

As part of the implementation of the Greenhouse Gas (GHG) Tailoring Rule, the U.S. Environmental Protection Agency is gathering information on Prevention of Significant Deterioration (PSD) and title V permitting activity, resources and burden. This information will be used to complete a study of permitting authorities experience with permitting, including GHG permitting. In the GHG Tailoring Rule, the EPA made a commitment to complete a five-year study by April 30, 2015, and undertake and complete a rulemaking by April 30, 2016, that addresses any future permitting obligations of stationary sources of greenhouse gas emissions based on this study. The GHG Tailoring Rule mentioned that “such study shall account, among other things, for permitting authorities’ ability to secure resources, hire and train staff [and] experiences associated with GHG permitting for new types of sources and technologies.” In addition, the GHG Tailoring Rule mentioned that such a study shall account for “the success of streamlining measures developed by the EPA (and adopted by the states) for reducing the permitting burden associated with such stationary sources.” 40 CFR 52.22(b)(2)(i).

To gather this information, the EPA needs your assistance. Your agency has been identified as a permitting authority with significant permitting experience. As such, the EPA is reaching out to you to collect information about your preconstruction and operating permit programs including information about GHG permitting experience, resources and burden. Instructions for providing this information to the EPA via regular mail or email can be found in Enclosure 1. Enclosure 2 itemizes the information requested in a survey format. We are requesting information for calendar years 2011 through 2014 under the following schedule:

Data for Jan. 2, 2011 to Dec. 31, 2011 calendar year by Jan. 31, 2014  
Data for Jan. 1, 2012 to Dec. 31, 2012 calendar year by Mar. 31, 2014  
Data for Jan. 1, 2013 to Dec. 31, 2013 calendar year by May 31, 2014  
Data for Jan. 1, 2014 to Dec. 31, 2014 calendar year by Jan. 30, 2015

The GHG permitting information collected will be used to assess past and present GHG permitting activity, resource burdens and any streamlining measures adopted by permitting authorities to reduce this burden. The general PSD and title V permitting information will be used to estimate possible future GHG permitting resource obligations as well as any possible permitting obligations related to lower GHG applicability thresholds.

We thank you in advance for your responses on this matter. Your information will be critical to inform this study and the decisions the EPA will undertake in determining future GHG permitting thresholds and requirements.

If you have any questions on any aspect of this request or the study, please do not hesitate to contact Ms. Jessica Montañez in the Office of Air Quality Planning and Standards (OAQPS) at 919-541-3407.

Sincerely,

Stephen D. Page  
Office of Air Quality Planning  
And Standards

Enclosures

cc: Steven Riva, Region 2  
Heather Ceron, Region 4  
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Jeffrey Robinson, Region 6  
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## Enclosure I

### I. INFORMATION REQUEST

The EPA is issuing this information request for the purpose of gathering information on PSD and title V permitting activity and its associated burden for use in completing a study of permitting authorities current experience with GHG permitting and any future burden associated with GHG permitting and as discussed in the GHG Tailoring Rule.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it collects information from less than 10 entities as part of this administrative study. All information responsive to this survey should be mailed to Ms. Jessica Montañez using the following address or emailed in Portable Document Format (PDF) or Microsoft Office Word to Ms. Montañez at [montanez.jessica@epa.gov](mailto:montanez.jessica@epa.gov).

Ms. Jessica Montañez  
New Source Review Group  
Air Quality Policy Division  
U.S. EPA - Office of Air Quality Planning and Standards  
109 TW Alexander Drive MD: C504-03  
RTP, NC 27711

### II. INSTRUCTIONS

The purpose of this permitting authority survey is to gather information for calendar years 2011 through 2014 on PSD and title V permitting activity, experiences and burden from selected permitting authorities. We are requesting your survey responses under the following schedule:

