Policy for Permitting Low-Emitting Sources

Abstract

In order to alleviate burdensome and unneeded requirements relating to the permitting of low emitting sources, the DAQ is presenting the following general and source-specific policy relating to the permitting of emission limits and associated MRR from certain low emitting sources. This policy is to be applied on a case-by-case basis and may be trumped by permitting situations including, but not limited to, synthetic minors.

Authority

Rule 13, Section 5.4. states: "The [permit] application shall contain sufficient information as, in the judgment of the Secretary, will enable the Secretary to determine whether the source construction, modification, or relocation will be in conformance with the provisions of any applicable rules promulgated by the Secretary." Rule 13, Section 5.11. states: "The Secretary may impose any reasonable [permit] condition as part of a granted administrative update, construction, modification, existing stationary source operating permit or relocation permit."

The above rule language allows the DAQ to implement any reasonable policy to standardize requirements relating to the submission of information concerning, and the permitting of, general and specific low-emitting sources.

Procedure

While the following policy alleviates some requirements on low-emitting emission sources, it does not change the policy of requiring applicants to submit reasonable information concerning all potential emission sources. Reasonable information concerning all equipment, emission units, stationary source, processes, etc. that are part of a proposed construction, modification or other permit application shall be required in a complete permit application and shall be reviewed in terms of their state rule and federal regulation applicability.

The following will outline the general and source-specific policy relating to the permitting of emission limits and associated MRR from certain low emitting sources.

- No emission limit for any regulated pollutant should be set with more than two significant digits after the decimal, (i.e. 0.5733 should be listed as 0.58). When rounding, the emission limit should always be rounded up.

- Fugitive emission sources, such as stockpiles or haulroads should not have emission limits in a permit. While these emissions are quantifiable and should be documented in the engineering evaluation, these emissions are not enforceable as a practical matter. Proper permit conditions to minimize pollutant discharges are limiting stockpile size, requiring water sprays, water trucks, or other control measures.

- Tanks of less than 20,000 gallons should not, as a general rule, have permitted emission limits. All tanks should be listed in Section 1.0 (the equipment table) of the permit. This same table should identify the size of the tank, any controls (such as a floating roof), and may include for tanks of 10,000 gallons or more the expected throughput or turnovers. Depending on the situation, setting a specific permit condition for maximum throughput, turnovers, or a vapor pressure for the tank is acceptable. Such situations would include tanks storing TAPs or HAPs, that are not subject to Rule 27 or a MACT but may be close to the thresholds for these rules. For a source subject to Rule 27 or a MACT storing the pollutant subject to the MACT or Rule 27 it may be appropriate to have emission limits for the regulated pollutant and the appropriate MRR to show compliance.

- For sources with multiple numbers of tanks storing similar compounds, it may be appropriate to aggregate the emissions from these tanks into one emission limit for all.

- For natural gas compressor engines, emission limits for NOx and CO should always be established. Emission limits for SO2, PM, PM10, PM2.5, or VOCs should only be established if the potential emissions would exceed 2 TPY. In general, emission limits for HAPs or TAPs should not be established for these sources. However, if the source is subject to a MACT or is establishing a synthetic minor for a MACT, then emission limits for specific HAPs are appropriate.

- For coating sources not subject to any MACT, a proper HAP emission limit is one that sets a plant-wide limit of less than 10 TPY of any individual HAP and less than 25 TPY of all aggregate HAPs. The permit should also inventory the expected HAPs in the permit.

- Any non-coating source with an individual HAP potential to emit of 2 TPY or more should have an permitted emission limit.

- Any source that has the potential to emit any TAP at or above the permitting thresholds should have their potential emissions established in their permit.