



Air Emission Registration Permits

Businesses with low levels of actual emissions can submit a simplified permit application form and obtain an air emissions permit called a "registration permit." Registration permits allow facilities greater flexibility to make changes as long as they can show they remain eligible for the registration permits.

Purpose of Registration Permits

It is essential that the Minnesota Pollution Control Agency (MPCA) have sufficient information available on permit application forms to ensure that permits are protective of the environment. For that reason, the agency's application forms for air emission permits call for a significant amount of detail about facilities. For those with low emissions of air pollutants, less detail is necessary.

Registration permits greatly simplify the permit application process for facilities. Also, since the public notice period for the rule is considered to be the public notice period for these permits, the registration permits can be issued without an individual public notice and comment period.

Registration permits are intended for two categories of permittees:

- Facilities that only need permits because they are subject to certain federal New Source Performance Standards.
- Certain facilities whose potential emissions exceed a permit threshold but whose actual emissions of air pollutants fall below the federal thresholds due to operating limits, fuel use, control equipment or other measures.

Eligibility for Registration Permits

The rule establishes four categories of eligibility for registration permits:

- Option A: New Source Performance Standards-only sources.
- Option B: Volatile Organic Compound (VOC)-only sources.
- Option C: Sources with emissions from boilers, internal combustion engines and VOC sources only.
- Option D: Sources whose potential emissions exceed state or federal threshold levels, but whose actual emissions are less than 50 percent of federal thresholds.

A source may be eligible for registration permits under more than one option. The options generally become more complex, yet more flexible, when moving from A to B, B to C, etc.

Besides requiring eligible sources to comply with all applicable state rules and federal regulations, the rule includes specific compliance requirements for each option.

In general, sources with registration permits need to maintain records and perform monthly calculations to show that they continue to be eligible for registration permits. They are also required to submit annual reports on their emissions for the MPCA's emission inventory.

Owners of existing, unpermitted facilities should contact the MPCA at 651-296-6300 or 1-800-657-3864, before applying for a registration permit. In many (but not all) cases, these facilities have already become subject to requirements that prohibit them from receiving a registration permit.

Owners or operators of facilities should not apply for registration permits if they anticipate making changes in the next year that would cause the facilities to become ineligible. Registration permits do not expire.

Option A: New source performance standards-only sources

Facilities are eligible for registration permits under Option A if potential emissions do not exceed state or federal permit thresholds, but they must obtain permits because they are subject to one of the following New Source Performance Standards (NSPS):

- Small Industrial-Commercial-Institutional Steam Generating Units (Code of Federal Regulations, Title 40, Part 60, subpart Dc (40 CFR pt. 60, subp. Dc)
- Storage Vessels for Petroleum Liquids (40 CFR pt. 60, subps. K, Ka and Kb)
- Grain Elevators (40 CFR pt. 60, subp. DD)
- Surface Coating of Metal Furniture (40 CFR pt. 60, subp. EE)
- Stationary Gas Turbines (40 CFR pt. 60, subp. GG)
- Industrial Surface Coating: Large Appliances (40 CFR pt. 60, subp. SS)
- Petroleum Dry Cleaners (40 CFR pt. 60, subp. JJJ)
- Nonmetallic Mineral Processes (40 CFR pt 60, subp. OOO)
- Industrial Surface Cleaning of Plastic Parts for Business Machines (40 CFR pt. 60, subp. TTT)
- Hot Mix Asphalt Facilities (40 CFR pt. 60, subp. I)
- Stationary Compression Ignition Internal Combustion Engines (but only if the engine has a displacement of less than 30 liters per cycle) (40 CFR pt. 60, subp. IIII)
- Stationary Spark Ignition Internal Combustion Engines (40 CFR pt. 60, subp. JJJJ)

For Subparts IIII and JJJJ, if all engines did not rely on performance testing of the affected unit to demonstrate compliance with the standard, then a permit is not required just because Subpart IIII or JJJJ applies. If only the notification and/or recordkeeping provision of any of the NSPS applies, a permit is not required. If a facility is also subject to an NSPS other than one of the above, that facility does not qualify for a Registration Permit, unless only the notification and record-keeping provisions apply.

Compliance requirements

A source obtaining a registration permit under this option must maintain records of the amount of (Volatile Organic Compound (VOC)-containing materials either purchased or used each month to show that it purchased or used less than 2,000 gallons during the calendar year.

