

# Air Quality Permits

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# Presentation Overview

1. Permit Goals
2. Permit Categories
3. Permit Development Process
4. Key Permit Elements
5. Accountability
6. Public Involvement
7. Permit Conditions When Standards are Violated
8. Implementation Tools

# Air Emission Permit Goals

Permits are one strategy for

- Providing legally-enforceable documents to clarify what the owner/operator must do to reduce emissions
- Tracking emissions
- Providing opportunities for
  - Owner/operator involvement
  - Public involvement

*Air Permit  
Categories Under  
U.S. Law*

*Pre-Construction  
Permits*

*Operating  
Permits*

*General  
Permits*

*Permit  
Modifications*

## Pre-Construction Permits

- Authorizes the construction of a new source of air pollution
- Require installation and maintenance of pollution control devices
- Permit application
  - Assesses source impacts
  - Proposes controls

## Operating Permits

- Authorizes the owner/operator to begin operations at the source of air emissions
- Contains all the emission and reporting requirements that apply to the source

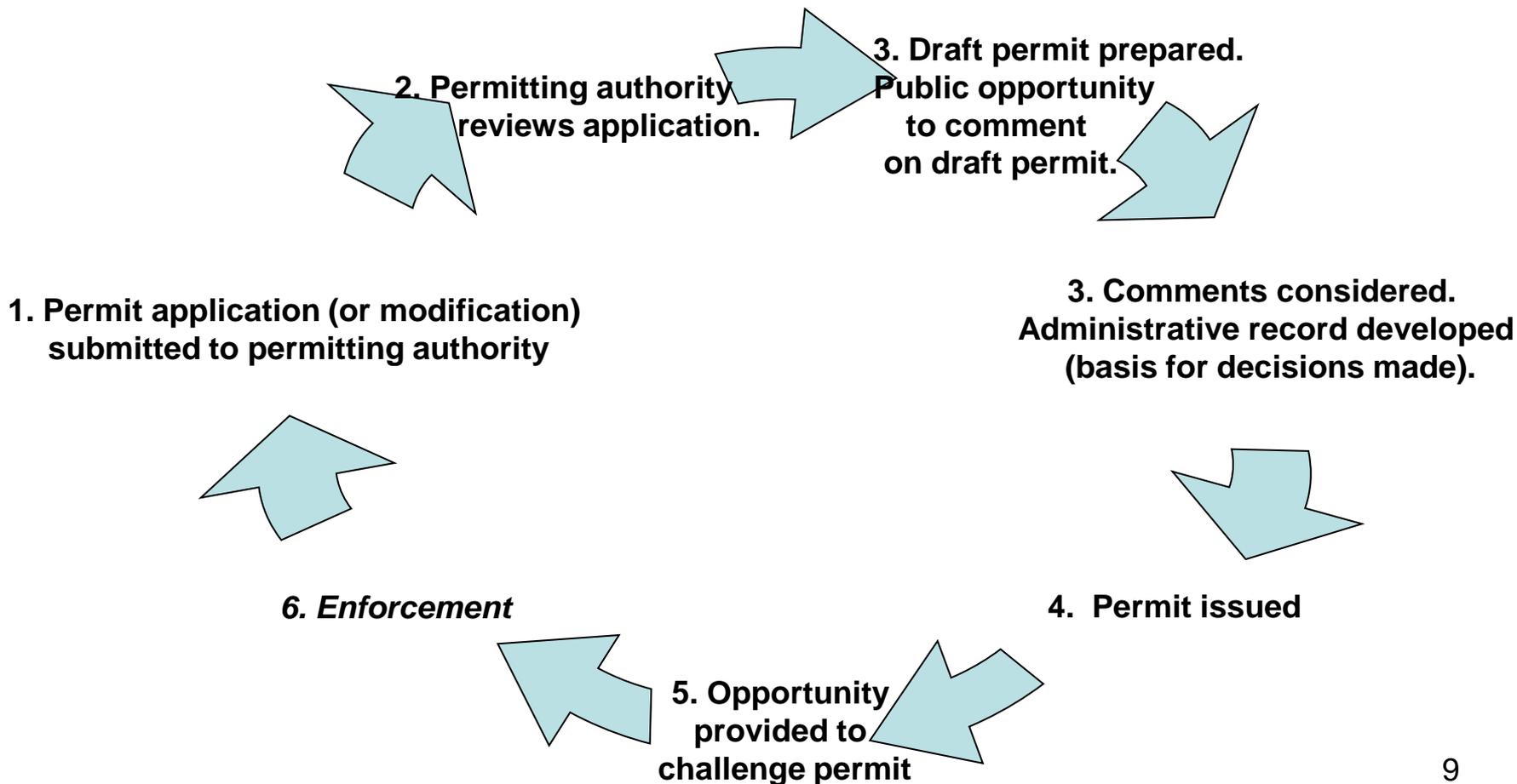
# General Permits

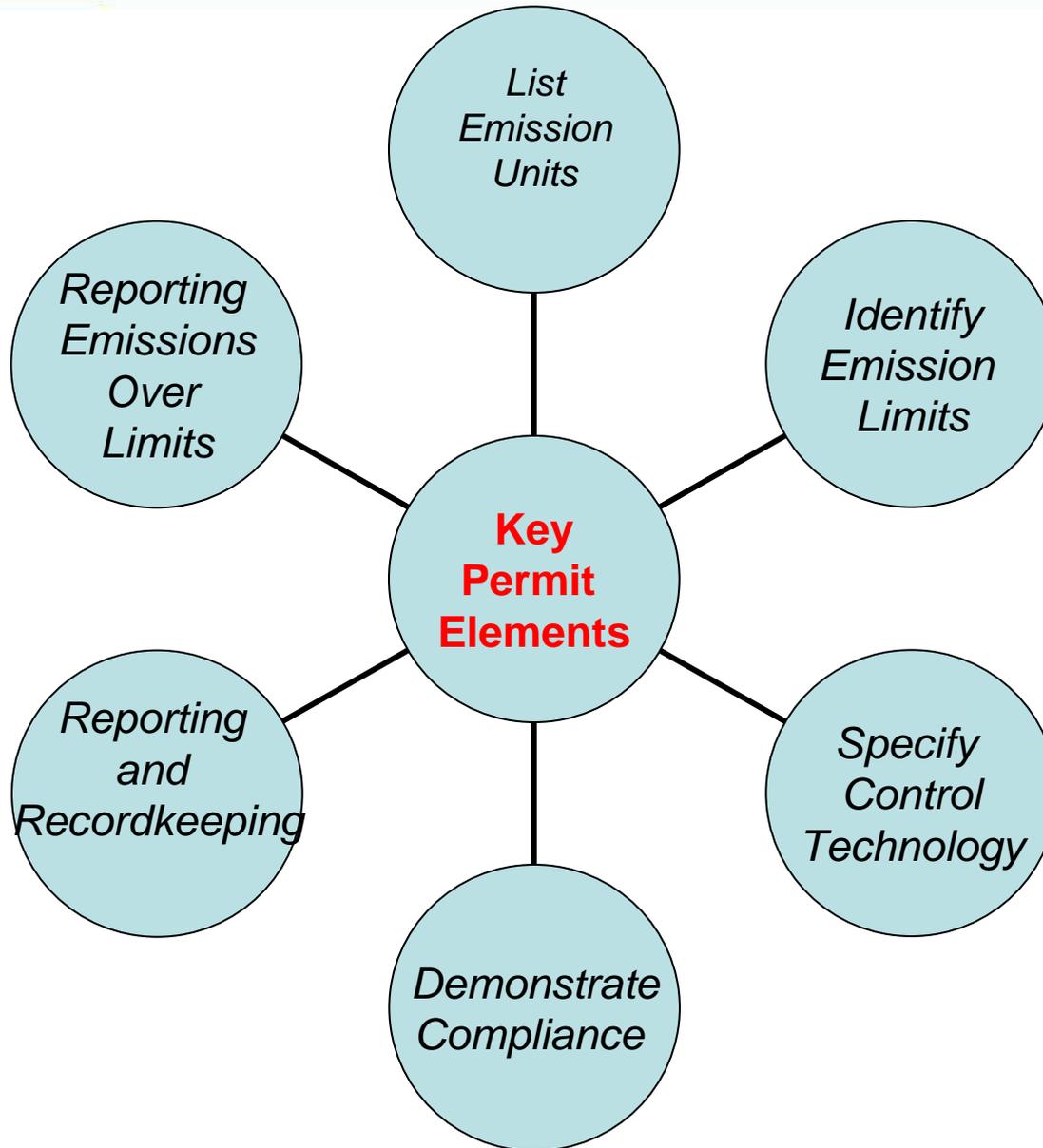
- General permits are used to regulate numerous, very similar, and generally smaller facilities that have emissions that pose little environmental risk
- Process
  - Government develops a general permit
  - Owner/operator agrees to conduct its proposed activities under the pre-set emission limits established by the general permit
- Efficiencies
  - Saves staff time and resources
  - Allow permitting authority and public to focus their time and energy on other sources that have potentially significant environmental impacts

## Permit Modifications

- When are modifications needed?
  - If an owner/operator modifies the source
  - If laws or regulations change
- What process is followed for modifications?
