Flexible Air Permitting (FAP) Approaches Used in Pilot Permits Evaluated by EPA

Source	Key Flexibility Provisions
3M St. Paul, Minnesota	• Plant-wide emissions limit for VOC (4,596 tons/year; 30,600 lbs/day). • Advance-approvals for specified categories of renovations and other changes deemed to be "consistent with" the specified change categories. • Approved replicable methodology (ARM) enabling updates to capture and destruction efficiency parameters for pollution control devices without requiring permit modifications.
DaimlerChrysler Newark, Delaware	• Plant-wide applicability limits (PALs) for NO_x (150.71 tons/year; 4.86 tons/day) and VOC (1,112.8 tons/year; 5.3 tons/day). • Advance-approvals for specified projects and categories of changes. • Case-by-case control technology determination for significant new units. • Enforceable Pollution Prevention (P2) performance requirement for topcoat emissions and P2 reporting requirements. • ARM for updating pollution control device parameters. • Permit conditions streamlining.
Imation Weatherford, Oklahoma	• Plant-wide potential-to-emit (PTE) limit for VOC emissions (249 tons/year). • Advance-approvals for specified changes and classes of changes. • Advance-approvals for raw material changes, including use of screening ARM to determine when case-by-case review is needed under State Air Toxics Program. • Alternative control device operating scenarios that provide flexibility in controlling or otherwise reducing VOC emissions. • Permit conditions streamlining of all technology requirements, including applicable MACT standards.
Intel Aloha, Oregon	• Plant Site Emissions Limits (PSELs) for VOC (190 tons/year; 8 tons/week) and CO (32 tons/year). • Potential-to-emit (PTE) limits on organic and inorganic hazardous air pollutants (HAPs). • Advance-approvals for a broad class of changes, provided no new applicable requirements and MRR requirements not covered in the permit. • Source-specific RACT limit based on units of production, designed to encourage P2.
Lasco Bathware Yelm, Washington	• Plant-wide PTE limits for VOC emissions (249 tons/year; 1.71 tons/day). • Advance-approvals for categories of changes, including BACT and P2 requirements to address minor NSR requirements. • ARM for updating emission factors without requiring permit modifications.
Saturn Spring Hill, Tennessee	• Variable PALs for VOC based on production (1,563 tons/year at 500,000+ vehicles per year; 198.5 tons/month); PALs for NO_x, PM, SO, and CO. • Advanced approvals for changes to existing emissions sources and construction of new emissions sources (with conditions). • BACT for all existing emissions units. • Case by case BACT determination for all new units under the PAL. • Permit conditions streamlining.

Source: EPA, *Evaluation of Implementation Experiences with Innovative Air Permits: Results of the U.S. EPA Flexible Permit Implementation Review*. http://www.epa.gov/ttn/oarpg/t5/memoranda/iap_eier.pdf