Option B: Volatile Organic Compound Sources

Sources whose only emission are from the use of Volatile Organic Compound Sources (VOC)-containing materials, insignificant activities, and dust from roads or parking lots are eligible for Option B if they purchase or use less than 2,000 gallons of VOC-containing material per calendar year. Additionally, the source may be subject to one or more of the 14 NSPS listed under Option A; if the source is subject to a NSPS other than one of those 14, then the source is ineligible for a registration permit.

Compliance requirements

A source obtaining a registration permit under this option must maintain records of the amount of VOC-containing materials either purchased or used each month to show that it purchased or used less than 2,000 gallons during the calendar year.

Option C: Boiler/internal combustion engine/VOC sources

Option C is for sources whose only emissions are from boilers, internal combustion engines, VOC-containing materials (or any combination of the three), insignificant activities and dust from roads or parking lots. The rule also excludes from eligibility any source that uses or generates nitrous oxide (N₂O) other than from combustion units and insignificant activities, and any source that uses or generates hydrofluorocarbons, perfluorocarbons, or sulfur hexafluoride other than from insignificant activities.

The rule includes a method of deriving a number related to total emissions from operating boilers, internal combustion engines and the use of VOC-containing materials. The rule includes emission factors and calculations to be used to determine eligibility under Option C. Additionally, the source may also be subject to one or more of the 14 NSPS listed under Option A; if the source is subject to a NSPS other than one of those 14, then the source is ineligible for a registration permit.

Compliance requirement

Recalculate the number monthly and maintain a record of fuel usage, VOC-containing material used and/or operating hours.

Option D: Sources with actual emissions under 50 percent of federal thresholds

A source is eligible for a registration permit under Option D if it has the potential to emit pollutant at levels exceeding a state or federal threshold but reduces its emissions through the use of pollution control equipment or other measure so that the annual actual emission for each pollutant are less than half the federal permit threshold.

- Sources can demonstrate that actual emissions are below the thresholds by calculating actual emissions based on emission factors, performance tests, continuous emission monitoring and material balance methods.

The rule includes control efficiencies for common types of pollution control equipment that can be used in calculating emissions.

In addition to using pollution control equipment, facilities can reduce actual emissions by limiting the amount of fuel burned, the amount of VOC-containing material used, production levels, the number of hours equipment is operated, or by employing pollution prevention practices.

Additionally, the source may be subject to one or more of the 14 NSPS listed under Option A; if the source is subject to a NSPS other than one of those 14, then the source is ineligible for a registration permit.

Compliance requirements

Recalculate actual emissions each month. Sources with control equipment must meet the pollution control equipment performance standard, which has additional recordkeeping and reporting requirements. Control equipment must be operating whenever the process equipment is in use, and standard monitoring and operation and maintenance practices must be observed. General requirements for operation, maintenance and monitoring are included in the rule.

Questions and answers

- Q: What if I have a registration permit and want to make a change or modification in my operations?
- A: Any change or modification in the operation is allowed without a permit amendment, provided that after the change or modification, the source remains eligible for the registration permit option that was issued.
- Q: What if I plan to modify my source and no longer qualify for the registration permit option I am permitted under, but instead qualify under a different registration permit option?
- A: The rule allows you to start construction seven days after the new registration permit application is received by the MPCA.
- Q: What if I already have a regular operating permit and I become eligible for a registration permit?
- A: This can happen, when facilities apply new pollution control equipment or adopt pollution prevention practices. In that case, you can submit our application for a registration permit. The existing permit will then be voided when the registration permit is issued.
- Q: I believe my pollution control equipment is more efficient than the rule would allow. Can I apply this efficiency to determine my emissions?
- A: Yes, if you conduct a performance test to show that you can meet the higher level in accordance with the requirements of the control equipment rule.
- Q: What if I am not sure how to calculate my emissions to determine whether I am eligible for a registration permit?
- A: The rule includes the calculation methods. There are specific application forms and worksheets to help you do the calculations. For additional help, you may want to consult other informational material available from the MPCA or the U.S. Environmental Protection Agency.
- Q: Can I apply the efficiency of my control equipment to calculate emissions of hazardous air pollutants?
- A: You may, if you conduct a performance test that demonstrates the efficiency of the equipment for controlling hazardous air pollutants.

More information

For additional information about air emissions facility permits, including application forms, you can contact the MPCA at 651-296-6300 or 1-800-657-3864. All application forms are available for download at <http://www.pca.state.mn.us/nwqh472>.

The MPCA also offers technical assistance to independently owned businesses with fewer than 100 employees through its Small Business Environmental Assistance Program by calling 651-282-6143 or 800-657-3938.

MPCA's website: <http://www.pca.state.mn.us/>.