
PRE-PERMIT CONSTRUCTION APPROVAL GUIDANCE DOCUMENT



State of Idaho
Department of Environmental Quality

Updated May 2012

OVERVIEW

Questions regarding the 15-Day Pre-Permit Construction Approval process may be directed to DEQ's Air Quality Permit Hotline (1-877-573-7648). A DEQ permit writer will be available on the Hotline to answer questions and schedule a consultation which is required by the Rule. DEQ encourages applicants to read this document and to call the Air Quality Permit Hotline to gain an understanding of the 15-Day Pre-Permit Construction Approval process.

The 15-Day Pre-Permit Construction Approval is available in accordance with the *Rules for Control of Air Pollution in Idaho (Rules)* IDAPA 58.01.01.213 only for those sources that satisfy and understand the following conditions:

1. The applicant will have completed a comprehensive air quality assessment and regulatory review;
2. The applicant is not proposing a new Prevention of Significant Deterioration (PSD) major facility, a PSD major modification (i.e. subject to PSD requirements), or a proposed major NSR source project in a non-attainment area;
3. The applicant is not utilizing emission offsets (netting);
4. The applicant is willing to commence construction at their own risk prior to issuance of a Permit to Construct. A risk exists because the owner or operator can not operate the source until a Permit to Construct is issued; if the Permit to Construct is ultimately denied the facility will be in violation of Section 201 (Permit to Construct Required) on the date that it commenced construction. The owner shall not contest the final permit to construct decision (denial) based on the fact they may have already begun construction after Pre-Permit Construction approval has been granted by DEQ (IDAPA 58.01.01.213.02.d);
5. The applicant understands that:
 - Pre-Permit Construction approval is granted or denied within 15-days of the receipt of the permit application; and
 - That the Permit to Construct application is processed under the same administrative timelines as are applications that do not seek to obtain Pre-Permit Construction approval (i.e. 30 day completeness review; 60 day permit development period; and an opportunity for public comment.
 - i. Opportunity for public comment is provided for by DEQ upon receipt of the permit application via publication in the local newspaper and through posting on DEQ's website.
6. The applicant understands that DEQ may not conduct a detailed technical completeness review of the application within 15-days. DEQ's review during the 15-day period is to determine if the application appears to have addressed all the necessary technical and regulatory requirements so that Pre-Permit Construction approval can be granted. If during the 15-day review period DEQ determines that information is lacking the Pre-Permit Construction approval request will be denied.
7. The applicant understands the Permit to Construct application may be determined incomplete, or denied, even though pre-construction approval may have been granted within 15-days.

These concepts are the basis for of the “213” Rule (15-Day Pre-Permit Construction Approval). While developing the Rule, all negotiating parties (including participating industries and the Idaho Department of Environmental Quality (DEQ), concurred that only those sources that completely demonstrate compliance with all preconstruction rules through an application process are eligible for the 15-day approval. This portion of the negotiated Rule is found in IDAPA 58.01.01.213.01.c. In short, a source must have a thorough understanding of air quality rules, ambient impact assessments, and appropriate methods to limit Potential to Emit. Pre-Permit Construction approval applications that do not fulfill these requirements will be denied.

This guidance is intended to aid applicants in submitting an application in accordance with IDAPA 58.01.01.213. The following list outlines the application requirements.

