



AIR QUALITY CONSTRUCTION PERMITS

INDOOR VENTING SOURCES

Indoor venting sources that emit or have the potential to emit air contaminants count towards the determination of major source applicability for purposes of the Title V Operating Permit and New Source Review (NSR) programs. The Iowa Department of Natural Resources (DNR) has developed this fact sheet to provide additional clarification and guidance on when a facility should consider applying for an air quality construction permit to restrict potential emissions from indoor venting sources.

Background

In early 2005, the DNR withdrew a practice related to indoor venting sources, called “Permit or Exempt.” This practice required facilities to

- use an exemption from receiving an air construction permit as specified in 567 IAC Chapter 22.1(2)
OR
- obtain an air construction permit for all equipment capable of emitting air contaminants to produce air pollution including indoor venting sources.

Since 2005, the DNR has had a long standing practice of not pursuing air construction permits for indoor venting sources unless these sources are part of a major NSR project or the indoor source vents air contaminants directly to the atmosphere¹. The purpose of this fact sheet is to reduce confusion on how indoor venting sources contribute to a facility’s potential to emit.

Indoor venting sources are not excluded from the definition of potential to emit and the interpretation that emissions generated from indoor venting equipment is categorically excluded in determining facilities’ potential emissions is incorrect. If potential emissions from indoor venting sources are not accounted for, a facility may unintentionally become subject to the major source programs. If potential emissions are greater than the major source thresholds, facilities are required to apply for a Title V Operating permit.

What should I do?

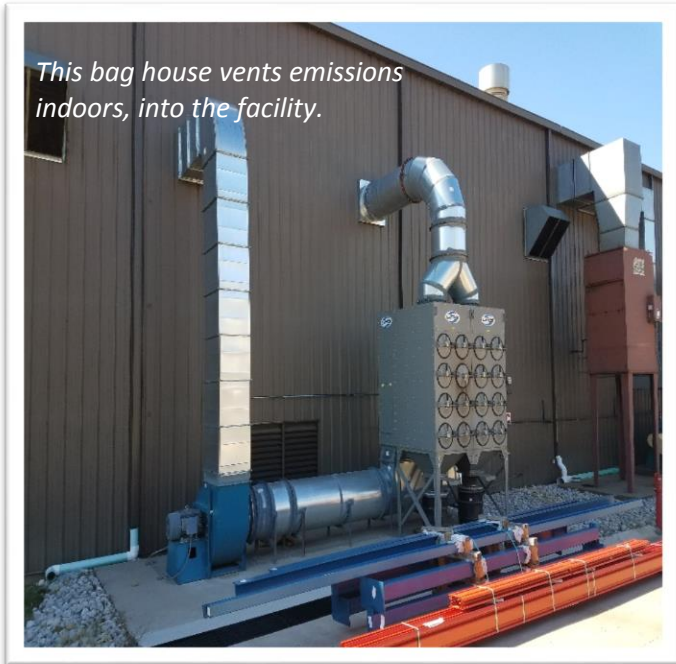
If your facility has indoor venting equipment capable of emitting air contaminants, you may need to consider them as a part of your facility-wide potential to emit. Primary indicators that your indoor venting emission units may impact your potential emissions are:

1. Your indoor equipment vents to a large control device such as a baghouse that exhausts inside a building,
2. Your potential emissions are 80 percent or greater of the Title V major source threshold,
3. You have numerous pieces of indoor venting equipment with or without controls.

POTENTIAL TO EMIT

“Potential to emit” is defined as the maximum capacity of a stationary source to emit under its physical and operational design. Any physical or operational limitation on the source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation, or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is enforceable by the Administrator.

If your facility has any of these indicators, you may consider conducting an internal review to determine if your potential emissions are greater than major source thresholds for Title V or NSR. If you determine that potential emissions may be greater than 100 tons per year, the DNR recommends that a facility consider applying for a construction permit or use the “small unit exemption” as detailed in 567 IAC 22.1(2)“w” to restrict potential emissions from indoor venting equipment.



Should I consider a permit or exemption?

The primary benefit of obtaining an air construction permit or using the “small unit exemption” is your potential emissions calculation can take credit for

- reductions achieved by the use of any control devices installed on the equipment and
- other process limitations that are included as a condition or limitation in a federally enforceable permit or “small unit” justification document.

Also, the use of a permit or small unit exemption allows a facility to minimize the potential impact of air emissions from your facility on the environment.

When considering the “small unit exemption” to restrict potential emissions, it may be necessary to maintain additional records to demonstrate exemption eligibility. To be eligible for the “small unit exemption,” the facility is required to develop and retain a document that justifies that

the equipment is below the small unit thresholds as specified in 567 IAC 22.1(2)“w.” The facility is responsible for updating and maintaining the equipment justification document onsite. The document must be available for inspection upon request. This exemption may be used for existing, new or modified indoor venting equipment with some eligibility limitations.

Obtaining an air construction permit to restrict potential to emit may allow for less recordkeeping since “small unit exemption” eligibility thresholds are not applicable. The air construction permit will prescribe any records or monitoring necessary for the equipment and the frequency in which the records are maintained. An air construction permit is good for the life of the equipment and does not require the facility to modify the permit unless the equipment is altered or modified. Please be aware an application fee is necessary to apply for an air construction permit. For more information on the air quality construction permit application process and the “small unit exemption” go to www.iowacleanair.gov

For more information or additional assistance related to indoor venting equipment and potential to emit, please contact the air construction permit assistance line at 1-877-AIR-IOWA.

ⁱ The indoor equipment vents air containments through a stack, vent or building opening; the stack, vent or building opening is intended to direct emissions from the indoor equipment to the atmosphere. In this case, the indoor equipment is required to obtain an air construction permit or qualify for a construction permit exemption as specified in 567 IAC 22.1(2).