- Data for Jan. 2, 2011 to Dec. 31, 2011 calendar year by Jan. 31, 2014
- Data for Jan. 1, 2012 to Dec. 31, 2012 calendar year by Mar. 31, 2014
- Data for Jan. 1, 2013 to Dec. 31, 2013 calendar year by May 31, 2014
- Data for Jan. 1, 2014 to Dec. 31, 2014 calendar year by Jan. 30, 2015

The survey is divided into five sections labeled A through E. Sections A through D should be completed for each calendar year per the schedule above while Section E needs to only be completed once by January 31, 2014. Section A solicits information on permitting activity; section B asks for information on permitting resources and burden; and section C focuses on streamlining approaches that your permitting authority has adopted to reduce GHG permitting burden. Section D allows you to provide comments on this survey and any additional information we should be aware of as we gather information for the GHG 5-Year study.

Section E asks you about the biomass permitting activity in your state or local permitting program. We also ask you to estimate the number of permit applications you would expect to receive at various GHG permitting threshold levels and the source categories that you expect would be affected within your permitting authority. Should any of your

estimates for Section E change, we request that you submit the new estimates as part of any of the other 2014 or 2015 data submissions.

Section E also asks you to describe what actions your permitting authority will have to undertake to be able to meet any PSD and title V regulatory requirements that could apply at lower GHG threshold levels and the time that it would take to put those actions in place.

Please provide a separate response to each question and subpart of a question set forth in this request as applicable. If an attachment is necessary to answer any question, please indicate in the attachment the calendar year, the survey section and the number of the question to which it corresponds.

If information or documents not known or not available to you as of the date of submission of a response to this request should later become known or available to you, you may supplement your response to EPA. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information needs to be revised, please notify EPA of this fact as soon as possible and provide EPA with a corrected response.

Definitions for the terms used throughout the survey are included in Enclosure 3.

## Enclosure II

### PERMITTING ACTIVITY, RESOURCES AND BURDEN SURVEY

**Calendar Year:** \_\_\_\_\_ to \_\_\_\_\_

As requested in Enclosure 1, please answer each question for the calendar year you identify at the top of this survey form. If an attachment is necessary to answer any question, please indicate in the attachment the calendar year, survey section and number of the question to which the answer corresponds. Term definitions are included in Enclosure 3.

#### **A. PERMITTING ACTIVITY**

1. Please use the following tables to identify the number of permits issued, during the calendar year referenced in this survey, for:
  - a. New greenfield major sources subject to the PSD program
  - b. Major modifications at existing sources subject to the PSD program
  - c. New or existing sources subject to the title V program for the first time (i.e., newly major)
  - d. Title V permit modifications at existing sources (includes significant permit modifications, minor permit modifications and administrative permit amendments)

For each permit category, please indicate how many of these permits were issued for EGUs, industrial sources, energy sources and waste sources<sup>1</sup> and classify them between permits with only GHG pollutant requirements, permits with GHG and conventional pollutant requirements and permits with conventional pollutant requirements only. In addition, please indicate the average number of days it took to issue these permits starting from the day the application was received.

For the information on title V permitting activity (Tables 3-4) and under the section titled “Only GHG Pollutants,” we have included a column titled “number of permits” and a column titled “hollow permits.” Please do not include the number of “hollow permits” under the “number of permits” column. For example, if your permitting authority has issued 20 title V permits that cover only GHG pollutants and 6 of those permits are “hollow permits,” the “number of permits” column should show “14” and the “hollow permits” column “6.” In addition, the column titled “time (days)” should reflect the average time it took to issue non-hollow permits and the column titled “time hollow permits (days)” should reflect the average time it took to issue “hollow permits” only.

