

## DO I NEED AN AIR PERMIT?

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### I. What is a Permit to Install? (Manufacturers' Guidebook Page 1-8)

- a. Contract between State and facility agreed to before construction
- b. Provides some assurance that the emissions from your facility will not harm the environment or public health.
- c. All applicable regulations will be incorporated into your permit as special conditions.

### II. What Rule Requires a Permit?

R 336.1201 (Rule 201) of the Michigan Air Pollution Control Rules

Access rule at [www.michigan.gov/deqair](http://www.michigan.gov/deqair) (select Laws and Rules)

### III. Air Terminology

- a. Air Contaminants (see Manufacturers' Guidebook page 1-2)
  - i. Criteria Pollutants – PM, PM-10, SO<sub>2</sub>, NO<sub>x</sub>, CO, Pb, Ozone (VOCs)
  - ii. Hazardous Air Pollutants (HAPs) – 187 Compounds
  - iii. Toxic Air Contaminants – state term, harmful to public health or environment, 41 substances excluded
- b. Activities (see page 3-4 to 3-5 of PTI Applicability Guidebook)
  - i. Installation/Construction
  - ii. Relocation
  - iii. Reconstruction
  - iv. Modification
- c. Devices
  - i. Process Device
  - ii. Control Device
  - iii. Stacks
- d. Emission Unit
  - i. Contains one or more process devices, zero or more control devices, and all related stacks.
  - ii. Examples – parts waster; coating line (booth, filter, oven, stack); plating line (tanks, duct work, scrubber, stack)
- e. Flexible Groups
  - i. Grouping of emission units with similar applicable requirements
  - ii. Makes recordkeeping and compliance easier
- f. Stationary Source
  - i. A collection of buildings and structures containing emission units
  - ii. Identified by State Registration Number (SRN) – e.g. Z9999
  - iii. Examples: Auto assembly plant, paper mill, autobody shop, dry cleaner
- g. Potential to Emit
  - i. The maximum capacity of a stationary source to emit an air contaminant under its physical and operational design.
  - ii. See Rule 336.1116(m)



- h. Major and Minor Source
  - i. Major source = PTE Criteria Pollutants greater than 100 tons per year or PTE HAPs greater than 10/25 tons per year
  - ii. Minor source = Facilities whose PTE is less than major, True Minor or Synthetic Minor (if PTE is limited)

#### **IV. When is a Permit Required? - Three step approach**

- a. Define Project
- b. Take Rule 278 Test
- c. Apply Exemptions

#### **V. Step 1: Define the Project**

- a. Identify all affected emissions units
- b. Determine if activity is an installation/construction, reconstruction, relocation, modification
- c. Determine project timeframe

#### **VI. Step 2: Apply Rule 278 Test**

- a. If expected actual emissions from project (activity) are greater than significant levels then excluded from exemptions
- b. Significant levels
  - CO -100 tpy
  - SO<sub>2</sub> – 40 tpy
  - NO<sub>x</sub> – 40 tpy
  - PM<sub>10/2.5</sub> – 15 tpy
  - VOC – tpy

#### **VII. Step 3: Apply Exemptions**

- a. Rules 280-290 (see permit exemption handbook)

#### **VIII. Conducting an Air Permit Survey at Your Facility**

- a. Identify all units that emit an air contaminant at your facility
- b. Each unit should be either permitted or exempt under Rule 280-290

#### **IX. What if I Don't Have a Permit?**

- a. Take action now!
- b. Start the application process.
- c. Contact your inspector to let them know what's going on.
- d. If you find a violation don't hide it, and hope your inspector doesn't either!