Permitting

Obtaining the required air permits to start and/or maintain operations, can be one of the biggest challenges an enterprise faces. INTERA brings the experience and tools needed to navigate the Clean Air Act (CAA), help define an optimal compliance strategy, perform calculations, and prepare the required documentation. Because our experience spans a variety of industries, we offer a diverse perspective in developing permitting strategies that provide flexibility without compromising responsible environmental stewardship. We prepare permit applications for both initial and amended projects, including those permitted under standard and general permits, permits by rule (PBR), case-by-case New Source Review (NSR) permits, and federal Title V permits. Our experience with regulators at the local, state, and federal levels, in a number of jurisdictions, enables us to move applications through the pre-application and review processes and arrive at agreeable permit terms.

INTERA's key air permitting services include:

- Case-by-case NSR Permits
- Title V Operating Permits
- PBR
- Standard Permits
- Nonattainment New Source Review (NNSR)
- Prevention of Significant Deterioration (PSD)

Air Permitting for a Batch Chemical Manufacturing Facility, Texas, USA

Challenge: To amend and renew a New Source Review (NSR) air permit

Solution: Located in the Dallas-Fort Worth (DFW) ozone nonattainment area, this facility handles a multitude of organic and inorganic chemicals that require speciation and evaluation for health effects per Texas Commission on Environmental Quality (TCEQ) rules. To amend and renew the air permit, INTERA collected information through a facility visit and via a review of air permits and associated compliance documents. Emissions were calculated for each stationary source, and then screened using TCEQ's Modeling and Effects Review Applicability analysis to determine which chemicals screened out as de minimis emitters and which required further modeling. Emissions modeling was conducted using the Industrial Source Complex (ISC) model to generate a Unit Impact Multiplier (UIM). Each hourly emission rate was multiplied by the UIM to determine a maximum offsite impact, which was then compared to TCEQ's Effect Screening Levels (ESLs) and the National Ambient Air Quality Standards (NAAQS) to determine the impacts to off-property human health and vegetation. Ultimately, the modeling demonstrated that all emissions were not harmful to offsite receptors. INTERA interacted with the site staff and the TCEQ regularly during the review of the application, including answering clarifying questions for the agency, refining calculations and estimations in conjunction with the appropriate stakeholders, and in negotiations of final permit content and conditions.

Results: A successfully amended and renewed NSR permit.