

Maricopa County Air Quality Department

**NSR
Program Briefing
March 31, 2016**

Mark Hubbard

Business Assistance Coordinator

Business Assistance Program

- Program Briefings
- Enforcement case review - evaluate the circumstances surrounding a Violation
- Permit assistance
- Non-enforcement courtesy site visits
- Participate in and sponsor meetings and conferences with State/local regulatory officials, industry groups, and business representatives



Maricopa County
Air Quality Department

Business Assistance Update

MARICOPA COUNTY AIR QUALITY DEPARTMENT

March 2015 Program Briefing

Do you have a General Permit or Permit Conditions for Fuel Dispensing Operations?

Come join the Business Assistance team as we offer the Fuel Dispensing Boot Camp. This free interactive seminar will answer questions such as:
What do I do when the inspector shows up?
What records do I need to keep?
What common mistakes and violations can this briefing help me avoid?

When: March 24, 2015 10:00AM-11:00AM
Where: Air Quality Department building
1001 N Central Ave, Phoenix 9th floor

[Click here to RSVP](#)

Emissions Inventory

Emissions Inventory reports for 2014 are due by Wednesday, May 6, 2015.

There are still two workshops scheduled that will discuss the requirements of the annual reporting process, and provide assistance in completing 2014 emissions inventory surveys. The workshops will be conducted on the following dates and times:

Thursday, March 26 9:00 to 11:00 AM
Tuesday, April 21 9:00 to 11:00 AM

All emissions inventory workshops are held at the Maricopa County Air Quality Department building located at 1001 N. Central Avenue in Phoenix. Space is limited, so RSVP's are encouraged.

Business Assistance

Click here for help with:
• Permit Application Assistance
• Courtesy Inspections
• Rule Interpretation
• Enforcement Case Review
[Email](#)

Links

[Maricopa County's Enhanced Regulatory Outreach Program \(EROP\)](#)
[Air Monitoring Permit Applications](#)
[Business Assistance Homepage](#)

Air Monitor Locations

(Real-time air monitoring data)



[Click Here to View Map](#)

Clean Air Make More



[Click here to download the App](#)

Get information on the air quality forecast, current restrictions, no burn day restrictions, air quality news, upcoming events and ways to reduce air pollution. To learn more

New Source Review

A tool for enabling nonattainment areas to reach attainment and for maintaining the National Ambient Air Quality Standards (NAAQS)



CLEAN AIR
MAKE
MORE

Planning Department

Background/ History

Permitting Department

Permitting Thresholds

Public Notice Thresholds

Future Modeling Guidelines



Permitting Implications of Minor New Source Review (NSR)

*Richard Sumner, PE
Permitting Manager
Maricopa County Air Quality
Department*

Minor NSR Package

- Rule 100: General Provisions and Definitions
- Rule 200: Permit Requirements
- Rule 210: Title V Permit Provisions
- Rule 220: Non-Title V Permit Provisions
- Rule 230: General Permits
- Rule 240: Major New Source Review
- Rule 241: Minor New Source Review
- Rule 500: Attainment Area Classification
- Rule 510: Air Quality Standards
- Rule 600: Emergency Episodes
- Appendix D: List of Insignificant Activities
- Appendix E: List of Trivial Activities

Rule Changes

- Rule 100: General Provisions and Definitions
 - Rule 200: Permit Requirements
 - Rule 210: Title V Permit Provisions
 - Rule 220: Non-Title V Permit Provisions
 - Rule 230: General Permits
 - Rule 240: Major New Source Review
 - Rule 241: Minor New Source Review
 - ~~Rule 500: Attainment Area Classification~~
 - Rule 510: Air Quality Standards
 - Rule 600: Emergency Episodes
 - ~~Appendix D: List of Insignificant Activities~~
 - ~~Appendix E: List of Trivial Activities~~
- 

Overview

- Adopted February 3, 2016 by County Board of Supervisors
 - Rules final and effective
- Next steps
 - Submit to EPA
 - Incorporate into SIP late 2016
- New Requirements for Non-Title V Permitting
- New Requirements for Minor NSR
- Modeling

Primary Rules Impacted

- **Rule 100: General Provisions and Definitions**
- **Rule 200: Permit Requirements**
- Rule 210: Title V Permit Provisions
- **Rule 220: Non-Title V Permit Provisions**
- Rule 230: General Permits
- Rule 240: Major New Source Review
- **Rule 241: Minor New Source Review**
- Rule 510: Air Quality Standards
- Rule 600: Emergency Episodes

New Definitions

- Old terms with new definitions:
 - Begin Actual Construction (§200.24)
 - Insignificant Activity (§200.63)
 - Modification (§200.73)
 - Net Emissions Increase (§200.75)
 - Potential to Emit (§200.95)
 - Proposed Final Permit (§200.97)
 - Regulated Air Pollutant (§200.106)
 - Stationary Source (§200.120)
 - Trivial Activity (§200.127)

Rule 100

New Definitions

- New terms:
 - Conventional Air Pollutant (§200.36)
 - Maximum Capacity to Emit (§200.69)
 - Minor NSR Modification (§200.71)
 - Permitting Threshold (§200.88)
 - Public Notice Threshold (§200.98)
 - Regulated Minor NSR Pollutant (§200.105)

Rule 100

Regulated Minor NSR Pollutant

- Any Pollutant for which a NAAQS has been established and precursors
 - NAAQS:
 - CO
 - Pb
 - NO₂
 - PM_{2.5} & PM₁₀
 - SO₂
 - Precursors:
 - VOC (for ozone)
 - NO_x (for ozone and PM_{2.5})
 - SO₂ (for PM_{2.5})

Rule 100 §200.105

New Definitions

Maximum Capacity to Emit

The maximum amount a source is capable of emitting under its physical and operational design without taking any limitations on operations or air pollution controls into account.

