Updates to the Form PI-1 General Application

Version 6.1 Updates

- General
 - Added questions about the Public Involvement Plan to Section VI. Application Materials.

Technical

- Moved a question about agricultural facilities from the Public Notice sheet to Section I. Additional Questions for Specific Permit Types and Actions.
- Added two questions about rock and concrete crushers to Section I.
- Moved a question about PAL amendments from the Public Notice sheet to Section VI. PAL Permits.

Public Notice

Reformatted sheet to meet Web Content Accessibility Guidelines.

Fees

Allows minor NSR permit alteration projects to be expedited.

Monitoring

 Revised minimum monitoring requirements for emergency diesel engines for consistency across industry types and with recently issued permits.

Version 6.0 Updates

- General
 - Updated attainment status summaries for DFW and HGB counties and Bexar County.
 - Deleted request for site latitude and longitude.
 - Revised signature section so that it is only visible when a project cannot be submitted through STEERS.

Federal Applicability

- Updated ozone nonattainment classifications for DFW and HGB counties and Bexar County.
- Revised GHG PSD section to follow the 2-step major modification applicability test.

BACT and Monitoring

- Revised text that currently reads "See additional notes:" to the following.
 - BACT "Fill out the Additional Notes column to demonstrate how BACT will be met."
 - Monitoring "Fill out the Additional Notes for Monitoring column to demonstrate how monitoring will be conducted to demonstrate compliance with the permit."

Version 5.0 Updates

Cover

- In "Types of Permits and Actions Included" section, added
 - "extension to start of construction" to Action Type column and
 - "construction operating permits" and "special operating permits" to Permit Type column.
- Revised instructions for requesting a permit split.

General

- Made Section IV. Facility Location and General Information visible for more project types (such as alterations) to assist with initial review.
- Updated county attainment status description in Section IV to account for new ozone (El Paso County) and SO2 (Howard, Hutchinson, and Navarro counties) nonattainment areas.
- Added inclusion of graduated scale to plot plan requirements.
- Corrected conditional formatting for GHG PSD Voluntary Update projects that are submitted with Minor NSR Renewal/Amendment.
- Updated county attainment status description in Section IV.

Renewal

Revised question regarding MSS authorization in Section III.A., row 49.

Technical

 Updated instructions for finding contact information for the county judge and presiding officer.

Example

 Added new example for inputting GHG Emissions on the Unit Types – Emission Rates sheet.

Public Notice

- Added new subsection for Regional Council of Government information.
- o Added new section for Plain Language Summary.

Federal Applicability

- Incorporated TCEQ Table 1F into sheet.
- Added summary section describing whether nonattainment NSR, PSD review, and/or GHG PSD review are required.
- Updated SO₂ nonattainment designations for Howard, Hutchinson, and Navarro counties.
- Updated ozone nonattainment designation for El Paso County.

Fees

o Removed redundancies from Section I. Expedited Permitting Request.

BACT

- o Corrected data validation in Additional Notes column.
- Monitoring

Corrected data validation in Additional Notes column.

Materials

Clarified tables needed for federal applicability (section C).

Version 4.1 Updates

Cover:

- Added information stating the intended zoom level is 100%.
- Updated application submittal instructions to require submittal via STEERS for almost all project types.
- o Revised application submittal instructions to account for 30 TAC § 116.118.
- Updated application attachment submittal instructions to require electronic submittal of all attachments except original (ink) signatures when needed.
- Updated printing tips to clarify that hard copies of the entire application do not need to be submitted to APD.

General:

- Added conditional formatting to turn cells red if certain responses are given which require further review by APD staff.
- o Removed the "N/A" option for some questions which must be answered "Yes".
- Clarified that the original (ink) signature is not required if submitted through STEERS in instruction number 2 and in Signature section.
- Added conditional formatting to grey out Project Timing subsection for renewals.
- Specified that area maps should have an accurate graduated scale.
- Edited conditional formatting to allow consolidation of NSR permits during renewals.
- Clarified instructions and questions in Incorporation of Standard Permits, Standard Exemptions, and/or Permits by Rule (PBR) subsection.
- Clarified instructions in project description section.
- Added additional item to Application Materials section—a detailed list of requested actions.

