



Virginia's Minor NSR Permit Program

Patrick Corbett

Air Toxics Coordinator

Virginia Department of Environmental Quality

Overview

- Attainment except in DC area – ozone
- Case-by-Case Permitting Program
- Limited Use of General Permits
- ~270 actions average per year
 - including permits, amendments, and ~30 exemptions per year

Permit Applicability

- Minor NSR Program – 4 applicability processes since 2000
- New stationary sources and projects
- Certain units never exempt – EtO Sterilizers, incinerators
- Opt-in Provisions

Pollutants Covered

- PSD pollutants with significant rates except GHG
- Toxic pollutants
 - State-only enforceable
 - Essentially HAP list
 - Exemptions for MACT categories

Exemption by Emission Rate

- Uncontrolled Emission Rate not PTE
 - Unit by unit assuming infinite raw material supply and infinite downstream processing (no bottlenecking)
- Increases summed for all units in the project
- Most new sources/units need a permit but future changes much less likely to need a permit

Pollutant	New Stationary Sources (TPY)	Projects (TPY)
CO	100	100
NO _x	40	10
SO ₂	40	10
PM	25	15
PM10	15	10
PM2.5	10	6
VOC	25	10
NMOC	22	22

BACT Requirements

- Applicable based on Uncontrolled Emission Rate
- Determination considers post-permit limits
- Procedures and NSPS define floor for many units
- BACT database (control device based not emission limit based)

Application Fees

- Collect from Title V by Rule, synthetic minor, and major sources
- Collect for permits, amendments, and exemption letters
 - Different fees for different size sources and types of applications
- Exemptions went from ~300/yr to ~20/yr