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<sup>1</sup> Please refer to Enclosure 3 for the definitions of each category

**Sample Table for Identifying the Number of PSD Permits Issued by a Permitting Authority**

Category	Total Number of Permits	Only GHG Pollutants		GHG and Other Pollutants		Non-GHG Pollutants Only	
		Number of Permits	Time (days)	Number of Permits	Time (days)	Number of Permits	Time (days)
EGU's	12	0	n/a	12	375	0	n/a
Industrial	87	9	323	64	362	14	300
Energy	26	7	315	9	340	10	315
Waste	20	8	300	2	305	10	310
Total	145	24	938	87	1,382	34	925

**Table 1. New Greenfield Major Sources Subject to the PSD Program**

Category	Total Number of Permits	Only GHG Pollutants		GHG and Other Pollutants		Non-GHG Pollutants Only	
		Number of Permits	Time (days)	Number of Permits	Time (days)	Number of Permits	Time (days)
EGU's							
Industrial							
Energy							
Waste							
Total							

**Table 2. Major Modifications at Existing Sources Subject to the PSD Program**

Category	Total Number of Permits	Only GHG Pollutants		GHG and Other Pollutants		Non-GHG Pollutants Only	
		Number of Permits	Time (days)	Number of Permits	Time (days)	Number of Permits	Time (days)
EGU's							
Industrial							
Energy							
Waste							
Total							

**Sample** Table for Identifying the Number of Title V Permits Issued by a Permitting Authority

Category	Total Number of Permits	Only GHG Pollutants				GHG and Other Pollutants		Non-GHG Pollutants Only	
		Number of Permits	Time (days)	Number of Hollow Permits	Time Hollow Permits (days)	Number of Permits	Time (days)	Number of Permits	Time (days)
EGU's	12	0	n/a	0	n/a	12	375	0	n/a
Industrial	87	9	323	0	123	64	362	14	300
Energy	27	7	315	1	115	9	340	10	315
Waste	22	8	300	2	150	2	305	10	310
Total	148	24	938	3	388	87	1,382	34	925

**Table 3. Sources Subject to the Title V Program for the First Time (Newly Major)**

Category	Total Number of Permits	Only GHG Pollutants				GHG and Other Pollutants		Non-GHG Pollutants Only	
		Number of Permits	Time (days)	Number of Hollow Permits	Time Hollow Permits (days)	Number of Permits	Time (days)	Number of Permits	Time (days)
EGU's									
Industrial									
Energy									
Waste									
Total									

**Table 4. Title V Permit Modifications at Existing Sources**

Category	Total Number of Permits	Only GHG Pollutants				GHG and Other Pollutants		Non-GHG Pollutants Only	
		Number of Permits	Time (days)	Number of Hollow Permits	Time Hollow Permits (days)	Number of Permits	Time (days)	Number of Permits	Time (days)
EGU's									
Industrial									
Energy									
Waste									
Total									

2. For each type of minor permit your permitting authority issued during the calendar year referenced in this survey (e.g., NSR synthetic minor permits, permits issued to sources that opt to limit their emissions not to be subject to the title V program, true minor preconstruction permits, etc.), please indicate the total number of permits issued, the top 10 categories/sectors with the largest number of permit actions, including the number of those actions, and the number of days it took to issue permits for each of those source categories/sectors starting from the day of application was received. A sample table is provided for your reference. In any given table, the total number of permits for this permit type could be more than the total number of permits issued for the top 10 categories/sectors as a result of issuing this permit type to more than 10 categories/sectors. For example, in the sample table the total number of NSR synthetic minor permits issued is 581, but the total number of permits for the top 10 categories/sectors is 575. If there are less than 10 categories/sectors for a particular permit type, please cross-out the rows that are not necessary. In Table 6, permits issued to sources that opted out of the Title V permitting program include title V synthetic minor permits, FESOP permits or any other permit mechanism used by a source to avoid title V permitting.

