

DNREC Air Quality Management Air Permitting Seminar

Natural Minor Permitting



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Natural Minor Permitting

What is a Natural Minor Facility?

It is a facility that does NOT have the POTENTIAL
TO EMIT in quantities above the Major Source
Thresholds



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MAJOR SOURCE THRESHOLDS IN TONS

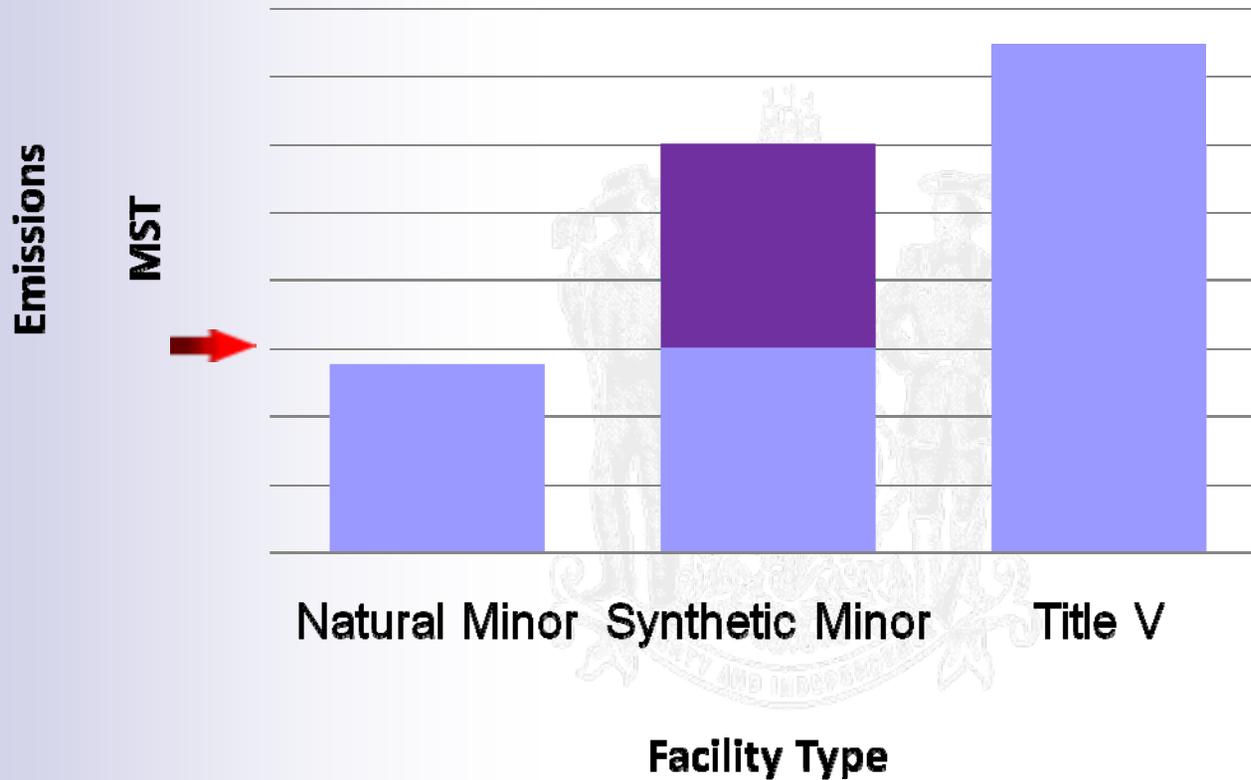
	VOC	NOx	CO	SO ₂	PM ₁₀	HAPs	Other Air Pollutants
New Castle	25	25	100	100	100	10/25	100
Kent	25	25	100	100	100	10/25	100
Sussex	50	100	100	100	100	10/25	100



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Facility Type Comparison



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REGULATORY REVIEW

Regulation No. 1102 – Permits

This Regulation contains the requirements for the application, advertising and permitting of units which have the potential to emit less than the major source thresholds.



