Tips for Completing the Form PI-1 General Application

Overview
- Please refer to the [PI-1 guidance videos](#) for details on how to fill out this form.
- The Form PI-1 General Application is required for all permit and action types included in the form.
  - Minor NSR: Initial, Amendment, Renewal, Renewal/Amendment, Relocation/Alteration, Change of Location, Alteration, Extension to Start of Construction
  - Special Permit: Amendment, Renewal, Renewal/Amendment, Alteration, Extension to Start of Construction
  - De Minimis: Initial
  - Flexible: Initial, Amendment, Renewal, Renewal/Amendment, Alteration, Extension to Start of Construction
  - PSD: Initial, Major Modification
  - Nonattainment: Initial, Major Modification
  - HAP Major Source [FCAA Section 112(g)]: Initial, Major Modification
  - PAL: Initial, Amendment, Renewal, Renewal/Amendment, Alteration
  - GHG PSD: Initial, Major Modification, Voluntary Update
- The PI-1 must be submitted through STEERS with the ePermit application unless the permit and action type are listed below. If the permit and action type are listed below, the PI-1 must be submitted by email to APIRT.
  - GHG PSD initial or major modification applications not submitted concurrently with a minor NSR application
  - all HAP applications not submitted concurrently with a minor NSR application
  - all PAL applications not submitted concurrently with a minor NSR application
  - all De Minimis applications
- All application attachments (EMEW, plot plan, calculations, etc.) must be submitted electronically through STEERS, TCEQ FTPS, or email.
- If the application cannot be submitted through STEERS, a hard copy of the PI-I must be sent to the regional office and local programs, if applicable. Projects submitted through STEERS do not need to be sent to the regional office or local program.
- The applicant must have a hard copy of the PI-1 printed for public access if notice is required. Do not print any sheets or pages without data entry.
- All yellow input cells in the PI-1 should be completed before submittal. All red cells in the additional notes columns of the BACT and monitoring sheets must be completed before submittal. This will be reviewed early in the process.
- All data entry sheets have an applicant internal notes column for use when preparing the application. All data in these columns must be deleted prior to submittal to TCEQ.
- The PI-1 sheets must be completed in sequence from top to bottom and left to right in order for the workbook features to function correctly. Do not complete the sheets out of order.
- If you can see the page header, there are questions applicable to your project on that sheet. You may need to scroll down.
- **Questions?** Contact the Air Permits Division at (512) 239-1250 or airperm@tceq.texas.gov

Tips for Completing the Form PI-1 General Application

If you encounter any issues, it is easiest to troubleshoot your issue if you send the file.

General

- In the permit and action type section, a response is required for each permit type to ensure correct conditional formatting is applied throughout the PI-1.
  - Tip: once you select "Not applicable" for one permit type, you can enter "n" for the other permit types and the workbook will autocomplete the cells.
- Project description: This is designed to be an overview of the project. The description will be pulled into the technical review by a macro and edited as needed by the permit reviewer. Please use complete sentences and list all actions to be taken with this project.
- If you are not submitting through STEERS, this is the only page of the PI-1 that needs to be submitted in hard copy to APD. The rest of the file must be submitted electronically to APD.

Unit Types-Emission Rates

- Review the Examples sheet prior to filling out this sheet.
- Include all sources on the permit, even if not included in the project. This streamlines the creation of the MAERT and emission summary table and saves time for future submittals.
- There are two recommended techniques for filling out your PI-1. Detailed instructions for each method are at the top of the Unit Types-Emission Rates sheet:

  1. Use an existing MAERT to copy-paste EPNs, source names, pollutants, and current emission rates.
  2. Use the Blank Table sheet. This allows you to reorganize data without the risk of breaking formulas.

- If copying/pasting:
  - Do not cut, insert, or delete rows. When pasting, always use Excel's "Match Destination Formatting" or "Paste as Values" option from the right-clicking menu.
  - Only copy and paste yellow input cells, do not paste across the difference in the short term and long-term emission rates (columns M-N). Instead copy-paste columns A-L and then copy-paste O-P separately.
- Do not miss the industry type drop-down selection above the table in row 8.

