

# **Standardized Authorizations**

## **De Minimis, Permits By Rule, and Standard Permits**

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**Texas Commission on Environmental Quality**

Environmental Trade Fair 2019



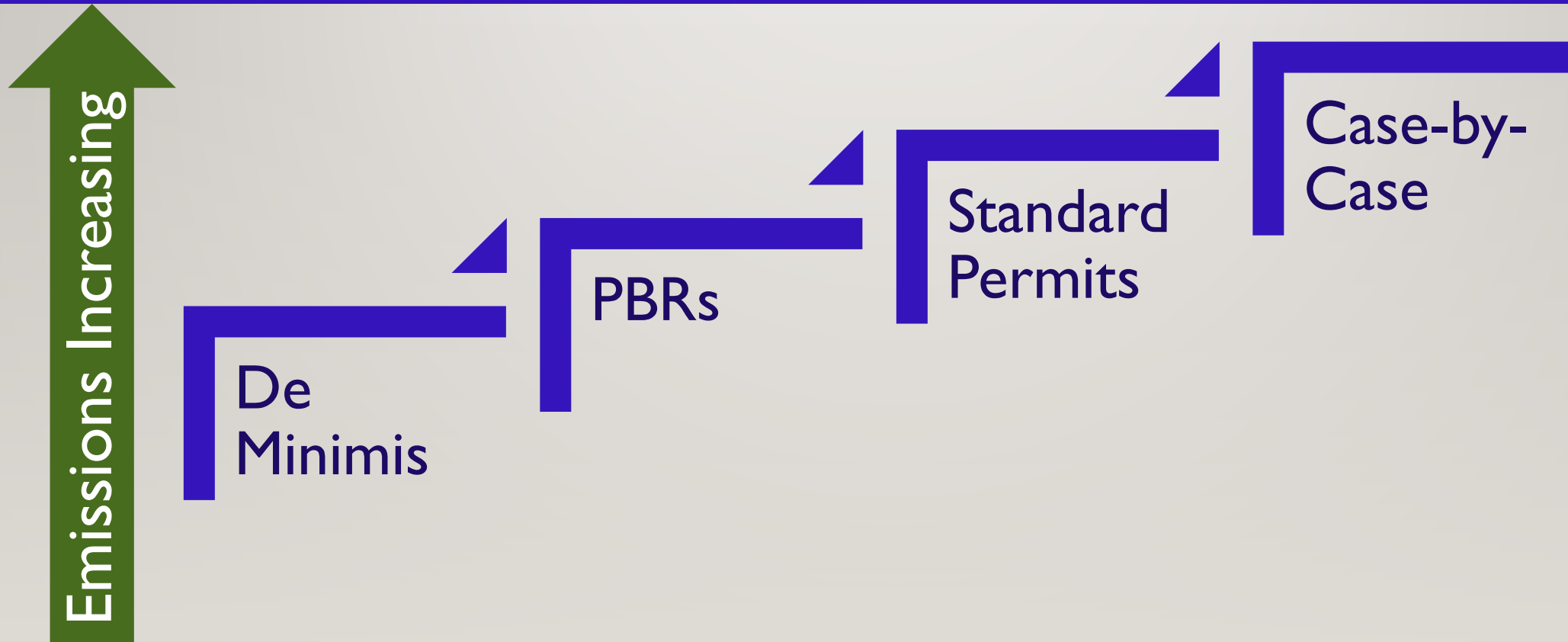
# Overview

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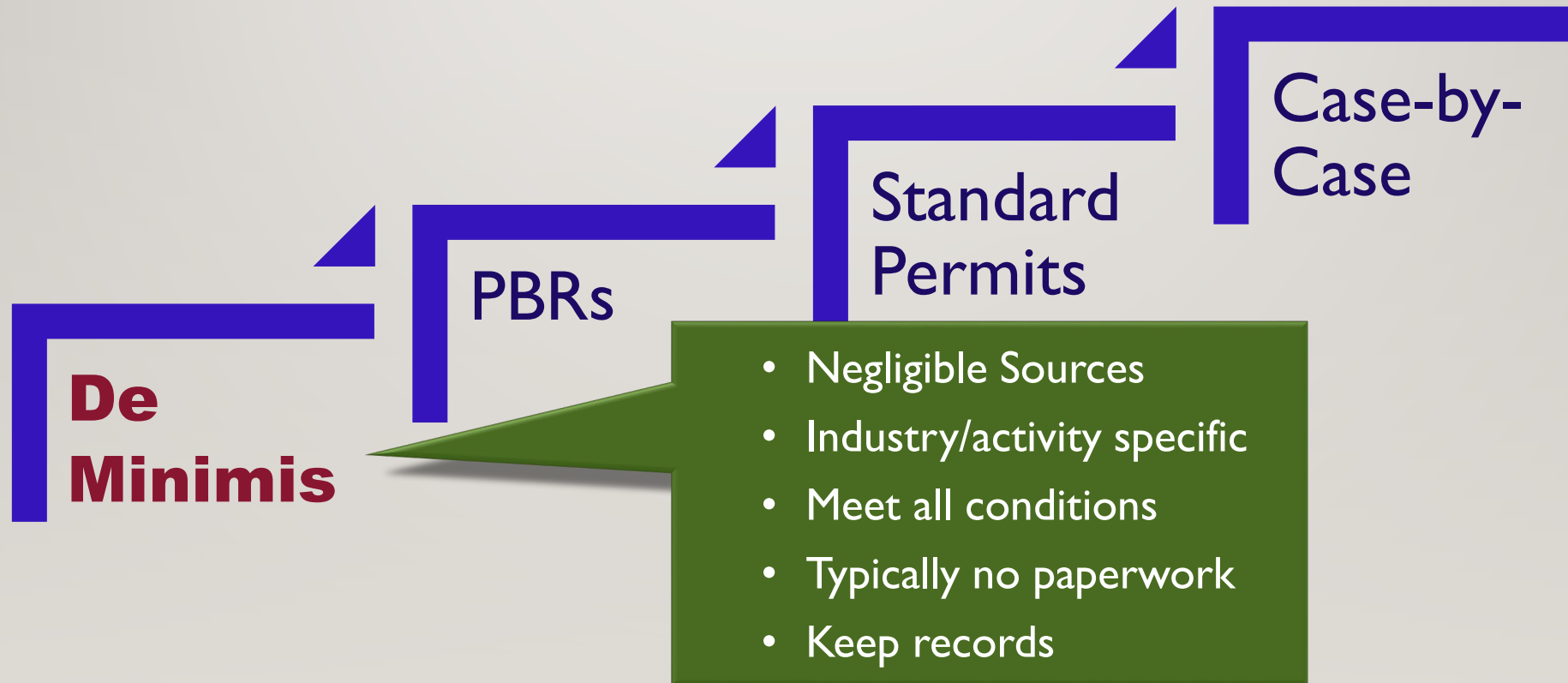
- Types of NSR Authorizations
- Submitting Applications
- Case Studies
- Questions



