



ENVIRONMENTAL GUIDANCE DOCUMENT

09-001

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Air Quality Permit Application Tips and Other Tidbits

Make sure the permit application is complete and accurate. Read and follow the directions that accompany each application form. Don't forget to include the appropriate permit fee with your construction permit application. Type or complete the application in blue or black ink. A responsible official must sign the application in ink. Be sure to provide a detailed description of your facility, processes, and emission points and be specific. Since the permit writer might not be familiar with your facility, providing specifics will facilitate the permit process and result in a more accurate, representative permit.

Identify your emission points consistently. The best way to identify all of your emission points is to complete your process flow diagram and plant layout before you begin filling out specifics in your permit application. After you have identified all of your emission points, emission units, and control equipment, you will want to give each of them a number or other identifier, such as Emission Point 001. It is important that you use these numbers or identifiers consistently throughout the application. It is also important to use the identifiers consistently across all of your permit applications and your emission inventory. If emission points and units are renamed or identified differently across permits or programs, it will cause confusion and we won't know if new units have been added or units removed.

Include calculations and citations with your permit application. Including emission calculations and emission factor citations with the permit application helps us review your project. Without such citations and calculations, we will have to reproduce the work that you have done to ensure that the facility will meet state and federal requirements. Reproducing your work takes time on our part, which can delay the issuance of your permit. We have created several potential emission calculation spreadsheets for your use. The spreadsheets are located on our website under "Air Quality Publications".

Research. Your facility may be subject to federal air quality regulations such as New Source Performance Standards (NSPS) or National Emission Standards for Hazardous Air Pollutants (NESHAP). Each NSPS and NESHAP has testing, monitoring, record-keeping and reporting requirements. These requirements could influence your decisions regarding the equipment that you install. For copies of this information, contact the Air Quality Division.

Get help. Although not required, we encourage facilities to consult with persons who are familiar with Nebraska's air quality regulations, air quality permits, and your facility's processes. This not only expedites the permit process but also ensures that the permit application is complete and accurate. To

obtain a list of consultants in the area, contact the NDEQ Field Services and Assistance Division at (402) 471-6974. A list of consultants is also available on the agency's web site. Go to www.deq.state.ne.us, then select the Assistance category, and select [Consultants Directory](#).

Read and make comments to the draft permit. Once the application is reviewed and deemed technically complete by NDEQ, the permit writer will draft a permit and fact sheet based on the application materials. The draft permit will be sent to the designated facility representative for comments. Make sure that references to equipment are correct and that you will be able to operate under the required conditions. Make sure you understand and are prepared to comply with all of the record-keeping, reporting and monitoring requirements in the permit. It is much easier to make changes to a draft permit than a final permit.

Understand the final permit. Once the permit is finalized, the facility representatives will be responsible for compliance with the permit conditions. It is very important for facility staff and managers to understand these requirements to prevent permit violations. Although not required, it is helpful for facilities to have at least one full-time person dedicated to maintaining compliance with the environmental regulations and permits.

Construction Permit Application Tips

Start early. As soon as you begin your plans for construction, complete and submit an air quality construction permit application to the Nebraska Department of Environmental Quality (NDEQ) Air Quality Division. An air quality permit may take 4-12 months to process depending on the quality of the application and complexity of the permit.

Talk with NDEQ. Make an appointment to meet with the air permit program during the early planning stages. Discussing your project with the Air Quality Division early in the process can help you avoid some of the questions that often arise with permit applications. Also, for large or complex projects it is advisable to set up a meeting with NDEQ soon after you submit the permit application. This will clear up any preliminary questions we have with the information in the application and give the facility representatives a sense of what they should expect from NDEQ in the following months. Communication is a key element to a smooth permitting process.

Avoid "As Built" Differences. Be sure to include information for all of the equipment that you plan to install. Not only is it important to tell us what you will install, but it is also very important that you install the equipment that you specified in your permit application. By avoiding "as built" differences, you can avoid potential permit violations and waiting for a permit revision. If your plans change after you have submitted an application, you are obligated to submit updated information to NDEQ. You may also be required to conduct a computer modeling analysis of the impacts your project will have on the ambient air.

Complete the requested modeling information. The modeling information (ex., stack parameters) requested in the application should be completed whether or not air quality dispersion modeling will be conducted for your proposed project, unless the source emits only volatile organic compounds or hazardous air pollutants. If dispersion modeling is not required for your facility at the time your project goes through the permitting process, your facility may be included in modeling conducted by a nearby facility. Having representative information from all facilities will lead to more accurate modeling.

To determine whether or not dispersion modeling is required for your project, consult the “[Atmospheric Dispersion Modeling Guidance for Permits](#)” guidance document or contact the Department’s modeling staff. If modeling is required based on your potential emissions, but you are planning on limiting your potential emissions, be sure to let us know. There may be instances where you are willing to take operational limits that could keep you from having to submit modeling. For instance, diesel-fueled internal combustion engines will usually trigger the need for nitrogen oxide modeling. Many times, these engines are only emergency backup generators and do not operate on a continuous basis throughout the year. In this case, a limit on the annual operating hours (usually < 500 hrs) may avoid a modeling analysis.

Operating Permit Application Tips

Submit your initial application on time. Operating permit applications need to be submitted within 12 months of beginning operation, installing equipment that requires a construction permit, or of becoming subject to the program. Not all sources need an operating permit, and you should read the “[Operating Permit](#)” Fact Sheet on the NDEQ website to determine if you need an operating permit.

Submit your renewal application on time. Renewal applications are due 6-18 months prior to your permit expiration. Submitting a complete renewal application within this time frame means your permit is timely and your permit will not expire. If it is submitted less than six months prior to your permit expiration date, your permit may expire and result in violations for operating without a permit.

Identify your insignificant activities first. You may have several pieces of equipment that can be considered “insignificant” under the operating permit program. Since you do not have to list insignificant activities on the emission point forms, you should complete the insignificant activities portion of the application first. Doing this can save you work, time, and frustration.

Utilize the Expedited Form for renewal applications. If you haven’t made changes to your facility since your last operating permit was issued, you may save yourself a lot of time by completing the Expedited Application Form. Generally, you would be eligible to submit an expedited form if your stationary source has not undergone one or more of the following activities: constructed any new emissions units; made operational changes that would require altering existing operating permit conditions; and/or, became subject to new applicable requirements (i.e. NSPS, NESHAP, etc). If you meet the requirements, you will have fewer forms to submit with your application.

We need your help!! The Air Quality Division is now requesting modeling information with your operating permit application. While modeling is not required for operating permits, the modeling information requested will be of assistance to the Division. If dispersion modeling is performed on a source in your area, your facility may be considered a “nearby” source in that modeling. Having representative information from all sources will lead to more accurate modeling.

If you have questions about the air quality permit applications, contact the Air Quality Division Permit Hotline at (877) 834-0474.

Produced by: Nebraska Department of Environmental Quality, P.O. Box 98922, Lincoln, NE 68509-8922; phone (402)471-2186. To view this, and other information related to our agency, visit our web site at www.deq.state.ne.us.