Tips for Completing the Form PI-1 General Application

- Column A dropdowns depend on the project type:

Initial or Amendment	New/modified Not new/modified Remove Consolidate
Renew/Amend	New/modified Renew only Remove Consolidate
Renewal	Renew Remove Consolidate

- To enter the pollutants, either use the drop-down to select common pollutants or enter in a specific pollutant.
  - Be consistent and check for typos if entering your own pollutants. The formulas are looking for items that are different, so "CO" will be treated as a different pollutant than "carbon monoxide". An easy way to check for this is the consolidated pollutant list on the public notice sheet.
- When entering emission rates of the pollutant, a blank is treated as 0 to minimize data entry.
- The emission rate "<0.01" can be entered.
- Consolidated emission rates:
  - List the current lb/hr and tpy already authorized by the other permit or registration in the "Consolidated Current Short-Term" and "Consolidated Current Long-Term" columns.
  - Then list what you want to be included on the MAERT in the Proposed columns. This allows you to increase the emissions with this action.
  - The calculated difference does not include consolidated emissions.
- Columns D-H match your MAERT. This allows you to copy data from an existing MAERT directly into the PI-1. Note, use "**paste as values"** to complete this action.
- Do not miss the Unit Types columns (O-P) at the end of the table. This allows for BACT and Monitoring requirements to automatically populate in their respective sheets.
- If selecting the unit type "other", be sure to use a clear description of the unit in column P. The description you enter here will be used on the BACT and monitoring sheets.

Tips for Completing the Form PI-1 General Application

Flex Permits

- This sheet is only for flexible permits. It is greyed out for other permit types.
- Because cap contributions are listed on this sheet, the emission rates for FINs and pollutants in a cap should not be entered on the Unit Types – Emission Rates sheet. Leave those cells empty.
- The sheet is very wide. We highly recommend using the freeze pan feature of Excel to help navigate. There are detailed instructions in the PI-1 to do this.
- If the source name of a facility entered on the Unit Types-Emission Rates sheet includes "cap", columns D-CV will be greyed out in order to reduce data entry.

Federal Applicability

- As stated in Section I, if the project requires more than one federal applicability review, attach separate analyses to the application.
- The Project Emissions Increase (PEI) – used in Section II, Step 2 – is not always the same as the value used to calculate offsets needed. This is why Section III has a column for "Total Emissions Used to Calculate Required Quantity of Offsets". (Whether these two values are equivalent depends on the technique used to calculate PEI.)
- Read step 6 of the sheet's instructions to determine what additional attachments may be required. For example, if netting is necessary, you should submit Table 3F (and possibly 4F) showing how the net emissions increase was calculated for each pollutant.
- Review Section VI before submitting the project.
  - Ensure selections in the General and Fees sheets match the federal applicability determinations.
  - If nonattainment or PSD permitting is required, your permit reviewer may request additional information to assist with the federal permit project.

Impacts

- Projects requiring an impact review must submit an air quality impact demonstration with their application.
- An impacts analysis may include a qualitative analysis, MERA analysis, and/or modeling. Modeling is not always required to complete an impacts analysis.
- If modeling is conducted, an EMEW is required with the application submittal.

BACT

- Tier I BACT will be populated for efficiency. Tier II, Tier III, and LAER analysis are still acceptable and can be included in the additional notes column or as an attachment in the application.
- Be sure to expand the height of the cell to see the full text.
- The additional notes column will have a red cell when additional details are required.
- You can always attach additional information to help explain a BACT analysis entry.
- For renewals, current Tier I BACT will still be listed automatically so it's less typing if your unit happens to be meeting it. If not, you can list the control technique which is currently in use that is economically reasonable and

technically practicable given the age of the facility and the impacts of its emissions on the surrounding area.

Monitoring

- Minimum monitoring requirements will be populated.
- Be sure to expand the height of the cell to see the full text.
- The additional notes column will have a red cell when additional details are required.
- You can always attach additional information to help explain monitoring proposals.
- Use the drop-downs to indicate how emissions will be measured for pollutants with a project increase above the PSD significant emission rate.

Resource slides – these do not need to be printed

- **Copies:** instructs where application materials should be sent for this specific type of project and location.
- **Glossary:** terms used within each sheet.
- **Acronym:** list for acronyms used within the PI-1.
- **Unit Types:** lists unit types by industry types.
- **Examples:** provides different scenarios on the Unit Types-Emission Rates sheet. These are not linked to the application at all. These are based on actual scenarios from projects we've received or questions from applicants related to representations.
  - If there is an example very similar to the one you are working on, you can copy-paste as values into your Emission Rates – Unit Types sheet and then update the data (columns A-L only).

- **Blank Table:** This is an optional (and highly recommended) tool to help you organize your sources before entering them onto the Unit Types-Emission Rates sheet.
  - It is not linked to any of the other sheets but allows you to more easily organize your data before copy and pasting as values to the Unit Types-Emission Rates sheet.
  - Inserting a unit or pollutant on the Unit Types-Emission Rates sheet must be completed carefully to ensure formulas are not broken. Because the blank table sheet does not have formulas, it allows for easier manipulation of rows if you need to make edits.

- **Summary sheet:** Pulls data from all the other sheets into a one-page project summary.