



**STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY**

**Air Quality
Tier II Operating Permit
Pre-Application Meeting Agenda**

Agenda Topics

1. Overview of the permitting process – DEQ

- Pre-application modeling protocol – highly recommended – increases likeliness for an application completeness determination
- Application completeness determination – 30 day process
 - ***Pitfalls to avoid:***
 - *Emissions inventories (EI) for potential-to-emit and air dispersion modeling analysis don't match.*
 - *Ambient air boundary is not defined.*
 - *DEQ strongly recommends that you DO NOT submit confidential business information (CBI). Any CBI submitted is the responsibility of the applicant and is subject to IDAPA 58.01.21 – Rules Governing the Protection and Disclosure of Records in the Possession of the Department of Environmental Quality.*
 - *Regulatory analysis is incomplete.*
- Draft permit development – 60 day process
 - *Facility draft review request – check the box on Form GI to request to review the draft permit – highly recommended - allows DEQ and the applicant to resolve any issues with the draft permit prior to public comment or final issuance. 10-day limit for review*
- Opportunity for public comment – provided for most T2 applications
- Public comment – required for facilities with actual annual mercury emissions greater than 62 pounds, for all T2 permits required by DEQ, and for T2 permits for which a member of the public requests a public comment period. Adds around 45 days to processing time
- Public hearing – required for T2 permits required by DEQ
- Permit fees – a processing fee applies:
 - *Processing fee which depends on permitted emissions – ranges from \$1,250 to \$10,000*
- Permit handoff meeting – highly recommended – meeting between DEQ and permittee after permit issuance. The goal of the meeting is to ensure that the permittee understands every permit condition and every compliance obligation.

2. Overview of proposed project – Applicant

- Project overview – describe the project
- Propose the type of T2 permit required for the project
- Emissions inventories – potential-to-emit and air dispersion modeling
 - *The potential-to-emit EI determines the facility’s classification as either minor or major under the Title V air program*
 - *The air dispersion modeling EI is used in the air dispersion modeling analysis to predict compliance with the NAAQS and state air toxics increments*
 - *The modeling EI must reflect either potential-to-emit or allowable emissions (those allowed in a federally enforceable permit) and must be expressed in terms of the averaging period for each pollutant.*
 - *Acceptable emissions data and emission factors*
 - *Refer to the following guidance document:*
<http://www.deq.idaho.gov/media/655505-emissions-data-hierarchy.pdf>
- Pre-application modeling protocol
 - *Ensures that the appropriate air dispersion model, meteorological data, and procedures are followed*
 - *DEQ written approval provides some assurance that the approach and methodology taken will be accepted*
 - *For assistance, contact DEQ’s modeling coordinator at 208-373-0502.*
- Regulatory analysis – state and federal rules and regulations applicability
 - *State rules – For each applicable rule, you must state in your application how compliance will be demonstrated.*
 - Greenfield projects require a full regulatory review of IDAPA 58.01.01.
 - Modification projects require a regulatory review IDAPA 58.01.01 to the extent that the state rules apply to the modification.
 - *Federal rules and regulations – For each applicable rule and regulation, you must state in your application how compliance will be demonstrated.*
 - DEQ has developed Form FRA to help an applicant through this analysis. Below is the link to Form FRA:
<http://www.deq.idaho.gov/media/580037-form-fra.doc>

3. Application content

- Application forms and an application checklist are available on DEQ’s website. DEQ strongly recommends that these forms and the checklist be used to develop the permit application. To access these documents, click on the link below:
<http://www.deq.idaho.gov/air-permitting-forms-checklists>

- The application must contain the following elements at a minimum:
 - *Written narrative/overview describing the project*
 - *Emissions inventories – project potential-to-emit and air dispersion modeling*
 - *Regulatory review – state and federal rules and regulations applicability*
 - *Process flow diagram(s)*
 - *Proposed emissions limits*
 - *Proposed operating, monitoring, reporting and recordkeeping permit conditions to demonstrate compliance with the proposed emissions limits*
 - *Request a permit handoff meeting*
- DEQ strongly recommends that the applicant retain a copy of the application, modeling analysis, and any other supporting information for future reference and use.

Tools to Help the Applicant

DEQ has developed a guidance document, *Air Quality Permits – Applicant and DEQ Responsibilities*, that is designed to provide the applicant a basic understanding of DEQ's air quality permitting process. It also describes applicant's responsibilities and how DEQ will interact with applicants throughout the permitting process. Please review this document prior to scheduling your pre-application meeting. Access the guidance document by clicking on the link below.

<http://www.deq.idaho.gov/media/655501-applicant-deq-responsibilities.pdf>

In addition, DEQ has developed a number of application forms to assist the permit applicant. Click on the link below to access these documents. Review the list and choose the appropriate application forms.

<http://www.deq.idaho.gov/air-permitting-forms-checklists>