

# Air permitting completeness reviews: two years in review

Megan Lai & Rand Silvers | MPCA

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- Completeness reviews: what and why
- Process updates
- The data
- Recommendations
- Feedback
- Questions

# What is a completeness review?

- Administrative review
- What makes an application complete?
  - Defined under Minn. R. 7007.0500
  - Checklists published on our applications forms page



Try this at home!

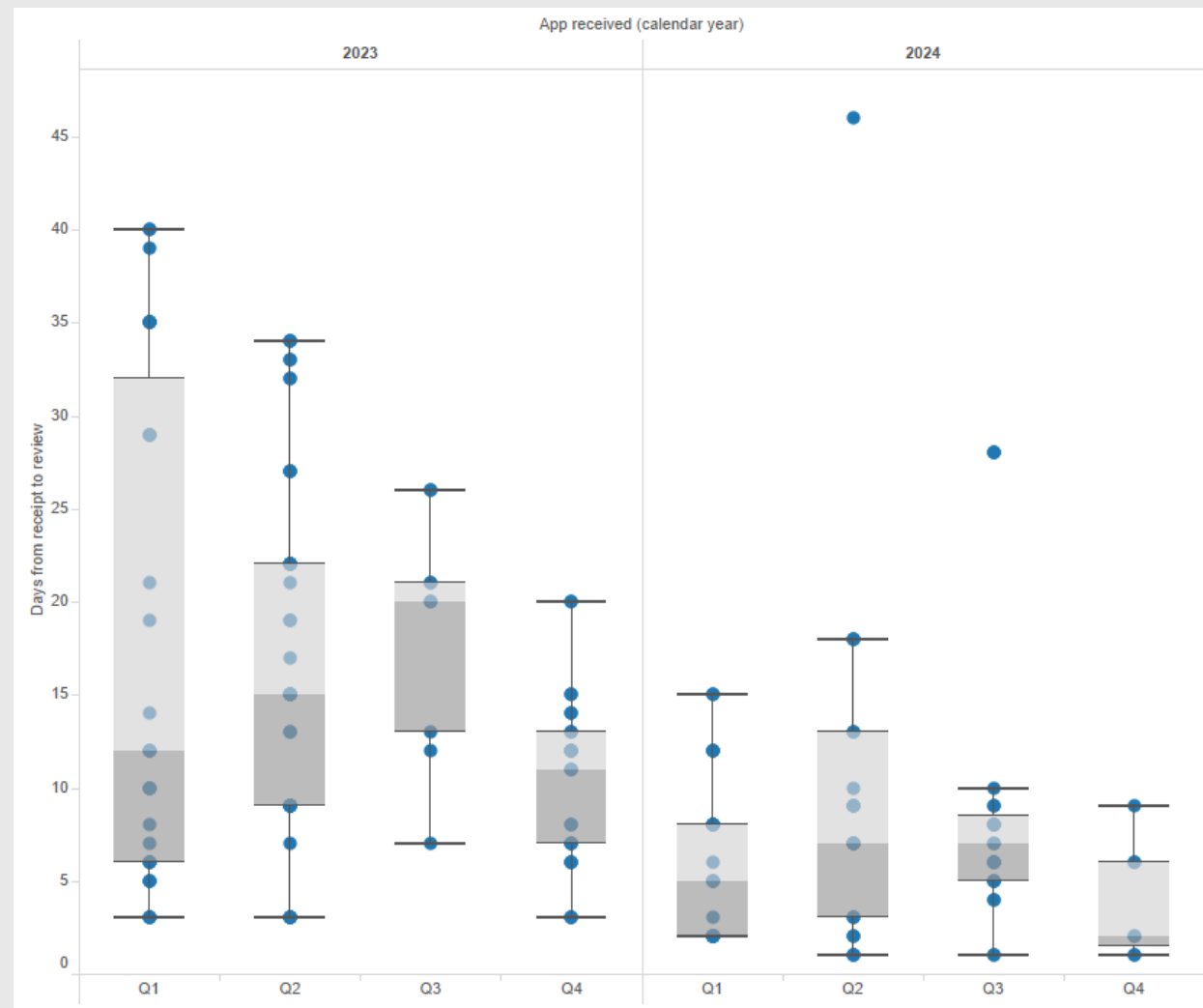
# Why is a completeness review?