  - Generally, the same process as permit issuance

# *The Permit Issuance Process*





# U.S. Mechanisms for Permit Accountability

- Accurate permit development
  - Owner/operator involvement in permit development
- Permit implementation oversight
  - Federal and local
- Owner/operator compliance certification and liability

# Public Involvement

- Provide notice and opportunities for the public to comment on and request public hearings
  - Permit program regulations
  - Draft permits before they are issued
- Provide opportunities for the public to challenge and enforce permits
- Make permits and compliance information available to the public

# Permit Conditions When Air Standards Are Violated

- Terms in a permit that create overall air quality benefits by having sources of emissions either
  - Reduce pollution with stringent emission limitations, or
  - Buy credits from another source to offset new source emissions

# Permit Enforcement

- Setting and rewarding goals
  - Number of actions
    - Administrative
    - Civil
    - Criminal
  - Fines
- Hiring enforcement personnel
- Ongoing training for enforcement personnel
- National initiatives and campaigns targeting source sectors
- National oversight of local implementation
- Track enforcement actions and distribute information to the public
- Public involvement
  - Citizen education and outreach
  - Providing opportunities for filing complaints with the permitting agency
  - Opportunities for citizen enforcement

# Permit Implementation Tools



Identify control technologies for pollutants

Program funding - permit fees

Training – government, companies, public

Standard Application Forms and Instructions

Application review checklists

Model permits and permit condition language

Regulations and Guidance Documents

Define national/regional/local roles and responsibilities

Technical Assistance



Thank You

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