

Do I Need an Air Permit?

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Outline

Two questions we hope to answer:

- What is a “project”?
- Does MY project need a Permit to Install (PTI)?

Rules to Consider

R 336.1119(e) or “Rule 119(e)” – Significant Emission Rate

R 336.1201 or “Rule 201” – Permits to install

R 336.1278 or “Rule 278” – Exclusion from exemption

Definition: “Project”

- Comprised of one or more “activities”
 - Any one of the 5 terms listed in Rule 201:
 - install,
 - construct,
 - reconstruct,
 - relocate, and
 - modify.
 - “Activity” in Rule 278 refers to the ***concurrent and related*** installation, construction, relocation, or modification of any process or process equipment.

Pop Quiz!

- What are some examples of a “project”?

Examples of Projects

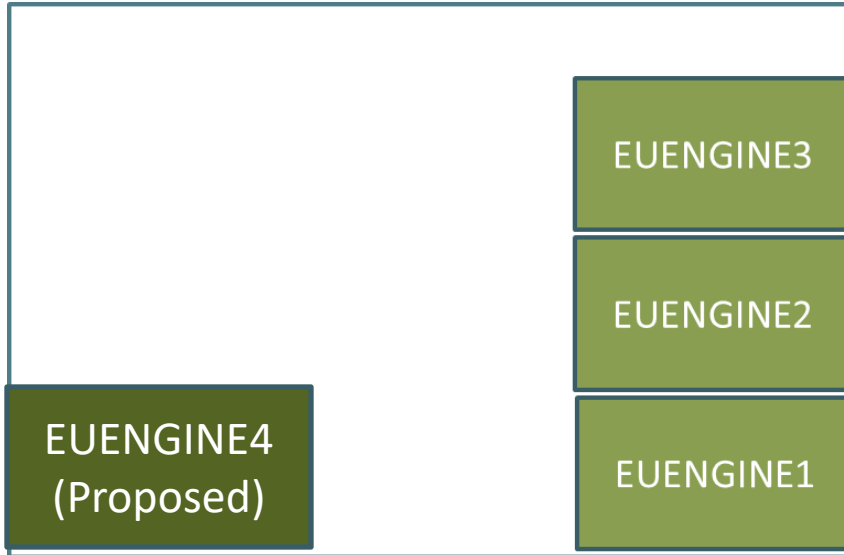
- Installation of new crusher.
- Replacing existing engine with a larger engine.
- Increasing fuel usage limit to an existing natural gas fired boiler and installing a new engine.
- Adding a new coating usage limit to an existing coating line along with installing a new coating line.

Does my project need a permit?

R 336.1201:

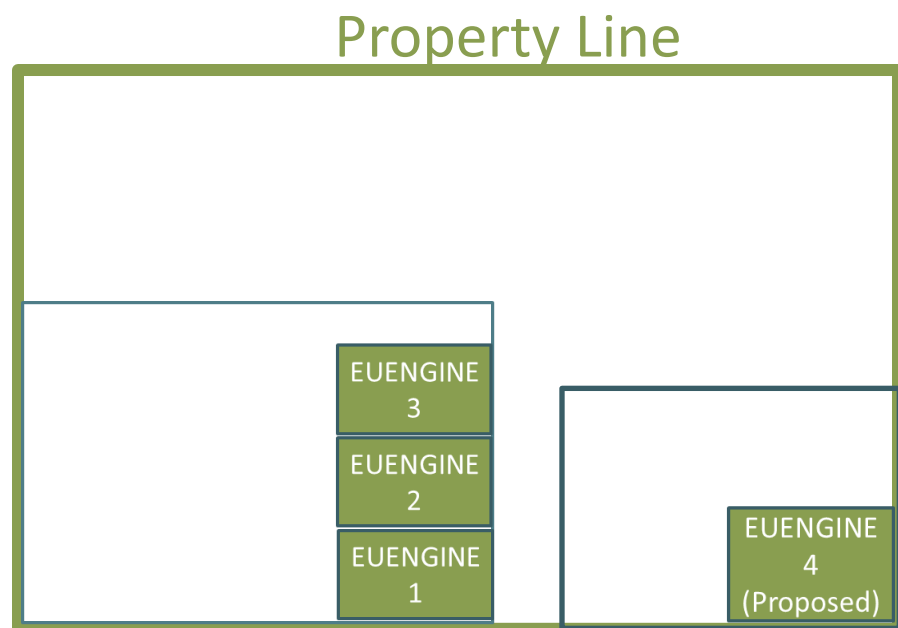
*A person shall not **install, construct, reconstruct, relocate, or modify** any process or process equipment, including control equipment pertaining thereto, which may emit (an air contaminant), unless a Permit to Install which authorizes such action is issued by the Department.*

