

Frequently Asked Questions for New/Revision/Renewal/ Administrative Renewal Applications



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Disclaimer: The NDEP Air Program reserves the right to modify this guidance at any time. This document supersedes any previous documents that relate to permits issued by the NDEP Air Program.

General Questions about Applications

- 1) I have many units with the same design parameters that are listed or grouped in the permit. Can these be considered one unit when determining the number of emission units?
 - *No – each unit is considered one emission unit.*
- 2) I have multiple units ducted to a common control. Can I count this as one emission unit?
 - *No – each individual unit ducted to the control is considered an emission unit and should be counted towards the total count of emission units.*
- 3) The Storage Silo Application Forms include both loading and unloading. Can I count this as one emission unit?
 - *No – because both the loading and unloading are considered separate emission points.*
- 4) How are alternate operating scenarios counted for application fees and maintenance fees?
 - *For applications, emission units will be counted separately for each alternative operating scenario that they are a part of because each alternate operating scenario requires separate calculations and permit conditions. As far as maintenance fees are concerned, emission units will only be counted once for the purposes of totaling the number of emission units, even if there are alternate operating scenarios that utilize that same emission unit multiple times. For the potential to emit portion of your annual maintenance fee calculation, the largest potential to emit value for each regulated pollutant, regardless of which operating scenario those emissions are derived from, will be used when determining the potential to emit for maintenance fee determination.*

Questions on Administrative Renewals

- 1) When am I eligible to submit an Administrative Renewal?

The facility may submit an Administrative Renewal if all of the following items have been met:

 - *The facility has one or more Class I or II operating permits;*
 - *The facility has been issued a new or renewed operating permit that was issued on or after January 1, 2018;*
 - *The renewal does not require changes to the existing operating permit; and*
 - *At the time of the operating permit renewal request, an environmental evaluation and an air pollutant dispersion model that were submitted within five years of the request are deemed adequate.*
- 2) What if I have submitted a Renewal application to the NDEP Air Program that has not been issued yet?
 - *Contact the NDEP Air Program, Permitting Branch, to determine if you are eligible for an Administrative Renewal.*
- 3) My permit has been renewed after January 1, 2018, but I have added Insignificant Activities as defined under NAC 445B.228(2) or NAC 445B.288(4). Can I still submit an Administrative Renewal?

- *If the NDEP Air Program has issued an action that included a modeling demonstration with the Insignificant Activities after January 1, 2018, then yes, you are eligible to submit an Administrative Renewal.*
- *If the NDEP Air Program has not issued an action that included a modeling demonstration with the Insignificant Activities after January 1, 2018 then no, you are not eligible to submit an Administrative Renewal. If the Insignificant Activities have not been added to the most recent model that the NDEP Air Program has on file, the facility must submit an action where a modeling demonstration will be completed by the NDEP Air Program (eg. Revision, OPTC Rollover, etc.).*

4) What if I have a Revision application in to the NDEP Air Program that has not yet been issued at the time my renewal is due, will I be eligible to submit an Administrative Renewal?

- *If the facility is eligible for an Administrative Renewal as described above and the Revision is past the regulatory timeframe, then yes.*
- *If the facility is eligible for an Administrative Renewal as described above but the submitted Revision is not past the regulatory timeframe, then no.*

5) How many revisions can I submit that utilize SILs between renewal applications in order to still be eligible for an Administrative Renewal?

- *Review the Policy for [Significant Impact Levels \(SILs\) Analysis for Air Quality Impact Assessment](#) and verify with the NDEP Air Program, Modeling Branch.*

6) Class 1 Notification of Authorized Changes have been approved for my facility since the last renewal. Can I submit an Administrative Renewal?

- *Yes.*

7) I want to decrease my emission limits, decrease hours of operation, decrease throughput, or remove a system or emission unit. Can I submit an Administrative Renewal?

- *Yes. The facility must list these changes in the application.*

8) I want to increase my emission limits, increase hours or operation, increase throughput, or add a system or emission unit that hasn't been approved through a Class I Notification of Authorized Change. Can I submit an Administrative Renewal?

- *No. A Revision application is required.*

9) I would like to change the monitoring or testing language currently in my permit. Can I submit an Administrative Renewal?

- *No. A Revision application may be required.*

10) The location of my emission unit(s) have changed since my last renewal. Can I still submit an Administrative Renewal?

- *If the facility has received an approval of a Change of Location for these units, yes.*
- *If the facility has not received an approval of a Change of Location for these units, no.*

11) My facility is a major stationary source and I would like to request less frequent meteorological or ambient air monitoring requirements, can I submit an Administrative Renewal?

- *Contact the NDEP Air Program, Modeling Branch, to determine if you are eligible for an Administrative Renewal.*