- Required by rule
  - Minn. R. 7007.0700, subp. B
  - Starting point for regulatory action deadlines
- Helps write permits faster



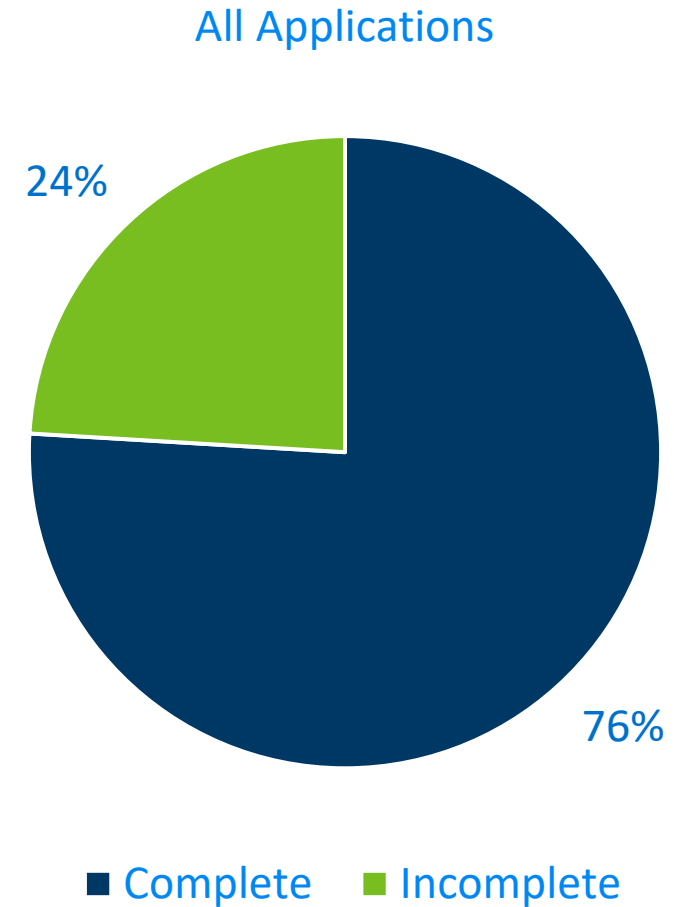
# Process updates

- Assigning completeness reviews more quickly
- 30-day deadline for resubmittal
- Retargeted completeness checklist based on permit engineer feedback
- Emission calculators
  - Mandatory January 2025
- Other form updates



# Two years in review: the data

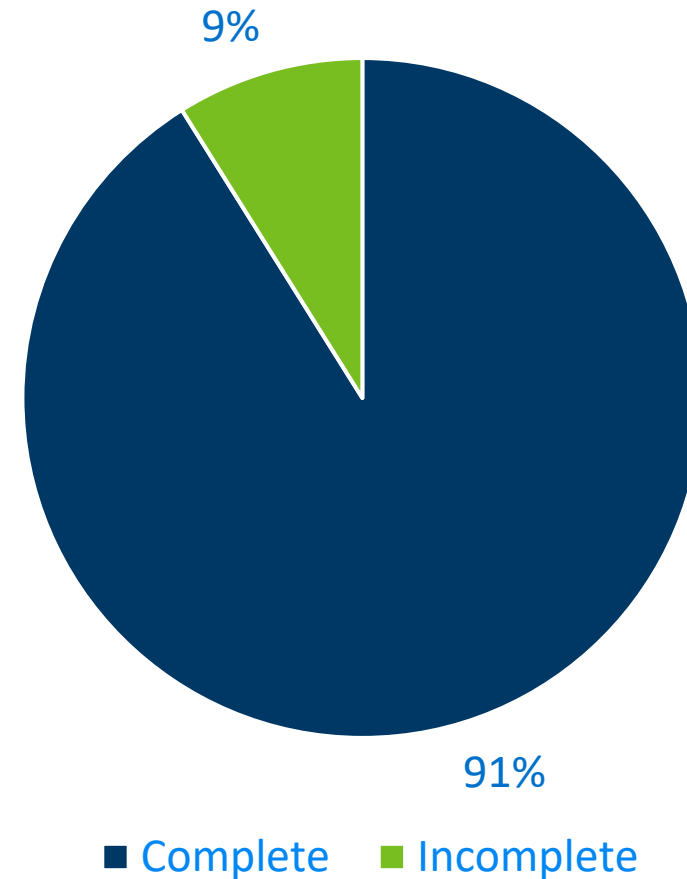
- Reviewed 291 submittals received from Jan. 1, 2023 to Sept. 30, 2024
- 70 deemed incomplete at least once



