

Texas Commission on Environmental Quality

INTEROFFICE MEMORANDUM

To: NSR Permit Reviewers **Date:** November 7, 2005
From: Mr. Richard Hyde, P.E., Director, Air Permits Division
Subject: Abbreviated Review of Permit Renewal Applications

An abbreviated review of permit renewal applications can be accomplished if an applicant certifies that certain requirements do not apply and no changes are required or desired in the current permit. The criteria that must be certified as not being applicable are identified in the enclosure. They have been included in a new section of the Renewal Application Form and Instructions (Form PI-1R, TCEQ Form-10254)

If the applicant certifies the criteria do not apply and elects the abbreviated review option, the permit reviewer will verify the following:

- Form PI-1R Sections VII and XII are properly completed.
- The fee is correct.
- Compliance history (CH) classification for the regulated entity and customer are not Poor. A federal orders check must also be made as part of this verification.
- The public notice (PN) was published correctly.
- No comments have been received from the regional office or local program(s).

Deficiencies noted in the certification, fee, or PN must be resolved. If there is a Poor CH classification or any comments received in response to PN, the application is not eligible for abbreviated review. This is also true if there are comments received from regions or local programs that cannot be resolved without changes to the permit.

Upon determination that the PI-1R is properly completed, the permit reviewer will complete the technical review summary and prepare a renewal letter. A new permit is not issued with an abbreviated review so there is no need for a draft permit Request for Comments.

This memorandum is effective upon announcement of the abbreviated review option on the external web site and availability of the revised Form PI-1R.

Enclosure

CRITERIA FOR ABBREVIATED REVIEW

- Facilities do not emit air pollutants that are on the "watch list" for the area (www.tceq.state.tx.us/implementation/tox/AirPollutantMain/APWL.html)
- Facilities are not subject to the Houston/Galveston Area (HGA) cap and trade program for highly reactive volatile organic compounds (HRVOC), or already have HRVOC speciated emissions identified in the permit maximum allowable emission rates table (MAERT).
- Compliance history classifications for site and company are average or high.
- Permit is not a Flexible Permit (Subchapter G) or Existing Facility Flexible Permit (Subchapter H, Division 3).
- There is no amendment application for the permit under Air Permits Division review.
- Permit does not require inclusion or update of Compliance Assurance Monitoring (CAM) conditions.
- Permit does not require inclusion of marine loading emissions.
- Permit does not require inclusion of scheduled maintenance, startup, and shutdown emissions (MSS) not authorized by permit by rule (PBR) or standard permit.
- Permit is not involved in consolidation with other permit(s).
- Permanently shutdown facilities are not being removed from the permit.
- Permits by rule, changes to qualified facilities, or standard permits are not being incorporated into the permit..
- Permit allowable emission rates are not being revised due to emission factor changes.
- Facilities/emissions that have always been present, but never reflected in the permit, are not being added.
- Renewal does not involve any changes to the special conditions or MAERT.