



## Considerations in Air Permitting

As difficult as navigating the complexities of air regulations may be, at the end of the day many of us still need a permit for our sources. So, how do you make sense of it all? And what are good strategies for getting a permit you can live with? The following are a few common sense strategies you can use.

1. **Plan ahead.** It is pretty much a universal truth that it takes time to get a good air permit. Title V permits can take as long as a year to obtain. However, planning ahead requires coordination within your facility regarding changes to equipment and processes, future growth goals, and needed maintenance upgrades. The better you communicate ahead of time, the more clear your current and future objectives will be, which is critical in getting a permit you can live with and in a time frame you can handle.
2. **Understand the rules.** In order to get a permit, you need not only to understand the air rules (state and federal) that apply to your facility, you also need to have a grasp on the future repercussions of proposed rules. Moreover, you need to understand the rules of the “game.” What are the limitations of your existing permit? EPA will not relax an existing permit—so, if your problem is that an existing permit is too confining, you may need a new permit altogether or you may need to alter your process. It is also important to understand what can be done before a permit to install (PTI) or construct is received. Some states allow ordering of equipment, but not installation, prior to PTI issuance. Other states allow the equipment to be on-site but not in its final position or otherwise connected in to electric or other utilities. Check with your state before making plans to order equipment.
3. **Submit a complete application.** The more information you can provide to the EPA to allow them to understand your objectives and how your process works, the better off you are in terms of your final permit. By submitting a complete application with calculations and supporting data, you are also giving EPA an opportunity to check your work and dialogue with you about the basis for your assumptions.
4. **Communicate.** Throughout the permitting process, keep in touch with your permit writer and answer any questions they may have. Request copies of their calculations and permit drafts to review so that you can catch any errors or issues early on, before you are stuck to work through the appeals process. Keep your permit writer informed of your schedule so that they understand when you need your permit. Also, communicate with your staff. Let them know when the permit is coming and what they can and cannot do before the permit is issued. Also, keep the lines of communication open regarding any changes to the proposed modification or installation.
5. **Implement.** Once the permit is issued, study it carefully. Develop a plan to comply with the recordkeeping and reporting provisions of the permit. Set up reminders on a wall calendar, on your computer in Microsoft Outlook or a similar program, or in your preventative maintenance system.
6. **Reevaluate.** Continually keep an eye out for new regulations that may apply to your facility and how they may impact your permit. Talk with the plant operators to determine how compliance with the permit is going. Determine if there are waste minimization or pollution prevention opportunities that may also save you air emissions. Also, always keep an eye out for your renewal deadline.

## SUMMARY

Obtaining an air permit you can live with can be a time-consuming and labor-intensive process, but the payoffs are huge. If you would like assistance in your air permitting process, please contact Emily Rynders or Tony Domanico at (513) 489-2255 or via e-mail at [ear@paynefirm.com](mailto:ear@paynefirm.com) or [aid@paynefirm.com](mailto:aid@paynefirm.com). This and other Environmental Edge topics are available at our website at [www.paynefirm.com](http://www.paynefirm.com).