

The Air Permits Division (APD) has changed the air quality analysis (AQA) process to support efforts to prevent, reduce, and manage permit backlog. The changes were made after an evaluation of factors such as the experience level of current staff, applicants, and consultants; permit-related and other agency workload; and rule and regulation changes. By addressing potential AQA issues early in the New Source Review (NSR) permit application review process, many difficulties that tend to delay the technical review can be minimized or avoided. Effective immediately:

Permit Modeling Meetings. Permit modeling meetings must be held with the air dispersion modeling team, permit reviewer, and other agency staff, as applicable, to develop a modeling checklist or protocol. This meeting is required before modeling is submitted in support of any NSR permit application. The meeting can be held by phone as appropriate.

Prevention of Significant Deterioration (PSD) Modeling Projects. Applicants must submit an AQA protocol to APD for approval, and a courtesy copy of the protocol to Region 6, Environmental Protection Agency.

PSD Ambient Air Monitoring. Applicants must conduct ambient air monitoring or request a waiver that demonstrates the monitoring requirement is not applicable or can be met with available, representative monitoring data. Ideally, the monitoring requirement should be addressed a minimum of 18-24 months in advance of the permit application. Advanced planning is required to develop an approved monitoring plan to obtain appropriate data for the AQA. The monitoring data is used to estimate air quality near the proposed location of the facilities to be authorized and to obtain background concentrations used in the AQA.

Minor NSR Ambient Air Monitoring. Applicants do not need to conduct ambient air monitoring for minor NSR AQA projects. However, at the permit modeling meeting, applicants should identify background air concentrations for minor NSR modeling projects that involve criteria pollutants.

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