# Types of NSR Authorizations



# De Minimis Authorizations

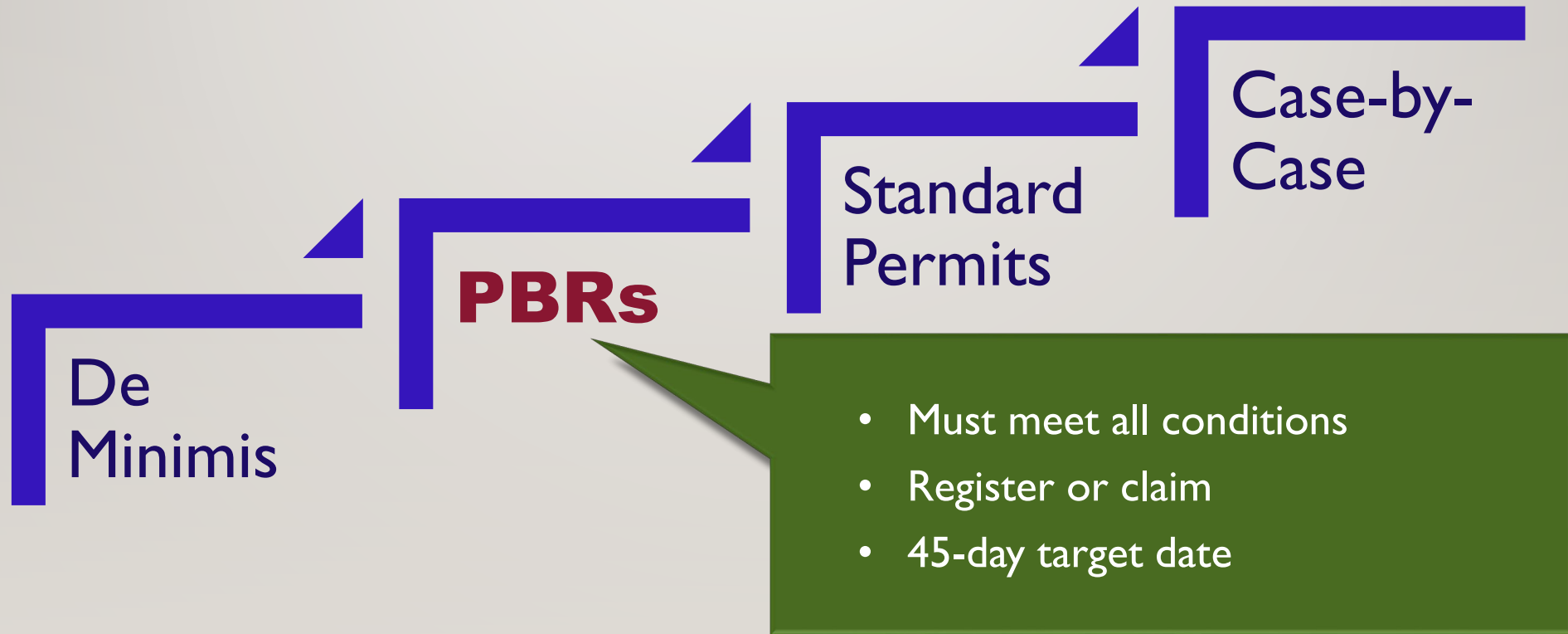




# De Minimis Examples



# PBR Authorizations

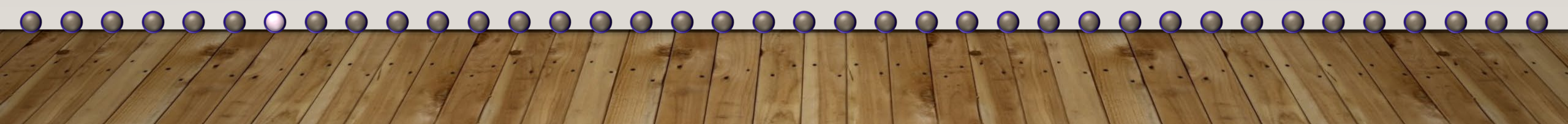




# Chapter 106 Subchapters

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- Subchapter E: Aggregate and Pavement
- Subchapter K: General
- Subchapter O: Oil and Gas
- Subchapter S: Surface Coating
- Subchapter U: Tanks, Storage, and Loading



# Subchapter E

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- 30 TAC § 106.141 - Batch Mixers
- 30 TAC § 106.144 - Bulk Mineral Handling
- 30 TAC § 106.146 - Soil Stabilization Plants





# Subchapter K

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- 30 TAC § 106.261 – Facilities  
(Emission Limitations)
- 30 TAC § 106.262 – Facilities  
(Emission & Distance Limitations)
- 30 TAC § 106.264 – Replacement of facilities



# Subchapters S & T

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- 30 TAC § 106.433 – Surface Coating
- 30 TAC § 106.436 – Autobody Refinishing Facility
- 30 TAC § 106.452 – Dry Abrasive Cleaning