**Sample. Number of NSR Synthetic Minor Permits**

Total Number of Permits for this Permit Type:     581    

Top 10 Categories/Sectors	Number of Permits	Time (days)
Oil and Natural Gas Wells	235	180
Boilers	85	90
Concrete Batching Plants	46	90
Reciprocating Internal Combustion Engines	53	120
Surface Coating Operations	8	90
Printing Operations Lithographic	5	90
Clay and Ceramics Operation	3	90
Automotive Repair and Maintenance	7	90
Asphalt Batch Plants	60	90
Diesel Generators	73	90

**Table 5. NSR Synthetic Minor Permits**

Total Number of Permits for this Permit Type: \_\_\_\_\_

Top 10 Categories/Sectors	Number of Permits	Time (days)



**Table 6. Permits Issued to Sources that Opted Out of the Title V Permitting Program**

Total Number of Permits for this Permit Type: \_\_\_\_\_

<b>Top 10 Categories/Sectors</b>	<b>Number of Permits</b>	<b>Time (days)</b>

**Table 7. True Minor Preconstruction Permits**

Total Number of Permits for this Permit Type: \_\_\_\_\_

<b>Top 10 Categories/Sectors</b>	<b>Number of Permits</b>	<b>Time (days)</b>

**Table 8. True Minor Operating Permits**

Total Number of Permits for this Permit Type: \_\_\_\_\_

<b>Top 10 Categories/Sectors</b>	<b>Number of Permits</b>	<b>Time (days)</b>

**Table 9. Combined True Minor Preconstruction and Operating Permits**

Total Number of Permits for this Permit Type: \_\_\_\_\_

<b>Top 10 Categories/Sectors</b>	<b>Number of Permits</b>	<b>Time (days)</b>

**Table 10. Other. Please describe.**

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Total Number of Permits for this Permit Type: \_\_\_\_\_

<b>Top 10 Categories/Sectors</b>	<b>Number of Permits</b>	<b>Time (days)</b>

3. Does your permitting authority have a registration program for certain source categories or unit sizes? If so, please describe the types of sources or units subject to your registration program and indicate how many sources registered per source category or unit during the calendar year referenced in this survey.

**B. PERMITTING RESOURCES AND BURDEN**

1. During the calendar year referenced in this survey, how many FTE(s) did your program need to process major and minor preconstruction and operating permits (Table 11)? Please indicate if any additional FTE’s were needed for GHG permitting and how many (Table 12).

**Table 11. Number of FTEs Needed to Process Major and Minor Preconstruction and Construction Permits**

Number of FTEs	
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**Table 12. Number of Additional FTEs Needed to Process Major and Minor Preconstruction and Construction Permits due to GHGs**

Number of FTEs	
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2. If your permitting authority collects permitting fees for GHG’s please:
  - a. Describe (e.g., amount, frequency of collection, etc.) your permitting authority’s fees for GHG permitting under the PSD program.
  - b. Describe (e.g., amount, frequency of collection, etc.) your permitting authority’s fees for GHG permitting under the title V program.
  - c. Describe (e.g., amount, frequency of collection, etc.) your permitting authority’s fees for GHG permitting under the minor program. This question refers to any fees you might collect for synthetic minor permits issued to sources that want to keep their GHG emissions below major source levels or any other fees you might have in place for minor GHG permitting.



- g. Increased Title V permit processing time. If so, what was the average increase in permit processing time (days) from the date of application to permit review and issuance?
  
  - h. Other. Please describe.
4. Which of the following actions did your permitting authority experience and what effect did the action have on permit processing time (days) during the calendar year referenced in this survey?
- a. Budget cuts.
  
  
  
  
  
  
  
  
  
  
  - b. Increased burden from other permitting requirements (*e.g.*, 1-hour SO<sub>2</sub> and NO<sub>x</sub> modeling requirements, PM<sub>2.5</sub> dispersion modeling).
  
  
  
  
  
  
  
  
  
  
  - c. Increased number of permit applicants.
  
  
  
  
  
  
  
  
  
  
  - d. Decline in permitting fee revenue.
  
  
  
  
  
  
  
  
  
  
  - e. Other. Please describe.

**C. PERMIT STREAMLINING APPROACHES**

1. Please indicate (yes or no) if your permitting authority implements any of the listed streamlining approaches for GHG permitting purposes. Please also indicate (yes or no) if any of these GHG permitting streamlining approaches have been proposed and/or incorporated into your SIP or title V program.

