

TITLE V PETITION TO OBJECT RULE REVISIONS PERMIT APPLICATION IMPACTS



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BEN HOLDEN, PE
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AGENDA



01 WHY IT REALY MATTERS?

02 WHAT ARE THE IMPACTS IN AR?

03 WHAT CAN YOU DO?

01

WHY IT REALY MATTERS?

45 DAYS

WHAT'S THE BIG DEAL?



TIME = \$\$\$





PERMIT TIMING

Preparing Application

Admin
Review

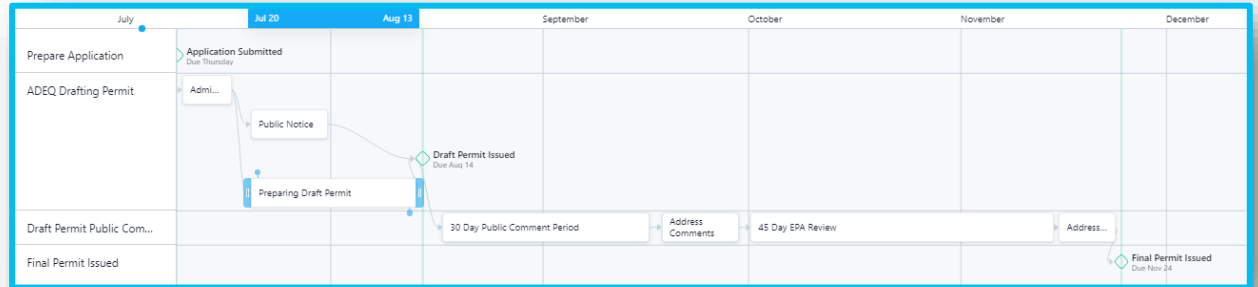
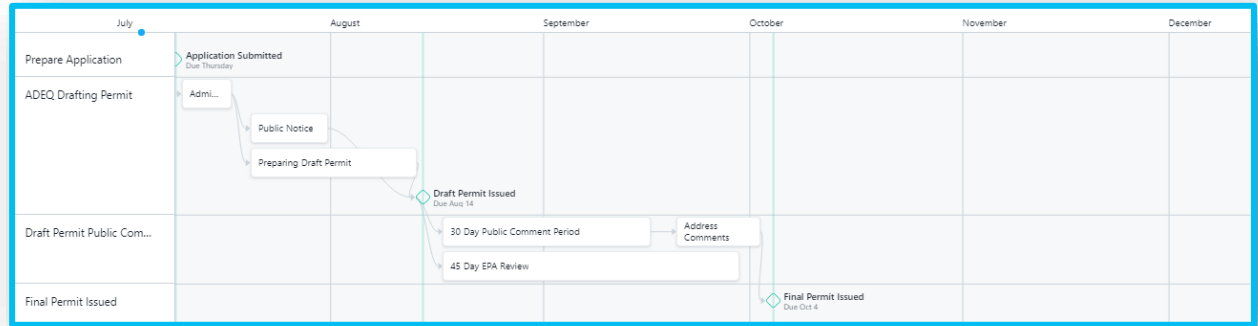
Application Review

Public
Comment
Period

Final Permit



45 DAYS?



02

WHAT ARE THE IMPACTS IN AR?