Rule 100 §200.69

Potential to Emit

MCE, BUT air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design, if the limitation or the effect it would have on emissions is legally and practically enforceable.

Rule 100 §200.95

Rule Changes

- All Sources (Rules 200 and 220)
 - New permitting thresholds
 - Changed permitting exemptions
 - New public notice triggers
 - Begin construction with proposed final permit
- New and Modified Sources (Rule 241)
 - BACT/RACT requirements
 - Review of NAAQS Compliance (Modeling)

Permitting Thresholds

- Previously a list of Insignificant Activities, with a catch-all for anything above 3 lb VOC or PM10/day or 5.5 lb/day of any other regulated air pollutant.
- Now a list table with annual emission thresholds.

Rule 200 §303.1

Permitting Thresholds

Pollutant	Uncontrolled Emission Rate In Tons Per Year (TPY)
PM _{2.5}	0.5
PM ₁₀	0.5
SO ₂	1.0
NO _x	1.0
VOC	0.5
CO	1.0
Pb	0.3
Single HAP (other than Pb)	0.5
Total HAPs	1.0
Any other regulated air pollutant	1.0

Rule 200 §303.1

Permitting Exemptions

- Similar list of exemptions as before, unless the source emits more than the permit threshold.
- No source shall have a permit solely because of the following regulations
 - NSPS IIII and JJJJ
 - MACT 61.145, 5W, 6H, 4Z, 6C, 6J

Rule 200 §303.2, 305

Public Notice

- Issuing, denying, renewing a permit, or permit revision now requires a different basis for public notice.
- Instead of Fee Table basis, notice is required for any stationary source which exceeds the public notice threshold.

Rule 220 §407

Public Notice Thresholds

Pollutant	Public Notice Threshold TPY (New Or Permit Renewals)	Public Notice Threshold TPY (PTE To PTE Emission Increase)
VOC	25	25
NO _x	25	25
SO ₂	25	25
PM ₁₀	7.5	7.5
PM _{2.5}	5.0	5.0
CO	50	50
Pb	0.3	0.3
Any Single HAP	5.0	5.0
Total HAPs	12.5	12.5

Minor New Source Review

Minor NSR applies:

- New stationary source which exceeds the permitting threshold, or
- *Minor NSR Modification* which increases the source's *maximum capacity to emit* greater than the *Minor NSR threshold*
 - Is it a minor NSR modification?
 - Does the modification increase the source's *maximum capacity to emit* greater than the *Minor NSR threshold*?

Rule 241 §102

What is a Minor NSR Modification?

- Increases *PTE* by an amount **greater** than the *minor NSR modification* threshold
 - For this definition, PTE is the lower of PTE and allowable emissions
- No netting of emissions
- Exemptions:
 - Insignificant activities
 - Emissions caps
 - Replacement of existing equipment
- Fugitive Emissions only if Categorical Source
 - All roadways are a single emissions unit