**Table 13. Permit Streamlining Approaches**

<b>Streamlining Option</b>	<b>Implemented by Your Permitting Authority?</b>	<b>Proposed?</b>	<b>Incorporated into SIP or Title V Program?</b>
Electronic Permitting			
Lean Techniques			
GHG PAL			
Synthetic Minor			
Presumptive BACT			
General Permit			
Permit-by-Rule			
Other. Please describe.			

2. If your permitting authority implements source category or unit specific GHG permit streamlining approaches such as presumptive BACT, general permits or permits-by-rule, please list the streamlining approach and all the source categories or units for which it was developed. Attach additional information if necessary.

3. If your permitting authority has implemented any GHG streamlining approaches, please comment on the effectiveness of these approaches in reducing the GHG permitting burden (e.g., reduction in permit processing time).

#### **D. ADDITIONAL INFORMATION**

1. Please comment on any part of this survey and provide any additional information we should be aware of as we gather information for this GHG 5-Year study.



## **E. BIOMASS PERMITTING ACTIVITY AND ESTIMATES OF GHG PERMITTING ACTIVITY, BURDEN AND RESOURCES AT LOWER THRESHOLDS**

Please answer the following questions only once by January 31, 2014 and provide the basis for any estimates. If your estimates change in the future, please submit these new estimates as part of any of the other 2014 or 2015 data submissions.

1. Did any PSD or title V major sources under your permitting jurisdiction take advantage of the Biomass Deferral? If so, please indicate the number of sources and the source categories for which the deferral was used. For the PSD program, please indicate which of the following permitting scenarios the sources fell under.
  - a. Sources which relied on the Deferral Rule to obtain a final and effective PSD permit that does not contain a limit on GHG emissions or contains a limit on non-biogenic GHG emissions only and that have commenced or begun actual construction under that permit.
  - b. Sources which obtained a PSD permit, like the one described above, but have not commenced or begun actual construction.
  - c. Sources which have not received a final and effective PSD permit but for which the permit application or the permitting authority has referenced the deferral rule as a basis for not including a GHG limit in the PSD permit or for including a limit covering only non-biogenic GHG emissions.
  - d. Sources which avoided PSD permitting altogether on the basis of the deferral rule and have commenced or begun actual construction.
  - e. Sources planning a construction project that have not commenced or begun actual construction and have not applied for a PSD permit on the basis of the deferral rule (and may have obtained a minor source construction permit).

2. If the GHG PSD and title V applicability thresholds are lowered to any of the following threshold levels in the future (tpy of CO<sub>2</sub>e), how many PSD and title V permit applications do you estimate you would receive for each of the source categories identified below and any other source categories you identify at lower thresholds?

**Table 14. Estimated Number of PSD Permit Applications for New Greenfield Major Sources and Major Modifications at Existing Sources at Various GHG Permitting Thresholds**

Category	75,000		50,000		25,000		10,000		100/250	
	New	Modified	New	Modified	New	Modified	New	Modified	New	Modified
EGU's										
Industrial										
Energy										
Waste										
Total										

**Table 15. Estimated Number of title V Permit Applications (includes Newly Major, Significant Permit Modifications, Minor Permit Modifications, Administrative Permit Amendments) at Various GHG Permitting Thresholds**

Category	75,000		50,000		25,000		10,000		100/250	
	New	Modified	New	Modified	New	Modified	New	Modified	New	Modified
EGU's										
Industrial										
Energy										
Waste										
Total										

3. Considering the estimates provided in question 2, how many more full-time employees would your program need to address the increase in PSD and title V permitting applications due to GHGs and still meet current PSD and title V permit processing times? If no data for question 2 is available, please provide this estimate based on a 2, 5 and 10-fold increase in permit applications.

