How to Avoid Common Mistakes of Section (6) Permit Applications

Start early. As soon as you begin your plans for construction, complete and submit an air quality construction permit application to the APCP. A construction permit may take 4 – 12 months to process depending on the quality of the application and complexity of the permit.

Talk with APCP. 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, it is advisable to set up a meeting with APCP 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 APCP in the following months. Communication is a key element to a smooth permitting process.

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 amount. Type or complete the application in blue or black ink. A responsible official must sign the application in ink. 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 also it is 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 having to wait for a permit modification. If your plans change after you have submitted an application, you have an obligation to submit updated information to APCP.

Determine if an ambient air quality analysis is required. If the potential to emit for any regulated pollutant (except VOC) is above the de minimis level for that particular pollutant, you may be required to conduct a refined modeling analysis of the impacts your project will have on the ambient air. This may include an evaluation of the increment and National Ambient Air Quality Standards (NAAQS).

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.

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.

Read and make comments to the draft permit. Once the application is reviewed and deemed technically complete by APCP, the permit writer will draft a construction permit. The draft permit will be sent to the facility representatives 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.