



An Overview of Environmental Permitting of Industry

January 24, 2017

Pasadena Citizens Advisory Council



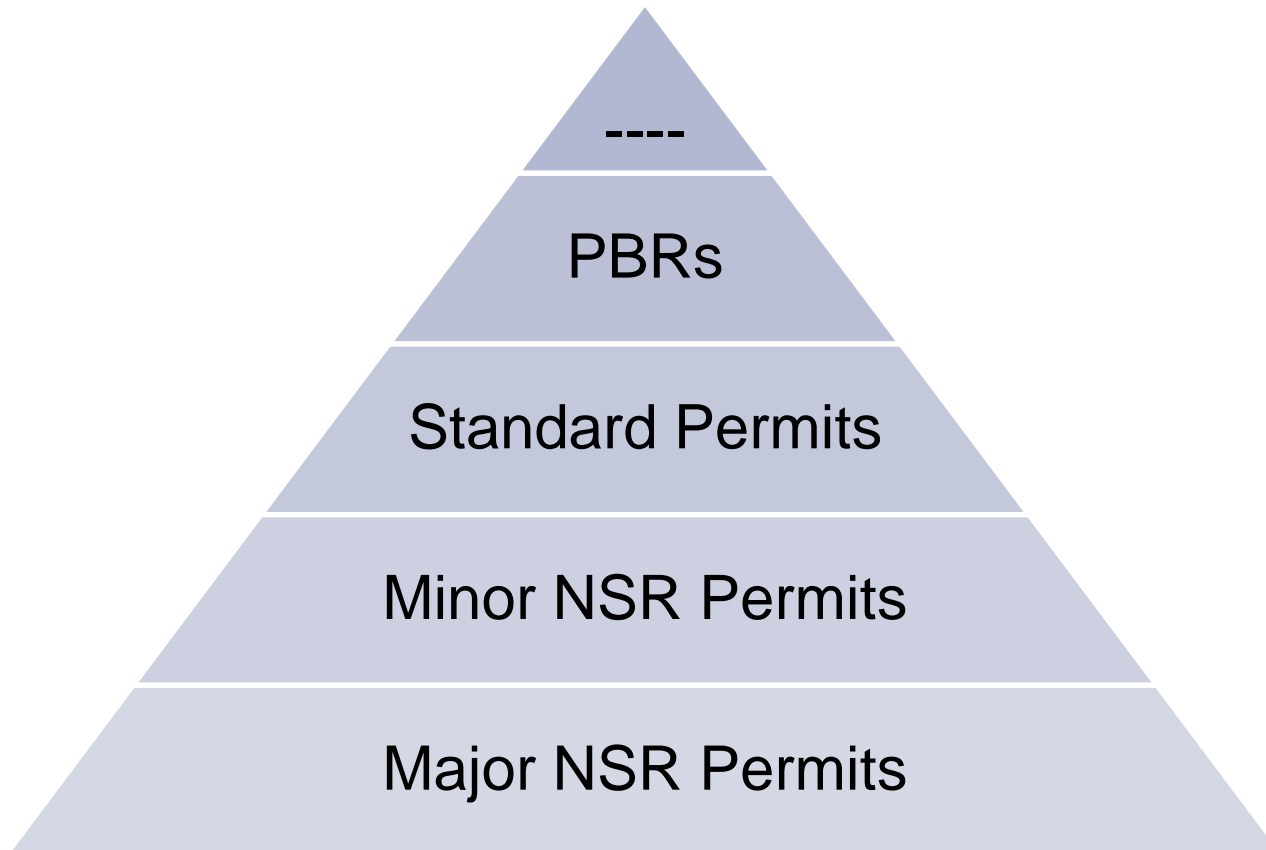
Agenda

- ◆ Construction Permit
- ◆ Operating Permit
- ◆ Wastewater Permit
- ◆ Stormwater Permit
- ◆ Compliance with Permits



Construction Permits

Types of New Source Review (NSR) Authorizations





Types of NSR Authorizations

De Minimis Facilities/Sources

- ◆ Some sources and facilities are considered de minimis and do not require registration or authorization prior to construction.

Permit by Rule (PBR)

- ◆ Facilities with emissions that do not meet de minimis criteria but will not make a significant contribution of air contaminants to the atmosphere may be permitted by rule.



Standard Permit

- A standard permit authorizes the construction or modification of new or existing facilities that are similar in terms of operations, processes, and emissions.
- A standard permit provides an efficient mechanism for qualifying facilities to obtain authorization as an alternative to a case-specific air quality permit.

Types of NSR Authorizations

Minor NSR Permits

- ◆ These are case-by-case permits for minor sources (i.e., those sources that do not trigger major source permitting).

