

# AQ Permitting Completeness Checklists

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Minnesota Pollution Control Agency

# Why?

- Reduce the cycle time between receiving an application and the date of construction authorization
- One of the common barriers is incomplete applications
- Develop checklists to address/minimize application incompleteness

# What?

- Developed Completeness Checklists
- Will be used internally to review amendment applications and applications for new facilities
- Not registration, capped or general permits; not reissuance applications (at this time); not for expedited process

# When?

- Now
- Pilot program underway
  - Using checklists on construction applications already in-house prior to them being picked up
  - Will still be 'tweaking' checklists as we develop experience

# Future Plans

- Will use checklists on incoming applications starting mid-March
- Applications may be placed on hold - to await additional information - or be returned, or deemed complete

# Completeness Checklists

- Two checklists
  - One for Change/Modification applications (CH forms)
  - One for new Total Facility permit applications
  - Will not be used for expedited permit program

# Form of Checklists

- Three parts
- Administrative Completeness Review
- Technical Completeness Review
- Project Completeness Review

# Administrative

- Check for presence of necessary forms (criteria is: present/missing)
- Turn-around time – two business days
- Application immediately returned if missing forms:
  - Mod. applications: CH-02, CH-03, CD-01
  - TFP: GI-09, CD-01, calculations



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520 Lafayette Road North  
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## Amendment Application

### Administrative Completeness Review Checklist

Air Quality Permit Program

Facility Name: \_\_\_\_\_

AQ Facility ID No.: \_\_\_\_\_ AQ File No.: \_\_\_\_\_

Date Application Received: \_\_\_\_\_

Type of Permit Action Requested:  Major  Moderate  Minor  Administrative  Notification

An application is returned when:

- After administrative review, return if any one of the forms CH-02, CH-03, or CD-01 (in bold below) is missing or if any form has been modified by changing or eliminating questions; or
- After technical review, return if technically incomplete.

Place an application on hold if it is determined to be technically complete and the forms CH-02, CH-03, and CD-01 are included, but any other forms are missing as identified through the administrative completeness review. Notify applicant and give two weeks to submit missing forms. If not received in two weeks, return application.

Date review complete: \_\_\_\_\_ Administrative Reviewer Initials \_\_\_\_\_

Were the most recent AQ Forms used?  Yes  No      Were Construction Fees Included?  Yes  No  N/A

Were two public copies submitted?  Yes  No      Were two confidential copies submitted?  Yes  No  N/A

Forms Required for All Types of Permit Amendment Requests	Present	Missing	N/A
1. CH-CP-01 Permit Amendment Application Cover Page	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. CH-CR-01 Certification Form (must have original signature – no photocopies)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. CH-GI-01 Facility Information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. CH-00 Project Screening	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. CH-01 Change Description	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. CH-02 <b>Action Type Determination</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. CH-03 <b>Major Permit Amendment Determination</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(Check N/A for Administrative Amendment application, Contravening Permit Terms or Notifications not Requiring a Permit)			
8. CR-03 Confidentiality Certification (if Permit Application Cover Page indicates confidentiality is sought)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(Original Certification, a Confidential Application Copy, and a Public Application Copy)			

Reviewer's Comments: \_\_\_\_\_

Forms Required for Major Amendment Requests	<input type="checkbox"/> N/A	Present	Missing	N/A
9. CH-04 Determination of New Source Review Status		<input type="checkbox"/>	<input type="checkbox"/>	
a. If checked "No" on question 5 – attached CH-04a or CH-04b?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Reviewer's Comments: \_\_\_\_\_

10. CH-05 Applicability of New Source Performance Standards (NSPS)  Present  Missing

# Technical Completeness

- Completeness, *not* correctness
- Review is done on scale of 1-3
  - 1 = incomplete, 3 = complete
- Application incomplete if # of 1's  $\geq 5$  and/or # of 2's  $\geq 8$
- Turn-around time – 5 business days



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## Amendment Application

### Technical Completeness Review Checklist

Air Quality Permit Program

Date review complete: \_\_\_\_\_ Technical Reviewer Initials \_\_\_\_\_

Type of Permit Action Request:     Major     Moderate     Minor     Administrative     Notification

Ranking system used to rate quality of submittal

- 1- lacking all information
- 2- lacking some information
- 3- submitted all information
- NA- Not applicable

If five (5) or more items are rated "1" then the application will be deemed technically incomplete.