1. The applicant shall submit an application that fulfills all of the application procedures specified in IDAPA 58.01.01.202. This includes submitting a \$1,000 application fee in accordance with IDAPA 58.01.01.224, and completing all necessary application forms and checklists. The forms and checklists can be found DEQ’s website:
http://www.deq.idaho.gov/air/permits_forms/forms/forms.cfm
2. The applicant shall consult with DEQ prior to submitting the application as specified in IDAPA 58.01.01.213.01.b. The intent of the consultation is to assure that the applicant understands the procedures of the Pre-Permit Construction approval Rule, and to have a detailed discussion on the methods that the applicant will use to estimate emissions and determine ambient impacts. The meeting should include the DEQ Permit Coordinator, the DEQ Permit Writer who will be assigned the project, and DEQ Modeler who will review the modeling submissions. Applicants should contact the Air Quality Permit Hotline (1-877-573-7648) to schedule a meeting. The meeting may be at the DEQ office in Boise or may be a telephone conference call. Calls to the Hotline do not suffice for the consultation that is required by the Rules; though the consultation may be scheduled during the call to the Hotline. The consultation will be a meeting or teleconference, and will include DEQ Permit Coordinator, Permit Writer, and Molder as well as the applicant and the applicant’s consultant.
3. The applicant shall request in writing the ability to construct prior to permit issuance (Rules Section 213.01.c).
4. The applicant shall submit proof of eligibility for Pre-Permit Construction approval. Approval is not available for new PSD major facilities, PSD major modifications (facility’s which are subject to PSD requirements), major PSD projects in non-attainment areas, sources which plan to utilize offsets (or netting), nor sources which impact air quality related values of Class I areas (Rules Section 213.01.c).
5. Applicants seeking limitations on potential to emit, such that permitted emissions will be either below major source levels or below significant increase levels, must describe in detail in the application the proposed emission limitations and operational limitations which will adequately limit Potential to Emit below major source thresholds (Rules Section 213.01.c).
6. The applicant shall certify in accordance with the Rules Section 213.01.01.d that it will comply with all limitations it has imposed on Potential to Emit, including

emission limitations, operational limitations, and monitoring and reporting requirements.

7. The applicant shall conduct ambient impact assessments for all air pollutants subject to regulation under the *Rules*. Ambient impact assessments shall be conducted in accordance with a written and DEQ-approved protocol. The protocol must be approved in writing by DEQ prior to submitting the application (Rules Section 213.01.c).
8. Within ten (10) days after application submittal, the applicant shall hold an informational meeting in at least one (1) location in the region in which the source is to be located (Rules Section 213.02.a). The informational meeting shall be made known by notice published at least ten (10) days before the meeting in a newspaper of general circulation in the county(ies) which the source will be located. A copy of the notice shall be included in the application, also submit proof of publication if you receive one from the publisher. The notice shall include the date, time and location of the meeting, a brief description of the source, and a statement that the purpose of the meeting is to discuss the air quality related aspects of the proposed project. This informational meeting is the responsibility of the applicant. During the meeting DEQ encourages the applicant to discuss their proposed process, proposed emissions, applicable rules, and procedures that will be followed to obtain a permit. Emphasis should be placed on the fact that the facility will not be able to operate until a permit to construct is issued by DEQ in accordance with the administrative procedures for issuing permits. It should be made clear that the administrative process includes providing an opportunity for a public comment period on DEQ's proposed action (i.e. draft permit, statement of basis) prior to issuing the final permit. Interested parties should be informed to contact DEQ if they want to request a public comment period. The application which has been submitted will be available on DEQ's web page, as is the ability to request a comment period on DEQ's proposed action.

Provided below is an application structure that the applicant should follow. This will assist the applicant in determining if all information required by IDAPA 58.01.01.213 has been submitted. The 15-day review period specified by the Rule does not allow the luxury for DEQ to solicit the source for information needed to grant Pre-Permit Construction approval. If information is lacking, DEQ will deny the Pre-Permit Construction approval request. In the case of a denial, the process does not allow time for DEQ to list in detail the specific information that is lacking in the submittal. The applicant may submit a new 15-day Pre-Permit Construction Approval application, along with a \$1,000 application fee for the new application, upon thoroughly readdressing the application requirements. However, the fact that the original application was denied is indication that comprehensive knowledge needed to perform air quality impact assessments and regulatory reviews consistent with the basis for the Rule may be lacking. It should be noted that \$1,000 application fee is required for each 15-day Pre-Permit Construction application, and that the fee is not transferable or refundable.