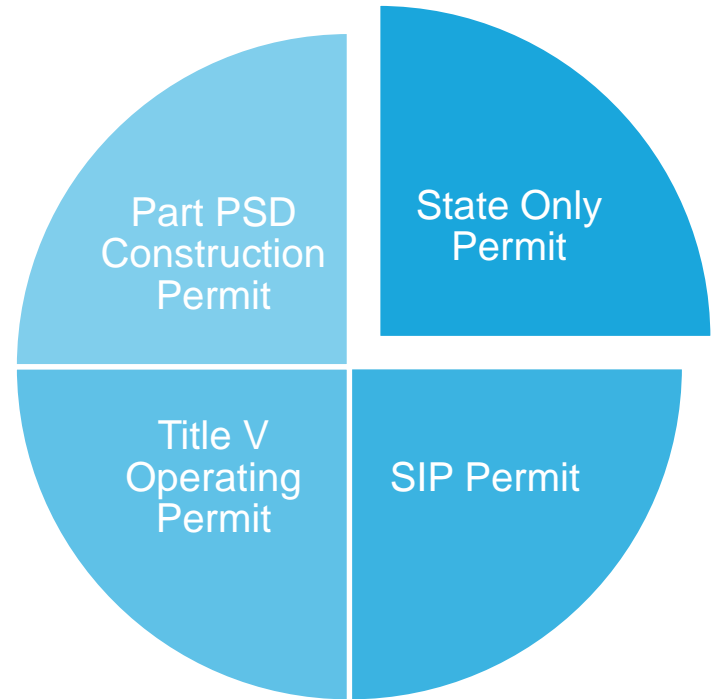


ONE PERMIT STATE

❖ **Regulation 18 – State Only**

❖ **Regulation 19 – SIP/PSD**

❖ **Regulation 26 – Title V**





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Significant comments in this context include, but are not limited to, comments that concern whether the Title V permit includes terms and conditions addressing federal applicable requirements and requirements under Part 70, including adequate monitoring and related recordkeeping and reporting requirements...

AR PERMITTING OPTIONS

Same Day

- Administrative Amendment

7 Days

- Changes Resulting in no Emission Increases
[Reg. 18.313]
[Reg. 19.415]
[Reg. 26.802]

10 Days

- Interim Construction Authority
[Reg. 8.216]

15 Days

- Minor Modification

30 days

- Temporary Authorization
[Reg.18.314(B)]
[Reg.19.416(B)]
[Reg.26.1013(B)]

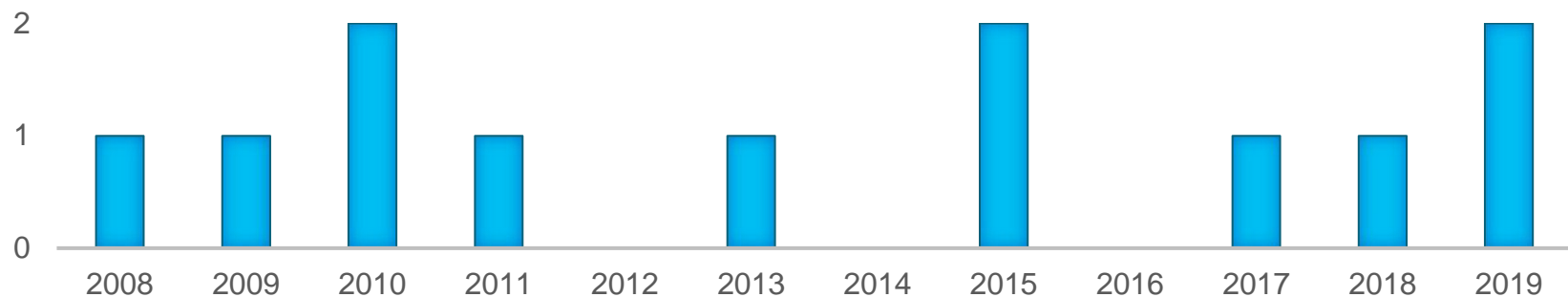
3 – 12 Months

- Significant Modification
- PSD Construction



PETITION TO OBJECT

IT'S RARE FOR AR PERMITS



03

WHAT CAN YOU DO?



**STRONG
APPLICAITON**

**PREDRAFT
PERMIT**

**RESPONSE
TO
COMMENTS**



STRONG APPLICATION

Address any potential issues or concerns, don't wait for public comments.

Provide information for a strong permit docket.

Communicate project timeline early and often with ADEQ.



PREDRAFT PERMIT

Request strong monitoring and related recordkeeping and reporting requirements.

Review the Statement of Basis closely.

Ensure that Title V provisions (Reg 26) are accurately cited.



RESPONSE TO COMMENTS

NGO's often bring up valid concerns.

Provided supporting information to assist ADEQ's response to comments.

Keep on top of public notices.

THANKS!



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