

This pamphlet outlines the various air permits that are required in Pennsylvania and the types of equipment and facilities that need permits. You also will learn about how to obtain a permit. This information applies generally throughout the state, and also covers the special requirements in Allegheny and Philadelphia counties.

Small businesses sometimes require air permits. This pamphlet will help you determine whether your business should have a permit, or at least whether you should check to find out. If you have any questions, contact ENVIROHELP at (800) 722-4743, visit the website at www.pa-envirohelp.org or contact any of the organizations listed on the last page of this pamphlet.

WHAT IS A SOURCE OR FACILITY?

There are two key terms that you need to understand before reading further: source and facility. Assume you run a wood furniture coating plant and you have a spray booth, a boiler for space heat and a parts washer. Each piece of equipment is a "source." The total of all the sources at the plant combined is a "facility."

WHAT IS THE PERMIT PROCESS?

The box on this page lists the air pollutants that are of most concern along with their chemical symbol or acronym. If your business emits any of these pollutants to the outdoors, you may need a permit. This section gives you a brief overview of the permit process, and later sections provide more details. Briefly, you will need to follow a 3-step process:

STEP 1 - GET YOUR PLAN APPROVED BY DEP OR LOCAL AGENCY

STEP 2 - APPLY FOR AN OPERATING PERMIT

STEP 3 - SHOW THAT YOU ARE COMPLYING WITH THE PERMIT

AIR POLLUTANTS	
Carbon Monoxide	CO
Nitrogen Oxides	NO _x
Sulfur Oxides	SO _x
Particulate Matter smaller than 10 microns	PM ₁₀
Volatile Organic Compounds	VOCs
Hazardous Air Pollutants	HAPs

STEP 1 - GET YOUR PLAN APPROVED

When you plan to add, modify or restart equipment to improve your process, you should also decide whether it is a source that releases air pollutants. If it is, you must obtain approval for your plan—what is known as "plan approval"—*before* you begin installing the equipment. You will need to file a separate plan approval application with DEP or your local agency for each individual source. If you installed a source any time since September 1971, you should have followed this process.

Title V permit - Required if your potential to emit for any pollutant for the entire facility is above the level in the following table, and your actual emissions are high.

Synthetic minor permit - If your potential to emit for any pollutant for the entire facility is above the levels in the following table, but your actual emissions are small, you can use this simpler alternative instead of a Title V permit.

Natural minor permit - Required if your potential to emit is below and your actual emissions are above the levels in the following table for any pollutant. Also called a state-only permit.

Major And Area Sources

POLLUTANTS	POTENTIAL TO EMIT THRESHOLD*	ACTUAL EMISSIONS THRESHOLD*
CO	100 tons/year	20 tons/year
NO _x	100 tons/year**	10 tons/year
SO _x	100 tons/year	8 tons/year
PM ₁₀	100 tons/year	3 tons/year
VOCs	50 tons/year**	8 tons/year
Single HAP	10 tons/year	1 ton/year
Multiple HAPs	25 tons/year	2.5 tons/year

* If emissions are below both thresholds, no permit is needed.
 ** 25 tons per year in Bucks, Chester, Delaware, Montgomery and Philadelphia counties.

Plan Approval - Authorization from a regulatory agency to install a piece of equipment that emits air pollution.

Potential to Emit (PTE) - The theoretical amount of air pollutants from a source or facility, assuming it operates at full capacity 24 hours per day, 365 days per year.

Request for Determination - A form used to request that DEP decide whether a plan approval or operating permit is needed for a source of air pollution.

Supplemental Compliance Review Form - If you have sent DEP a compliance review form in the past for a different source, you would send a supplemental form for a new source, providing only new information.

INFORMATION AND ASSISTANCE

ENVIROHELP

ENVIROHELP provides free and confidential technical assistance to small businesses that are affected by environmental regulations or that want to learn more about pollution prevention and energy efficiency. The program operates a toll-free hotline ((800) 722-4743; TDD at (800) 208-0937) and a website (www.pa-envirohelp.org) in addition to conducting seminars across the state. ENVIROHELP can help you determine if you need a permit, assist you with completing a permit application, conduct a compliance assistance site visit at your facility and help you implement pollution prevention and energy efficiency projects. You also can contact ENVIROHELP by email (envirohelp@ttemi.com).

Facilitywide Permits:

Beginning in 1994, businesses were required to combine all the individual permits for the various sources into one permit for the entire facility. These are called facilitywide permits. There are three types in Pennsylvania: *Title V*, *synthetic minor* and *natural minor*. The type of permit you need depends on the total amount of actual and potential air emissions from your entire facility. If actual emissions from your facility are below certain set levels for various pollutants, you do not need any type of permit. The section called "What Do the Terms Mean?" can help you determine if you need a facilitywide permit and which type of permit you should have. You can contact ENVIROHELP for assistance.