# Administrative changes and amendments

- 101 received, only 9 incomplete
- Common issue
  - Missing transfer agreements
- e-Services seems to resolve this

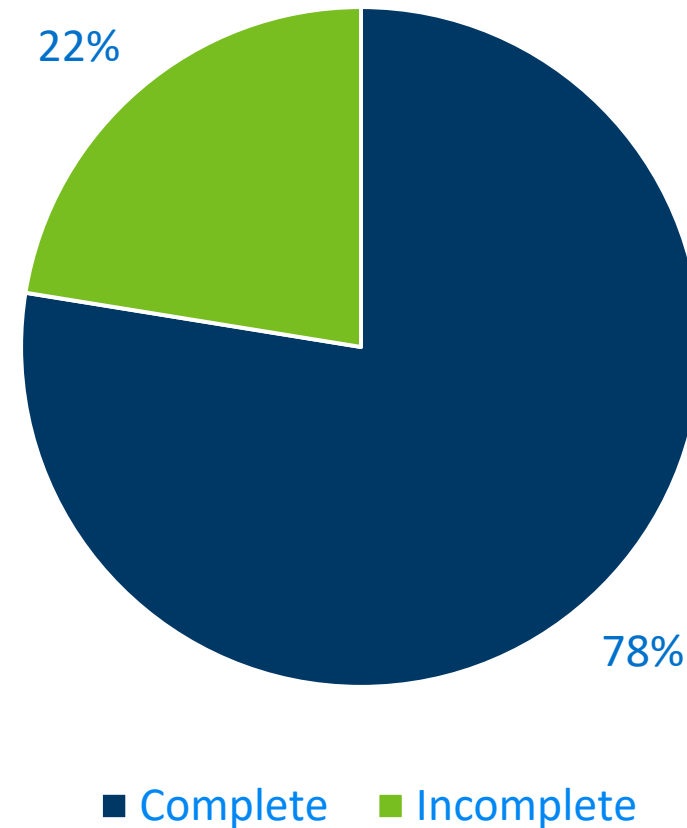
Administrative changes/amendments



# Capped and registration permits

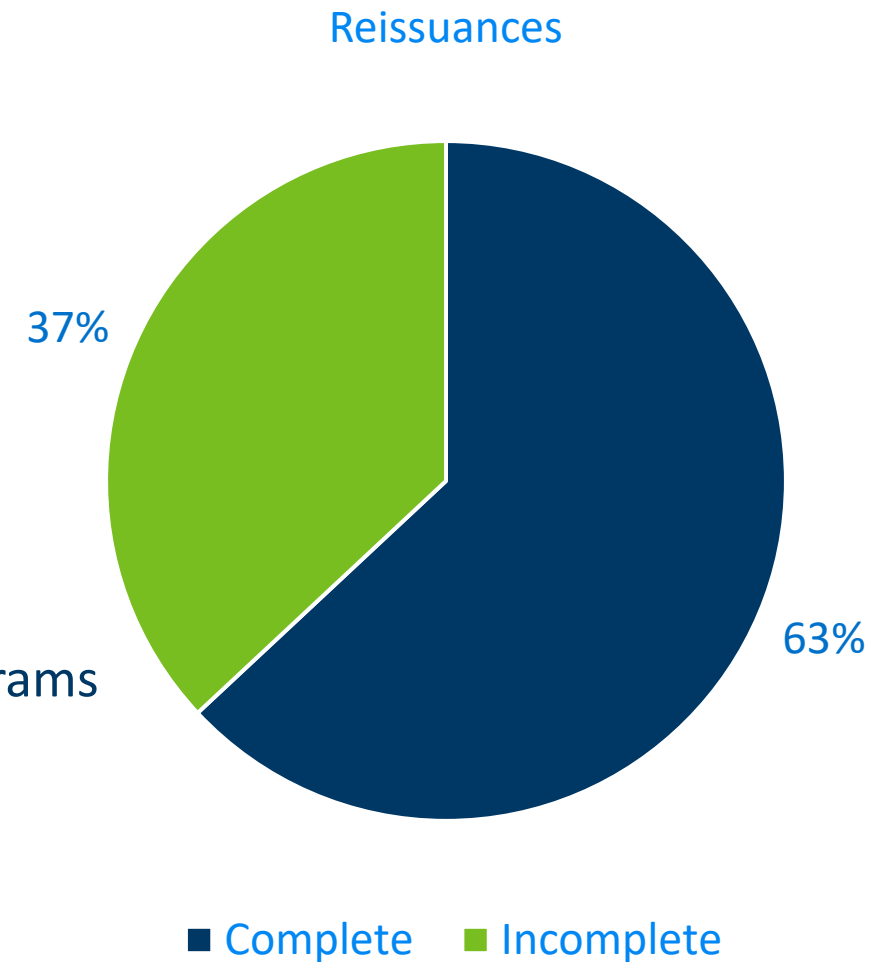
- 49 received, 11 incomplete
- Common Issues
  - Missing highlighted federal standards, especially general provisions
  - Missing SI details
  - Missing editable calculations spreadsheet
- Tier I actions – different process

