



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

True-Ups/ Minor Source Mini-PALS

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What is a True-Up?

- Definition: To make true or correct
- With regards to NSR permitting, a true-up is a permit/project update to reflect the “as built” emission sources.

When is a True-Up Necessary?

- If the as built emission sources have higher potential emissions than permitted
- If there is a significant change to a modeling parameter
- If additional/different emission sources were built than were permitted
- If capture/control equipment changes
- If your permit specifically says one is necessary

True-up Example #1:

A company notices that the project description section in the body of their permit states their MHDR is 100 tph, but they know their as built MHDR is 125 tph.

A true-up is needed to update emissions calculations. Even the MHDR is not limited by a special condition, it was used as the basis for the permitting action. Increasing the MHDR increase the project emissions increase.

True-up Example #2:

A company notices that the project description section in the body of their permit states their MHDR is 100 tph, but they know their as built MHDR is only 90 tph.

A true-up is not required; however, a true-up is recommended. This reduction could have all kinds of ramifications, it might reduce the PTE such that an operating permit is not required or change CAM applicability.

True-up Example #3:

A company notices that the emissions/controls evaluation section in the body of their permit states their VOC emission factor is 0.023 lb/kgal beer feed. They've recently stack tested and observed a VOC emission rate of 0.028 lb/kgal beer feed. A true-up is needed to update emissions calculations. Even though the emission factor is not limited by a special condition, it was used as the basis for the permitting action.

True-up Example #4:

A company notices that the emissions/controls evaluation section in the body of their permit states their VOC emission factor is 0.023 lb/kgal beer feed. They've recently stack tested and observed a VOC emission rate of 0.018 lb/kgal beer feed. A true-up is not required but is recommended.

True-up Example #5:

A company stack tests. Their stack temperature and velocity are lower than modeled.

We require that you discuss significant changes to modeling parameters with us. In this instance, reduced temperature and reduce velocity would decrease dispersion and may cause modeling problems. If the modeler says to true-up then do so.

True-up Example #6:

After installing Line 6, the installation realizes that they forget to permit their ancillary line equipment – two small space heaters, an emergency generator, and storage tank.

A true-up is required. These emission sources are part of the originally project. They would need to be included in tracking sheets and any modeling that may have occurred.

True-up Example #7:

An installation obtains a permit to installed two new lines. Only one is installed.

A true-up is not required, but is recommended. If construction ceases for more than two years, the authority to construct expires. New plant personnel may not know this. They may assume that they can install the second line six years later.

True-up Example #8:

An installation obtains a permit for a new hammermill that will go to a new stack equipped with a new baghouse. After they get the permit they realize they could save money by routing the emissions from the hammermill to an existing baghouse and don't build the new stack or new baghouse.

A true-up is required. Even if special condition is generic as to which baghouse. An inspector would look for a new baghouse.



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Questions?

What is a PAL?

- PAL is the acronym for Plantwide Applicability Limit
- PALs are a type of PSD permit
- A PAL is a flexible permit that allows an installation to make future changes without obtaining an additional construction permit

What is a mini-PAL?

- A mini-PAL is not a technical term. Mini-PAL is a Missouri Air Pollution Control Program slang for a special-case de minimis permit

What is a special-case de minimis permit?

- The reason we like to call these mini-PALs is because like PALs they are flexible permits that allows an installation to make future changes without obtaining additional construction permits.
- In fact most of our special-case de minimis requirements mirror requirements found in the PAL regulations.

Regulatory Citation

- 10 CSR 10-6.060(5)(C): In order to eliminate the necessity for a large number of *de minimis* permit applications from a single installation, a special case *de minimis* permit may be developed for those batch-type production processes that frequently change products and component source operations. Operating in violation of the conditions of a special case *de minimis* permit is a violation of this rule.

Why you might want one

- Speed to market
- Flexibility
- Reduces the number of permit applications you have to submit

General Requirements:

- Plantwide de minimis limits or at least de minimis limits that cover all emission sources to be installed during the next 10 years
- Monthly and 12-month rolling total emissions tracking of each limited pollutant
- Approved emissions calculation methodologies for all emission sources to be installed during the next 10 years
- Maintain an active emission source list

Why 10 years?

- It's hard to foresee too far into the future. Also, we do need to periodically review the special-case de minimis permit to ensure that it is working properly
- PALs are effective for 10 years.
- After the 10 years, the limits continue to apply and you can still operate the equipment you installed/modified during the 10 years, but authority to add/modify additional emission sources expires

What can't a special-case de minimis permit do?

- They can't consolidate or replace construction permits you've already obtained
- They don't get you out of any applicable NSPS, MACT, NESHAP, or other state or federal regulations
- They don't remove or reduce your EIQ reporting frequency

Ideal Installations:

- Installations that have frequent coating changes
- Army bases or other installations frequently installing engines, space heaters, boilers, etc.
- Installations that frequently replace their production lines
- Batch operations such as some pharmaceutical and chemical plants



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Questions?

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