Rule 100 §200.71

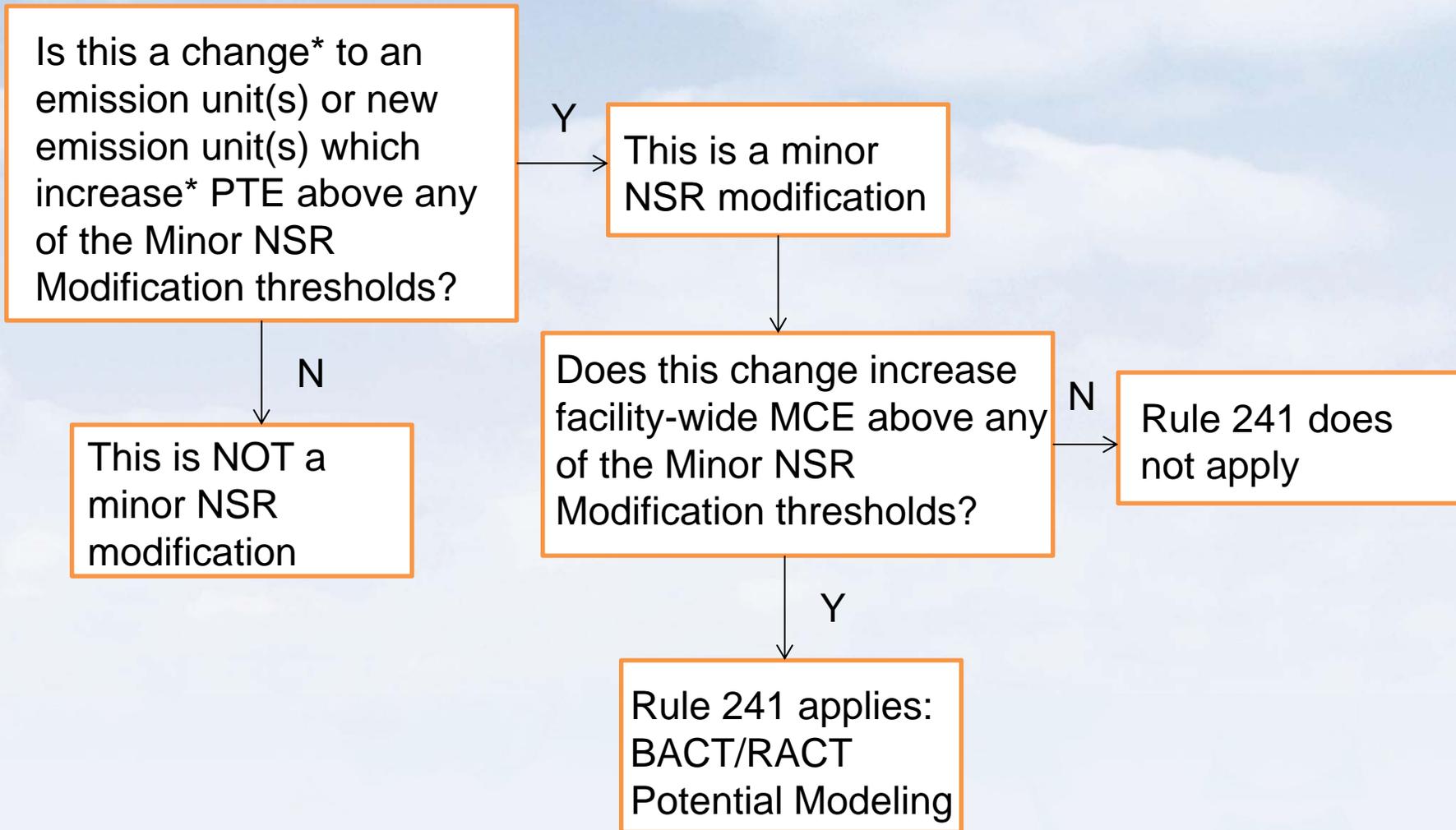
Minor NSR Modification Thresholds

Pollutant	Maximum Capacity to Emit In Tons Per Year (TPY)
PM _{2.5} (Primary Emissions)	7.5
PM ₁₀	7.5
SO ₂	20
NO _x	20
VOC	20
CO	50
Pb	0.3

No netting

Rule 100 §200.71

Minor New Source Review



Sources: Rule 100 §200.71, Rule 241 §102.2

BACT Triggers

- Best Available Control Technology (BACT) is required for sources exceeding BACT triggers.
- Reasonably Available Control Technology (RACT) is required otherwise.
- No daily BACT trigger.

Rule 241 §304

BACT Thresholds

Pollutant	BACT Threshold TPY (New Sources)	BACT Threshold TPY (Modifications)
VOC	25	25
NO _x	25	25
SO ₂	25	25
PM ₁₀	15	15
PM_{2.5}	10	10
CO	100	100
Pb	0.3	0.3

Rule 241 §304

NAAQS Compliance

- An ambient air quality impact analysis shall be conducted upon the Control Officer's request.
 - To be addressed in the modeling guidelines
- The Department will conduct a screening at the applicant's request.
 - Screening results will be compared to significance levels.
 - If significance levels are exceeded, refined modeling must be conducted by the applicant.

Rule 241 §308

NAAQS Compliance

- Permit conditions may be added to ensure compliance with NAAQS.
- Application will be denied if no compliance can be shown.

Rule 241 §308-9

Modeling

- Still in development, but will be a four step process:
 - Step 1: Does the source trigger modeling?
 - Step 2: Screening model
 - Step 3: Refined model w/ background
 - Step 4: AOI analysis
- No modeling of VOC (no NAAQS) or Ozone (complexity)

Modeling Guidelines [in development]

Summary

- Many new and revised definitions
- BACT applicability and permitting thresholds are based solely on annual emissions
- New basis for public notices
- NAAQS impact analysis may be required

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(with acknowledgement to
Mike Sonenberg)

Thank you for attending!

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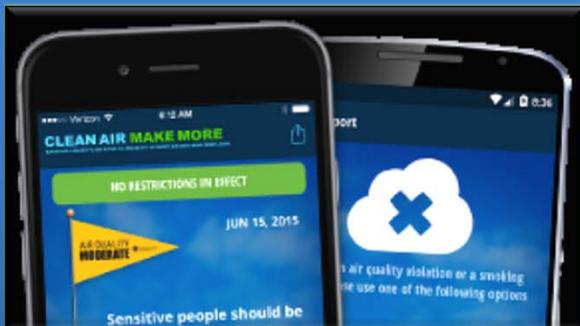
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