**Table 16. Estimated Number of FTEs Various GHG Permitting Thresholds**

	75,000		50,000		25,000		10,000		100/250	
	PSD	Title V	PSD	Title V	PSD	Title V	PSD	Title V	PSD	Title V
Number of FTEs										

**Table 17. Estimated Number of FTEs based on a 2, 5 or 10-fold Increase in Permit Applications**

	2-fold Increase		5-fold Increase		10-fold Increase	
	PSD	Title V	PSD	Title V	PSD	Title V
Number of FTEs						

4. Considering the estimates provided in question 3, how long (i.e., number of days) would it take your permitting authority to add the additional staff necessary to process these PSD and title V permit applications?

**Table 18. Estimated Time Necessary to Add Staff to the Permitting Authority**

	75,000		50,000		25,000		10,000		100/250	
	PSD	Title V	PSD	Title V	PSD	Title V	PSD	Title V	PSD	Title V
Number of days										

**Table 19. Estimated Time Necessary to Add Staff to the Permitting Authority based on a 2, 5 or 10-fold Increase in Permit Applications**

	2-fold Increase		5-fold Increase		10-fold Increase	
	PSD	Title V	PSD	Title V	PSD	Title V
Number of days						

5. Absent the addition of new staff to address the increase in permit applications, what would be the estimated effect of the increase on PSD and title V permit processing times (i.e., number of days)?

**Table 20. Effect of Increased Number of Permit Applications on Permit Processing Times**

	75,000		50,000		25,000		10,000		100/250	
	PSD	Title V	PSD	Title V	PSD	Title V	PSD	Title V	PSD	Title V
Number of days										

**Table 21. Effect of Increased Number of Permit Applications on Permit Processing Times based on a 2, 5 or 10-fold Increase in Permit Applications**

	2-fold Increase		5-fold Increase		10-fold Increase	
	PSD	Title V	PSD	Title V	PSD	Title V
Number of days						

6. What regulatory or legislative actions (e.g. updates to state law, SIP revisions, etc.) would your permitting authority have to undertake if any changes are made to the GHG permitting program in the future? Please indicate how long (i.e., number of

## **Enclosure III**

### **DEFINITIONS**

1. The term “Best Available Control Technology (BACT)” means an emissions limitation as set forth in section 165(a)(4) of the CAA and defined in CAA §169(3) and 40 CFR §51.166(b)(12).
2. The term “Biomass Deferral” refers to the final rule issued by EPA on July 20, 2011 (76 FR 43490) that deferred the application of the Prevention of Significant Deterioration (PSD) and Title V permitting requirements to carbon dioxide (CO<sub>2</sub>) emissions from bioenergy and other biogenic stationary sources (biogenic CO<sub>2</sub>).
3. The term “Electric Generating Units (EGUs)” refers to the definition of Electric Utility Steam Generating Unit (EUSGU) in 40 CFR 51.166(b)(30).
4. The term “electronic permitting” generally means an electronic system that allows sources and the permitting authority to complete a variety of permitting steps or activities electronically.
5. The term “energy source” refers to oil and gas extraction, transport, processing and underground coal mining.
6. The term “Federally Enforceable State Operating Permit (FESOP)” refers to a permit issued under a non-title V federally enforceable state operating permit program.
7. The term “Full Time Employee (FTE)” is defined by each employer, but in general it means an employee that works the normal number of hours defined by its employer for Full Time Employees.
8. The term “general permit” is a permit that may be applied to a number of similar emissions units or sources as long as the source follows certain qualifying criteria, emissions limitations, conditions of operation, and requirements for recordkeeping and reporting.
9. The term “greenfield” refers to newly constructed sources.
10. The term “hollow permit” refers to a title V permit for a GHG major source that does not contain requirements for GHG emissions, but which contains other applicable requirements for pollutants for which the source is not major.
11. The term “industrial sources” comprises establishments engaged in the mechanical, physical or chemical transformation of materials, substances or components into new product, and specifically includes business classified in Sectors 31-33 according to the North American Industry Classification System (NAICS).
12. The term “lean techniques,” for purposes of this survey, means the application of Lean improvement methods to air permitting processes. Lean techniques identify and eliminate unnecessary and non-valued added process steps and activities that have built up over time.
13. The term “new source review (NSR)” refers to the preconstruction permitting program described in 40 CFR 51.166.
14. The term “permit-by-rule (PBR)” generally means a simplified permitting process for certain sources in which the air pollution control source does not have to obtain a permit as long as the source complies with the requirements described in the rule. Sources generally complete a short and standardized form for purposes of notifying the permitting authority that they are subject to the permit-by-rule.

