Guide to Air Pollution and Asbestos Abatement Permits and Licenses

Air pollution permits and/or licenses are required to install and operate different types of equipment that causes or controls air pollution. In addition, an asbestos abatement permit or notification is required to conduct any type of asbestos removal activity in the City. These permits and licenses are issued by Air Management Services (AMS), a unit in the Department of Public Health. This document describes the permitting process and the different types or permits and licenses. Some air pollution permits can be complicated, so please contact AMS if you have any questions. All submissions, correspondence, and questions regarding air pollution permits and licenses should be directed to:

Source Registration
Air Management Services
321 University Avenue
Philadelphia, PA 19104-4543.
Phone 215-685-7572

For more information on air pollution permit and license applications, click here or call Air Management Services at 215-685-7572.

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- Description of Permits to Install Equipment
- Description of Operating Permits and Air Pollution Licenses
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Permit Process

The air pollution permit process for a piece of equipment has three phases:

- Obtaining a permit to install the equipment.
- The conformance check.
- Obtaining an operating permit or air pollution license to operate the equipment.

The phases are described below:

Permit to Install Equipment

Permits to install equipment (also called pre-construction permits) allow companies to install and begin operation of equipment that emits or controls air pollution. These permits must be issued by AMS **before** the equipment is installed. As a general rule, a permit to install equipment may be needed if the equipment burns fuel, uses paint or solvent, emits particles outdoors, or is used to control emissions from these sources. Some common examples are:

- Combustion Units (such as boilers, hot water heaters, warm air furnaces, and some chillers) rated more than 250,000 BTU/hr.
- Internal Combustion Engines (such as emergency generators, fire pumps, peak-shaving engines, and some chillers) rated 100 Horsepower or more.
- Paint Spray Booths.
- Incinerators.
- Equipment that emits particles or dust outdoors like crushers, grinders, sandblasters, or woodworking.
- Equipment that uses solvents like degreasers, dip tanks, and some dry cleaners.
- Loading or storing volatile liquids like gasoline.
- Equipment used to control emissions like cyclones, baghouses (fabric filters), or afterburners.

An application for a permit to install equipment is submitted to AMS along with the applicable application fee. AMS will review the application and determine which air pollution regulations are applicable to the proposed equipment. The final permit to install that is issued to the business will list the air pollution requirements that the equipment must meet. There are different types of permits to install equipment, depending on the type of equipment and the potential emissions of air pollutants. Once AMS has issued a permit to install, the equipment may be installed and operated until AMS conducts a conformance check. Please note that the installation and operation must follow the requirements of the permit to install.

Conformance Check

After the equipment is installed, AMS will send an engineer to the facility to conduct a conformance check. This is an inspection of the equipment to make sure that it meets the requirements of the permit to install. AMS will make sure that the equipment installed is the same as in the permit (including capacity and fuel types) and that the business is meeting any requirements listed in the permit, such as work practice standards and recordkeeping. Once the equipment has been determined to be in compliance with the permit to install, AMS will sign the permit into conformance and have the business submit an operating permit or air pollution license application.

Operating Permit/Air Pollution License

After the permit to install the equipment is signed into conformance by AMS, the equipment must become part of an operating permit or it must get an air pollution license. An operating permit is a document issued to an entire facility that lists all of the equipment and air pollution requirements. An operating permit must be renewed every five years. An air pollution license is issued to a specific piece of equipment and must be renewed annually, except for indefinite licenses, which are issued to certain small combustion units. If a facility has an operating permit, it does not also need air pollution licenses for its equipment.

The type of operating permit or air pollution license required depends on the potential emissions of the facility (what the facility is physically and legally capable of emitting, not what it typically does emit).

Description of Permits to Install Equipment

These permits allow companies to install and begin operation of equipment that emits or controls air pollution. These permits must be issued by AMS **before** the equipment is installed. There are different types of permits to install equipment, depending on the type of equipment and the potential emissions of air pollutants. You may contact AMS at 215-685-7572 for assistance in determining the appropriate permit to install for your facility. The following are the different types of applications:

- Plan Approval Application
- General Plan Approval/Operating Permit Application for Small Gas and No. 2 Oil Fired Combustion Units
- General Plan Approval/Operating Permit Application for a Volatile Organic Liquid Storage Tank
- General Plan Approval/Operating Permit Application for Portable Nonmetallic Mineral Processing Plants
- Process Equipment Installation Permit Application for Minor Emission Source
- Air Cleaning Device Installation Permit Application for Minor Emission Source
- Installation Permit Application for Internal Combustion Engines
- Installation Permit Application for Boilers, Warm Air Furnaces and Hot Water Heaters
- Installation Permit Application for Mechanical Ventilation Systems for Enclosed Parking Garages
- Request for Determination of Requirement for Installation Permit/Operating License

Plan Approval Application

This is an application to install and begin to operate equipment or air cleaning devices that do not meet one of the Plan Approval Exemptions. Multiple pieces of equipment may be included in this application. The fee for this permit starts at $1000, but may be more if any of the equipment is applicable to certain Federal regulations. Details of the additional fees can be found under Plan Approval Fees in the Fee Schedule. A Compliance Review Form must be submitted with each application.