Capped and Registration Permits



# Reissuances

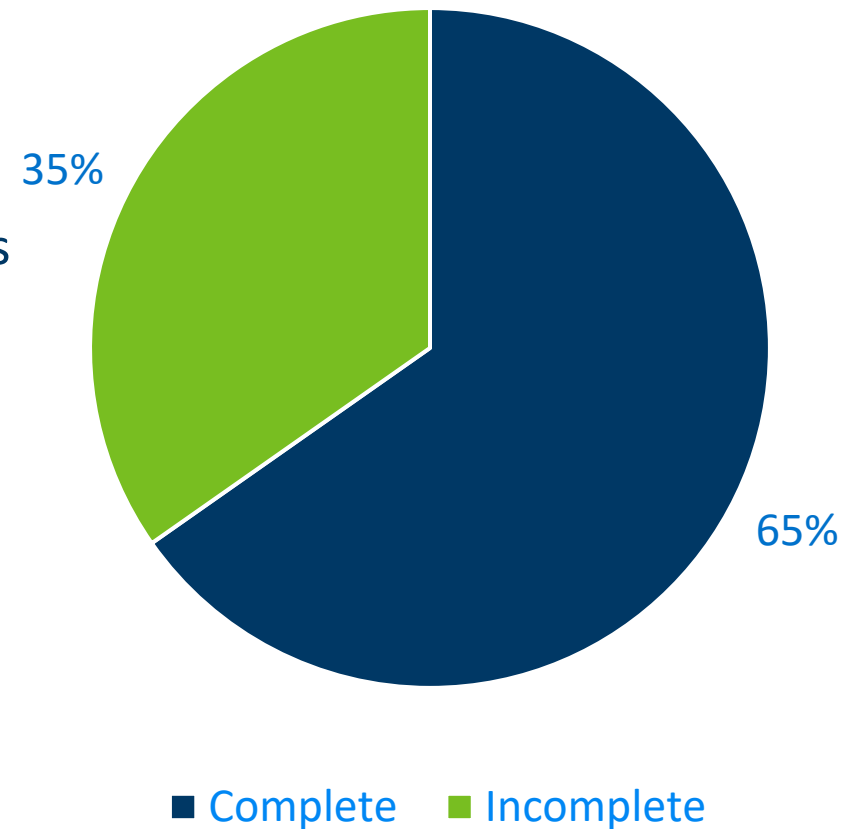
- 46 received, 17 incomplete
- Common issues
  - Missing SI Relationships, especially stacks and monitors
  - Inactive units not marked correctly
  - Missing or incorrect hood certifications, stack/vent diagrams and process flow diagrams
- Major update made in September
- New instruction documents



