|  |  |
| --- | --- |
| Minnesota Pollution Control Agency (MPCA), 520 Lafayette Road North, St. Paul, MN 55155-4194 | Registration Permit Application Review  Completeness Checklist  Air Quality Permit Program  Doc Type: Permitting Checklist |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Facility name: |  | | | | | | Main tracking number: |  |
| AQ Facility ID number: | |  | | | Date application received (mm/dd/yyyy): | | |  |
| Date review complete (mm/dd/yyyy): | | |  | Reviewer’s name: | |  | | |

**Tier I Review**

The Permit Document Coordinator will return a permit application if missing any of the following:

|  |  |
| --- | --- |
| * Form SCP-01 with signature | * Check for appropriate fee |

**Tier II Review**

**Complete Section A or Section B.**

**Section A. Application for an Administrative Change to an existing Registration Permit**

**Note:** Once the e-Service is available, registration permit holders can electronically apply for an administrative change to their permit through MPCA's e-Services website at <https://www.pca.state.mn.us/data/e-services>. At some point, permit holders will be required to use e-Services for administrative permit changes. After that, paper change requests submitted will be denied. Check the MPCA website for the current status.

| **Form RP-05 review** | **Yes** | **No** | **NA** |
| --- | --- | --- | --- |
| * Does the described change qualify as an administrative change? |  |  |  |
| * If a change in facility ownership or control is requested, is the required information included? (a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee – Minn. R. 7007.1400, subp. 1.E.) |  |  |  |
| * Is the Facility located **outside** of the [cumulative levels and effects statute area](https://www.pca.state.mn.us/sites/default/files/aq1-42b.pdf) in South Minneapolis (approximately 1.5 miles around Hiawatha Ave and 28th St intersection)? |  |  |  |

Go to Tier II Completeness Review Results and Summary

**Section B. Application for a new Registration Permit, or a change from one Registration Permit option to another (A, B, C, D)**

**Initial eligibility review**

|  | | **Yes** | **No** | **NA** |
| --- | --- | --- | --- | --- |
| * If the Permittee has requested confidentiality, mark “No” for this section. Confidentiality is not available to registration permit applicants (SCP-01, item 6a). | |  |  |  |
| * Is the Facility located **outside** of the [cumulative levels and effects statute area](https://www.pca.state.mn.us/sites/default/files/aq1-42b.pdf) in South Minneapolis (approximately 1.5 miles around Hiawatha Ave and 28th St intersection)? | |  |  |  |
| * If the Facility has enforcement actions identified in Delta or Tempo, and they affect the ability to issue to the permit, mark “No” for this section. | |  |  |  |
| * If the facility is listed as a source in Minn. R. 7007.1110, subp. 2 that may not obtain a registration permit; mark “No” for this section. (acid rain, SW incinerator, other Pt. 70 source, SIP permit, waste combustor) | |  |  |  |
| * If the facility assumed any other site-specific permit requirements not contained in Minn. R. 7007.1110 to 7007.1130 as a mitigation measure in an EIS, to obtain a negative declaration in an EAW, or to demonstrate compliance with any AAQS (state/national), mark “No”. | |  |  |  |
| Reviewer’s comments: |  | | | |

**The facility is not eligible for a registration permit if any of the above answers are “No.”**

**Application form review**

**Note to reviewer:**

Pay attention to whether instructions were followed pertaining to order of questions. On some forms, depending on the answers given, the user is directed to a question that may not be the next question sequentially. If the instructions for which question to go to next are not followed, it can lead to a situation where the form is lacking some or all required information.

If you mark “No” during the application form review, clarify in the comments whether this renders the application ineligible for a registration permit or if additional information is needed.

| **RP-01: Facility information** | | **Yes** | **No (incomplete)** | **No (ineligible)** | **NA** |
| --- | --- | --- | --- | --- | --- |
| * Is Form RP-01 completely filled in? | |  |  |  |  |
| * Does the application include all required forms for the selected registration permit option? (See question 17 of Form RP-01.) | |  |  |  |  |
| Reviewer’s comments: |  | | | | |

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **RP-03 Requirements: NSPS (40 CFR pt. 60)** | | **Not included in application** | **Yes** | **No (incomplete)** | **No (ineligible)** | **NA** |
| * Are the identified New Source Performance Standards (NSPS) included on the list of allowed standards in Table RP-03.1? | | |  |  |  |  |
| * Does it seem likely that emission units listed are only subject to the NSPS identified on this form?   **(This should always be reviewed regardless of whether or not the form was included.)** | | |  |  |  |  |
| * Did applicant include a highlighted copy of the applicable Part 60 NSPS subpart or NSPS Checklist? | | |  |  |  |  |
| * Did applicant include a highlighted copy of the applicable requirements of 40 CFR pt. 60, subp. A (General Provisions)? | | |  |  |  |  |
| * If the applicant indicated emission units are subject to NSPS subp. IIII, does the compression ignition internal combustion engine have a displacement of less than 30 liters per cylinder?   (**Note** that a unit subject to NSPS subp. IIII may only receive a registration permit if the compression ignition internal combustion engine has a displacement of less than 30 liters per cylinder.) | | |  |  |  |  |
| Reviewer’s comments: |  | | | | | |

