

## Air Permitting Session - REGFORM

### Application/Permit Review Process

#### **1. Pre-application questions/meetings**

- a. De Minimis and Minor Source New Source Review Permits
  - i. Pre-application meetings or conference calls are encouraged for projects that require air quality modeling and are more complicated in nature.
- b. Major New Source Review Permit
  - i. This is a complex permitting process. Pre-application meetings are required 30 days prior to application submittal. Communication with APCP in the early planning stages of the project helps prevent time delays during the permit review period.
- c. Asking a lot of questions before a permit project is submitted. Consider a meeting if:
  - i. Requesting updates to conditions in an existing permit
  - ii. The proposed project has air dispersion modeling requirements
  - iii. You would like to discuss potential future projects with APCP
- d. Please do your own research. APCP requests that you have the following information prepared prior to a meeting:
  - i. A process flow diagram of the project
  - ii. A site map or layout
  - iii. Question you may have regarding rules or regulations
  - iv. Potential to emit calculations for the new or modified equipment

#### **2. Timing (regulatory, holds, prioritizing)**

- a. Regulatory
  - i. De Minimis and Minor Source New Source Review Permits
    1. State regulations require the department to issue a minor new source review permit within 90 days of receipt of a complete application. If additional technical information is requested during the permit review, the time spent by the applicant preparing this information is not included in the 90 days.
  - ii. Major New Source Review Permit
    1. State regulations require the department to issue a major new source review permit within 184 days of receipt of a complete application. If additional technical information is requested during the permit review, the time spent by the applicant preparing this information is not included in the 184 days. The public comment period and public hearing are both included in this 184-day time frame.

- b. Holds
  - i. APCP policy allows for a one time hold of 30 days.
    - 1. If a response or update is not received within the timeframe, the application will be closed out and a new application will need to be submitted.
      - a. APCP notifies applicants before closing out a project
      - b. Applicants can submit a new application for closed out projects. A new project number will be assigned but previously completed work (drafts, calculations, etc.) can be transferred over
  - ii. APCP asks that applicants respond to requests for additional information within 15 days of receipt of the request
- c. Prioritizing
  - i. The construction permitting process lead time depends on the type and complexity of the project, the existing workload, and the quality of the application.
  - ii. APCP does not offer a formal expedited permit review process. For applicants requesting expedited permits, APCP attempts to meet applicant deadlines. Please communicate when there are tight deadlines by marking the projected date of operation startup on the application form and explaining the need for the quick turnaround in the cover letter.

### **3. Internal steps for issuing permits and other projects**

- a. Received, Assigned Project Number and Engineer
  - i. Typically, within 7 days of receiving the application
- b. Application Completeness Checks
  - i. Thirty calendar days from receipt of application to determine if the application is administratively complete. APCP will notify the contact person on the application.
    - 1. Applications are considered complete as of the day APCP receives the application if no additional information is needed
    - 2. If APCP requests additional information the application is considered incomplete and the regulatory timing to review the application does not start until the information is received.  
Common reasons applications are considered incomplete:
      - a. Application is not signed by responsible official
      - b. Missing filing fee
      - c. Missing or blank application forms

- d. No Ambient Air Quality Impact Analysis for projects that require modeling
  - ii. Pre-Construction Waiver if requested are processed during this phase
- c. Technical Review
  - i. The most complex step in the permitting process and takes up the majority of the time
  - ii. Permit writer will review calculations, regulatory requirements, and ensure any recordkeeping, testing, and monitoring is adequate to demonstrate compliance
- d. Internal and Applicant Draft Review
  - i. After the permit and supporting materials are drafted, they will be reviewed by other APCP staff determine if the emissions were properly evaluated, permit limits are appropriate and enforceable, and the permit is clear, concise and consistent
  - ii. Following the internal review the draft permit will be provided to the applicant for their review.
    - 1. Applicants are given a 10 day review period to provide any comments or corrections
    - 2. Revised drafts are sent for projects that require changes based on any comments or corrections provided by the applicant.
- e. Public Notice Process (for Major New Source Review Permits Only)
  - i. APCP accepts comments from the public for 40 days.
  - ii. A public hearing may be requested during the public notice period between day 30 and 40
  - iii. APCP drafts a response document to address all of the public comments received.
- f. Unit Chief Review
  - i. If the Unit Chief has comments that require revising the permit, the project is returned to the permit writer to make necessary revisions. Any changes in Special Conditions are discussed with the applicant
  - ii. Once the permit document has been reviewed and is ready for issuance it's forwarded to clerical
- g. Final Clerical Preparation and Executive Review
  - i. Permit is prepared for signatures
  - ii. Once the permit is signed an invoice of fees accrued during the review of the application is emailed to the facility.
  - iii. Applicants typically see an invoice for permits one to two weeks after approving of the draft permit. The one to two weeks accounts for the unit chief review, final clerical preparation and executive review stages.
  - iv. Once payment of the fees has been received, the original permit is emailed to the applicant. Paper copies are by request only

#### 4. Credit card procedure

- a. Filing fees are required for Construction Permits:
  - i. All project types except for amendments and applicability determinations.
  - ii. Amendments and 7 day relocations only have the hourly review fee
- b. The applicant should:
  - i. Indicate in their cover letter they would like to pay by credit card or include payment check, and
  - ii. Indicate the type of construction permit project requested
- c. The application receives a project number and is assigned to a permit writer.
- d. For online credit card payments (preferred), the department will email the installation the payment link, the amount of payment due, and the project number. Payment links are as follows:
  - i. Construction Permit:  
<https://magic.collectorsolutions.com/magic-ui/payments/mo-natural-resources/312/>
  - ii. Construction Permit Portable Source:  
<https://magic.collectorsolutions.com/magic-ui/payments/mo-natural-resources/669/>
- e. For credit card payments over the phone, The permit writer collects the following information from the application: Installation name, billing contact person name, email, and phone number:
  - i. The permit writer emails this information to the APCP Financial Section
  - ii. APCP Financial Section contacts the installation and collects payment.