# Individual permit actions

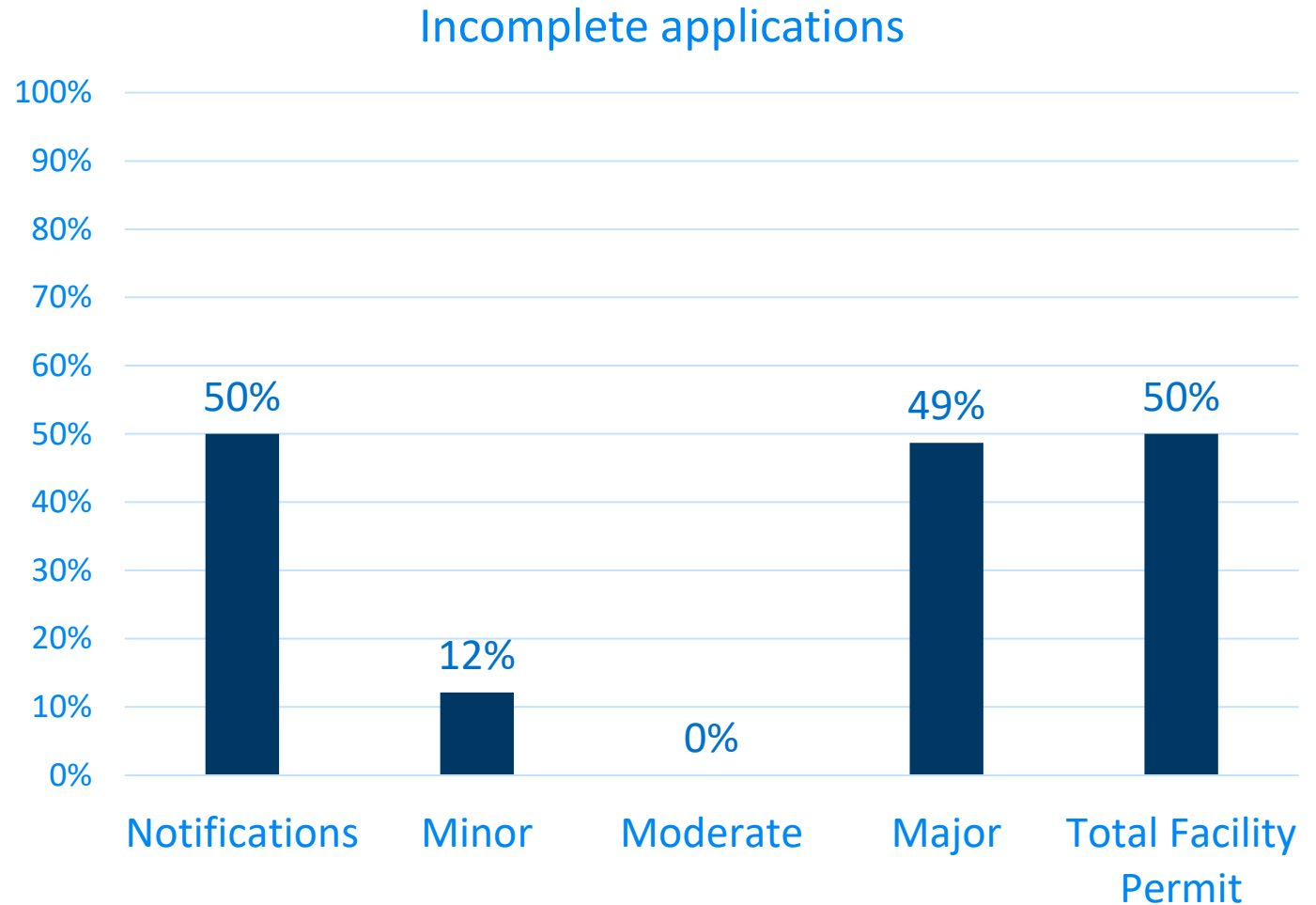
- 95 received, 33 incomplete
- Common issues
  - Missing marked-up permit, federal standards
  - Missing IPER, CH-04 series calculations
  - Missing an editable spreadsheet, pdf printout of calculations, or GI-07 summary sheet
- Ongoing efforts – complicated projects

Individual Permit Actions



# Individual permit actions – breakdown by type

- Notifications
  - Most likely to be missing forms
- Major amendments
  - Most likely to have calculation issues
- Total facility permits
  - Only received eight applications