| **RP-04: Estimation form** | | **Not included in application** | **Yes** | **No (incomplete)** | **No (ineligible)** | **NA** |
| --- | --- | --- | --- | --- | --- | --- |
| * Is the appropriate section completely and correctly filled out? | | |  |  |  |  |
| * Do the calculations look like they were done correctly? And include all emission sources? | | |  |  |  |  |
| * For Option B: is the estimated annual quantity of Volatile Organic Compound (VOC) used/purchased < 2000 gallons/year? | | |  |  |  |  |
| * For Option D: for each pollutant, are the emissions less than the applicable threshold? | | |  |  |  |  |
| Reviewer’s comments: |  | | | | | |

| **RP-07 Requirements: NESHAP (40 CFR pt. 63)** | | **Not included in application** | **Yes** | **No (incomplete)** | **No (ineligible)** | **NA** |
| --- | --- | --- | --- | --- | --- | --- |
| * Are the identified National Emission Standards for Hazardous Air Pollutants (NESHAPs) included on the list of allowed standards in Table RP-07.1? | | |  |  |  |  |
| * + See note 1 in Table RP-07.1 to determine if the identified NESHAP disqualifies the facility from receiving a registration Permit. If it is one of the 8 NESHAPs mentioned in note 1, mark “No” and return the application as ineligible for a Registration Permit. | | |  |  |  |  |
| * Was enough information provided to identify all applicable NESHAPs? | | |  |  |  |  |
| * Did applicant include a highlighted copy of the applicable Part 63 NESHAP subpart? | | |  |  |  |  |
| * Did applicant include a highlighted copy of the applicable requirements of 40 CFR pt. 63, subp. A (General Provisions)? | | |  |  |  |  |
| * Does it seem likely that emission units listed are only subject to the NESHAP identified on this form?   **(This should always be reviewed regardless of whether or not the form was included)** | | |  |  |  |  |
| Reviewer’s comments: |  | | | | | |

| **RP-C1: Option C – Calculation form** | | **Not included in application** | **Yes** | **No (incomplete)** | **No (ineligible)** | **NA** |
| --- | --- | --- | --- | --- | --- | --- |
| * Did Permittee fill out Calculation 1, 2A and/or 2B, 3 and 4 as applicable? | | |  |  |  |  |
| * Do the calculations look like they were done correctly? | | |  |  |  |  |
| * Is the result of Calculation 4 less than 50? | | |  |  |  |  |
| * Did Permittee provide responses to question 7? | | |  |  |  |  |
| Reviewer’s comments: |  | | | | | |

| **RP-D1: Option D actual emission form** | | **Not included in application** | **Yes** | **No (incomplete)** | **No (ineligible)** | **NA** |
| --- | --- | --- | --- | --- | --- | --- |
| * Do the values reported here match the values calculated on Form RP-04? | | |  |  |  |  |
| * Are the emissions for each pollutant less than the applicable threshold?  |  |  | | --- | --- | | **Pollutant** | **Threshold (tons/year)** | | HAP – Single | 5 | | HAP – Total | 12.5 | | PM // VOC // SO2 // NOX // CO | 50 | | PM10 (Attainment Area / Nonattainment Area) | 50/25 | | Lead (Pb) | 0.5 | | CO2e | 50,000 | | | |  |  |  |  |
| Reviewer’s comments: |  | | | | | |

| **RP-D4: Option D flow diagram** | | **Not included in application** | **Yes** | **No (incomplete)** | **No (ineligible)** | **NA** |
| --- | --- | --- | --- | --- | --- | --- |
| * Does the process flow diagram match information provided in the application? Is it understandable? | | |  |  |  |  |
| * Are all emission units accounted for in the process flow diagram? | | |  |  |  |  |
| * Are all fugitive sources accounted for in the process flow diagram? | | |  |  |  |  |
| * Are all tanks accounted for in the process flow diagram (other than insignificant activities)? | | |  |  |  |  |
| * Are all controls accounted for in the process flow diagram? | | |  |  |  |  |
| Reviewer’s comments: |  | | | | | |