General Plan Approval/Operating Permit Application for Small Gas and No. 2 Oil Fired Combustion Units

This is an application to install and begin to operate a combustion unit (such as a boiler) rated less than 50 MMBTU/hr but greater than or equal to 10 MMBTU/hr that can only burn natural gas or No. 2 oil. The fee for this permit is $375. A Compliance Review Form must be submitted with each application.

General Plan Approval/Operating Permit Application for a Volatile Organic Liquid Storage Tank

This is an application to install and begin to operate a stationary storage tank with a rated capacity of 2000 gallons or greater which stores volatile organic liquids with a storage vapor pressure of 11.1 psia or less. The fee for this permit is $375. A Compliance Review Form must be submitted with each application.

General Plan Approval/Operating Permit Application for Portable Nonmetallic Mineral Processing Plants

This is an application to install and begin to operate a portable nonmetallic mineral processing plant, such as a portable crusher used at a construction site. Any diesel-fired internal combustion engines that are part of the process cannot be included in this application; a separate Installation Permit for Internal

Combustion Engines or Plan Approval must be submitted for these engines. The fee for this permit is $1000 for the initial location and $375 if the crusher moves to a new location. A Compliance Review Form must be submitted with each application.

Process Equipment Installation Permit Application for Minor Emission Source

This is an application for a permit to install and begin to operate minor emission source equipment, such as a paint spray booth, degreaser, or Stage II vapor recovery unit for a gasoline pump. This application can be used for any equipment that meets one of the Plan Approval Exemptions. The fee for this permit is $430.

Air Cleaning Device Installation Permit Application for Minor Emission Source

This is an application for a permit to install and begin to operate an air cleaning device for a minor emission source, such as a small baghouse (fabric filter), cyclone, or afterburner. This application can be used for any equipment that meets one of the Plan Approval Exemptions. The fee for this permit is $430.

Installation Permit Application for Internal Combustion Engines

This is an application for a permit to install and begin to operate an internal combustion engine, such as an emergency generator, fire pump, or peak-shaving generator. Internal combustion engines rated less than 100 horsepower and portable internal combustion engines used for 14 days or less at special events are exempt and do not need an air pollution permit. Some large internal combustions engines that have Nitrogen Oxide (NOx) emissions of 100 lbs/hr, 1000 lbs/day, 2.75 tons per ozone season or 6.6 tons per year are not eligible for this permit and must use a Plan Approval Application . The fee for this permit is $430.

Installation Permit Application for Boilers, Warm Air Furnaces and Hot Water Heaters

This is an application to install and begin to operate a boiler, warm air furnace, or hot water heater rated less than 10 MMBTU/hr that only burn natural gas, No. 2 fuel oil, or lighter fuel and units rated at 2.5 MMBTU/hr or less that are capable of burning No. 3 fuel oil or heavier. Units rated at 250,000 BTU/hr or less are exempt and do not need an air pollution permit. The fee for this permit is $280.

Installation Permit Application for Mechanical Ventilation Systems for Enclosed Parking Garages

This is an application to install and begin to operate a mechanical ventilation system for an enclosed parking garage. The fee for this permit is $430.

Request for Determination of Requirement for Installation Permit/Operating License

This form can be submitted to AMS if you are unsure if your proposed equipment needs a permit to install or what type of permit is needed. There is currently no fee for this form.

Description of Operating Permits and Air Pollution Licenses

These permits and licenses allow companies to operate equipment that emits or controls air pollution. They are required after a company has been issued a permit to install equipment by AMS and AMS has inspected the equipment and determined that it meets the conditions of its permit to install. The type of permit or license required depends on the potential emissions of the facility (what the facility is physically and legally capable of emitting, not what it typically does emit). You may contact AMS at 215-685-7572 for assistance in determining the appropriate permit or license for your facility. The following are the different types of applications for operating permits and air pollution licenses:

- Title V Operating Permit Application
- Synthetic Minor Operating Permit Application
- Natural Minor Operating Permit Application
- License Application for Minor Emission Source
- Request for Exemption from Operating Permit Requirements

Title V Operating Permit Application

Facilities with potential emissions that exceed one of the following must submit a Title V Operating Permit application:

- 25 tons of Volatile Organic Compounds (VOC) or Nitrogen Oxides (NOx) per year
- 100 tons of Carbon Monoxide (CO), Sulfur Oxides (SOx), or Particulate Matter less than 10 microns (PM10) per year
- 10 tons of an individual Hazardous Air Pollutant (HAP) per year
- 25 tons of all HAPs combined per year

The operating permit covers all air emissions equipment and control devices at the facility. The fee for this operating permit is $750. A Compliance Review Form must be submitted with each application. For further clarification please read the Permit Instructions Guide.

