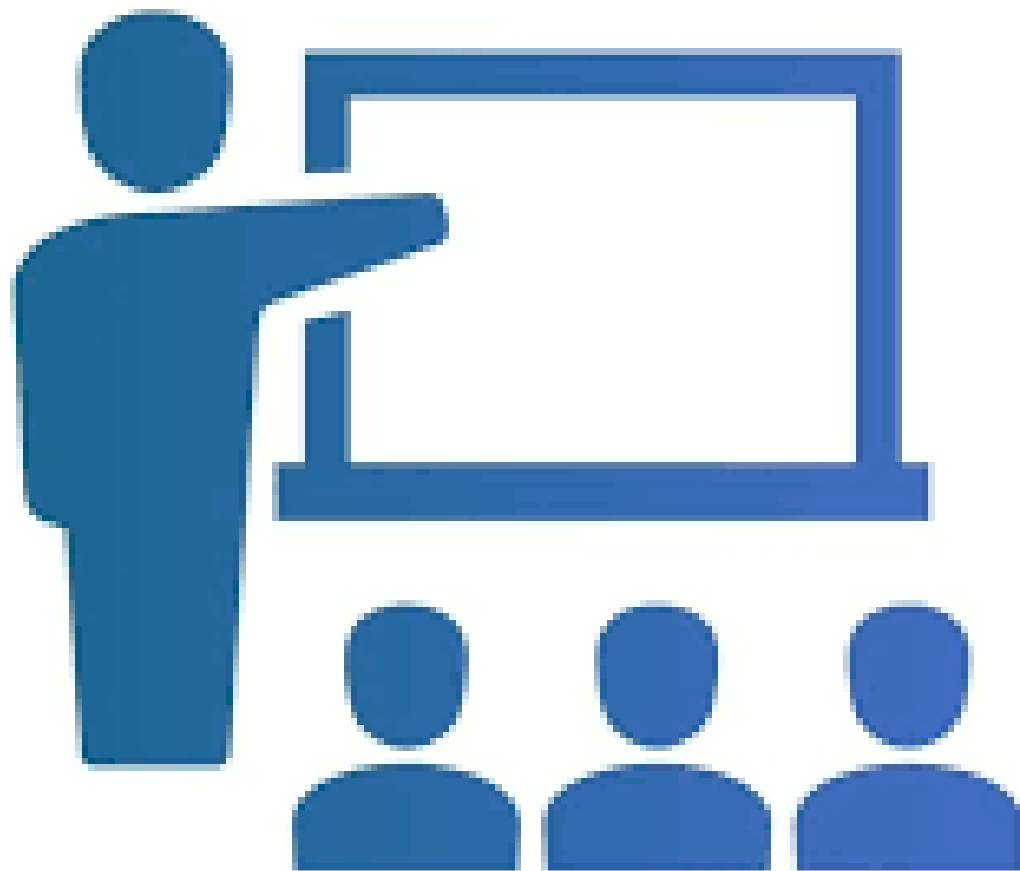


# EPA Region 4: Air Permits Training for Meaningful Involvement

AIR PERMITTING PROCESS AND PUBLIC PARTICIPATION



# Training Overview

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- The Clean Air Act
- Types of Permits
- Permitting Process
- Public Participation
- Useful resources
- EPA Title V Review and Public Participation Flow Chart
- Knowledge Test

A tall, dark smokestack is shown on the left side of the image, emitting a thick, white plume of smoke that rises and spreads across the sky. The sky has a hazy, orange-brown tint, suggesting a sunset or sunrise. The smokestack is positioned vertically, and the smoke plume is the central focus of the image.