The application process for a facilitywide permit is the same as for a plan approval, including the information required, where you send it, the public notification and the review by DEP or your local agency. If you are not sure whether you should apply for any type of permit, you can file a "Request for Determination" form and let DEP decide.

STEP 3 - SHOW THAT YOU ARE COMPLYING WITH THE PERMIT

After you receive your permit, you must continue to operate the source according to the conditions in the permit. Most permits also include conditions requiring you to record information about how you operate and report any problems to DEP or your local agency.

GENERAL PERMITS

DEP has developed "general permits" for some groups of air pollution sources that are similar in operation and emission control requirements. For the following types of sources you will simply use a one-page form to apply for both plan approval and an operating permit at the same time:

- Small oil- and gas-fired combustion units
- Portable nonmetallic mineral processing plants
- Natural gas production facilities
- Sheet-fed offset lithographic printing
- Small storage tanks for volatile organic liquids
- Burnoff ovens
- Petroleum dry cleaning
- Nonheatset web offset lithographic printing

The general permits describe all the air quality requirements that apply to the sources. Although it is convenient to apply for the general permit, remember that you will need to meet all the conditions it specifies. You cannot modify a general permit.

DEFERRED PERMITS

The following five types of area sources are covered by federal regulations and normally would have to apply for a Title V or synthetic minor permit:

- Perchloroethylene dry cleaning
- Ethylene oxide sterilization
- Hard and decorative chromium electroplating and chromium anodizing
- Halogenated solvent cleaning
- Secondary lead smelting

However, the U.S Environmental Protection Agency (EPA) has proposed to defer these permits until Dec. 9, 2004. DEP will follow suit and continue to defer these permits as long as EPA does. If your entire facility is a major source, then you should have included the applicable sources in the facilitywide permit application you already submitted.

WHAT ELSE DO YOU NEED TO KNOW?

So far this pamphlet has described the plan approval and permit process in general. The following scenarios will help you understand the air permit process in more detail, although how a specific situation is handled may vary from facility to facility.

Grandfathered Facility:

If all of the sources at your facility were installed before 1971, a plan approval or permit was not required. However, it is likely that you have obtained a permit since then. If your business is a major source, you should have applied for a Title V or synthetic minor facilitywide permit by Nov. 27, 1995. If your business is an area source that exceeds the permit threshold, you should have applied for a natural minor facilitywide permit by September 1996. However, if your business is an area source, and the emissions fall below the threshold for a permit, you can continue to operate without a permit or plan approval. See "What Do the Terms Mean?" for the various permit threshold values.

Existing Permitted Facility:

If you were in operation before 1994 and your business involves emissions sources that were already permitted, you should have estimated the emissions and figured out whether your facility is a major source. If your business is a major source, you should have applied for a Title V or synthetic minor facilitywide permit by Nov. 27, 1995.

You will continue to operate under a source-specific operating permits if your business is considered an area source. As these permits expire, DEP will send you an application for a facilitywide natural minor permit. If you already hold several permits that expire at different times, DEP will typically send you an application for natural minor permit when the first source-specific permit expires.

New Source at an Existing Facility:

If you are adding a new source of air pollution, you should first check to see if the source is on the plan approval exemption list. If it is not, you must either apply for a plan approval and an operating permit or submit a request for determination for either step. DEP will add the new source to an existing permit if you already hold one of the three types of facilitywide permits.

New Facility:

If you plan to build a new facility, you should check to see if the intended source is on the plan approval exemption list. If it is not, you must either apply for a plan approval and an operating permit or submit a request for determination for either step. You also should estimate the actual and potential emissions from all of the sources at the facility by considering how much business you will be doing and how many and what

kinds of raw materials you will use. The two emissions estimates will tell you which of the facilitywide permits you will need, if any.

WHAT IF YOU ARE IN PHILADELPHIA OR ALLEGHENY COUNTY?

Philadelphia and Allegheny counties operate their own air management programs. However, the permit process is essentially the same as that for DEP. The plan approval in these counties is called an installation and construction permit and the permit itself is called a license to operate. Allegheny County uses one permit application form for all types of permits. The forms are sent to the Allegheny County Health Department or the Philadelphia County Health Department's Air Management Services (see back panel for telephone numbers).

WHAT ARE THE FEES?

TYPE OF PERMIT/ APPLICATION	2000-2004	AFTER 2004
Plan approval	\$ 850	\$ 1,000
Non-Title V application fee	\$ 350	\$ 750
Title V application fee	\$ 600	\$ 750
Annual admin fees, Non-Title V	\$ 300	\$ 375
Annual admin fees, Title V	\$ 615	\$ 750

WHAT DO THE TERMS MEAN?

Actual Emissions - Amount of air pollution released from a piece of equipment or a facility based on the actual hours and conditions of operation.

Area Source - A facility that has the potential to emit pollutants at levels below the amounts in the table on the next page.

Compliance Review Form - A form that you must fill out with a plan approval or permit application listing any past compliance problems (such as a notice of violation).