# Subchapter U

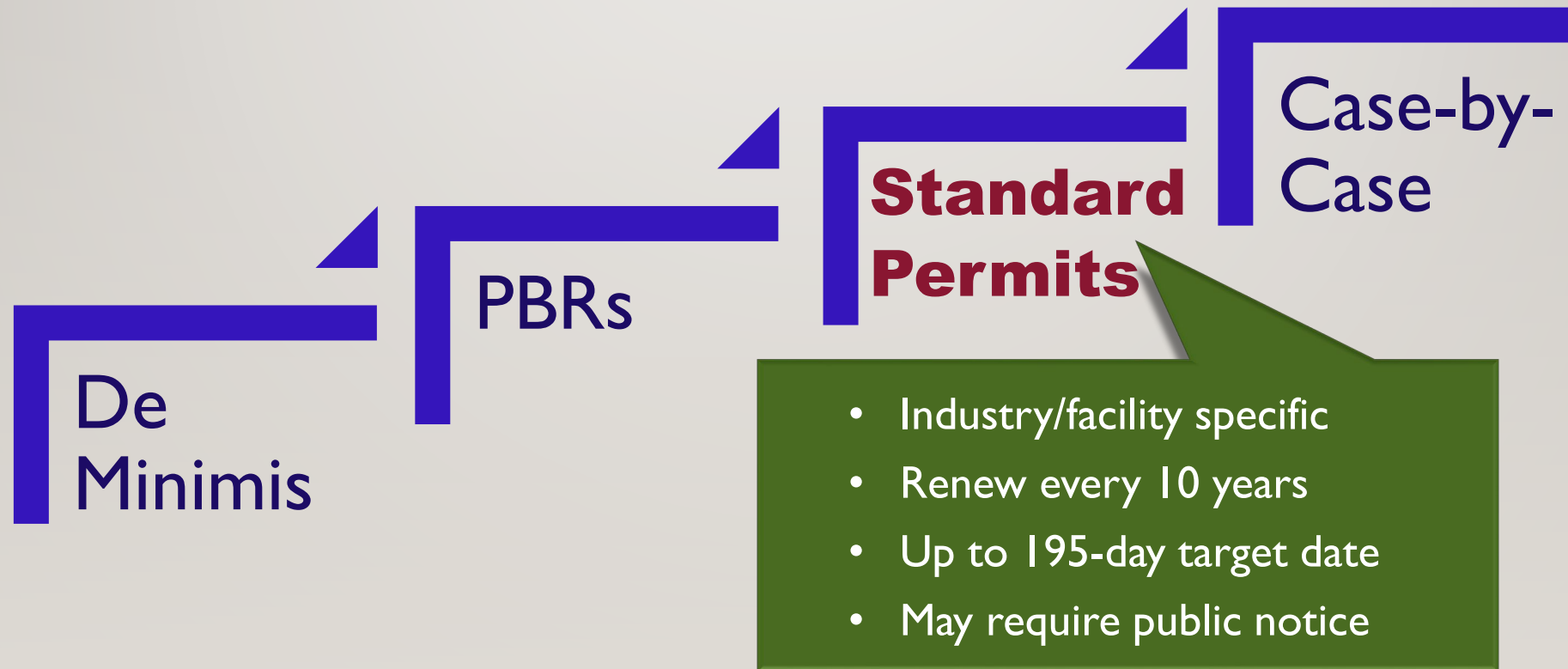
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- 30 TAC § 106.472 – Organic and Inorganic Loading and Unloading
- 30 TAC § 106.473 – Organic Loading and Unloading
- 30 TAC § 106.478 – Storage Tank and Change of Service





# Standard Permit Authorizations



# Standard Permits in Rule Registrations (RR)

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- Oil and Gas
- Municipal Solid Waste
- Pollution Control Projects
- Animal Carcass Incinerator
- Boilers
- Electric Generating Units



# Mechanical Standard Permits

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- Concrete Batch Plants
- Rock and Concrete Crushers
- Hot Mix Asphalt Plants





# Agricultural Standard Permits Requiring Registration

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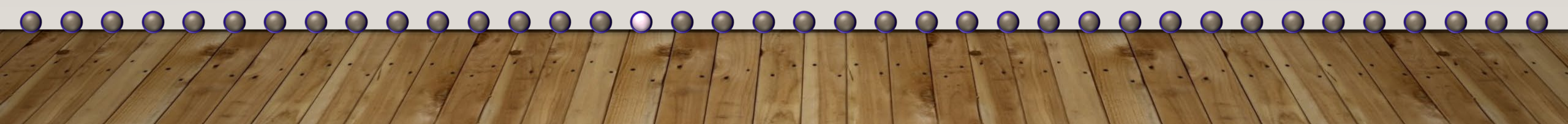
- Feedmills, Portable Augers,  
and Hay Grinders (5)(A)
- Temporary and Permanent  
Polyphosphate Blenders



# Claimed Standard Permits

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- Anhydrous Ammonia Storage and Distribution Operations
- Cotton Gin Facilities and Cotton Burr Tub Grinders
- Grain Elevator/Grain Handling Operations and Portable Grain Augers
- Dry Bulk Fertilizer Handling Operations
- Peanut-Handling Operations
- Feedmills, Portable Augers, and Hay Grinders [Other than (5)(A)]



# Case-by-Case Permits



- Special conditions and emission rates
- Renew every 10 years
- Public notice
- Not specific to an industry



# Permitting Approach

**Gather information**

Site location

Proposed Process

**Evaluate authorizations**

De Minimis

PBR

Standard Permit

**Emission data**

Usage rates

AP-42

Calculation spreadsheet

**Identify other applicable rules**

State

Federal

# The Application Package

## Administrative Documents

Cover letter

Core Data  
Form

Registration  
forms

Proof of  
payment

# The Application Package

## Technical Information

Rule  
compliance

Process flow  
diagram

Process  
description

Detailed  
emissions

Plot plan

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# Case Study - Coatings

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# Gather Information

- Located in Deaf Smith County / Attainment County
- Recreationally coating car parts
- 75 gallons of coatings used per year



