PREPARING TO SUBMIT A PTI APPLICATION

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EAST MICHIGAN AWMA PTI WORKSHOP
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PTI APPLICATION
OVERVIEW

• PTI Processing
• Exemptions
• ROP Program
• Clean Corporate Citizen Benefits
• Preparing the Application
• Complete Applications
PTI STATISTICS

Average No. of Days to Approve a Permit to Install

The current goal is 90 days from receipt of the application.
EXEMPTIONS?

- Proper use of an exemption
- Written agreement?
- ROP sources - application/staff report
- Written documentation should be “permit like” including emission calculations
- Visit Air Quality Source Information page:
  https://www.michigan.gov/egle/0,9429,7-135-3310_70317-313032--,00.html

The inspection on 09/11/2009 concluded that the activities and/or equipment at Novi were exempt from the requirement of Rule 201 to obtain a permit to install (PTI) pursuant to R336.1283 (1) - Rule 283 - which exempts testing and inspection equipment.
BARRIERS TO USING EXEMPTIONS?

• Rule 290 can require a lot of documentation – it’s based on actual emissions.
• Rule 291 is based on PTE – and the thresholds are low.
• Use at your own risk?
• True minor or synthetic minor source?
• Need “buy-in” from the inspector.
• Copies of some original permitting materials (for meaningful change).
<table>
<thead>
<tr>
<th>Pollutant</th>
<th>CAS No.</th>
<th>Screening Level (µg/m³)</th>
<th>Averaging Time</th>
<th>Screening Level Type</th>
<th>Exemption</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vinyl Chloride</td>
<td>75-01-4</td>
<td>100</td>
<td>24-hr</td>
<td>ITSL</td>
<td>R290(a)(ii)(A)</td>
</tr>
<tr>
<td>1,1-Dichloroethene</td>
<td>75-35-4</td>
<td>200</td>
<td>24-hr</td>
<td>ITSL</td>
<td>R290(a)(ii)(A)</td>
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<tr>
<td>1,1-Trichloroethane</td>
<td>71-55-6</td>
<td>1000</td>
<td>24-hr</td>
<td>ITSL</td>
<td>R290(a)(ii)(A)</td>
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<tr>
<td>1,1-Dichloroethane</td>
<td>75-34-3</td>
<td>500</td>
<td>24-hr</td>
<td>ITSL</td>
<td>R290(a)(ii)(A)</td>
</tr>
<tr>
<td>cis-1,2-Dichloroethene</td>
<td>156-59-2</td>
<td>35</td>
<td>24-hr</td>
<td>ITSL</td>
<td>R290(a)(ii)(A)</td>
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<tr>
<td>trans-1,2-Dichloroethene</td>
<td>156-60-5</td>
<td>70</td>
<td>24-hr</td>
<td>ITSL</td>
<td>R290(a)(ii)(A)</td>
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<tr>
<td>Trichloroethylene (TCE)</td>
<td>79-01-6</td>
<td>0.6</td>
<td>annual</td>
<td>IRSL</td>
<td>R290(a)(ii)C</td>
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<tr>
<td>Tetrachloroethylene (PCE)</td>
<td>127-18-4</td>
<td>1.7</td>
<td>annual</td>
<td>IRSL</td>
<td>R290(a)(ii)C</td>
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<tr>
<td>Toluene</td>
<td>108-88-3</td>
<td>5000</td>
<td>24-hr</td>
<td>ITSL</td>
<td>R290(a)(ii)(A)</td>
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<tr>
<td>Ethylbenzene</td>
<td>100-41-4</td>
<td>1000</td>
<td>24-hr</td>
<td>ITSL</td>
<td>R290(a)(ii)(A)</td>
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<tr>
<td>Xylene</td>
<td>1330-20-7</td>
<td>100</td>
<td>24-hr</td>
<td>ITSL</td>
<td>R290(a)(ii)(A)</td>
</tr>
</tbody>
</table>

**In tracking monthly emissions, you can do a PTE and simply prorate emissions based on throughput.**

Rule 290 thresholds (< 500 pounds controlled and 1000 pounds uncontrolled apply)
ROP PROGRAM

- *DON’T* INCORPORATE MACT STANDARDS THROUGH THE PTI PROGRAM.
- *DON’T* INCLUDE UNNECESSARY MONITORING, RECORD KEEPING AND REPORTING AS THE ONLY WAY TO REMOVE IT IS THROUGH THE PTI PROGRAM.
- *CAN* SUBSUME REQUIREMENTS THROUGH THE ROP PROGRAM.
- CAN CHANGE MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS THAT ORIGINATED IN THE ROP.
- MIGHT BE WORTH A TRY!
CLEAN CORPORATE CITIZEN BENEFITS

