

# Air Permitting



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## Who Regulates Air Quality?

- U.S. EPA
- DNRE, Air Quality Division
- Local Government

## How is Air Quality Regulated

- Clean Air Act [www.epa.gov/air/caa](http://www.epa.gov/air/caa)
- Part 55, of the Natural Resource and Environmental Protection Act (NREPA) [www.michigan.gov/dnre](http://www.michigan.gov/dnre) (“Key Environmental Topics” then “Laws and Rules”)
- Michigan Air Pollution Control Rules [www.michigan.gov/air](http://www.michigan.gov/air) (“Laws and Rules”)
- Requirements from laws and rules are identified in an air permit

## Permit to Install (PTI)

- A.K.A New Source Review Permit
- Applicable to any business regardless of size
- Pre-Construction Permit
- Required by R 336.1201 of Michigan Air Pollution Control Rules (Rule 201)

## When is a Permit to Install Required?

- Air permit is required if process or activity emits an air contaminant.
- Unless, process or activity is specifically exempted in rules.

## Boilers

- Applicable exemption = R 336.1282(b)
- Permit required if:
  - Nat gas max heat input capacity > 50 million Btu/hr
  - Fuel Oil max heat input capacity >20 million Btu/hr

## Standby Generators

- Applicable exemption = R 336.1285(g)
- Permit Required if:
  - Generator max heat input > 10 Million Btu/hr
  - Emissions are Significant - CO and NOx emissions > 100 tons/yr and 40 tons/yr, respectively. Based on 500 hours/yr.

## Degreasers/Cold Cleaners

- Applicable exemption = R 336.281(h)
- Exempt if air/vapor interface not more than 10 ft<sup>2</sup>

## Bulb Crushers

- No Exemption
- Air Permit Required

## Painting Operations

- Applicable exemption = R 336.1287(c)
- Air permit required if use > 200 gal coating/month
- Must keep records

#### The Air Permit Application

- Free [www.deq.state.mi.us/aps/#PTI](http://www.deq.state.mi.us/aps/#PTI)
- Basic Source Information
- Stack information
- Process and site information
- Emission estimates

#### The Air Permit

- Contains requirements
- Contract between state of MI and business

#### Renewable Operating Permit (ROP)

- A.K.A Title V Permit
- Title V of Clean Air Act
- Required if Facility is a “Major Source”

#### Major Source = Potential to Emit:

- > 100 tons/yr Criteria Air Pollutant (CO,
- > 10 tons/yr single Hazardous Air Pollutant (HAP) (see page ).
- >25 tons/yr total Hazardous Air Pollutants

#### Potential to Emit = Maximum amount of air contaminants that your source could emit if:

- Operate at 100% of design capacity;
- Operated 24hrs/day, 365 days/yr
- Worse-case materials used or processed 100% of the time
- No air pollution control equipment

#### ROP Requirements

- Apply within 12 months of becoming a major source
- Renew Every 5 years
- Annual Air Quality Fee
- Annual Air Emissions Reporting
- Annual and Semi-Annual Compliance Reporting
- Deviation Reporting

### **10 Tips for Staying in Compliance with Air Quality Regulations**

1. Conduct a Facility Inventory
  - Go through facility and make a list of each process that emits air contaminants.
  - Next to each item, write down either the Permit under which the equipment was installed or the rule that exempted that piece of equipment from having to obtain a PTI.
  - Every emission unit should be either permitted or exempt.
  - Keep this survey in your records.
2. Know Your Permit and Understand Requirements
3. Establish Procedures
  - Monitoring procedures
  - Recordkeeping practices
  - Reporting schedules
  - Internal review process
4. Practice Good Record Keeping
5. Know the Reporting Deadlines
6. Don't Recreate Records or falsify data
7. Take immediate action to correct violations (Don't wait until you get caught!)

8. Do not ignore correspondence from the DNRE
9. Communicate with your Inspector
  - Ask for a business card when they visit
  - Ask questions
10. Educate Yourself
  - Understand Terminology
  - Read DNRE Education materials
  - Attend DNRE Workshops
  - Keep up on Rules

Resources

- Find Permits [www.deq.state.mi.us/aps/](http://www.deq.state.mi.us/aps/)
- Online Training [www.michigan.gov/dnreworkshops](http://www.michigan.gov/dnreworkshops) (click on “Online Training”)
- Publications Center [www.deq.state.mi.us/pubcenter/](http://www.deq.state.mi.us/pubcenter/)
- Training is offered by our experts on a variety of environmental programs  
[www.michigan.gov/dnreworkshops](http://www.michigan.gov/dnreworkshops)