Technical:

- Added instruction number 2.
- Clarified instructions in Impacts Analysis subsection.
- Added formula instead of dropdown to answer, "Does this project require an impacts analysis?" Added multiple questions in this subsection to support this formula.
- Revised Mass Emissions Cap and Trade subsection to clarify that allowances must be identified (not obtained) at the time of submittal.

Unit Types Emission Rates:

- Revised instructions area formatting to increase readability.
- Clarified that "not new/modified" means the FIN is not new or modified.
- Allowed inputting zero as an emission rate.
- Added conditional formatting to reduce data entry for sources that will be removed.

Flexible Permits:

Added conditional formatting to grey out emission rate entry columns for caps.

Public Notice:

- Clarified how to enter multiple languages when applicable for bilingual notice.
- Corrected the summary cell formula in row 46.

Fees:

- Revised instruction number 3 to require entering zero when dollar amount is zero.
- Added the Expedited Permitting Request section.
- Added formula instead of dropdown to answer, "Does the permit require PSD permitting?"
- Revised transaction number input instructions in Payment Information section.

Impacts:

- In step 3 of instructions, clarified that the method used to demonstrate acceptable impacts must be selected whether the modeling is for PSD or minor NSR.
- Replaced first note with information about what an impacts analysis may include.

BACT:

- Corrected malfunction in Action Requested column.
- Changed cell formatting so that users can expand cells when necessary.

Monitoring:

- Corrected conditional formatting to grey out header and instructions when the sheet does not require any data entry.
- Changed cell formatting so that users can expand cells when necessary.
- Updated monitoring requirements for "Control: Bag Filter/Baghouse".

Materials:

- Removed mail and hand delivery options from "How submitted" column for all items except the original (ink) signature.
- Added conditional formatting to Administrative Information subsection to turn cells red if certain responses are given which require further review by APD staff.

Copies:

- Updated submittal instructions in accordance with STEERS submittal requirements.
- Updated EPA submittal instructions.

Version 4.0 Updates

Overall:

- Updated the nonattainment classifications for counties reclassified from moderate to serious (effective September 23, 2019).
- Further limited the data required when submitting renewal certifications, minor NSR alterations, flexible permit alterations, and GHG voluntary updates.

Cover

- Updated the methods for submitting application materials to include STEERS for ePermits. All NSR action types are now available through STEERS. There are many time-saving features of submitting this way.
- Updated the methods available for submitting confidential application materials to the APD.

Technical:

 Added new questions for plant fuel gas and bulk fuel terminals. If applicable, additional BACT requirements are listed on the BACT sheet.

Example:

- Moved the sheet so it is located next to the Emission Rates-Unit Types sheet to provide easier access.
- Added new examples for flexible permits and for incorporating by consolidation Pollution Control Project standard permits.

Unit Types Emission Rates:

Updated the instructions for completing this sheet for flexible permits.

Flexible Permits:

 A new sheet which allows flexible permit holders to indicate which FINs are in caps and list the cap contributions. The addition of this sheet also improves the usability of the Unit Types-Emission Rates sheet for flexible permit holders.

Stack Parameters

 Changed the setup to now list all EPNs represented on the Unit Types-Emission Rates sheet. This allows users to more easily copy-paste between projects instead of entering the data each time a new project is submitted.

Impacts

- Changed the set up to show ozone, VOC, and all pollutants listed on the Unit Types Emission Rates sheet rather than using a default list.
- Updated the drop-down options and the data populated in the "Notes" column.
- Listed all guidance links at the top of the sheet instead of in a column based on the selection. This allows users to access the links without making selections.
- Added an "Additional Notes" column for qualitative discussions or additional details the applicant may need to provide.

