

Synthetic Minor Permitting Process



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Blue Skies Delaware; Clean Air for Life

What is it?

- Synthetic Minor Source:
- A source that agrees to limit its emissions through conditions, often related to hours of operation, throughput, or capacity, so that its potential to emit air contaminants is less than the thresholds for applicability of a particular federal requirement.



Huh?

- A source which takes voluntary restrictions to avoid major source thresholds.
- One thing to keep in mind: Minor New Source Review (MNSR) : \neq $>$ 5 TPY of specific air pollutants, must meet requirements of Reg. 1125, Section 4.



Steps to SM Permitting

1. When in doubt, call Dover (302-739-9402) or New Castle (302-323-4542) office anytime during project development to speak with a permitting engineer or scientist for help with permitting questions and guidance.
2. Do your homework & complete your application forms. Will be same forms as those used for Natural Minor sources, Regulation No. 1102 permits. Previous workshop @ 2yrs ago?



Steps to SM Permitting

3. When complete, Call Dover or New Castle office to schedule a pre-application review/meeting. Existing- contact your assigned engineer/scientist. New-Call Dover & ask to be assigned. Provide draft application package at least 7 days before meeting.
4. At meeting, you will be informed if application is complete & ready for submittal or deficient & what info is needed in order to complete application for submittal.



Steps to SM Permitting

5. When application is complete, submit original and 1 copy to Dover office along with fees. Application will be logged in and processed.
6. The application screened for administrative completeness. If not complete, request for additional info sent. No response, application returned. We ask 2x, 1st informally, 2nd formally.
7. If administratively complete, a copy will be sent to the assigned engineer/scientist.



Steps to SM Permitting

8. When received by engineer/scientist, application is checked for technical completeness.
9. If not technically complete, request for additional info sent. Again, we ask 2x; informally, then formally. No response, application returned.
10. If technically complete, write DRAFT permit and technical memo, gets reviewed/approved, then place ad for 30-day public comment period, copy sent to applicant & EPA for comment.



Steps to SM Permitting

11. If hearing requested, hearing scheduled and advertised min 30 days before hearing. Hearing held. Applicant responds to comments w/in 15 days of hearing.
12. If only comments received, applicant responds to comments w/in 15 days of end of comment period.
13. Final permit written taking comments into consideration.



Steps to SM Permitting

14. If no comments received during comment period, write final permit, gets reviewed, approved, and issued.
15. Final permit sent to facility and copy to EPA.
16. When constructed and ready to operate at full capacity, request Construction to Operation inspection.
17. If in compliance, operating permit issued w/in 1 week. Try for 24-48 hours after inspection.



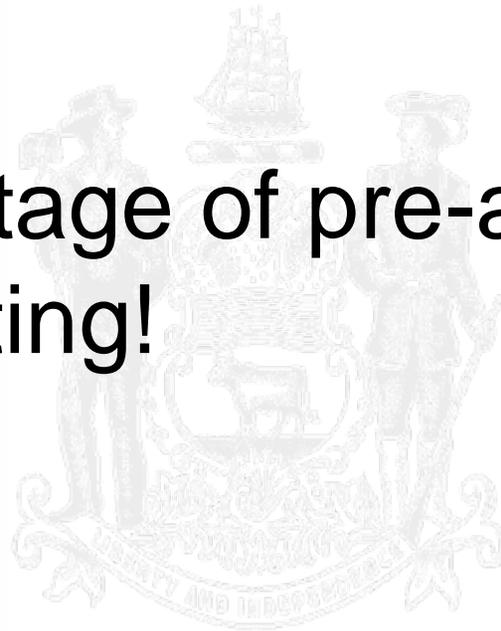
E&C Goal

- Issue construction permit within 120 days.
- Administrative completeness.
- Technical completeness.
- Public comments.
- EPA comments.
- Request for hearing.
- Take advantage of pre-application Review/meeting!



In Conclusion

- Take advantage of pre-application review/meeting!



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