# The Clean Air Act (CAA)

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**CAA signed by President Nixon in 1970**

**Several major amendments in 1970, 1977, and 1990**

**Major breakthroughs:**

- Prevention of significant deterioration (PSD)**

- State implementation Plan (SIP), local implementation Plan (LIP)**

- Permit program for larger sources of air pollutants (Title V)**

- Opportunities for public participation**



Birmingham, Alabama (Present)

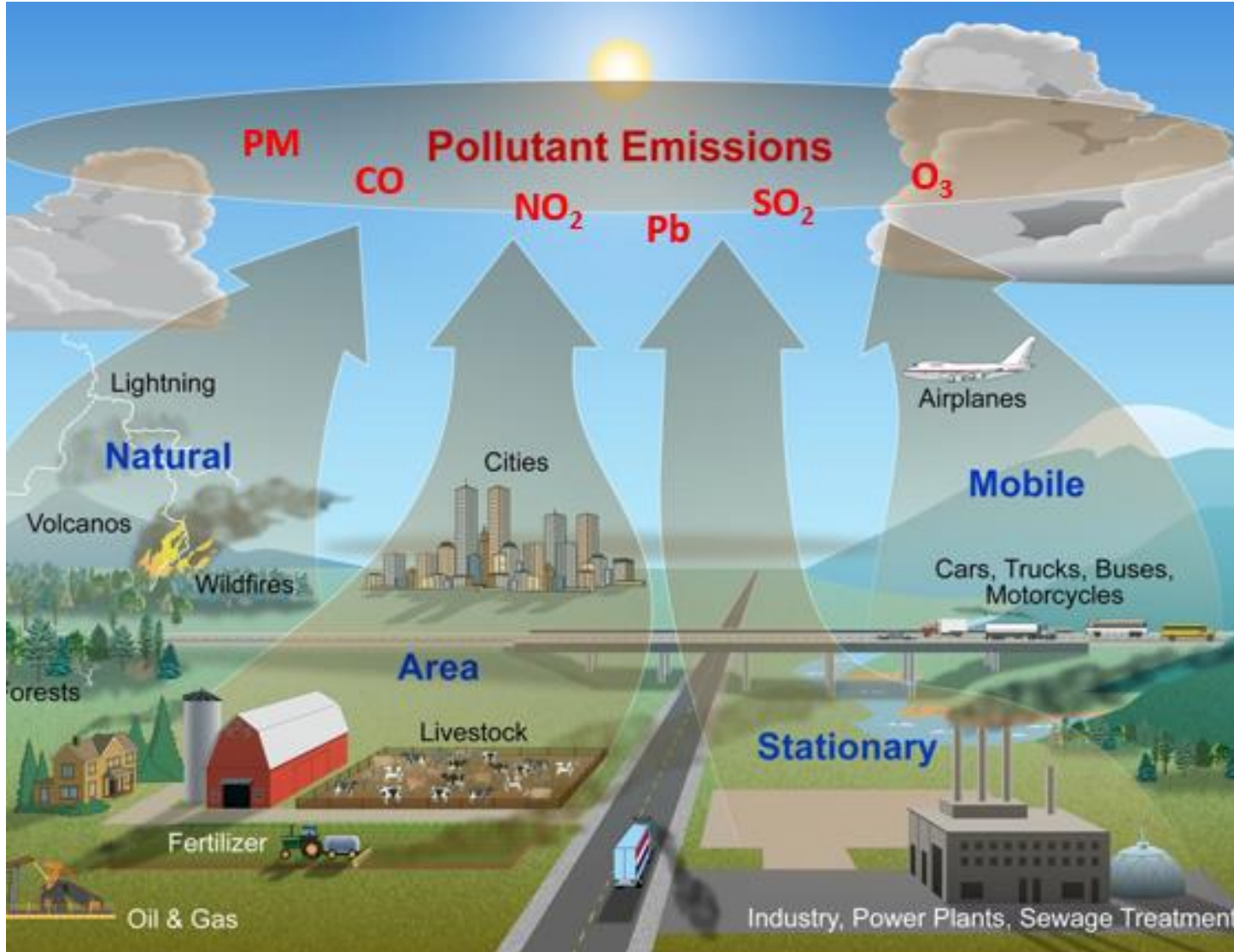


Birmingham, Alabama (1970)

