Permit Overview Part 1: In The Beginning

Chuck Greco
Permit Overview

• Cover Letter

• Permit Sections
  • Title Page
  • Emission Source Table
  • General Conditions & Limitations
  • Specific Conditions & Limitations
  • Appendices
    • A: NC State Toxics
    • B: Insignificant Activities (i.e. Exempt Equipment)
What First – The Cover Letter

- Facility Classification:
  - basis for annual fee and permit application fee
  - not listed on the permit
- Appendix A: NC State Toxics Requirements
- Commencement of Operation Notice
- Monitoring Requirements
- Source/Performance Testing Requirements: typically only if new
- Other New Requirements: typically new rule applicability
- 30-Day Comment Period:
  - Errors
  - Source or control device description clarification
  - Alternatives to Requirements
Permit Sections: Title Page

• New Permit Number
• Company Name: company legal business name
• Physical Address: May include Facility Name if different from Company Name
• Facility Description
Permit Sections: Emission Source Table

• Permit Issue Date
• Source ID: most often generic (ES-1, ES-2), can be descriptive but should be short (GEN-1, GEN-2)
• Source Description: from the application
• Installation/Modification Dates: Important for rule applicability
• Control Device ID and Description: from the application
• Permitted Pollutant - Listed if:
  • Facility-wide uncontrolled potential exceeds permitting limits; or
  • Source is subject to a rule that regulates its emissions
• Applicable Permit Specific Conditions and Limitations
Permit Overview Part 2: Conditions & Appendices

Lexin Murphy
Permit Sections

• General Conditions & Limitations
  • Administrative
    • G-1 – Comply with MCAPCO
    • G-2 – Permit transfer requires approval by MCAQ
    • G-4 – Update your permit before constructing, modifying or operating any new equipment
    • G-8 – Permit may be revoked or modified in certain situations
    • G-11 – Retain a copy of your permit at permitted facility

Permits can be obtained through MCAQ’s Air Pollution Facility Database at [http://airquality.charmeck.org](http://airquality.charmeck.org).
Permit Sections

• General Conditions & Limitations:
  • Operational
    • G-13 – Notify MCAQ of commencement of operation
    • G-14 – Comply with Asbestos NESHAP requirements
    • G-15 – Comply with RMP requirements
    • G-16 – Visible emissions should generally stay below 20% opacity
    • G-17 & G-18 – Don’t allow dust to cross your property lines
    • G-21 – Don’t cause objectionable odors to cross your property lines
    • G-22 – Comply with toxics requirements
Permit Sections

• Specific Conditions & Limitations:
  • Procedural – Voids previous permit
  • Emission Standards – Lists any MCAQ-specific or other federal emission rules site is subject to
  • Emission Limits – Lists any SM or toxics limits
  • Monitoring & Recordkeeping (covered later)
  • Performance Testing – Table listing subject sources, rules requiring testing, and testing frequency
  • Notifications & Reporting (covered later)
Appendix A

• Toxic Air Pollutant Review
  • Listing of any toxic air pollutants (TAPs) your facility emits that have been reviewed at some point to determine whether the emission rates are below TPERs.
  • Just because a TAP is listed here does not mean your facility is permitted for that pollutant.
Appendix B

• Insignificant Activities Table
  • Helps MCAQ keep track of which equipment at a facility has already been reviewed for regulatory purposes
  • Not part of the official permit, so it can be revised separately
  • Three different types of insignificant activities: due to size and production rate, due to category, and due to facility potential
    • Only exemptions due to size and production rate will sometimes require recordkeeping or reporting
Questions???