#### All Permit Types

General	Yes	No	N/A
Check in Delta: if facility has permit, has the permit expired?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If yes, has an application for reissuance been submitted prior to the expiration date (check the DQ)? If no, permit must be reissued prior to or in conjunction with permitting the modification.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Reviewer's Comments: \_\_\_\_\_

Check in Delta: Does the facility currently have a registration permit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If yes, have they submitted a total facility permit application with the modification amendment? A facility must receive a total facility permit prior to or in conjunction with the amendment which makes them subject to requirement for state or federal permit.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Reviewer's Comments: \_\_\_\_\_

Confidential Information Request <input type="checkbox"/> NA – confidentiality not requested	1	2	3
Is information on the public version properly blocked out, i.e. only the specific information which is being requested to be confidential?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is a confidential copy enclosed which has all the data available?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Did they appropriately block out material, i.e. data needed for emissions calculations can not be confidential (e.g. emission rates, hourly maximum design rates)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Reviewer's Comments: \_\_\_\_\_

CH-01 Change Description	1	2	3	N/A
If Construction or physical change box is checked (question #3), are appropriate GI forms attached?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If Operational Change box is checked, does it look like it matches up with amendment type requested, i.e. most will require major amendment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Reviewer's Comments: \_\_\_\_\_

CH-03 Major Permit Amendment Determination	1	2	3	N/A
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# Project Completeness

- Other information, as applicable, needed prior to working on application
  - AERA
  - EAW/EIS
  - Modeling
  - NPDES permit application
- Checking only for presence



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## Project Completeness

### Project Completeness Review Checklist

Air Quality Permit Program

#### Other Program Submittals

(Note to reviewer: Use form CH-00 to assist in answering these questions)

	Yes	No	N/A
Did they indicate that an EAW or EIS is required?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If Yes, has it been received by MPCA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reviewer's Comments:			
Did they indicate that an AERA is required?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If Yes, has it been received by MPCA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reviewer's Comments:			
Is modeling required (Yes if AERA needed, and Yes if a PSD project, unless only pollutant involved is VOC)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If Yes, did they submit modeling info on CDs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reviewer's Comments:			
Did they indicate that a NPDES permit is required?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If Yes, has an application been received by MPCA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reviewer's Comments:			
Check permit application to see if any type of biomass fuel is proposed to be burned or if permit application is for facility to produce/process biomass (other than a liquid fuel)? If yes, then notify Permittee that EAW may be required for a 'fuel conversion' facility.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reviewer's Comments:			

# Application Returned

- Returned immediately when 'must have' forms identified as missing in administrative completeness
- Returned if technically incomplete

# Application on Hold

- Technically complete and 'must have' forms are present, but other forms are missing
- E-mail (or letter) sent to applicant identifying missing forms
- On hold for two weeks; return application if missing forms not received within 2 weeks

# Possible Concerns

- Review may be subjective
  - Process designed to minimize
- Criteria for returning
- Question about use of most recent forms
  - Will use reason when checking
- Question about modification of forms
  - Questions should not be eliminated

# Checklists on Web

- Checklists for use by MPCA staff
- Available to help applicants; not intended to be sent in
- Checklists will be revised as we develop experience
- Checklists will be available on web at <http://www.pca.state.mn.us/air/permits/forms.html>

**Related Pages:**



[Air Permits](#)

[Air](#)

This Web site contains [PDF documents](#) that require Adobe Acrobat for viewing.

## Air Quality Forms — Permit Application, Notifications, Compliance and Miscellaneous

Available below are air emission permit application forms, compliance reporting forms and other miscellaneous air quality forms from the Minnesota Pollution Control Agency (MPCA).

[Instructions](#) for completing and submitting the forms is available below. Each form is available as either a downloadable  Microsoft Word (word processing) file, or as an  Adobe Acrobat [pdf file](#).

### Timelines and Instructions for Completing and Submitting Application Forms

- For projects that are straight-forward and non-controversial, you should allow at least 3-5 months for the permit to be placed on public notice and 6-8 months for permit issuance from date of receipt by the MPCA. If the project is subject to PSD, requires an Environmental Assessment Worksheet (EAW), or is otherwise complex

### Instructions

#### Air Quality Forms

1. [Total Facility Permit Application Forms](#)
  - o [Miscellaneous](#)
  - o [General Information](#)
  - o [Compliance](#)
  - o [Emission Calculation](#)
  - o [Monitoring Equipment](#)
  - o [Modeling Information](#)
  - o [EMS Permit Qualifications](#)
2. [Change/Modification Application Forms \(includes New Source Review forms\)](#)
3. [Registration Permit Application Forms](#)
4. [General Permit Application Forms](#)
  - o [Non-Metallic Mineral Processing](#)



# Common problems

- Not reading and following instructions!
- Calculations not complete (lacking justification for control efficiency, source of emission factors not fully cited)

# Common problems

- Information not consistent in application, e.g. different control efficiency on GI-05A and in calculations; calculations based on emission factors for fuel, but different limit proposed in CD-01
- GI-07 often does not include Total HAPs

# Goal

- Can complete permitting process more quickly
- Better, more complete applications
- Less time on fixing application means can move on to next permit sooner
- Level playing field