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IOWA DEPARTMENT OF NATURAL RESOURCES ENVIRONMENTAL PROTECTION DIVISION

DRAFT POLICY/PROCEDURE STATEMENT

TOPIC: Air Quality Analyses of Non-PSD Criteria Pollutants in PSD Applications

Policy Procedure Number:

Replaces Number: N/A

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Effective Date:

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Reviewer: Catharine Fitzsimmons

Approval: Bureau Chief: Peter R. Hamlin  **Date:** September 16, 1998

Division Administrator: Allan Stokes **Date:**

Applicable Code of Iowa or Iowa Administrative Code Rule:

IAC 22.3(1)(b)

Attachments: None

BACKGROUND

A Prevention of Significant Deterioration (PSD) review includes an air quality impact assessment for those pollutants with a potential to emit that is greater than the applicable **significant** emission rate. The criteria pollutants regulated under the Clean Air Act that have significant emission rates are listed in 40 CFR 51.166. The significant emission rates for these pollutants are listed in the table on the next page. Since the applicability of a PSD review is determined on a pollutant-by-pollutant basis, it is possible that a number of criteria pollutants emitted from the proposed or modified source may not be evaluated in the air quality impact assessment. Under 40 CFR 51.166, these pollutants would not have to be evaluated in the air quality impact assessment since their potential to emit was calculated to be less than the significant emission rate that would have triggered a PSD review for that pollutant.

Although a criteria pollutant may not be emitted at a level that would trigger a PSD review, it is possible that the emissions of this pollutant could be high enough to threaten the applicable National Ambient Air Quality Standards (NAAQS). This possible threat should be evaluated. The statutory authority for requesting air quality evaluation of a pollutant that has not triggered a PSD review is given in IAC 22.3(1)(b). This paragraph of the Iowa Administrative Code states that a construction permit shall not be issued if the expected emissions from a proposed source or modification, in conjunction with all other emissions, will prevent the attainment or maintenance of the ambient air quality standards. Therefore, the IDNR may request that pollutants which would not trigger a PSD review be included in the air quality impact assessment for the proposed source or modification. This policy statement formally provides for this request.

DETAILS

In a PSD project, pollutants with a potential to emit that are calculated to be less than the applicable PSD significant emission levels will be subject to the IDNR's "Dispersion Modeling Guidelines" for non-PSD sources in an attainment area. The applicant shall demonstrate that the proposed source or modification will not threaten the applicable NAAQS for these pollutants. The demonstration shall be in accordance with the latest version of the IDNR's "Dispersion Modeling Guidelines" for non-PSD sources in attainment areas and all other applicable state and federal rules, policies, and guidelines. A PSD permit application will not be approved until a demonstration, acceptable to the IDNR, has been made by the applicant that the applicable NAAQS will not be threatened by the proposed source(s) or modification.

Modeling of pollutants that have triggered a PSD review will be conducted in accordance with all applicable EPA rules, policies, and guidelines.

PSD Significant Emission Rates	
Pollutants	Tons Per Year
PM ₁₀	15
SO ₂	40
NO _x	40
Ozone (VOC)	40
CO	100
Lead (Pb)	0.6
PM	25