Addendum 1- Method of Compliance (Mandatory)

- Instructions
- Application

Addendum 2-Alternative Operating Scenarios

- Instructions
- Application

Addendum 3-CAM Applicability Worksheet for Sources

- Application

Synthetic Minor Operating Permit Application

Facilities with potential emissions that exceed one or more of the Title V Operating Permit levels listed above but with actual emissions below all of those levels may submit a Synthetic Minor Operating Permit application. The facility must accept emission limits that keep them below these levels. The operating permit covers all air emissions equipment and control devices at the facility. The fee for this

operating permit is $375. A Compliance Review Form must be submitted with each application. For further clarification please read the Permit Instructions Guide.

Natural Minor Operating Permit Application

Facilities with potential emissions below all of the Title V Operating Permit levels listed above but above one or more of the following levels must submit a Natural Minor Operating Permit application:

- 8 tons of Volatile Organic Compound (VOC) or Sulfur Oxides (SOx) per year
- 20 tons of Carbon Monoxide (CO) per year
- 10 tons of Nitrogen Oxides (NOx) per year
- 3 tons of Particulate Matter less than 10 microns (PM10) per year
- 1 ton of a single Hazardous Air Pollutants (HAP) per year
- 2.5 tons of combined HAPs per year

The operating permit covers all air emissions equipment and control devices at the facility. The fee for this operating permit is $375. A Compliance Review Form must be submitted with each application. For further clarification please read the Permit Instructions Guide.

License Application for Minor Emission Source

An Air Pollution License is required for the operation of air pollution equipment or control devices at a facility that is not covered by an operating permit. Each piece of equipment is issued a separate air pollution license. The License is renewed annually and expires on October 31 of each year, except for the indefinite license mentioned below.

An indefinite air pollution license is issued to a boiler or furnace with rated capacity of less than 2,000,000 BTU/hr, or less than 5,000,000 BTU/hr using only No. 2 grade or lighter commercial fuel oil, or less than 10,000,000 BTU/hr using only gas. Indefinite licenses are issued once and do not need to be renewed.

Equipment that is exempt from permit to install requirements, such as a combustion unit rated 250,000 BTU/hr or less or an internal combustion engine rated less than 100 HP, is also exempt from air pollution license requirements.

Request for Exemption from Operating Permit Requirements

If your facility qualifies for a Natural Minor operating permit but has actual emissions below the Natural Minor levels, you may request to be exempt from operating permit requirements. If approved, your facility will be required to keep actual emissions below the Natural Minor levels and must get air pollution licenses for any air pollution equipment or control devices. An exemption will not be approved if your facility is applicable to certain Federal regulations. There is no fee for this form.

Other Resources Regarding Permits to Install and Operate Equipment

Compliance Review Form

This is a form listing the compliance history of any facilities owned by a company in the State of Pennsylvania. It must be submitted with any plan approval, general plan approval/operating permit, or operating permit application, but is not required for an installation permit or air pollution license application. It does not have an additional fee.

Fee Schedule

This document lists the fees for the different permits and licenses.

Change of Ownership Form for Plan Approval/Operating Permit

This form is submitted when your facility needs to change the ownership listed on a plan approval or operating permit. A change of ownership is not needed for a plan approval that has been incorporated into an operating permit; only a change of ownership for the operating permit is needed. The fee for this form is $300 for a plan approval, $375 for a Synthetic Minor or Natural Minor operating permit, and $750 for a Title V operating permit. A Compliance Review Form must be submitted with the form.

Asbestos Abatement Permits

An asbestos permit is required to perform abatement of greater than or equal to 40 linear or 80 square feet of asbestos in Philadelphia.* To obtain this permit you must be a licensed Philadelphia abatement contractor.

For more information on asbestos requirements in Philadelphia, please visit: http://www.phila.gov/health/AirManagement/AsbestosControl.html or call AMS at 215-685-7576.

An Asbestos Permit Application must be submitted to AMS ten days prior to the scheduled start of abatement. In addition to a $25 filing fee, the permit fee is 2½% of the first $50,000 of the cost of abatement and 1¼% of the amount exceeding $50,000.

The Minimum Permit Fee is $125.

*Abatement projects of less than 40 linear or 80 square feet of asbestos, while not requiring a permit, still requires submitting the Asbestos Abatement and Demolition/Renovation Notification Form to AMS prior to the start of the project.

An Asbestos Inspection Report (AIR) is required by the Department of Philadelphia Licenses and Inspections (L&I) when applying for a permit for demolition or a renovation that will cost more than $50,000. This does not apply for demolition of a single residence with three dwelling units or less. The AIR can only be filled out by a certified Philadelphia Asbestos Investigator. If you need an AIR, you must contact a Certified Investigator and they can fill one out for you