5

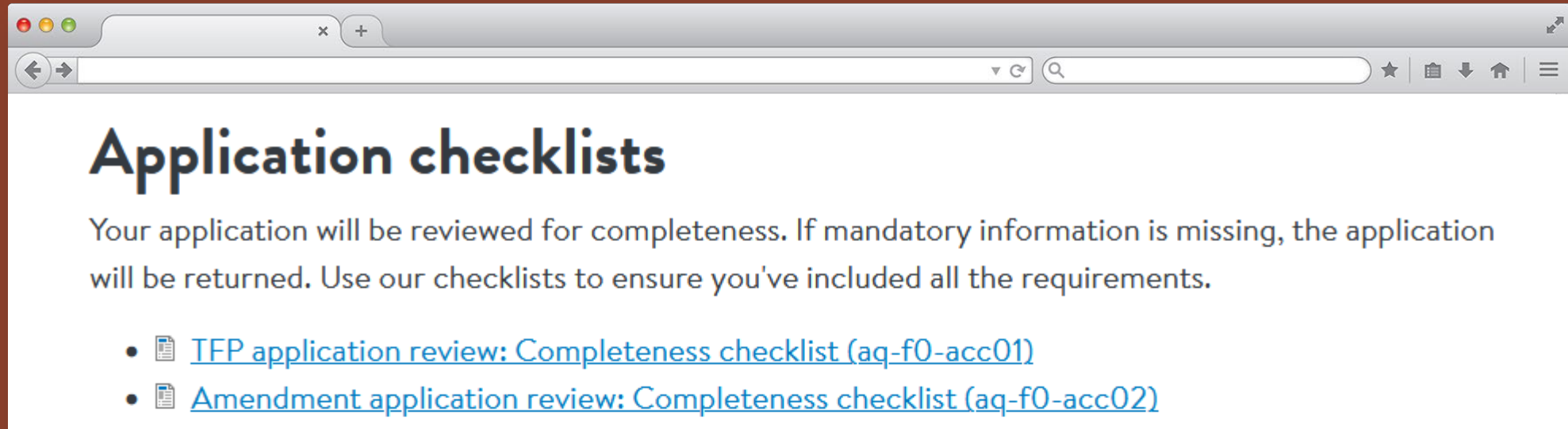
**Recommendations for  
applicants**  
to consider before  
submitting your application



# 1

## Review the completeness checklist

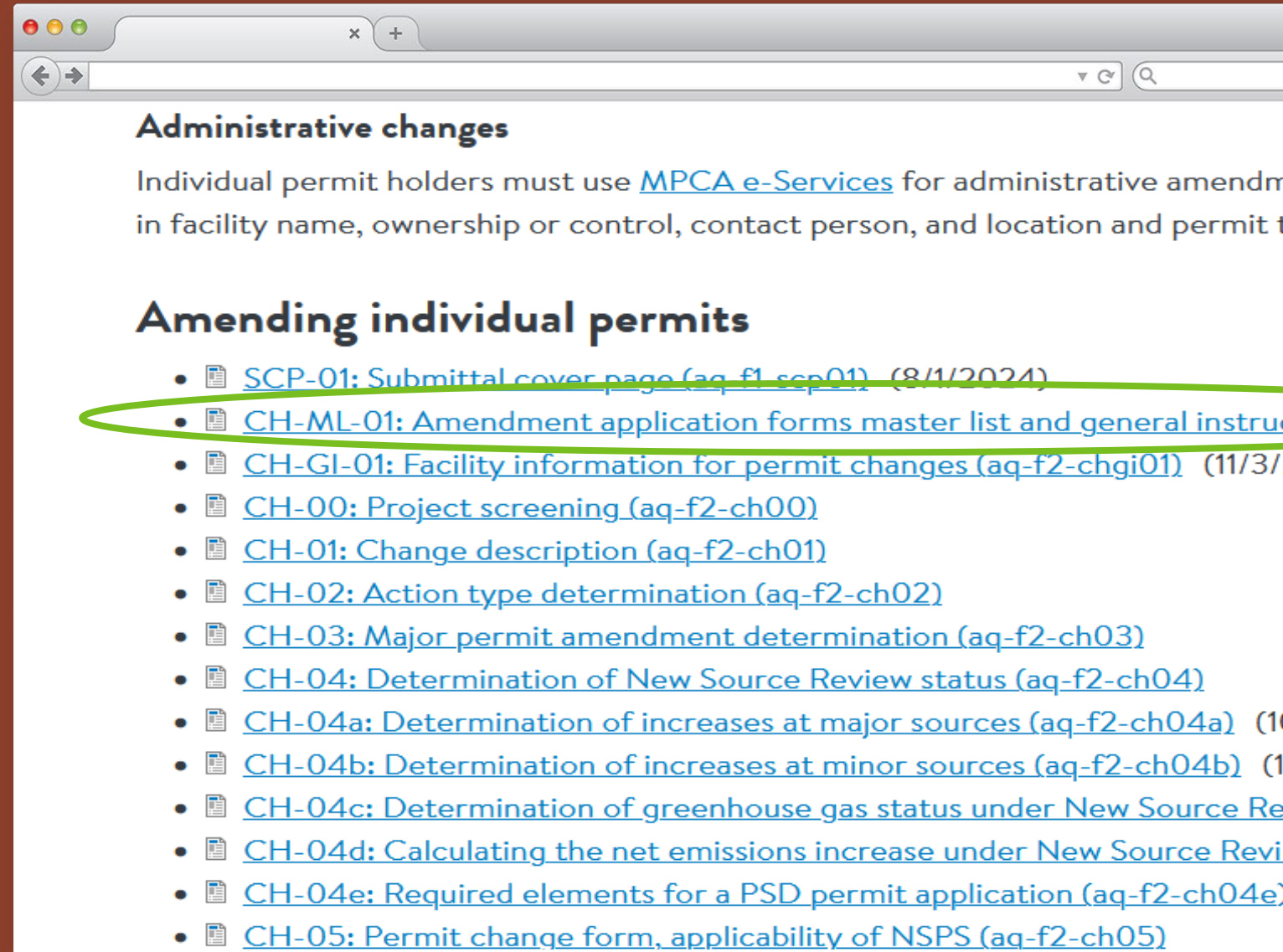
- Review the MPCA application checklists to ensure you've included all the requirements
- Refer to the checklist corresponding to your permit type
- Application checklists section of the Air permit application forms page of the MPCA website under Business With Us / Permits and regulations / Air permits



