

When Might a PSD Permit be a Wise Choice?

Kendall Hale November 9, 2021

PSD Avoidance Options

- Refinement of potential emissions (PTE) calculations
- Aggregation/dis-aggregation of projects
- One vs. two installations
- Routine maintenance, repair and replacement (RMRR)
- Netting analysis
- Use of "demand growth" exclusion in the context of net emissions increase calculations



PSD Review Elements

- Pre-construction monitoring
- Modeling
 - Class I analysis
 - Class II analysis
 - Increment
 - Additional Impact Analysis (Visibility, Soils & Vegetation)
 - Growth
- BACT analysis
- Formal Public Notice
- 184 days



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