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DEPARTMENT OF ENVIRONMENTAL PROTECTION



Bureau of Air Quality

# **Draft Plan Approval Application Form Update**

**Air Quality Technical Advisory Committee**

**August 17, 2023**

**Harrisburg, PA**

Josh Shapiro, Governor

Richard Negrin, Secretary

# Background

- The Bureau of Air Quality (BAQ) has undertaken an initiative to revise air quality permit application and other forms.
- Title V and State-Only operating permit application forms were revised in January 2021.
- Currently, BAQ is working on revisions to Plan Approval application forms and instructions. These forms were last updated in 2004.

# Overall Concept

- One main goal of the revised forms is for the applicant to provide DEP with the information required for application review while minimizing requests for unnecessary or extraneous material.
- While there are currently eight different plan approval applications for different source types, the revised application will be a singular form with supplemental sections for various sources and control devices.

# AQTAC Request

- In October 2022, BAQ reached out to AQTAC Chair John Tissue regarding having AQTAC members review draft Plan Approval Application forms while still in draft form.
- Mr. Tissue was able to arrange for AQTAC member volunteers to review the draft forms and instructions.
- In January 2023, Mr. Tissue sent BAQ feedback from AQTAC members on the draft forms.

# AQTAC Feedback

- One common theme was that since applicants may still be in a procurement stage when the plan approval application is being filled out, specific information may not be known.
- Comments were made regarding the need for certain design information that does not impact air emissions, such as burner ignition methods and sketches/schematics for equipment.

# AQTAC Feedback

- Questions for operating parameters seemed vague and did not specify whether they were for maximums, averages, etc.
- Some operating parameter questions should ask for ranges rather than specific numbers.

# AQTAC Feedback

- The forms should focus on how sources and control devices impact air contaminant emissions and compliance with regulations. The forms should not be asking for information that, while useful for operators, is not relevant to determining, controlling, or monitoring emissions.
- Many other specific comments and suggested revisions were offered.

# BAQ Response

- BAQ appreciates the comments and perspectives supplied by AQTAC members.
- BAQ is also seeking guidance and feedback from equipment vendors and manufacturers.
- The feedback from AQTAC and others will be discussed with regional DEP staff.



# BAQ Response

- BAQ expects that many of the suggested changes will be incorporated into the final draft documents.
- There is no anticipated timeline of when the final draft documents will be prepared.



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