# 2

## Reference instruction forms

- Additional guidance including form information and links to additional resources
- MPCA website under Business With Us / Permits and regulations / Air permits / Air permit application forms
- Look for the list of forms under the type of permit you are submitting



**Administrative changes**

Individual permit holders must use [MPCA e-Services](#) for administrative amendments in facility name, ownership or control, contact person, and location and permit type.

**Amending individual permits**

- [SCP-01: Submittal cover page \(aq-f1-scp01\) \(8/1/2024\)](#)
- [CH-ML-01: Amendment application forms master list and general instructions](#)
- [CH-GI-01: Facility information for permit changes \(aq-f2-chgi01\) \(11/3/2024\)](#)
- [CH-00: Project screening \(aq-f2-ch00\)](#)
- [CH-01: Change description \(aq-f2-ch01\)](#)
- [CH-02: Action type determination \(aq-f2-ch02\)](#)
- [CH-03: Major permit amendment determination \(aq-f2-ch03\)](#)
- [CH-04: Determination of New Source Review status \(aq-f2-ch04\)](#)
- [CH-04a: Determination of increases at major sources \(aq-f2-ch04a\) \(11/3/2024\)](#)
- [CH-04b: Determination of increases at minor sources \(aq-f2-ch04b\) \(11/3/2024\)](#)
- [CH-04c: Determination of greenhouse gas status under New Source Review \(aq-f2-ch04c\) \(11/3/2024\)](#)
- [CH-04d: Calculating the net emissions increase under New Source Review \(aq-f2-ch04d\) \(11/3/2024\)](#)
- [CH-04e: Required elements for a PSD permit application \(aq-f2-ch04e\) \(11/3/2024\)](#)
- [CH-05: Permit change form, applicability of NSPS \(aq-f2-ch05\)](#)

# 3

## Reference e-Services help documents

The screenshot shows the MPCA e-Services website interface. At the top, there is a navigation bar with three tabs: "Documents and Forms", "Non-Registered Services", and "Registered Services". Below the tabs, the text "Version: 1.4" and "You are currently not logged in." is displayed. A "WELCOME" banner is present. The main content area is divided into two columns: "Non Registered Services" and "Registered Services". The "Non Registered Services" column includes the text "I want to pay a bill, create a new account or retrieve my password." and a "More Services >>" link. The "Registered Services" column includes the text "I want to apply for a permit, sign up for notifications, submit monitoring results, check the status of an application or download a Electronic Signature Submittal Agreement." and a "More Services >>" link. Below the main content, there is a "LOGIN" section with input fields for "User ID:" and "Password:" and a "Login" button. In the top right corner, there is a "Skip Navigation" link and a "Help | Login" link, which is circled in green. The MPCA logo and name "MINNESOTA POLLUTION CONTROL AGENCY" are visible in the top right corner.

- Select guidance for every screen in e-services
- View ahead of time on MPCA website under Business With Us / Permits and regulations / Air permits /e-Service air permit applications

## Instructions for form GI-05B

Use one column for each emission unit (EU). Use multiple copies of this form, if necessary. Use this form to describe emission units other than liquid storage tanks and fugitive emission sources. Separate forms are provided for liquid storage tanks (GI-05C) and for fugitive emission sources (GI-05D).