Install



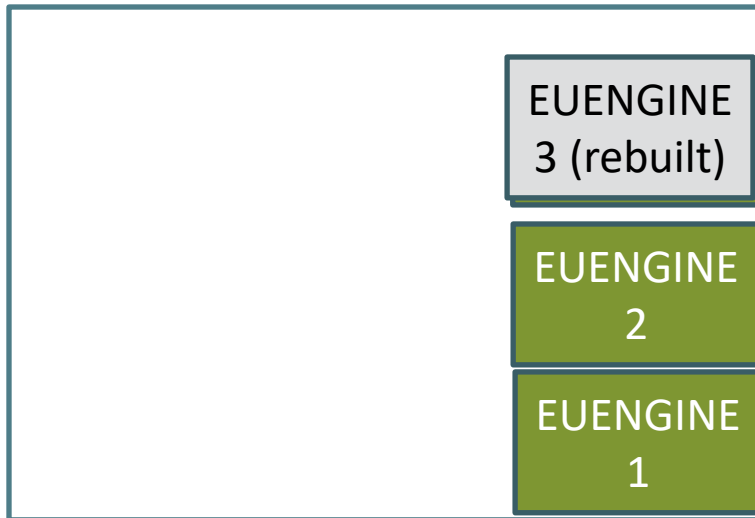
- Adding new emission units into an **existing** building or site.

Construct



- Adding a **new** building along with installing **new** emission units within that building or installing emission units at a **new** site.