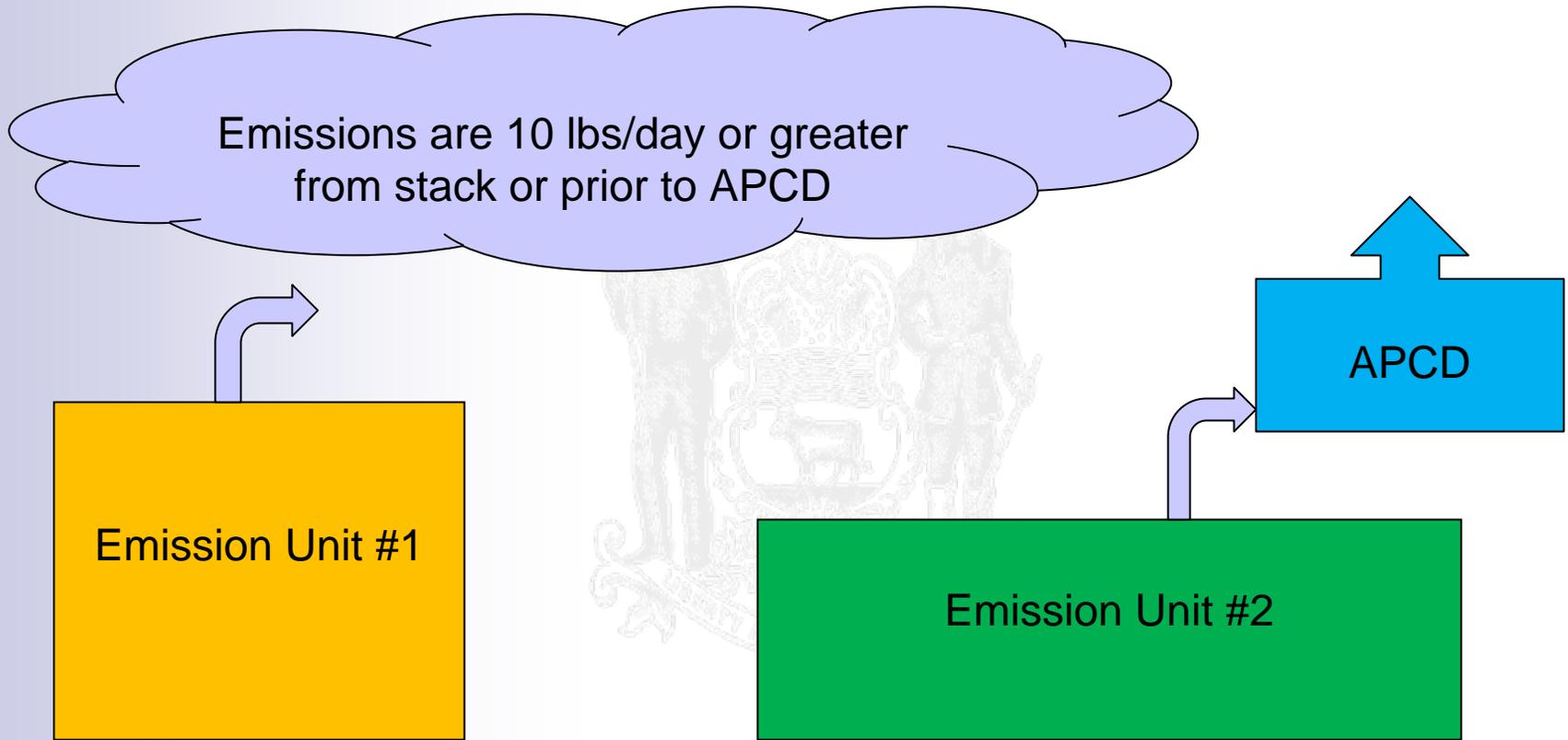
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Regulation No. 1102 - Applicability

- 2.1.1.1 For equipment without an air contaminant control device, the equipment has actual emissions to the atmosphere of any air contaminant(s), in the aggregate, during any day that are equal to or greater than 0.2 pound per day and, during each and every day, that are less than ten (10) pounds per day; and
- 2.1.1.2 For equipment with an air contaminant control device, the equipment has actual emissions to the inlet of the air contaminant control device of any air contaminant(s), in the aggregate, during any day that are equal to or greater than 0.2 pound per day and, during each and every day, that are less than ten (10) pounds per day; and
- 2.1.1.3 Regulation No. 1125 does not apply.



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EXEMPTIONS

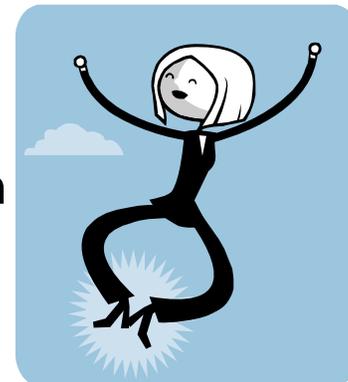
Regulation No. 1102 Appendix A

Example:

2.0 Except as provided for in Regulation No. 22, “Restriction On Quality of Fuel in Fuel Burning Equipment,” external combustion fuel burning equipment which:

- 2.1 Uses any fuel and has a rated heat input of less than 10 million British-Thermal Units (BTUs) per hour.
- 2.2 Uses only natural gas, LP gas, or other desulfurized fuel gas and has a rated heat input of less than 15 million British-Thermal Units (BTUs) per hour.