Following is a specific outline that sources should follow to be eligible for the 15-Day Pre-Permit Construction Approval. Each section must be completed in sufficient detail to allow DEQ to quickly determine what the applicable requirements are, how the source will continuously determine compliance, whether process descriptions were provided, if detailed emission estimates were provided, and if the applicant stated all assumptions.

As previously stated, an in-depth review of the information submitted may not occur during the 15-day period; DEQ's review during the 15-day period is to determine if the application appears to have addressed all the necessary technical and regulatory requirements so that Pre-Permit Construction approval can be granted. The permit to construct application will then be processed in accordance with Section 209 of the Rules. This means that the application may be determined incomplete within 30 days of submittal even if Pre-Permit Construction approval has been granted. If the application is determined complete DEQ will prepare either a proposed permit or permit denial within 60 days of determining the application complete. An opportunity for a public comment period will be provided on DEQ's proposed action.

The intent of this document is to provide guidance, and where appropriate to provide examples of what should be submitted. If this document is not read from beginning to end, the applicant may not fully understand the procedures and requirements associated with applying for the 15-day approval. The applicant should follow the examples as closely as possible when completing the application.

The applicant should be aware that seeking the 15-day pre-permit application will entail a significant amount of work. All Rules and Regulations which apply to new sources or modifications to existing sources must be addressed. Where necessary limitations on operations must be self-imposed such that they limit the potential to emit below PSD major source (or PSD major modification) thresholds. Ambient impact assessment must be performed to demonstrate that the proposed emission units will not exceed ambient air quality standards. As previously mentioned, this process mandates comprehensive knowledge of air quality rules and ambient impact assessments and a willingness of the applicant to commence construction at their own risk

It is very important for the source to follow the outline and the guidance that is given. Fifteen (15) days is a very short period of time for DEQ to review an application and determine if approval to construct should be granted. The applicant must make every effort to make the application as organized and complete as possible.

APPLICATION STRUCTURE

Section 1	Application Forms/Checklists
Section 2.	Process Description
Section 3.	Process Flow Diagram
Section 4.	Applicable Requirements
Section 5.	Potential to Emit/Emission Estimates/Limitation on Potential to Emit
Section 6.	Facility Classification
Section 7.	Ambient Impact Assessments

1. APPLICATION FORMS/CHECKLISTS

In accordance with the Rules for the Control of Air Pollution in Idaho (58.01.01.202) applications for a permit to construct must be made using forms furnished by the Department. The application forms are located on DEQ's web page (<http://www.deq.idaho.gov/air-permitting-forms-checklists>). All applicable application forms must be completed and submitted.

Checklists have been developed to aid the applicant in submitting complete applications. At a minimum the following checklists should be completed and submitted along with application forms:

- 15-Day Pre-Permit Construction Application Completeness Checklist
- Toxic Air Pollutant (TAP) Preconstruction Compliance Application Checklist
- Dispersion Modeling Protocol Checklist

DEQ developed application forms which are designed to aid applicants in submitting the necessary information. However, because of the wide variety of sources it is not possible to generate application forms that work for all applicants. For that reason it is important for the applicant to review the application requirements of Section 202 of the Rules which states that the following shall be submitted:

- Site information, plans, descriptions, specifications, and drawings showing the design of the stationary source, the nature and amount of emissions (including secondary emissions), and the manner in which it will be operated and controlled.
- All estimates of ambient concentrations shall be based on the requirements of 40 CFR 51, Appendix W (Guideline on Air Quality Models).
- A schedule for construction of the stationary source or modification.

There are three general requirements that apply to all applicants:

- 1) The applicant must identify and document compliance with all applicable emissions standards and regulatory requirements.
- 2) The applicant must provide an emission inventory for all regulated air pollutants. Emission estimates must be documented.
- 3) The applicant must demonstrate compliance with all ambient standards and toxic air pollutant increments. Often this requires air pollution dispersion modeling.

Satisfying the application requirements of Section 202 of the Rules often requires submitting more information than what is asked for on the application forms. Following is guidance on what must be submitted.