# The Clean Air Act

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- Common air pollutants decreased by more than 50%
- Air toxics from large industrial sources reduced by 70%
- New cars are 90% cleaner
- U.S. GDP has tripled
- Energy consumption has increased by 50%
- Vehicle use has increase by 200%

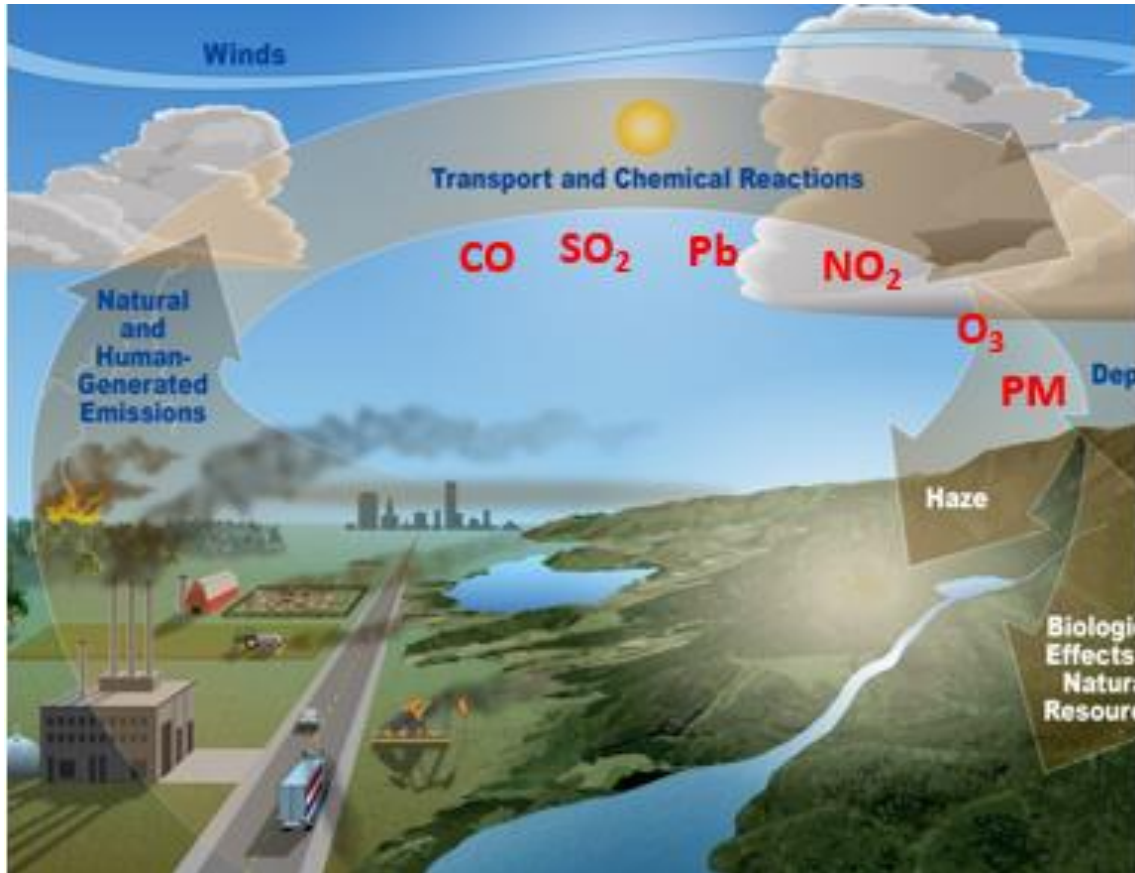


## WHAT ARE THE NATIONAL AMBIENT AIR QUALITY STANDARDS (NAAQS)?

EPA establishes national levels for six specific pollutants in outdoor air:

