

Air Permitting



CONTACT US

For more information please visit our website at www.obg.com or e-mail info@obg.com

Air permitting is a means of documenting emissions of a particular operation, building, or system in order to allow regulatory review of compliance with emission limitations.

At O'Brien & Gere, we provide air permitting services to fulfill state and federal requirements related to construction and operation of new or modified air emission sources. Our air management program goal is to proactively assist clients in complying with emission requirements while maintaining maximum operational flexibility. Our experience interfacing with federal, state, and local regulatory agency personnel gives us the expertise necessary to expedite your projects.

Permitting may involve:

- Evaluation of the proposed project's regulatory impact (e.g., New Source Review or Prevention of Significant Deterioration [PSD])
- New Source Performance Standards (NSPS) compliance, which may be incorporated into PSD or state permits
- Air toxics control under National Emission Standards for Hazardous Air Pollutants (NESHAPS) regulations

TITLE V

Title V of the 1990 Clean Air Act Amendments added key features related to permitting:

- A massive new operating permit program to be administered by state and local permitting authorities, in accordance with federal guidelines
- Requirement that many sources obtain operating permits, including facilities and operations previously grandfathered from permit requirements

THE ELEMENTS OF A PERMIT

Operating permits outline in one enforceable document, the actions a facility owner needs to take in order to comply with air quality regulations. As such, permits include the following elements for major sources identified under the Clean Air Act:

- General facility information
- Process description and applicable Standard Industrial Classification (SIC) codes
- List of regulated air pollutants and all pollutants for which the facility is classified as a major source, as well as rates (in tons per year) for determining test methods
- Description and location of all emission points
- Description of fuels, raw materials, production rates, and operating schedules
- Enforceable emission limits (both hourly and annual) for each permitted operation at a plant site (in many cases, these limits are anticipated to be formulated on a stack-by-stack basis)
- Emission monitoring requirements
- Semi-annual compliance certification reporting by a responsible corporate official

A typical operating permit for a facility is valid for up to five years and may require the collection and maintenance of a large amount of emissions data.

Air Permitting

ASSISTANCE TO COUNT ON

Over recent years, O'Brien & Gere has completed more than 200 permitting programs for its clients. These range from preparing a state facility operating permit for an asphalt product manufacturer's process operations to a nationwide Title V permitting program for 19 mineral processing facilities located in 13 different states.

