

The Differences Between Being Major and Being Minor

Pros and Cons of Title V Permitting

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Norfolk: November 17, 2015

Grand Island: November 18, 2015



What is the difference between major and minor sources?

- A **major source** is a facility that emits more than the major threshold of a certain pollutant for that area
- A **minor source** is a facility that emits more than the minor threshold but less than the major threshold of a certain pollutant for that area – many are synthetic minors only



What does Title V mean?

- One Source – One Title V Permit
 - Permit that pulls all reqmts for a source into one place
- Valid for 5 years
- Improves enforceability and compliance of the Clean Air Act
 - Consolidation of requirements
- Allows citizens to be involved in the permit review process
 - public notice and comment
 - Compliance data and reports
- Improved implementation



Struggles with Minor Source

- All permits are different, each plant, each state, each emission source
- Limited by PTE in many cases
- Many plants take operational limits to remain synthetic minors
 - This means increased scrutiny and risk each month to stay below those imposed limits. If you break them you have state and federal implications.
- Minor's within 10% of 100 tons are going to get state and federal scrutiny for proper permitting. Within 3% expect enforcement if you have any excess emissions.



Benefits of Title V

- All look the same
 - If you have multiple facilities this make mgmt easier
- Emission Units/Groups (hint for audits)
 - Everything is listed individually
 - Acquisitions – verify as built to permit conditions
- Fact Sheet – includes more info
 - Better for us and the inspectors
- Use real emission factors not PTEs
 - Makes related reporting calcs – TRI - easier



Benefits of Title V

- Often more lenient operating conditions
 - PM/PM10 – RTO/TO, Baghouses
 - NO_x – RTO/TO
 - Acetaldehyde – Scrubbers
 - Unusual or Temporary Activities
 - ie – temporary ground piles for corn
 - Temporary boilers
- Often reduced testing frequencies
- Expanded legal rights/requirements
 - compliance plans



What does it mean for my day to day?

- Emission limits, operational restrictions, work practice standards
 - Less scrutiny
- Monitoring and Testing
- Recordkeeping and Reporting
- Compliance Schedules
- Audits – often less frequent



CAM Plans

- Helps with fence to fence PSM
 - I know what maintenance needs to be done and when
 - I ensure operating parameters are maintained

Deviation Reports and Compliance Cert

- Forces Mgmt to review everything in detail
- Catch errors or missing info faster



Forward or Backwards

If I went Title V for GHG – should I go back?

- Business decision
- So much effort and \$ went into application, why go back? Money is already spent
- Keep your operational flexibility
- Already tracking everything you need
- I prefer fewer visits and fewer rules
- I know I am under limits, no longer a worry
- If I want to do expansions or change plant operations, I can do so much more easily now
- Rules could change again, and I would have to start again, I definitely don't want that!



Downsides of Title V

- More Costly Potentially
- More Severe Penalties for Violations
- LONG application process



Questions?

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