2. PROCESS DESCRIPTION

Process descriptions must be submitted with sufficient detail to convey how the proposed process will operate. Considerable effort should be given to the process description development. The process description must be from raw material in to final product out. In order for DEQ to appropriately regulate a source by limiting emissions and process throughput, a source's process must be thoroughly understood. The appropriateness of a limitation can only be determined when compared to how a source operates. Attention to detail in developing the process description may eliminate certain inappropriate permit limitations which may be imposed on the source in the absence of an adequate process description.

Examples of process descriptions may be found in AP-42 (EPA's *Compilation of Air Pollution Emission Factors*). It is important to remember that the process description should detail air pollution emitting activities as well as the process as a whole.

3. PROCESS FLOW DIAGRAM

Process flow diagrams should be a depiction of the process description and show the process from raw material in to final product out. All air pollution emission sources must be shown. Sources which emit through a stack should be represented as emitting through a stack. Sources of emissions that do not pass through a stack must also be shown.

As with the process description, the process flow diagram should be detailed. All air pollution emitting activities must be shown. Any air pollution emitting activities not shown on the diagram cannot be considered part of the air pollution emitting activities subject to Pre-Permit Construction approval. Commencing construction of omitted emission units may be a violation of the *Rules*.

4. **LIST ALL APPLICABLE REQUIREMENTS**

All applicable requirements must be cited by the Rule or Regulation section/subpart that applies for each emission unit. If the applicant does not complete the application with all requirements cited, demonstration of compliance with all applicable air quality rules and regulations could not have been proven. Demonstration of compliance with all applicable Rules and regulations is mandated by IDAPA 58.01.01.213.01.c.

Rules for the Control of Air Pollution in Idaho

Below is an example of what DEQ is looking for in an application regarding a listing of the applicable requirements of the *Rules For the Control of Air pollution in Idaho (Rules)*. Included is a list of the *Rules* which apply to nearly all sources during day-to-day operations. When other rules apply, they should also be listed using the format given.

Following the listing of each applicable Rule the applicant must provide a demonstration how they are, or will be, in compliance with that Rule.

IDAHO ADMINISTRATIVE PROCEDURES ACT 58.01.01
Rules for the Control of Air Pollution in Idaho

- 123. CERTIFICATION OF DOCUMENTS
- 210. DEMONSTRATION OF PRECONSTRUCTION COMPLIANCE WITH TOXIC STANDARDS
- 577. AMBIENT AIR QUALITY STANDARDS FOR SPECIFIC AIR POLLUTANTS
- 585. TOXIC AIR POLLUTANTS NON-CARCINOGENIC INCREMENTS
- 586. TOXIC AIR POLLUTANTS CARCINOGENIC INCREMENTS
- 590. NEW SOURCE PERFORMANCE STANDARDS
- 591. NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS
- 625. VISIBLE EMISSIONS
- 650. RULES FOR THE CONTROL OF FUGITIVE DUST
- 675. FUEL BURNING EQUIPMENT -- PARTICULATE MATTER
- 676. STANDARDS FOR NEW SOURCES
- 700. PARTICULATE MATTER -- PROCESS WEIGHT LIMITATIONS

Many more rules exist which may apply. These are listed because they nearly always apply to new sources or modifications of existing sources. The applicant should address each of these rules, even if it is only to explain why they do not apply.

Examples of how DEQ expects applicants to address each of the listed applicable requirements are given below for a few of these Rules. They all should be addressed in detail. It is the applicant's responsibility to ensure that all other applicable Rules are cited in accordance with the following format. The basic concept is that the applicant must

provide: a listing of all applicable Rules; identify all emission units which the Rule applies; and a demonstration of how the applicant will comply with the Rule.

