

Greenhouse Gas (GHG) Emissions and Air Quality Permitting FAQs

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“I Received a Green Postcard from the DEQ. What do I do?”

You received a green postcard from the DEQ because you were issued a [Permit to Install](#) (PTI) within the last 18 months. If you begin actual construction on your project before **July 1, 2011**, and you have a [Renewable Operating Permit](#) (ROP), you may ignore this notification. If you did not begin actual construction on this project before **July 1, 2011**, and/or you did not have an ROP, you may be subject to additional requirements due to changes in federal law.

“I Have Already Constructed My Project and/or My Equipment/Process Is Up and Running. How Does This Law Affect Me?”

Because you constructed prior to **July 1, 2011**, you do not need submit a [Prevention of Significant Deterioration](#) (PSD) application regardless of the greenhouse gas (GHG) emissions from this project. However, if the potential GHG emissions from your site exceed 100,000 tons per year (tpy) on a CO₂e basis and 100 tpy on a mass basis, you may be subject to Title V (the [Renewable Operating Permit](#), or ROP, program).

“I Never Had to Get a Permit to Install (PTI) Before. Do I Need One Now?”

You will only need to apply for a [PTI](#) for greenhouse gases (GHGs) if your project has GHG emissions that exceed the major source thresholds identified in the [Tailoring Rule](#). You do not need to get a PTI to comply with the permitting requirements if you are not making any changes to your facility and you began actual construction on any new process you have been issued permits for by **July 1, 2011**. Regardless of your PTI or construction status, you may need to begin reporting emissions under the [Mandatory Reporting Rule](#) (MRR).

“I Have a Permit to Install (PTI). How Does This Affect My PTI?”

If you are making no changes to your process then you do not need to do anything else with your [PTI](#) at this time.

If you constructed prior to **July 1, 2011**, you do not need submit a [Prevention of Significant Deterioration](#) (PSD) application regardless of the greenhouse gas (GHG) emissions from this project. However, your potential greenhouse gas (GHG) emissions exceed 100,000 (tons per year) tpy on a CO₂e basis and 100 tpy on a mass basis, you may be subject to Title V (i.e. need a [Renewable Operating Permit](#) or ROP).

If you did not begin actual construction on your project before **July 1, 2011**, and/or did not have a Title V or Renewable Operating Permit (ROP), you may be subject to additional requirements due to changes in federal law. If your potential greenhouse gas (GHG) emissions exceed 100,000 (tons per year) tpy on a CO₂e basis and 250 tpy on a mass basis (100 tpy if you are one of the [28 major source categories](#)), you may be required to apply for a new PTI prior to construction under PSD Rules.

“I Have a Renewable Operating Permit (ROP). How Does This Affect That?”

You will need to address greenhouse gases (GHGs) if you revise, renew, or apply for a new [ROP](#).

In addition, beginning **July 1, 2011**, sources may have become subject to Title V solely based on their GHG emissions. Sources have 12 months from the time they become subject to Title V to submit an application for an ROP. If a source became subject on **July 1, 2011**, then an application was due by **July 1, 2012**. The Department was amending the administrative rules to address the GHG requirements for Title V sources. The amendments were expected to be finalized in late 2011.

“I Never Had to Get a Renewable Operating Permit (ROP) Before. Do I Need One Now?”

Beginning **July 1, 2011**, sources may have become subject to Title V solely based on their greenhouse gas (GHG) emissions. These sources will have 12 months to submit an application for an [ROP](#). If you have sourcewide GHGs equal to or greater than 100,000 tons per year (tpy) on a CO₂e basis and 100 tpy on a mass basis, then you will have needed to apply for an ROP by **July 1, 2012**.

The Department was amending the administrative rules to address the GHG requirements to address Title V requirements. The amendments were expected to be finalized in late 2011.

“I Plan on Making Changes to My Facility. Do I Need to Address GHGs?”

You will need to address GHGs if any of the following are true.

- You are a new source that is proposing a new project that
 - will be subject to [Prevention of Significant Deterioration](#) (PSD) for one or more criteria pollutants, and
 - your sourcewide GHG potential to emit (PTE) is greater and 75,000 tons per year (tpy) on a CO₂e basis.
- You are a new source and
 - you received your [Permit to Install](#) (PTI) after **July 1, 2011**, and
 - your sourcewide GHG PTE is greater than 100,000 tpy on a CO₂e basis, and
 - your sourcewide GHG PTE is greater than 250 tpy on a mass basis (100 tpy if you are one of the [28 major source categories](#) as defined in R336.2801(cc)).
- You are an existing minor source that is proposing a modification to your source that
 - will be subject to PSD for one or more criteria pollutants, and
 - your GHG PTE from this modification project is greater than 75,000 tpy on a CO₂e basis, and
 - your net GHG emissions will be greater than 0 (zero) tpy on a mass basis.
- You are an existing minor source that is proposing a modification to your source and
 - you received your Permit to Install after **July 1, 2011**, and
 - the GHG PTE from the project is greater than 100,000 tpy on a CO₂e basis, and
 - your GHG PTE from the project is greater than 250 tpy on a mass basis (100 tpy if you are one of the 28 major source categories as defined in R336.2801(cc)).

- You are modifying an existing PSD major source and
 - you received your PTI after **July 1, 2011**, and
 - your sourcewide GHG PTE is greater than 100,000 tpy on a CO₂e basis, and
 - your sourcewide GHG PTE is greater than 250 tpy on a mass basis (100 tpy if you are one of the 28 major source categories as defined in R336.2801(cc)), and
 - you are proposing a modification with a GHG PTE greater than or equal to 75,000 tpy on a CO₂e basis, and
 - you are proposing a modification with a GHG net emissions greater than 0 (zero) tpy on a mass basis.

This information is also [available in table format](#).

EPA has also developed a guidance document entitled "[PSD and Title V Permitting Guidance For Greenhouse Gases](#)" which provides basic information that applicants may need to address GHG emissions in permits. In addition to the Permitting Guidance, EPA has also developed a Q&A document containing examples entitled "[When Does PSD Apply to GHG and Non-GHG Pollutants at Non-Anyways Sources and Modifications?](#)" that may be helpful.

"Where Can I Get Some Basic Information about GHGs and the Rules?"

The U.S. Environmental Protection Agency (USEPA) promulgated two rules that affect sources that emit greenhouse gases (GHGs). These rules are the [Prevention of Significant Deterioration and Title V Greenhouse Gas Tailoring Rule](#) (the Tailoring Rule) and the [Mandatory Reporting Rule](#).