Major NSR Permits

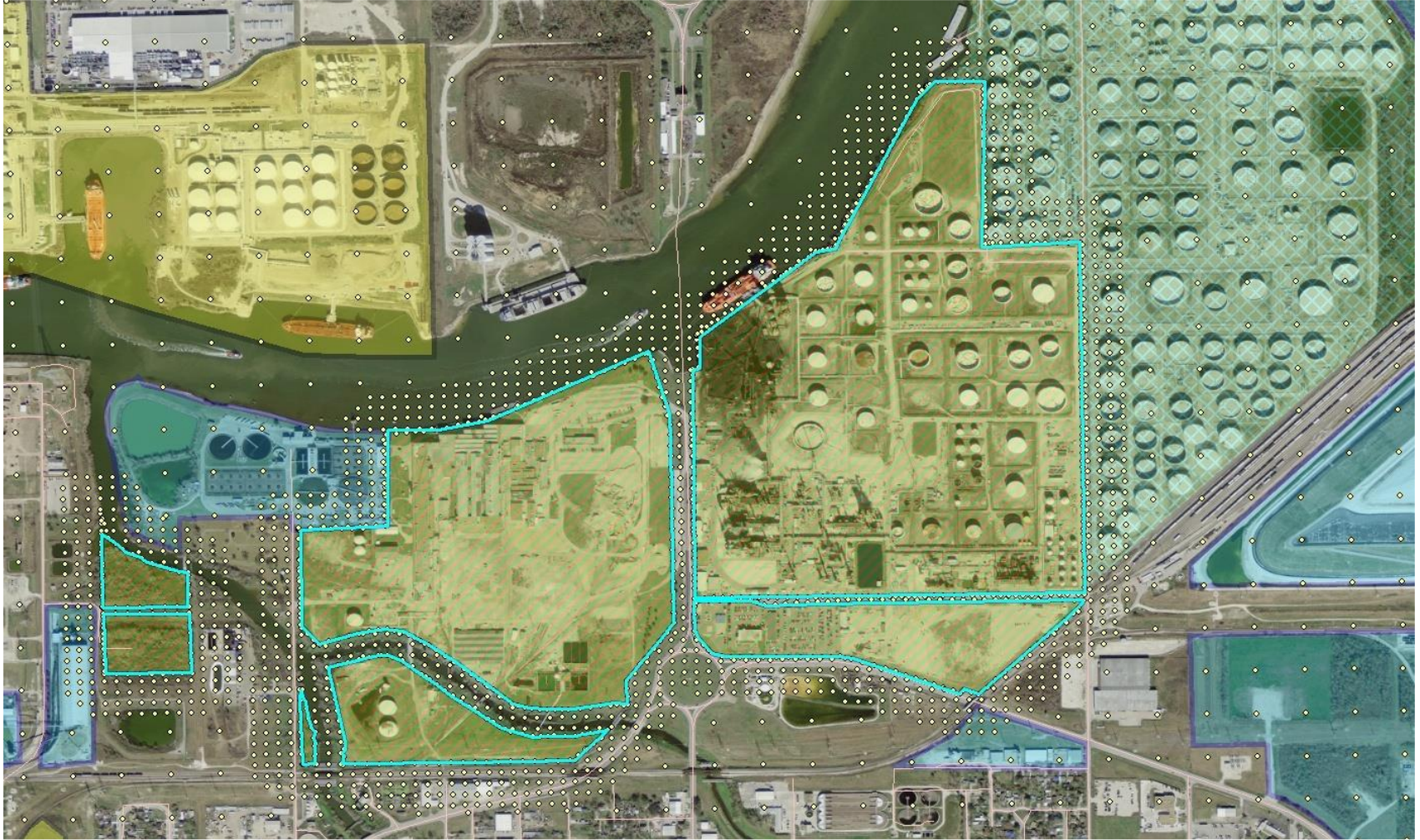
- ◆ These are case-by-case permits for major sources (i.e., those sources that trigger major source permitting requirements such as Prevention of Significant Deterioration, nonattainment, or Maximum Achievable Control Technology).

NSR Permitting Process

- ◆ Two Public Notice
- ◆ Emissions Data and Calculations
- ◆ Full Disclosure of Contaminants
- ◆ Protection of Public Health and Welfare
- ◆ Best Available Control Technology
- ◆ Modeling & Impacts Evaluation



Receptor Grid



Operating Permit



Clean Air Act Amendments of 1990

- Title I Nonattainment
- Title II Mobile sources
- Title III Air toxics
- Title IV Acid rain
- *Title V Operating Permits*
- Title VI Stratospheric ozone and global climate protection



Purpose of Title V

- To identify all of the applicable air quality requirements for a site in one document.
- To require the site to demonstrate compliance with these requirements on an ongoing basis.
- The program provides an opportunity for citizens to be involved in the permit review process.



Overview of Title V Program

- Public notice
 - ◆ Newspaper publication and signs
 - ◆ 30-day comment period
 - ◆ Bilingual notice, if required
- 30-day affected state review
- 45-day U.S. EPA review

Central to the Title V program is the semi-annual deviation reporting and annual compliance certification by Responsible Official.

Wastewater Permits





Clean Water Act Program

- All “point” sources discharging pollutants into water of the U.S. must obtain a NPDES from EPA or an authorized State

National Pollutant Discharge Elimination System (NPDES)

Texas Pollutant Discharge Elimination System (TPDES)



TPDES Permit

- The permit will contain limits on what you can discharge, monitoring and reporting requirements, and other provisions to ensure that the discharge does not hurt water quality or people's health.
- In essence, the permit translates general requirements of the Clean Water Act into specific provisions tailored to the operations of each person discharging pollutants.

Stormwater Permit

- Stormwater runoff is generated from rain events that flow over land or impervious surfaces, and washing surface contamination into water bodies.
- To protect these resources, communities, construction companies, industries, and others, use stormwater controls, known as best management practices (BMPs). These BMPs filter out pollutants and/or prevent pollution by controlling it at its source.



Compliance with Permits



Compliance with Permits

- Facilities are responsible to comply with all permits and its requirements.
- TCEQ and EPA performs inspection of facilities.
- Title V facilities are audited by TCEQ every three years.

■ Question?