Aside from ambient impact assessments, listing of all applicable requirements and providing documentation of compliance with those standards is the most demanding Pre-Permit Construction approval application requirements. Generally, DEQ will be able to quickly determine if the applicant has the comprehensive knowledge and ability to fulfill these requirements. In order to comply, considerable time is required to address each applicable rule in sufficient detail. The previous list of generally applicable rules should aid the applicant in completing this section of the application. Remember, it is not sufficient to simply list the applicable requirements. A listing of the emission units the rules apply to must be given as well as a demonstration on how the applicant will comply with each Rule or Regulation.

Examples

IDAPA 58.01.01.210

DEMONSTRATION OF PRECONSTRUCTION COMPLIANCE WITH TOXIC STANDARD.

DEQ has developed a Toxic Air Pollutant (TAP) Preconstruction Compliance Application Completeness Checklist. This checklist is designed to aid the applicant in submitting a complete preconstruction compliance demonstration for toxic air pollutants. This checklist should be completed and submitted. The checklist may be found at http://www.deq.idaho.gov/media/576565-ptc_checklist_tap_completeness.docx.

List each emission unit that emits a TAP. For each emission unit provide a documented TAP emission inventory and demonstration of compliance with the toxic increments listed in §585 and §586. Table 1 is an example of summary table that may be submitted.

Table 1. TAPs Compliance Summary

TAP	Controlled Emissions (lb/hr) ^a				Compliance Demonstration
	Source #1	Source #2	Total	EL	
Benzene	1.0E-3	2.0E-3	3.0E-3	8.0E-4	Modeling
Hydrogen Chloride	0.02	.025	.045	0.5	Total below EL

a) Emission calculations and assumptions are included on page 13 and 14 of the application.

IDAPA 58.01.01.675

FUEL BURNING EQUIPMENT – PARTICULATE MATTER

Provide a listing of fuel burning equipment and the particulate matter standards which apply. Also provide a demonstration of how the emission unit will comply with the applicable standard.

Fuel Burning Equipment	PM Standard	IDAPA 58.01.01 Citation	Control Device	Compliance Demonstration
Hog Fuel Boiler (Complete Form EU5)	0.08 gr/dscf @ 8% O ₂	§676	Baghouse (Complete Form BCE)	Calculations – see page 14 of application
Fuel Oil Boiler (Complete Form EU5)	0.05 gr/dscf @ 3% O ₂	§677	Scrubber (Complete Form SCE)	Calculations – see page 15 of application

Code of Federal Regulations

All New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAPs), that may be applicable must be addressed by completing the DEQ air quality permit application form for Federal Regulation Review and Applicability (Form FRA) at http://www.deq.idaho.gov/media/576565-ptc_checklist_tap_completeness.docx.

For each applicable federal emissions standard provide documentation on how the emissions unit will comply with the standard. Show all calculations, state all assumptions, and provide documentation of air pollution control device removal efficiencies.

5. POTENTIAL TO EMIT, ESTIMATE EMISSIONS, LIMITATIONS ON POTENTIAL TO EMIT

POTENTIAL TO EMIT

All applicants must provide the potential to emit of all regulated air pollutants.

Potential to Emit is defined by IDAPA 58.01.01.006.73:

“Potential to Emit/Potential Emissions. The maximum capacity of a facility to emit an air pollutant under its physical and operation design. Any physical or operational limitation on the capacity of the facility to emit an air pollutant, provided the limitation or its effect on emissions is state or federally enforceable, shall be treated as part of its design. Limitations may include, but are not limited to, air pollution control equipment, restrictions on hours of operation, and restrictions on the type or amount of material combusted, stored, or processed.”

Care should be given to correctly determine Potential to Emit. Potential to Emit is used to determine a facility’s classification as PSD major or PSD minor. Commencing construction of a PSD major facility or PSD major modification prior to obtaining a Permit to Construct is a violation of both federal and state Rules and Regulations and is not allowed under the Pre-Permit Construction approval Rule.

