

OPERATING PERMITS

- ❖ What is an “administratively complete” operating permit application?
 - ❖ A complete application is one that has been signed on the first and last page, includes a notarized Compliance Review Form (available at www.phila.gov/health/units/ams/), and includes a check for the application fee in the correct amount (currently \$375 for Natural and Synthetic Minors, \$750 for Title V’s). Also, each section must be sufficiently addressed so that Air Management Services can begin to work on a draft of the permit. If incomplete applications are received, they will not be processed.
- ❖ How can I tell if I need an operating permit (or what kind of operating permit do I need)?
 - ❖ If your facility has actual emissions above the following synthetic minor limits, a Title V operating permit is needed
 - ❖ 10 tons per year of a specific hazardous air pollutant or 25 tons per year of a combination of hazardous air pollutants.
 - ❖ 25 tons of volatile organic compounds (VOC) per year
 - ❖ 25 tons of nitrogen oxides (NOx) per year
 - ❖ 100 tons of any other air contaminant per year
 - ❖ If your facility has the potential to emit above the synthetic minor limits listed above, but you are willing to accept permit conditions that limit your actual emissions to below these limits, a Synthetic Minor operating permit is needed
 - ❖ If your facility does not have the potential to emit (PTE) above the synthetic minor limits, but does have a PTE above the following limits, a Natural Minor operating permit is needed:
 - ❖ 8 tons of volatile organic compounds (VOC) per year
 - ❖ 10 tons of nitrogen oxides (NOx) per year
 - ❖ 20 tons of carbon monoxide (CO) per year
 - ❖ 8 tons of sulfur oxides (SOx) per year
 - ❖ 3 tons of particulate matter less than 10 microns in diameter (PM10) per year
- ❖ What are “potential” and “actual” emissions?
 - ❖ Potential emissions are calculated assuming that all equipment is active 24 hours per day, 365 days per year and running at 100 percent of emissions capacity.
 - ❖ Actual emissions are calculated using actual hours of operation and take into consideration any other operating constraints imposed by a permit.
- ❖ If my facility’s potential emissions are above the Natural Minor operating permit limits, but my actual emissions are below the limits, must I obtain a Natural Minor Operating Permit?
 - ❖ No, you may accept emission limitations below the Natural Minor levels; however, the potential to emit levels must be below the Synthetic Minor levels, and the facility cannot be applicable to a New Source Performance Standard (NSPS) or Maximum Achievable Control Technology (MACT) regulation. Air Management may decide not to grant an exemption if an operating permit is necessary to properly monitor compliance for the facility. If an exemption is granted, the facility will need to obtain air pollution licenses for each piece of equipment at the facility.

FEES

- ❖ How much does a license/plan approval/installation permit cost?
 - ❖ A fee schedule along with other forms can be found on the Air Management Services website: http://www.phila.gov/health/units/ams/AMS_Application_and_Reporting_/AMS_Forms_Index2/ams_forms_index2.html
 - ❖ Plan approval fees vary depending upon the regulations that apply Contact Source Registration at (215) 685-7572 to determine the correct fee.
- ❖ Who should checks be made out to? Where should they be sent?

- ❖ All checks should be made out to “The City of Philadelphia”. All Air Management permitting forms and checks should be sent to: Source Registration, Air Management Services, 321 University Avenue, Philadelphia, PA 19104

COMPLIANCE REVIEW FORMS

- ❖ Which boxes do I check at the top of the Air Pollution Control Act Compliance Review Form?
 - ❖ Check “New Filing” if the form is being submitted for the first time with an application or change of ownership form.
 - ❖ Check “Amended Filing” if the form is being submitted to make corrections for a Compliance Review Form that was previously submitted.
 - ❖ Check “New Operating Permit” if the form is being submitted with the first operating permit application.
 - ❖ Check “New Plan Approval” if the form is being submitted with the first plan approval application.
 - ❖ Check “Renew Plan Approval” if the form is being submitted to renew a plan approval.
 - ❖ Check “Operating Permit” if the form is being submitted with a renewal or a new operating permit application.
 - ❖ Check “Change Owner” if the form is being submitted with a “Change of Ownership” form.

