Air Permits Update

Betsy Peticolas
Air Permits Division Special Assistant
Texas Commission on Environmental Quality
October 2017
Agenda

* Air Permits Workload
* 85th Legislative Session
* Readily Available Permits
* ePermits
* Expedited Permits
* Oil & Gas Authorizations
* Concrete Batch Plants and Rock Crushers
Projects: PBR and Standard Permit

- PBR Registration
- Standard Permit
- Completed PBR
- Completed SP

FY13 FY14 FY15 FY16 FY17
Projects: Title V

FY13  FY14  FY15  FY16  FY17
Title V
Completed
# Pending Projects

<table>
<thead>
<tr>
<th>Authorizations</th>
<th>Total Under Review</th>
</tr>
</thead>
<tbody>
<tr>
<td>NSR Initial Permits (minor NSR)</td>
<td>97</td>
</tr>
<tr>
<td>NSR Amendments</td>
<td>494</td>
</tr>
<tr>
<td>Federal NSR</td>
<td>62</td>
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<tr>
<td>NSR PBRs</td>
<td>189</td>
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<tr>
<td>NSR Standard Permits</td>
<td>77</td>
</tr>
<tr>
<td>NSR Alterations &amp; Other Changes</td>
<td>78</td>
</tr>
<tr>
<td>NSR Permit Renewals</td>
<td>385</td>
</tr>
<tr>
<td>New GOP</td>
<td>17</td>
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<tr>
<td>New SOP</td>
<td>61</td>
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<tr>
<td>Renewal GOP</td>
<td>43</td>
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<tr>
<td>Renewal SOP</td>
<td>243</td>
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<td>Revision GOP</td>
<td>64</td>
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<tr>
<td>Revision SOP</td>
<td>266</td>
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<tr>
<td><strong>Total</strong></td>
<td><strong>2078</strong></td>
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</tbody>
</table>
85th Legislative Session

*H.B. 4181
* Change in air permitting procedures related to renewal notices currently mailed via certified mail

*S.B. 1045
* Consolidated notice for application for which a draft permit is prepared within 15 days
Readily Available Permits

* Develop criteria up-front
* Potential timeframes
* More RAPs planned
Readily Available Permits

* Air Quality Analyses (AQA) included
* Conservative approach to AQA
* Analyses demonstrates protection of public health and welfare
ePermits

* 7,000 – 8,000 PBRs and standard permits/year
* This accounts for approximately 60% of the mail received by APD
* 15 employees enter all projects received by APD
* 70% of their time is spent on PBRs and standard permits
ePermits

* 7,033 – PBRs and standard permits issued in 2016
  * 3,368 submitted through ePermits
  * 2,050 had “Same Day” response

* 3,665 could have used ePermits
* 420 could have had “Same Day” response
*Future of ePermits
  * NSR renewals available 12/31/2017
  * Eventually will require submittal of PBRs and SPs through ePermits
  * Developing the ability to accept all applications through ePermits
**Expedited Air Permitting**

* Increased efficiency
* Additional contractors
* Removing projects from the Program
* Retaining small percentage of surcharge
## Expedited Projects Received

<table>
<thead>
<tr>
<th></th>
<th>FY 15</th>
<th>FY 16</th>
<th>FY 17</th>
<th>FY 18*</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PBR Registrations</strong></td>
<td>39</td>
<td>82</td>
<td>110</td>
<td>22</td>
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<tr>
<td><strong>STDPMT</strong></td>
<td>56</td>
<td>79</td>
<td>110</td>
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<tr>
<td><strong>Case-by-Case Minor NSR Permits</strong></td>
<td>89</td>
<td>144</td>
<td>178</td>
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<td><strong>Case-by-case Major NSR Permits</strong></td>
<td>41</td>
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<td><strong>Total</strong></td>
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<td>341</td>
<td>429</td>
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## Expedited Projects Issued

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<tr>
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<th>FY 15</th>
<th>FY 16</th>
<th>FY 17</th>
<th>FY 18*</th>
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<td>PBR Registrations</td>
<td>36</td>
<td>79</td>
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<tr>
<td>STDPMT</td>
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<td>Case-by-Case Minor NSR Permits</td>
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<tr>
<td>Case-by-case Major NSR Permits</td>
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<tr>
<td>Title V</td>
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<td>Withdrawn from program</td>
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<tr>
<td>Total</td>
<td>116</td>
<td>303</td>
<td>399</td>
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</table>
Common Oil & Gas Authorizations

30 TAC § 106.352(a)-(k)/(l) Oil and Gas Handling and Production Facilities

30 TAC § 106.512 - Stationary Engines and Turbines

30 TAC § 116.620 / Non-Rule Standard Permit for Oil and Gas Handling and Production Facilities

30 TAC § 106.492 - Flares

Voluntarily use Barnett Shale mechanisms
30 TAC § 106.352(a)-(k)

* Notification prior to construction or implementation of changes

* Registration
  * Level 1 - within 180 days from start of operation
  * Level 2 - within 90 days from start of operation
30 TAC § 106.352(l)

* Sweet
  * No registration required
  * Meet § 106.4 limits and keep records

* Sour (≥ 24 ppm H₂S )
  * Registration required
  * More specific requirements
## MSS for O&G PBRs

<table>
<thead>
<tr>
<th>Oil and Gas Rule</th>
<th>MSS should be authorized using...</th>
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<tbody>
<tr>
<td>§106.352(l)</td>
<td>§106.359</td>
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<tr>
<td>§106.352 (a)-(k) (Barnett Shale)</td>
<td>§106.352(i)</td>
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<td></td>
<td>§106.263 for painting and blasting</td>
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Concrete Batch Plant Authorizations

- PBRs
  - 30 TAC § 106.141 Batch Mixers;
  - § 106.144 Bulk Mineral Handling;
  - § 106.512 Stationary Engines and Turbines

- Standard Permit for Concrete Batch Plants

- Standard Permit for Concrete Batch Plants with Enhanced Controls
Rock Crusher Authorizations

PBRs
30 TAC § 106.144
Bulk Mineral Handling;
§ 106.512
Stationary Engines and Turbines

Standard Permit for Temporary
Rock and Concrete Crushers

Standard Permit for Permanent
Rock and Concrete Crushers
Contact Information

* Air Permits Division main line
  (512) 239-1250

*Betsy Peticolas, Special Assistant
betsy.peticolas@tceq.texas.gov
(512) 239-6033