Potential to Emit is also used to determine the degree of restrictions that are appropriate to protect ambient air quality standards. For instance, a source having an uncontrolled Potential to Emit which would cause a 24-hour PM-10 concentration of 400 micrograms per cubic meter would likely have more restrictive Potential to Emit limitations than a source with an uncontrolled ambient impact of 100 micrograms per cubic meter.

If you are unsure of a Potential to Emit determination, you may contact DEQ's Air Quality Permit Hotline at **1-877-5Permit (573-7648)**.

ESTIMATE EMISSIONS

Estimate emissions for all pollutants which have an applicable requirement. Clearly show all calculations and state all assumptions. Emission estimates must be documented using one of three methodologies. These methodologies are: standard engineering and scientific principles and practices; published emission factors; and source tests conducted on similar type emission units. If emissions estimates are based on source tests the source test report should be submitted. Work must be complete and shown in sufficient detail to allow review by someone with basic engineering knowledge.

If steps are skipped in calculations, or if references, assumptions, and arguments are not presented to allow complete understanding of the applicant's emission estimates, the emission inventory is incomplete. These calculations are the basis for ambient impact assessments and for facility classifications as PSD major or PSD minor. Incomplete or unclear analysis does not imply comprehensive knowledge, which is one of the foundations for the negotiated rule for Pre-Permit Construction approval. If this comprehensive knowledge is not established solely by the application materials, the application will be denied.

When calculations are being done to demonstrate compliance with an applicable requirement, that requirement must be cited.

When estimating emissions, emission factors that reflect best data must be used when available. The following represents the data quality hierarchy for common sources of information:

1. Continuous Emissions Monitoring (CEM) data from the emissions point(s) in question.

CEM emissions data on the actual source in questions provides is the most reliable source of emissions data for that source. CEM are typically calibrated and maintained according to federal regulations and are required to monitor emissions during the vast majority of the sources actual operating time.

2. Source test data from the emissions point(s) in question.

In absence of CEM data, source test data from the source in question is the most reliable source of emissions data. Source test emission data must include information regarding the operation of the source and air pollution control equipment during the test. The source test report should be submitted for review.

3. Manufacturer guarantee.

Manufacture guarantees that are stated in specific and quantifiable terms are considered the next most reliable emissions information. The manufacturer guarantees must be submitted for review.

4. CEM data at similar emission points.

CEM data from similar emissions units may be considered reliable provided it is clearly described why the emissions from the source are similar to the source in question, and the emissions data is submitted for review. Similar sources are those serving a similar operating function, using similar raw materials, having similar processing rates, and those using the same type of air pollution control equipment.

5. Source test data at similar emission points.

Source data from similar emissions units may be considered reliable provided it is clearly described why the sources are similar and the source test report is submitted for review. Similar sources are those serving a similar operating function, using similar raw materials, having similar processing rates, and those using the same type of air pollution control equipment.

6. AP-42 or industry derived emission factors.

AP-42 or industry derived emission factors should be used only when there is an absence of the emissions data of the type listed above.

If industry derived emissions factors are used they must be accompanied with documentation on how the emission factor was derived.

AP-42 emissions factors are often an average of a set of emissions data for the industry type in question. Because the emission factors are averages the factors must be used with caution, approximately half of the subject sources will have emission rates greater than the emission factor and the other half will have emission rates less than the factor. AP-42 emissions factors are rated A through E; A is considered the most reliable and E the least reliable. The rating of the AP-42 factor must be considered in determining how accurately the AP-42 emissions factor represents actual emissions from the subject source.

LIMITATIONS ON POTENTIAL TO EMIT

Sources must propose limits on Potential to Emit. The applicant must demonstrate that the limitations are short-term, quantifiable, enforceable as a practical matter, and demonstrates compliance with all ambient standards. Examples of limitations are: emission limits, production (or throughput) limits, monitoring, and recordkeeping. Potential to Emit is appropriately limited by incorporating all of these elements (emission limits, operating, monitoring, and recordkeeping) for each emission unit to ensure continuous compliance with each particular limitation that affects the emission unit. These limitations must be short-term, relevant to the applicable standard that applies, quantifiable, practical (i.e., allow inspectors to determine compliance), and contain monitoring and recordkeeping consistent with limitations.