**Calculation review**

| **Calculations: Option D/existing facility** | | **Not included in application** | **Yes** | **No (incomplete)** | **No (ineligible)** | **NA** |
| --- | --- | --- | --- | --- | --- | --- |
| * Was an unlocked, electronic version of calculations provided? Or were adequate sample calculations included? | | |  |  |  |  |
| * Are all affected units and pollutants included?   (Particulate Matter less than 2.5 micrometers (PM2.5) emissions and insignificant activity emissions are not required to be calculated.) | | |  |  |  |  |
| * Were assumptions/emission factors documented? Were they specific for each factor (i.e., AP-42, chapter and table # references)? | | |  |  |  |  |
| * If an emission factor is not from AP-42, is there justification for use of this factor? | | |  |  |  |  |
| * + Did they justify use of the factor, if it is not an exact match to the operation? | | |  |  |  |  |
| * + If the emission factor was established by a performance test, was a copy of the control equipment manufacturer’s specifications, which includes operating parameters, submitted? | | |  |  |  |  |
| * If they used control efficiency, does the number match value entered on Form RP-D2? | | |  |  |  |  |
| * Are calculations provided for Total Hazardous Air Pollutants (HAPs) and Single HAPs?   (A stationary source in which the only HAP emissions are VOC emissions and that has actual VOC emissions less than five tons per year is not required to calculate emissions of HAPs.) | | |  |  |  |  |
| * For existing facilities, were calculations of potential to emit (PTE) included? | | |  |  |  |  |
| * + For existing facilities, are there numbers for lb/hr (if needed), uncontrolled and controlled tons per year?   (PM2.5 emissions and insignificant activity emissions are not required to be calculated.) | | |  |  |  |  |
| * + Are potential emissions below all of the major source thresholds for New Source Review (NSR)? (If the PTE exceeds this threshold due to a change at the facility that will not be made until they receive this Registration Permit, answer “yes”). If not, then subject to Injunctive Relief provisions of NSR. (enforcement referral) | | |  |  |  |  |
| * + Are potential HAP emissions below all of the major source thresholds for NESHAPS (10 tons per year (tpy) for any single HAP, 25 tpy for total HAPs)? (If the PTE is above major source thresholds, but there is not an applicable major source NESHAP, or the NESHAP exempts the facility based on actual material usage or does not require a Part 70 permit, answer “yes.”) | | |  |  |  |  |
| * For existing facilities applying for an Option B permit, if (Particulate Matter (PM) and/or HAP emissions are associated with VOC emissions (e.g., painting operations), have these PTE calculations been included? | | |  |  |  |  |
| * + If PM and/or HAP PTE calculations were included, and they affect the eligibility for an Option B permit, mark “No” for this section. | | |  |  |  |  |
| * Are calculations provided for Greenhouse Gas Emissions? | | |  |  |  |  |
| Reviewer’s comments: |  | | | | | |

| **RP-D2: Option D control equipment form** | | **Not included in application** | **Yes** | **No (incomplete)** | **No (ineligible)** | **NA** |
| --- | --- | --- | --- | --- | --- | --- |
| * Did the Permittee properly identify control equipment? | | |  |  |  |  |
| * Did the Permittee only use control equipment that is listed as an option on Form RP-D2, when calculating emissions below Option D thresholds?   (Only the types of control equipment listed in this item may be counted toward emission reduction for Option D Registration Permits.) | | |  |  |  |  |
| * For control equipment… | | |  |  |  |  |
| * + If the efficiency is determined by Minn. R. 7011.0070, was a copy of the portion of the control equipment manufacturer's specifications, with the appropriate operating parameters required to be monitored under Minn. R. 7011.0080 highlighted, submitted? | | |  |  |  |  |
| * + If the efficiency is based on an alternative control efficiency under Minn. R. 7011.0070, subp. 2, was a copy of the performance test plan, with the appropriate operating parameters highlighted, submitted? | | |  |  |  |  |
| * If they indicated that any of their control equipment collects emissions through a certified hood, did they submit Form RP-D3? | | |  |  |  |  |
| Reviewer’s comments: |  | | | | | |

| **RP-D3: Option D hood certification form** | | **Not included in application** | **Yes** | **No (incomplete)** | **NA** |
| --- | --- | --- | --- | --- | --- |
| * If they indicated on Form RP-D2 that a certified hood is used, was a hood evaluation and certification submitted by a certified testing company? | | |  |  |  |
| * Is form completely filled out and certified? | | |  |  |  |
| * If the Permittee chooses not to certify or take credit for control efficiencies, notify EI staff. | | |  |  |  |
| Reviewer’s comments: |  | | | | |

**Tier II Completeness Review Results and Summary**

**MPCA Reviewer:**

Under Section A:

* If the answer to the eligibility question is “No,” the application should be denied and returned.
* If the required information for change of ownership is not included, the application should be returned as incomplete.

Under Section B:

* If the answer to any question in the “Initial eligibility review” portion of Section B is “No,” the facility is not eligible for a registration permit, and the application should be denied and returned.
* If the answer to any question in the “Application form review” portion of Section B is “No (ineligible),” the application should be denied and returned.
* If the answer to any question in the “Application form review” portion of Section B is “No (incomplete)”, the application should be returned as incomplete.

|  |  |
| --- | --- |
| **Initial eligibility review and calculation review – completed by Permit Engineer** | |
| Eligible (All required information is present and no additional information is needed).  Ineligible (application is ineligible as documented under initial eligibility review/calculation review).  Incomplete (information needed to deem the application complete or to make a determination on eligibility is missing). | |
| Reviewers’ comments: |  |