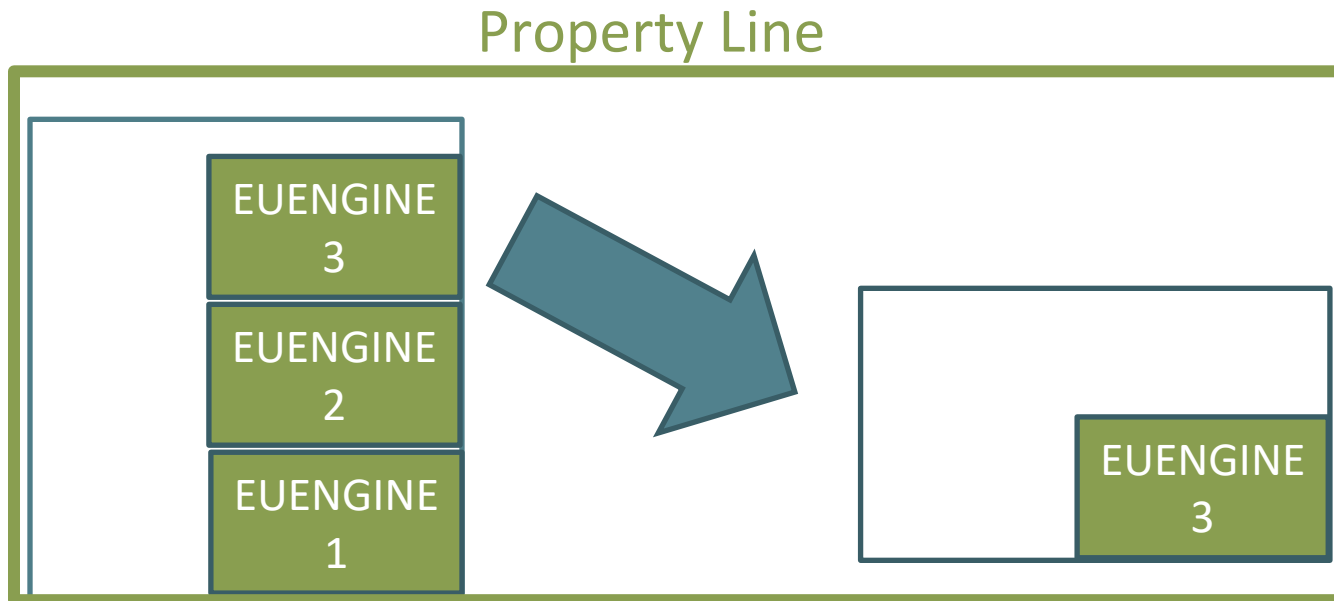
Reconstruct



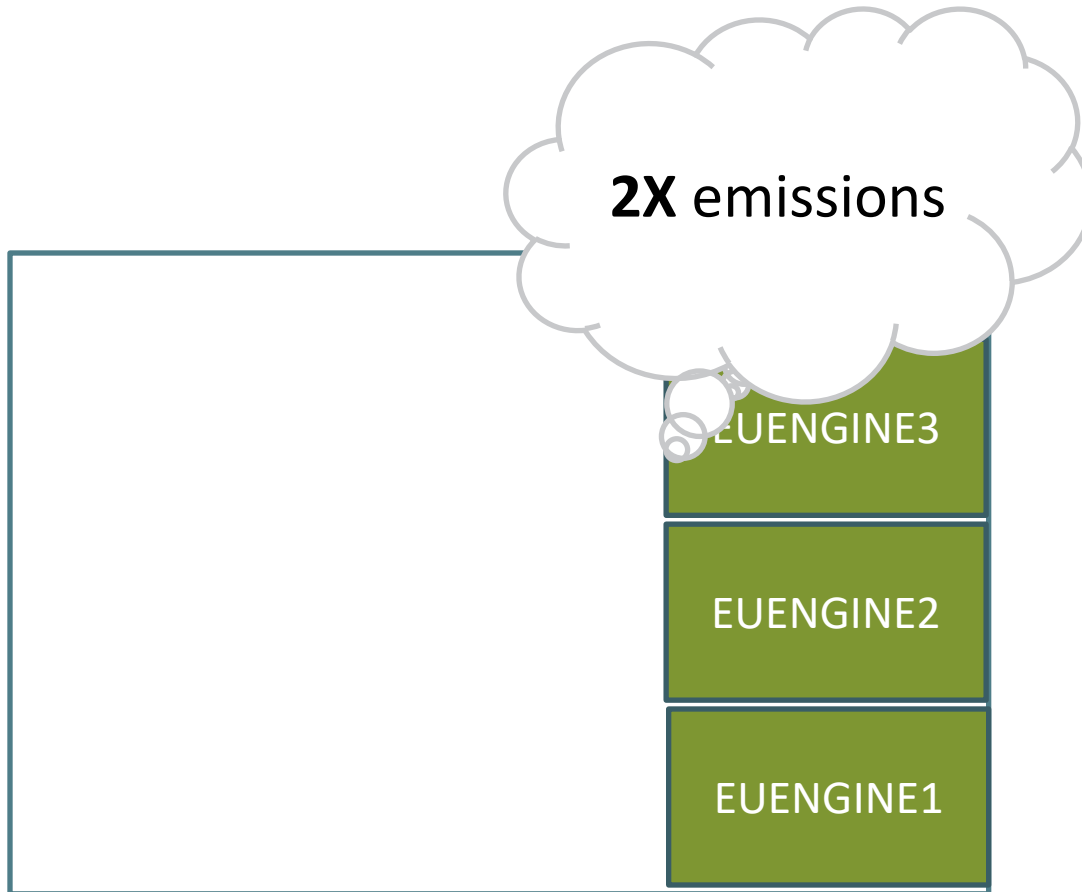
- Replacing components of an existing emission unit so the fixed capital cost of the new components is more than **50 percent** of the fixed capital cost that would be required to construct a comparable, entirely new emission unit.

Relocate

- Moving an existing emission unit from the current location and moving it to a new spot **within the same facility**.



Modify



The physical or operational change to an existing emission unit resulting in one or more of the following:

- Increased emissions
- Emissions of new pollutants not previously permitted
- Increasing the hours of operation or the production rate to a level that is higher than what is currently allowed.

Example



- **Existing equipment:**
 - 1 coating booth
- **Proposed Activities:**
 - add another coating booth, and
 - change what coatings are used in all the booths. The new coatings would emit different contaminants than the current coatings.
- **Timing:**
 - Add the new coating booth with the new coatings.
 - In 6 months, change the coatings in the existing booths to the new coatings.

Pop Quiz!

1. What types of activities are involved (install, modify, etc.) and with what equipment?

Installation of new coating booth, AND Modification of existing coating booths.

2. Are the activities considered as one single project, or separate projects?

A single project.

Why You Might Want a Permit

- Establish enforceable limitations to restrict PTE below the applicable major source thresholds in order to avoid the applicability of various major source regulations.
- Consolidating terms and conditions from existing PTIs into a single permit.
- Replacing or removing special conditions of an approved Permit to Install.

Permit Not Needed

- Grandfathered equipment
 - Applies to equipment installed before August 15, 1967.
 - Equipment or production processes are proposed to be, or have been, modified, reconstructed, or relocated after this date are no longer considered “grandfather equipment”.
- Exempt equipment as defined in Rules 278-291.

Can I Use an Exemption?

- Rule 278 prohibits the use of exemptions from a Permit to Install for
 - “Major sources” and “major modifications” as defined under:
 - Federal Prevention of Significant Deterioration (PSD) regulations
 - Major source review requirements for nonattainment areas
 - National Emission Standards for Hazardous Air Pollutants.
 - Activity emissions exceed the significant emission rate (SER). See Table 3-1.

SER Table - Rule 119(e)

Pollutant/Source Type	Threshold (TPY)
CO	100
NO _x	40
SO ₂	40
VOC (contribute to formation of Ozone)	40
Lead	0.6
PM	25
PM10	15
PM2.5	10

Rule 278 “Test”

- Used to determine whether exemption is possible.
- Based on 8,760 hr/yr at process capacity.
- Emissions from ALL Regulated Pollutants emitted must be under their respective SER to claim an exemption.

Resources

- [PTI Workbook](#)
- [PTI Exemption Handbook](#)
- [Permits to Install/New Source Review](#)
- [EGLE District Office Locations](#)
- [MI Administrative Code \(State Air Quality Regs\)](#)

Questions?