Grandfathered Source - A piece of equipment that emits air pollution and was in operation before Sept. 11, 1971.

Major Source - A facility that has the potential to emit pollutants at levels equal to or greater than the amounts in the table on the next page.

Modification - A physical change in a piece of equipment or a change in how you operate that increases the amount or type of air pollution. Routine maintenance, repair and replacement are not modifications.

Municipal Notice - A notice sent to the municipality and county about building, modifying or restarting a source of air pollution that needs plan approval or a permit.

Operating Permit - Authorization from a regulatory agency to operate stationary sources of air pollution for 5 years. There are three types, and they apply to the entire facility:

Getting Started:

To apply for plan approval, you need to submit the following information to the Pennsylvania Department of Environmental Protection (DEP):

- Plan approval application forms;
- Compliance review forms;
- Proof, such as a certified letter receipt, that you sent a municipal notice to the town and county; and
- Application fee (see section titled, "What are the Fees?").

You will submit the information to the regional DEP office that is responsible for your county (see section titled, "Regulatory Agencies").

Providing Municipal Notice:

You also must send a notice to the municipality and county where you will be installing the source. In some cases, DEP will send you the wording for a notice that you must publish in the local newspaper. This notice starts a 30-day comment period that allows area residents a chance to state their views on the planned source. In some cases, DEP may hold a public meeting to discuss your plan.

DEP Review:

DEP will review the plan approval application and may contact you with questions. As a result, you may need to revise and resubmit the application. After you receive approval from DEP, you can install the source. You must let DEP know when it is installed. A DEP inspector will check to make sure it has been installed as approved.

What is Not Covered:

DEP has exempted some types of sources because they are too small and do not need plan approval. If you plan to install a source that is on the plan approval exemption list, you can build it without DEP approval. The list is available through the ENVIROHELP hotline or website.

If you plan to install a source that is not on the exemption list, and you believe it will not emit much air pollution, you can ask DEP to make a decision about whether it needs a plan approval. You do so by filling out a two-page form called a "Request For Determination" and sending it to the regional DEP office. Again, you must have DEP's decision *before* you install the source.

STEP 2 - APPLY FOR AN OPERATING PERMIT

After the source has been installed, you must obtain an operating permit from DEP or your local agency before you begin normal operation. The plan approval will allow temporary operation so that DEP or your local agency can inspect the source. To avoid delays, submit an operating permit application with the plan approval application.

The operating permit you receive may set conditions on how you operate the source(s), such as limiting the hours of operation, monitoring pressure drop across a scrubber, recording the types of paints applied or reporting malfunctions of the emissions control device. The permit conditions are based on the plan approval.

State and Local Regulatory Agencies

- DEP Regional Offices

Southeast	Conshohocken	(610) 832-6000
Northeast	Wilkes-Barre	(570)826-2511
Southcentral	Harrisburg	(717) 705-4704
Northcentral	Williamsport	(570) 327-3636
Southwest	Pittsburgh	(412) 442-4000
Northwest	Meadville	(814) 332-6945
- Allegheny County Health Department (412) 578-8103
- Philadelphia County Air Management Services (215) 823-7584
- Environmental information is available on the Internet. Visit DEP through the Pennsylvania homepage at www.state.pa.us or directly at www.dep.state.pa.us.
- Another source of environmental assistance is the DEP Small Business Ombudsman's office at (717) 772-8951.

Other Technical Assistance

There are numerous organizations in Pennsylvania that offer a wide variety of services to businesses relating to compliance assistance, pollution prevention and energy efficiency:

- Pennsylvania Environmental Assistance Network (PEAN) at (717) 705-0374 or www.pean.state.pa.us.
- Pennsylvania Small Business Development Center's Environmental Management Assistance Program at (215) 573-7555 or www.libertynet.org/pasdc.
- Pennsylvania Technical Assistance Program (PENNTAP) at (814) 865-0427 or www.penntap.psu.edu.

Financial Assistance

- DEP's Small Business Pollution Prevention Assistance Account at (717) 783-0540
- Act 190 Pollution Prevention/Energy Efficiency Site Assessment Grant Program at (717) 783-0540
- Electrotechnology Applications Center grant for technological assessments of alternative coating, curing, drying and heating processes at (610) 861-5596
- MANTEC Inc. pollution prevention/energy efficiency low-interest loans in southcentral Pennsylvania at (888) 843-5054.



Tom Ridge, Governor, Commonwealth of Pennsylvania
James M. Seif, Secretary, Department of Environmental Protection
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GreenWorks is a website dedicated to helping you learn how to protect and improve the environment. The site features the largest collection of environmental videos available on the Internet and is produced by the nonprofit Environmental Fund for Pennsylvania, with financial support from the Pennsylvania Department of Environmental Protection. For more information call (800) 334-3190 or visit the website at www.greenworkschannel.org.



UNDERSTANDING AIR PERMITS IN PENNSYLVANIA