15. The term “major modification,” for purposes of the PSD program and this form refers to the definition of major modification in 40 CFR §51.166(b)(2).
16. The term “major source,” for purposes of the PSD program and this form refers to the definition of major stationary source in 40 CFR §51.166(b)(1)(i).
17. The term “major source” for purposes of the title V program and this form refers to the definition of major source in 40 CFR §70.2. This definition includes sources subject to the title V program for the first time (i.e., newly major) and existing title V sources that added GHG requirements into their existing title V permits for the first time.
18. The term “permits issued to sources that opted out of title V permitting program” is used to refer to title V synthetic minor permits, FESOP permits or any other permit mechanism used by a source to avoid title V permitting.
19. The term “permit modification” for purposes of the title V program and this form refers to the definition of permit modification in 40 CFR §70.7. This definition includes significant modifications, minor permit modifications and administrative permit amendments.
20. The term “plantwide applicability limit (PAL)” is used as defined in 40 CFR §51.166 w(2)(v). Generally, it refers to a site-specific plantwide emission limitation for a pollutant that allows the source to make changes at the facility without triggering the substantive requirements of the PSD program, provided that emissions do not exceed the PAL level.
21. The term “potential to emit” means the maximum capacity of a stationary source to emit a pollutant or any air pollutant under its physical and operational design, as defined in 40 CFR §51.166(b)(4) and 40 CFR §70.2, respectively.
22. The term “registration program” refers to any program established by the permitting authority where certain source categories or units are exempt from permitting if the source/unit emissions are below those established by the permitting authority. In many cases, sources and units have to notify the permitting authority about their use of this exemption and this action is commonly known as registration.
23. The term “state implementation plan” means the federally approved and enforceable plan by which each state identifies how it will attain and/or maintain the National Ambient Air Quality Standards described in Section 109 of the CAA and 40 CFR Part §50.4 through §50.12.
24. The term “streamlining approach” means any technique that may make the permitting programs more efficient to administer for GHGs. These approaches may include: (1) defining potential to emit (PTE) for various source categories, (2) establishing emission limits for various source categories that constitute presumptive BACT, (3) establishing procedures for use of general permits and permits-by-rule, (4) establishing procedures for electronic permitting, (5) applying lean techniques and use of plantwide applicability limits.
25. The term “synthetic minor” means a source that otherwise has the potential to emit regulated NSR pollutants (as defined in 40 CFR §51.166) or regulated air pollutants (as defined in 40 CFR §70.2) in amounts that are at or above the thresholds in 40 CFR §51.166 or §70.2 for these pollutants respectively, but that has taken a practically enforceable restriction so that its potential to emit is less than such thresholds.
26. The term “title V” refers to an operating permit program described in 40 CFR Part 70.

27. The term “true minor source” means a source that has the potential to emit regulated air pollutants in amounts that are less than the thresholds in 40 CFR § 51.166 or 40 CFR § 70.2 that would trigger PSD or title V permitting requirements without taking an enforceable restriction to reduce its potential to emit to such levels. That is, a true minor source is a minor source that is not a synthetic minor source.
28. The term “waste sources” refers to landfills and solid waste incinerators.
29. The terms “you” or “yours,” as used in each of the questions set forth in this request, refers to, and shall mean, the responsible official in the permitting authority for which this request is addressed including its divisions, directors, employees, representatives, attorneys and all other persons acting on its behalf.