



MPCA Perspective on Air Permit Amendments

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The Complete Application

Your Application has been determined to be complete enough for processing.

The MPCA may still have additional questions to clarify information contained in the application.

From Delta to Tempo

- Clean up
 - New Terminology
 - EU001 → EQUI 15
 - CE003 → TREA 38
 - etc

From Delta to Tempo

Using the new terminology:

All wood milling equipment controlled by ~~CE003~~ TREA 38 (or equipment replacing ~~CE003~~ TREA 38 as allowed under ~~GP008~~ COMG 22), including existing, modified, or replacement milling equipment, is subject to the requirements of ~~GP007~~ COMG 3.

Calculations

- Emission factor source
- Emission factor applicability
- Assumed production rate
- Assumed control efficiency
- HAPs? PM2.5? GHG?
- Tempo designations? (EQUI 15, rather than EU001)
- Compliance demonstration?

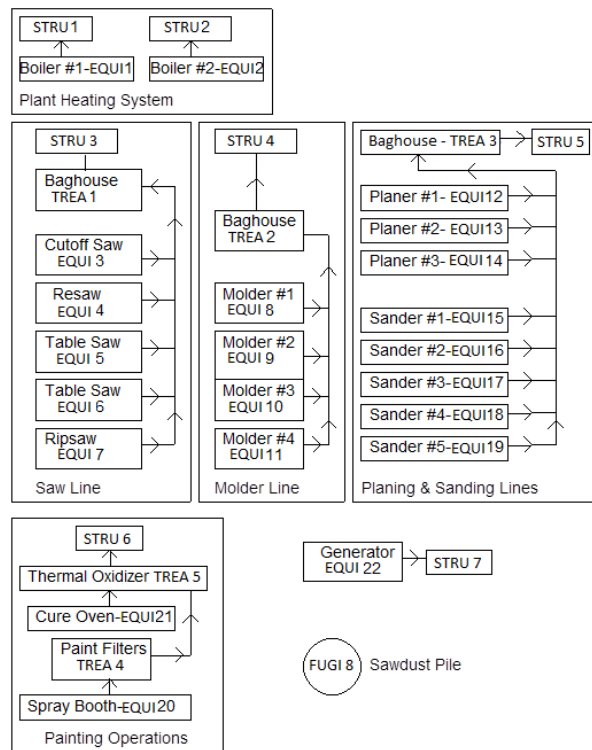
New Source Review

- Proposed rule changes
 - Affordable Clean Energy
 - Project Emissions Accounting
- EPA policy changes
 - Emission projections
 - Project aggregation
 - Source definition clarification

Dispersion Modeling

- Has required dispersion modeling been done?
 - NSR
 - Permit requirement to model for proposed changes
 - Permit requirement to model by a certain date or before permit expiration date
- Make sure emission calculations match permit application

Process Flow Diagram



New/Revised Federal Standards

New Source Performance Standard (NSPS, 40 CFR 60) & National Emission Standards for Hazardous Air Pollutants (NESHAP, 40 CFR 63)

- Unexpiring permit or 3+ years remaining in term of expiring permit:
 - Major amendment to incorporate, within 9 months of new or changed standard (Minn. R. 7007.0400, subp. 3)
- Less than 3 years remaining in permit term:
 - We are still going to add it in

Inapplicable Standards

- Looks like 40 CFR XYZ applies to manufacturing green widgets out of stuff
- 40 CFR XYZ does not apply because
 - We only make red widgets, or
 - Our green widgets are made out of super stuff which is exempt, or
 - Our widget machine was manufactured before 1985, or
 - Whatever the reason is

Insignificant Activities

- Do they still qualify?
 - If not, minor amendment required under Minn. R. 7007.1450, subp. 2
- Calculations?
 - Always required for Minn. R. 7007.1300, subp. 3(F) and subp. 4
 - Always required when we ask for them for all others
- No reclassification of Subject Items as insignificant activities

Insignificant Activities

- Makes a difference in permit applicability
- Part of a PSD modification and emits the PSD pollutant
- HAP emissions count toward major source classification
- Subject to CAM (40 CFR 64)

Environmental Justice

- Area of environmental justice concern
 - >40% of residents with income < 185% of national poverty level
 - <50% of residents are people of color
 - In or near federally recognized tribal area
- Enhanced outreach
- <https://www.pca.state.mn.us/about-mpca/mpca-and-environmental-justice>

Your Review

- Change of scope
- Requesting changes to standard language

- Questions?
- <https://www.pca.state.mn.us/about-mpca/ask-mpca-online-form>
- <https://www.pca.state.mn.us/about-mpca/information-requests>

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