# Evaluate Authorizations

| <b>NSR Authorizations</b> | <b>Applicable Rule</b> | <b>Limits</b>                            | <b>Meet Limits?</b> |
|---------------------------|------------------------|--|---------------------|
| <b>De Minimis</b>         | <b>Yes</b>             | <b>100 gallons per year</b>              | <b>Yes</b>          |
| <b>PBR(s)</b>             | <b>Yes</b>             | <b>Specific hourly and annual limits</b> | <b>Yes</b>          |
| <b>Standard Permit</b>    | <b>No</b>              | <b>N/A</b>                               | <b>N/A</b>          |

# Gather Information

- Located in Deaf Smith County / Attainment County
- Autobody shop
- 3 gallons per week



# Evaluate Authorizations

| <b>NSR Authorizations</b> | <b>Applicable Coating Rule</b> | <b>Limits</b>                | <b>Meet Limits?</b> |
|---------------------------|--------------------------------|------------------------------|---------------------|
| <b>De Minimis</b>         | <b>Yes</b>                     | <b>100 gallons per year</b>  | <b>No</b>           |
| <b>PBR(s)</b>             | <b>Yes</b>                     | <b>Specific usage limits</b> | <b>Must verify</b>  |
| <b>Standard Permit</b>    | <b>No</b>                      | <b>N/A</b>                   | <b>N/A</b>          |



# Evaluate Authorizations

## Subchapter S

**30 TAC §  
106.431**

- Equipment used exclusively to mill or grind coatings and molding compounds

**30 TAC §  
106.433**

- Surface coating or stripping facilities, excluding vehicle repair and refinishing shops

**30 TAC §  
106.436**

- Facilities used for the repair or refinishing of vehicle bodies, body parts, or chassis

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# **CONCLUSION**

## **Coatings Case Study**

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# **Case Study - Mechanical**

## **PBR vs Standard Permit**



# Gather Information

- Located in Williamson County / Attainment County
- Permanent construction of a concrete operation
- Maximum of 30 cubic yards per hour





# Evaluate Authorizations

| <b>NSR Authorizations</b> | <b>Applicable Rule</b> | <b>Limits</b>                         | <b>Meet Limits?</b> |
|---------------------------|------------------------|---------------------------------------|---------------------|
| <b>De Minimis</b>         | <b>No</b>              | <b>N/A</b>                            | <b>N/A</b>          |
| <b>PBR(s)</b>             | <b>Maybe</b>           | <b>Capacity limit</b>                 | <b>Must verify</b>  |
| <b>Standard Permit</b>    | <b>Yes</b>             | <b>Usage and distance limitations</b> | <b>???</b>          |

# Additional Details

**Confirm the process**

**Mix ingredients**  
**Load concrete to mixing trucks**

**Confirm ingredients**

**Cement**                      **Aggregate**  
**Water**                        **Sand**

**Confirm final product**

**Concrete**

# PBR vs Standard Permit

## 30 TAC § 106.141

- Batch mixers with rated capacity of 27 cubic feet or less
- Mixing cement, sand, aggregate....
- Produces concrete, grout, stucco, mortar, or other similar products

# PBR vs Standard Permit

**30 TAC §  
106.146**

- No specific limits of usage
- The process of blending and mixing materials with a soil to improve certain properties of the soil.



# PBR vs Standard Permit

## Concrete Batch Plant SP

- No more than 300 cubic yards in any one hour
- Can add water, Portland cement, and aggregates.....
- Does not include operations that meet the requirements of 30 TAC §§ 106.141 or PBR 106.146

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# **CONCLUSION**

## **Mechanical Case Study**

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# Keep in Mind

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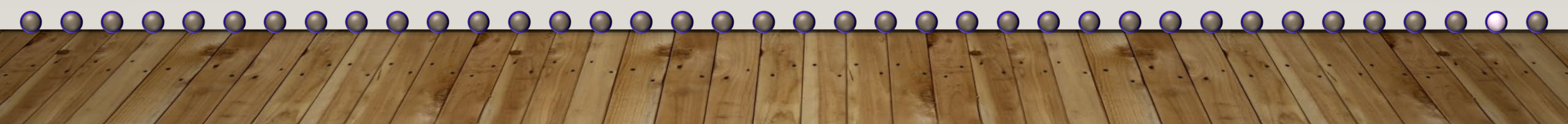
- Demonstrate distance limit in plot plan
- Match process description and process flow diagram
- Consistent representations on all documents
- Complete all applicable sections of each form



# Streamlining

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- Readily Available Permits
- STEERs (ePermits)
- Calculation Spreadsheet
- NSR Workbooks







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