• Monitoring:

- Corrected the monitoring for the unit type "Boiler: liquid and gas fuel, >40 MMBtu/hr" under combustion industry.
- Added additional details for truck loading monitoring requirements consistent with current boilerplate language.

Materials

Added greying out of data entry cells based on previous responses.

Version 3.3 Updates

General:

o Added the Material Balance, Table 2 to the list of common application attachments.

Technical

- Added conditional formatting to turn cells red if certain responses are given which require further review by APD staff.
- Updated the alteration questions to clarify when impacts may be needed.
- Added a question to the flexible permit alteration section to grey out more of the workbook if there are no changes to the current MAERT or stack parameters and is not submitted with a GHG voluntary update.

Public Notice

- Corrected the formula for pulling data from the Unit Types-Emission Rates sheet to the project increase table on the Public Notice sheet.
- Updated the formulas for Public Notice applicability for PM, PM10, and PM2.5 to follow current practice and added an explanatory note.
- Added a clarifying note to explain when notice is required for GHG permit actions and removed the public notice threshold values accordingly.
- Changed conditional formatting for a GHG voluntary update submitted with an amendment.
- Added conditional formatting to grey out the public notice thresholds for renewal and initial projects.

Federal Applicability

 Added questions for both the PSD and nonattainment sections asking if netting was required for the analysis. Additional instructions are included if netting was used.

Fees

- Updated the conditional formatting for the Professional Engineer seal to indicate it is not needed for a renew only project.
- Added conditional formatting to turn the cell red if the amount paid doesn't match the total amount due.

BACT

- Added a column to indicate the requested action for each FIN listed. This allows the user and reviewer to quickly see which sources are renewed only.
- Updated to list PM BACT for sources with PM, PM10, or PM2.5 listed. Applicants should list all three sizes of particulate matter on the Unit Types-Emission Rates sheet, but this change allows the BACT sheet to be correct even if they do not.

Monitoring

- Changed to pull in new, modified, consolidated, and/or renewed FINs instead of EPNs.
- Updated to list PM monitoring for sources with PM, PM10, or PM2.5 listed.
 Applicants should list all three sizes of particulate matter on the Unit Types-Emission Rates sheet, but this change allows the monitoring sheet to be correct even if they do not.

Materials: (new sheet)

- This sheet is being introduced with Version 3.3. Because application materials may be submitted in different ways (hand-delivered, mailed, email, STEERS, etc.), as well as at different times during the permit review, the sheet was added to document this information. This list will also help our Air Permits Initial Review Team verify that all submitted materials were received.
- The list is in the preferred application order. While not required, submitting your application with the materials in this order will help the permit reviewer find the information they need more quickly.

Copies

- Updated the instruction for submitting the application to APD to indicated that electronic submittals are preferred.
- Fixed the mailing address pulled in for Region 1 and Region 11.

Summary

 Corrected the impacts table to match the latest options on the impacts sheet, changed in Version 3.2.

Version 3.2 Updates:

General

- Renamed the workbook from NSR Application Workbook to "Form PI-1 General Application".
- o Revised instructions throughout to add clarity and more guidance.
- Unprotected row height for each sheet.
- Unlocked the Internal Comments column which had been inadvertently locked on some sheets.

Cover

 Updated submittal instructions for the workbook and for the attached application materials. APD's preference is to receive all application materials (application workbooks and attachments) electronically.

Renewals

 Updated renewal questions to match notice requirements and add clarity for when an amendment is required.

Technical

- Added conditional formatting to the alteration questions, so the response turns red if an amendment is required.
- Unit Types-Emission Rates
 - Added HAPs to the dropdown common pollutant list.

Stack Parameters

 Provided a new column so the applicant can indicate which sources are included in an EMEW. Sources included in an EMEW do not need to have the stack parameters entered.