All fields as directed by the form are **mandatory** except the Agency Interest Identification (ID) number. (if unknown). **If you submit your application with blank mandatory fields or without mandatory attachments, it will be deemed incomplete and returned.**

- 1a) **AQ Facility ID number** -- Fill in your Air Quality (AQ) Facility ID number. This is the first eight digits of the permit number for all new permits issued under the operating permit program. If you don't know this number, leave this line blank.
- 1b) **Agency Interest ID number** -- Fill in your Agency Interest ID number. This is an ID number assigned to your facility through the Tempo database. If you don't know this number, leave this line blank.

2) **Facility name** -- Enter the facility name.

- 3a) **Emission unit ID number** -- For the purposes of this application, this is an ID number you assign to each emission unit using a simple 001, 002, 003,... numbering system and must be the same as shown on the Emission Unit Flow Diagram Form (Form GI-02). Note that separate forms are provided for tanks and fugitive emission sources.

If you are adding new emission units to your permit or replacing existing emission units, it is important not to reuse previously used EU/EQUI numbers. The new or replacement emission units must be numbered consecutively beginning with the next number after the last one used. Numbers used for removed emission units cannot be reused for new or replacement emission units. This ID number is unique to this piece of equipment and must be used on all forms for this application. If known, use Tempo IDs (EQUIxxx) instead of Delta IDs (EUxxx). Note that the same ID number should not be used for multiple equipment.

- 3b) **Emission unit type** -- You must choose from the following list.

### Emission unit types

<u>Abrasive equipment</u>	<u>Conveyor</u>	<u>Furnace</u>	<u>Heat exchanger</u>
<u>Acid treatment equipment</u>	<u>Cooler</u>	<u>Gasoline loading</u>	<u>Pulverizer</u>
<u>Adhesion equipment</u>	<u>Cracking equipment</u>	<u>Glazing equipment</u>	<u>Pump</u>

4

Review instructions  
at the end of the  
forms

# 5

## Consider including a cover letter

- A cover letter may be useful to:
  - Describe unique aspects of your project
  - Include additional information or details that are not captured by the forms
- The cover letter should not contradict the information provided on the forms/in the e-Service screens

The image shows a screenshot of a cover letter template. At the top, there is a horizontal line followed by the text "Company Name" in a red serif font. Below this is another horizontal line. Further down, the text "Date" is shown in a red sans-serif font. Underneath, "Street Address" and "City, ST ZIP Code" are listed in a grey sans-serif font. The main body of the letter starts with "Dear Recipient:" followed by a vertical cursor. Below this, there are three paragraphs of placeholder text in a grey sans-serif font: "To get started right away, just tap any placeholder text (such as this) and start typing to replace it with your own.", "Want to insert a picture from your files or add a shape, text box, or table? You got it! On the Insert tab of the ribbon, just tap the option you need.", and "Find even more easy-to-use tools on the Insert tab, such as to add a hyperlink, insert a comment, or add automatic page numbering." The letter concludes with "Sincerely," and "Your Name" at the bottom.

# Give us feedback

- [aq.permit.forms.mpca@state.mn.us](mailto:aq.permit.forms.mpca@state.mn.us)
- Your completeness reviewer



# Thank you!

**Megan Lai & Rand Silvers**

*Megan.Dalbec@state.mn.us, Rand.Silvers@state.mn.us*

# Raw Data – Applications Received

	Received	Incomplete Once	Incomplete 2+	Complete
Total	291	60	21%	221
Admin	101	9	9%	92
Capped/Registration	49	11	22%	38
Reissuance	46	14	30%	29
Notifications	12	5	42%	6
Minor	33	4	12%	29
Moderate	3	0	0%	3
Major	39	13	33%	20
Total Facility Permit	8	4	50%	4

# Raw Data – Incompleteness Reasons

	Forms			Calculations			Applicability/ Other
	SI Details	Errors	Missing	Formatting	Technical	Missing	
Admin Changes	0%	0%	100%	0%	0%	0%	0%
Capped/ Registration	36%	45%	55%	36%	36%	9%	27%
Reissuances	50%	50%	45%	5%	0%	0%	0%
Notifications	0%	29%	86%	0%	0%	57%	29%
Minor Amendments	25%	0%	75%	25%	0%	25%	50%
Major Amendments	30%	41%	63%	37%	26%	37%	22%
Total Facility Permit	50%	0%	50%	50%	25%	50%	25%