- C3 facilities are entitled to a construction waiver (provided the project does not constitute a PSD modification, etc.) without demonstrating hardship in 15 days (Rule 1403(1)).
- C3 facilities are also entitled to a waiver to operate (Rule 1403(2)).
- Expedited review – 60 days?
# TAC Evaluation from PTI

## Table of Allowable Emission Rates (AER)

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th>CAS No.</th>
<th>Screening Level</th>
<th>Allowable Emission Rate (AER)</th>
<th>Proposed Emission Rate (ER)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>1st ITSL</td>
<td>2nd ITSL</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>ug/m²</td>
<td>ug/m²</td>
</tr>
<tr>
<td><strong>New TACs evaluated for 310-J88</strong></td>
<td></td>
<td></td>
<td>1.37</td>
<td>3700</td>
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<tr>
<td>Propylene glycol monosulfate</td>
<td>64772-22-6</td>
<td>3900</td>
<td>annual</td>
<td>2</td>
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<tr>
<td><strong>Worst Case EURALDES Resins - assume all potential trace compounds emitted at 1%</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Benzene</td>
<td>71-43-2</td>
<td>100</td>
<td>annual</td>
<td>50</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>500-00-0</td>
<td>30</td>
<td>24 hr</td>
<td></td>
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<tr>
<td>1,4-Dioxane</td>
<td>123-91-1</td>
<td>100</td>
<td>annual</td>
<td>7200</td>
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<tr>
<td>Acetaldehyde</td>
<td>75-05-1</td>
<td>50</td>
<td>annual</td>
<td></td>
</tr>
<tr>
<td>Ethylene oxide</td>
<td>75-21-8</td>
<td>50</td>
<td>annual</td>
<td>50</td>
</tr>
<tr>
<td>Benzene</td>
<td>71-43-2</td>
<td>30</td>
<td>annual</td>
<td>30</td>
</tr>
<tr>
<td>Toluene</td>
<td>108-88-3</td>
<td>5000</td>
<td>24 hr</td>
<td></td>
</tr>
<tr>
<td>Ethylene glycol</td>
<td>107-21-1</td>
<td>4700</td>
<td>1 hr</td>
<td></td>
</tr>
</tbody>
</table>
ELEMENTS OF A GOOD APPLICATION

• Good process description (and flow diagram),
• Example calculations,
• Calculations showing conformance with PSD thresholds/modeling thresholds, etc.,
• Regulatory review and understanding of applicable requirements,
• For true or synthetic minor sources – documentation showing project will not change regulatory status,
• Mention exempt equipment but do not include too much detail (unless you want them covered by the PTI or unless they affect regulatory status of facility),
• Process data used in PTI calculations will likely match emission limits, and
• Consider a PTI mark-up.

If neither you nor your client understands the scope of the project – how can EGLE issue a PTI to proceed?
PRE-APPLICATION MEETING

• Schedule a pre-application meeting when you have most (but not all) the application complete.

• Prepare an agenda designed to highlight the project – include a schedule for the application submittal and the project.

• Include information on how emissions are calculated, modeling set up and expected regulatory review issues.

• Everything is “draft” and will likely change after the meeting.

• There is no guarantee that the engineer you meet with will be assigned the application.
BE REALISTIC!

• Understand the regulatory requirements.
• Observe permitting and modeling memo thresholds.
• Don’t include unrealistic permit limits.
• Don’t include wacky operating scenarios that require a lot of review but applicant will never use.
WAYS TO WASTE TIME

- Mention process restrictions that are impossible to achieve.
- Include emission calculations that are not associated with process restrictions.
- Don’t include sufficient toxic air contaminant (TAC) information in the application (and be unable to secure it).
- Include SDS or formulation data that has active ingredients describe solely as “proprietary”.

Emissions information is not confidential!!
IMPORTANT INFORMATION TO INCLUDE

- Ensure the purpose of the application is stated up-front as well as clearly state PTI expectations.
- Include background information – but clearly label as background information.
- Make sure the application includes emission calculations as well as the source of emission factors and an example calculation.
KNOW THE EGLE WEBSITE

- ROP Information
  http://www.deq.state.mi.us/aps/downloads/rop/ROPlist/APS_ROP_Sources_by_Name.pdf

- AQ Site Information
  https://www.michigan.gov/egle/0,9429,7-135-3310-70317-313032--00.html

- PTI active conditions
  https://www.michigan.gov/egle/0,9429,7-135-3310-388619--00.html

- Pending applications
SUBMITTING YOUR APPLICATION

• It might be best to drop your application off – it will take additional time to make it from the mail room to a permit engineer.
• Provide an electronic copy as well – it provides you an opportunity to make sure the application is received and assigned.
• Provide the District a copy (required to get a construction waiver).
• Make sure the application form includes an obvious original signature.
QUESTIONS?

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