Public Notice

- Removed conditional formatting, so the pollutant list is visible for all project types.
- Updated which projects require internet at the public place: all PSD, nonattainment, and HAP actions.
- Updated the notice questions to provide more direction to the applicant and avoid common notice issues. For example, determining if there is a change in the character of emissions and identifying if HAPs pollutants are included.

Federal Applicability

 Removed the dropdown lists for indicating where offsets are coming from and provided more guidance of appropriate responses.

Fees

- Confirmed that the PE seal (when required) can be submitted electronically.
- Restructured to include all project fees, including renewals. Previous versions had the renewal fees on the Renewals sheet. Based on user feedback, all fee information is now on the Fees sheet. In addition, a "total fee" line has been added.

Impacts

- Changed the populated instructions for when modeling is selected. As of June 1, an EMEW is required when modeling is conducted, and the initial modeling summary option is no longer available.
- Updated the drop-down selections to clarify MERA steps 0-2 and allow for the option to use both MERA steps 0-2 and modeling for the same pollutant (for example, VOC)

BACT

Corrected how FINs and pollutants are populated on the BACT sheet.

Monitoring

 Entered the minimum monitoring requirements for more units based on current boilerplate conditions.

Copies

Updated the EPA Region 6 mailing address to their new office location.

Version 3.1 Updates:

- Updated submittal instructions: no hard copies are needed by APD except the general sheet when an original signature is required. Printed versions are still required when submitting to the regional offices, local programs, and/or for the public viewing place when notice is required.
- Fixed the drop-down list in Column A of the Unit Types Emission Rates sheet.
- Added unlocked columns to each data entry sheet for the applicant to use for internal notes and/or reviews. The information in this column should be deleted prior to submitting the workbook to APD.
- Added an optional dropdown selection to indicate the project should be reviewed under a different ozone classification than the current classification for areas in which it is anticipated that EPA will change the classification. Please note, additional notice may be required when submitting a nonattainment application before a classification change has been made effective.
- Corrected the listed region for the following counties: Ellis, El Paso, Lamar, Lamb, Lampasas, La Salle, McCulloch, McLennan, McMullen, Madison, Marion, Martin, and Matagorda.
- Added boilers to the Chemical/Energy unit type list which had inadvertently been removed.
- Added drop-down options for indicating where offset emissions will be coming from.
- Removed IFS, CONCAT, and IFNA formulas that are not compatible with Excel 2013.
- Clarified instructions throughout.
- Allowed sorting of the Unit Types reference sheet.
- Moved to version and patch numbers instead of dates.
- Allowed the row heights on the General and Federal Applicability sheets to be adjusted.
- Updated wording of the agreement to using the TCEQ version of the workbook.

March 18, 2019 Version Updates:

- Improved instructions throughout the workbook
- Updated conditional formatting
- Clarified submission procedures
- Added Version, the maximum number of FINs, and release date to Cover Page
- Moved the order of questions to improve the flow of document
- Added more permit and action types
- Added questions regarding consolidating NSR permits
- Added detailed questions from 30 TAC Chapter 116 requirements
- Added follow-up questions to specific permit and action types
- Added a "Renewals" tab with questions specific to renewals and renewal/amendments
- Added a "Technical" tab with sections specific to permit type
- Increased EPN/FIN actions available in the "Unit Types-Emission Rates" tab
- Revised Unit Types available for selection

- Moved "Impacts" and "Fees" tabs towards the end to improve the flow of document
- Added "Federal Applicability" tab with eligibility questions and four determination tables
- Updated "Fees" tab to cover more fee scenarios
- Added Ozone to "Impacts" tab and removed NOX
- Updated impacts demonstration options and resources
- Added Proposed Measurement Techniques to "Monitoring" tab
- Updated examples and included a table of contents for the examples
- Added a blank table in the same layout as the "Unit Types-Emission Rates" tab for ease of use
- Added "Summary" tab with an overall project summary
- Added Greenhouse Gas (GHG) pollutants to the drop-down list