CONSTRUCTION PERMITS (Plan Approvals and Installation Permits)

- ❖ What is the difference between the two construction permit types?
 - ❖ Plan approvals are required for all installations and modifications that require permits under the Pennsylvania Department of Environmental Protection (PaDEP) regulations. Plan approvals generally cover larger sources and require a 30-day public comment period before issuance. Multiple pieces of equipment and processes may be included in a single plan approval. The application fee for plan approvals will vary depending on which regulations apply to the sources being installed or modified.
 - ❖ Installation permits are issued under the City of Philadelphia regulations to minor sources that are exempt from PaDEP plan approval requirements. Combustion units (boilers, heaters, etc.) burning natural gas or No. 2 oil with a rated capacity of less than 10 million BTU/hr will qualify for an installation permit. Normally you can only have one piece of equipment per installation permit. Contact Source Registration at (215) 685-7572 for further details including fee information.
- ❖ What equipment requires a construction permit?
 - ❖ Any source that has the potential to emit any air contaminant needs a construction permit and either an operating license or operating permit except the following:
 - ❖ Any fuel burning equipment rated at 250,000 BTU/hr or below
 - ❖ Emergency generators rated less than 100 Hp (73 kW)
 - ❖ Household appliances
 - ❖ Any building or structure used exclusively for dwelling purposes containing fewer than three dwelling units
- ❖ How long does it take for an installation permit for a minor source to be approved?
 - ❖ Installation permit applications are processed in the order received. If a complete installation permit application is received with the appropriate application fee, it will be generally be processed within 30 to 60 days.
 - ❖ Because plan approvals require a 30-day public comment period, processing of complete plan approval applications will take a minimum of 90 days. Depending on the complexity of applicable regulations and/or public comments, processing time may be much longer.
- ❖ I want to move a piece of equipment to another place within the same facility; do I need to obtain an installation permit for this?

- ❖ In most instances, yes. Altering equipment in any way without an installation permit is a violation of City of Philadelphia regulations.
- ❖ What do I do if my installation permit or plan approval is about to expire?
 - ❖ Installation permits expire one year after the date of permit issuance. If construction of the source has not started by the expiration date, a new installation permit must be obtained.
 - ❖ Plan approvals expire 18 months after the date of issuance. A new plan approval or an extension must be obtained if construction is not completed within that time. Extensions are also necessary if an operating permit has not yet been issued to the facility and shakedown operation of the unit will occur beyond the expiration date of the plan approval.
 - ❖ Inform Air Management as soon as construction authorized under a construction permit is complete.
 - ❖ An Air Management Services engineer will visit the facility to verify that the constructed unit(s) are in conformance with the permit application and conditions. If the installation is found in conformance, the facility will then need to obtain either an operating permit or operating license. AMS will send a letter to the owner/operator with the necessary application forms and instructions.

LICENSES

- ❖ I applied for a license a long time ago, but I did not receive a license. Where is my license?
 - ❖ Air Management Services processes the initial license application and then forwards it to the City of Philadelphia Department of License and Inspection (L&I). L&I issues the actual license and is responsible for handling the annual renewal of the licenses. If you have not received your license, please call Source Registration at (215) 685-7572 to follow up.
- ❖ I have an air pollution license but it expired or I never received a renewal application for my license.
 - ❖ The City of Philadelphia Department of License and Inspection is responsible for the renewal of air pollution licenses. They can be contacted at (215) 686-2490. Please have your license code ready when you call.

CHANGE OF OWNERSHIP

- ❖ I have purchased a facility that has existing permits or licenses, how can I update them for the change of ownership?
 - ❖ If the facility has an operating permit, fill out and submit a Change of Ownership form to AMS with the appropriate fee. The operating permit will then be administratively amended to incorporate the change.
 - ❖ If the facility has licenses, you must obtain new ones in the name of the new company. This requires that new license applications be filled out and submitted to AMS with the appropriate fee.