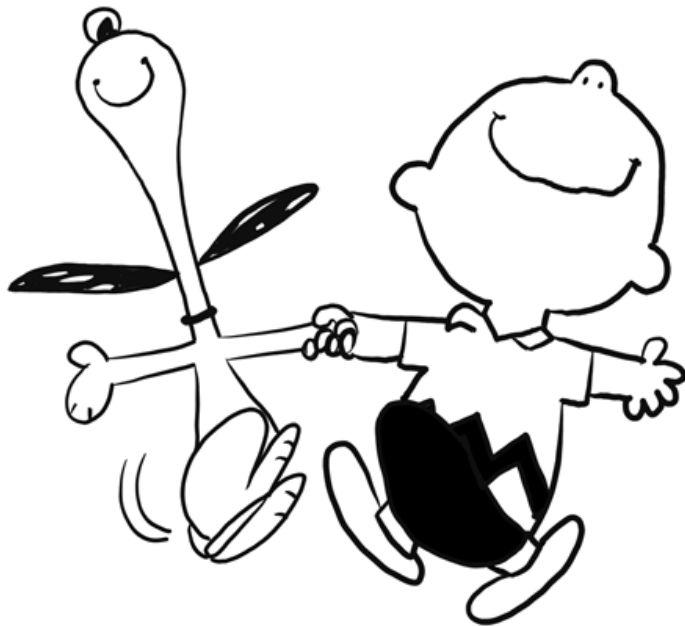
Facility probably made a decision for a reason

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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