Generally, enforceable restrictions are needed for two different reasons. One is to limit emissions below PSD major source permitting thresholds. This type of limitation typically requires annual emission limitations with, at least, monthly operating and

monitoring requirements. Often, one pollutant must be limited for both a PSD major source permitting threshold and to protect ambient air quality standards. When this type of “dual” limitation is required, the most stringent averaging period that applies to a particular air pollutant dictates the time period required for the emission limitation and for the corresponding operating restrictions and monitoring requirements.

For instance, PM-10 emissions may need to be limited to keep the facility out of PSD major source permitting requirements. This may be accomplished by an annual emission limitation and at least monthly operating and monitoring requirements. However, when the PM-10 ambient air quality standards must be protected, there are additional averaging periods which must be considered. Obviously, these are the averaging periods of the primary and secondary standards for PM-10. They are 24-hour and annual averaging periods. To appropriately limit Potential to Emit for both the PSD major source threshold and the ambient standards, the source should have at least hourly and annual limitations on emissions.

Applicants are encouraged to spend considerable effort in developing limitations which fulfill the requirements of enforceability. Estimating emissions then determining the facility classification and ambient impact are basic to all applications. Applications for Pre-Permit Construction approval must be raised to another level of thoroughness by addressing in detail emission limitations and operational limitations which are practical, quantifiable, assure compliance and have averaging periods consistent with the standard which applies. It is important to note that emission limitations alone do not fulfill the requirement of being enforceable. Emission limitations must be accompanied by operational limitations which ensure compliance with standards. To complete the enforceability requirements, there must be monitoring and recordkeeping requirements to document compliance with the operational limitation. The monitoring requirements must be consistent with the operational limitations. For instance, if the source must limit hourly throughput to limit ambient impacts to below acceptable levels, an hourly monitoring requirement must also be incorporated.

The applicant must provide:

- Emission limits
- Operational Requirements
- Monitoring Requirements

These limitations must prevent: PSD from being triggered; violations of the toxic air pollutant increments; and violations of the National Ambient Air Quality Standards.

6. DETERMINE FACILITY'S CLASSIFICATION

Facilities subject to Prevention of Significant Deterioration (BACT, increment consumption analysis, monitoring, etc.) requirements may not utilize the "213" Rule. For this and subsequent Title V permitting purposes, the facility's classification must be determined. In order to determine a facility's classification the Potential to Emit (IDAPA 58.01.01.006.81) must be determined.

In listing the facility's classification, the following convention should be used:

Designated: ___ yes ___ no

If yes, give category: _____

Give Potential to Emit: _____ tons per year

Give Pollutant which defines Potential to Emit: _____

The application must clearly specify whether the existing facility is PSD major or PSD minor and whether the modification to the existing facility is a major modification.

Detailed emission inventories are required for all proposed equipment and/or modified equipment.

7. AMBIENT IMPACT ASSESSMENT

All ambient impact assessments must be conducted in accordance with a DEQ approved modeling protocol. The protocol must be approved prior to submitting the application. It is required that an ambient air quality modeling protocol be submitted to DEQ at least two (2) weeks before the Pre-Permit Construction approval application is submitted. Contact DEQ's Air Quality Modeling Coordinator at (208) 373-0502 for information about the protocol.

The applicant should also review DEQ's Air Quality Modeling Guideline at <http://www.deq.idaho.gov/media/355037-modeling-guideline.pdf>.

A scaled plot plan showing emission release locations, nearby buildings, property lines, fence lines, and roads is required (Section 9.1.2(b), Guideline on Air Quality Models (EPA 2001)). The dimensions of the buildings (height, width, and length) should be noted either on the plot plan or in a table in the report. If building dimensions are listed in a table format, then it should be easy to cross-reference between the plot plan, model input file, and table.