IS EXEMPT FROM PERMITTING



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Regulation No. 1125 Requirements for Preconstruction Review

4.0 Minor New Source Review (MNSR)

The requirements of Section 4.3 of this Regulation shall apply to any person responsible for any **proposed new stationary source**, the construction of which:

- has a potential to emit of equal to or greater than five (5) tons per year of volatile organic compounds (VOC's) or, nitrogen oxides (NO_x), or sulfur dioxide (SO₂) and/or sulfur trioxide (SO₃) [also termed sulfur oxides (SO_x)] or, fine particulate matter (PM_{2.5}), or, the potential to emit of equal to or greater than five (5) tone per year, in the aggregate, of any of the hazardous air pollutants (HAP's) listed in Section 112(b) of the federal Clean Air Act.



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Application Process

Go to www.awm.delaware.gov

Under the heading “Services” on the left side of the page

Click on Forms/Applications

Under the heading “Air Forms”

Click on “Air Reg. 2 Application”



The Regulation No. 1102 Permit Application forms should be used by all Natural Minor and Synthetic Minor permit applicants other than auto body shops, dry cleaners, gasoline dispensing facilities, gasoline tank trucks (delivery vessel) operators, and air stripping/soil venting operations.



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Application Process Overview

- ✓ *Contact the State (initial application) or your permitting engineer or scientist (air quality permit holders): 302-739-9402*
- ✓ *Draft Application Meeting (Application Review Meeting)*
- ✓ *Construction Permit or Amendment to an Existing Permit?*



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Application Process Overview

- ✓ *Submit Draft Application to your assigned permitting engineer or scientist at least 7 days prior to your Draft Application Review Meeting*
- ✓ *Complete/Incomplete Application*
- ✓ *More information required?*
- ✓ *Final Application Package: One original and one copy of permit application – signed and dated, permit fee and advertising fee, proof of local zoning (if not previously submitted), Coastal Zone approval (if required), applicant background questionnaire (if new company)*



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Application Process Overview

Forms:

- *AQM-1: Administrative Information* – Joanna Austin will check for administrative completeness prior to handing application over to assigned Eng/Sci
- Incomplete? Phone call and/or e-mail requesting info. If not received within 14 days, letter sent requesting information within 14 days, if not received then application is returned
- Complete? EXCELLENT!!! Appropriate fees included, original signatures on forms, applicant background form and proof of zoning.



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Application Process Overview

Forms:

- *AQM-1: Forms*
- *AQM-2: Overall Process Diagram*
- *AQM-3.X: Equipment Specifics*
- *AQM-4.X: Control Devices (if none, skip; if not sure, ask)*
- *AQM-5: Emissions Information – Really a Natural Minor?*
- *AQM-6: Air Dispersion Modeling – INFO NEEDED!*

These forms will be reviewed by your assigned Eng/Sci. If complete process continues, if not...



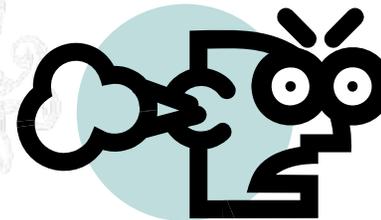
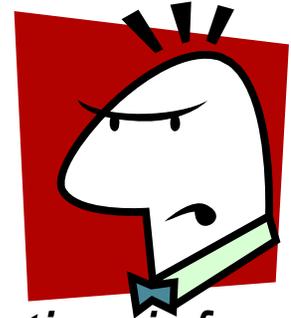
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Application Process Overview

Technically Incomplete Applications:

- *Phone calls, phone calls, phone calls*
- *E-mails galore*
- *Incomplete? Phone call and/or e-mail requesting info. If not received within 14 days, letter sent requesting information within 14 days, if not received then application is returned*



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Application Process Overview

Technically Complete Applications:

- ***Permit application is advertised for 15 days to give the public notice and an opportunity to comment***
- ***A hearing may be requested, but if not...***
- ***Work on the permit begins***
- ***Can take up to 90 days for issuance***



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Permitting Fees

For help with figuring out your permitting and advertising fees:

<http://www.awm.delaware.gov/Reg2/Pages/FormsTable.aspx>

Go to the bottom of the page and you will see the following links:

- For a list of permit fees, [click here](#).

This link lists TV fees, not needed here.

- For help calculating your permit fees, [click here](#).

This link will help you calc Construction Permit fees. Advertising fee is \$165.00

- For a permit amendment fee is \$175.00, advertising fee is still \$165.00



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Construction to Operation Inspection

A construction permit allows for:

***Construction, troubleshooting, testing, tweaking,
etc. NOT OPERATION!***

***Once unit is ready to run, a C to O
inspection is performed and if all***

***is well... YOUR NATURAL MINOR PERMIT WILL
BE ISSUED within one week of the inspection***