- Particulate Matter (PM)
    - PM<sub>10</sub> and PM<sub>2.5</sub>
  - Carbon Monoxide (CO)
  - Nitrogen Dioxide (NO<sub>2</sub>)
  - Sulfur Dioxide (SO<sub>2</sub>)
  - Ground-level ozone or smog (O<sub>3</sub>)
  - Lead (Pb)
- These are known as “**criteria**” pollutants

# WHAT DO THE NAAQS PROTECT?



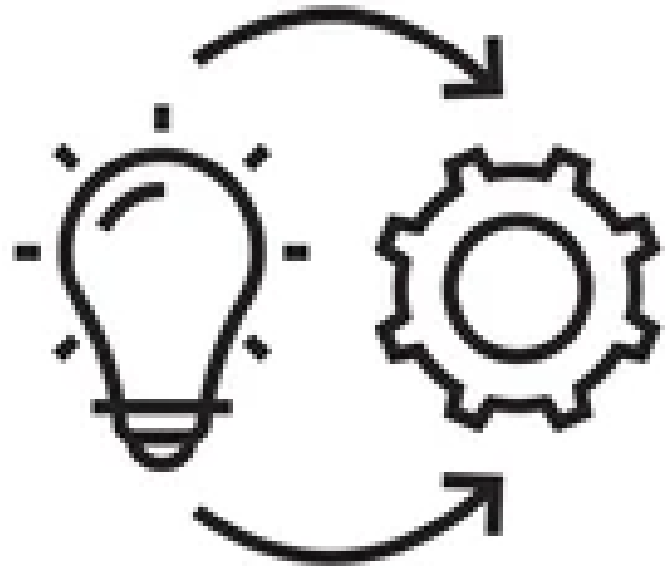
## Public health

- CAA requires that EPA set “primary” standards to protect public health (including sensitive populations) with an adequate margin of safety

## Public welfare

- EPA sets “Secondary” standards to protect public welfare and the environment (including visibility and damage to animals, crops and vegetation)

**EPA must review the standard set for each criteria pollutant every 5 years**



## Implementation

# CAA: Implementation Plans

---

- Required by the CAA (Title I)
- Include elements for new source (construction/preconstruction) and may include state operating permitting programs for smaller sources
- States/Local authorities are required to have State/Local Implementation Plans (SIPs) or (LIPs)
- Tribes are not required to develop Tribal Implementation Plans (TIPs)

# CAA: Organization

---

## Title I: Air Pollution Prevention and Control

- Part A - Air quality and emission limitations
  - NAAQS, NSPS, HAPs, etc.
- Part B - Repealed; moved to title VI
- Part C - Prevention of significant deterioration (PSD)
- Part D - Plan requirements for nonattainment areas

## Title II: Emission Standards for Moving Sources

## Title III: General

Citizen suits, administrative proceedings, judicial review, etc.

## Title IV: Acid Deposition Control

Acid rain program (SO<sub>2</sub> and NO<sub>x</sub> allowances)

## Title V: Permits

Operating permits program

## Title VI: Stratospheric Ozone Protection







# POP QUIZ

The EPA establishes national standards for six primary pollutants in outdoor air which we refer to as \_\_\_\_\_ pollutants.

---

A) Hazardous

B) Significant

C) Criteria

D) Regulated



---

CORRECT  
ANSWER

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Next Slide

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**WRONG ANSWER**

Back to Question 

Next Slide 

# Air Quality Management Responsibilities

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## State/Local governments

- Develop implementation plans
- Issue permits
- Enforce standards

## Federal government

- Sets standards
- Provides oversight

In Region 4, we review permits, but do not write many permits ourselves, mainly writing outer continental shelf (OCS) permits.



# EPA Region 4 Permitting Authorities

- **ALABAMA**
  - Huntsville, AL
  - Jefferson County, AL
- **KENTUCKY**
  - Jefferson County, KY
- **TENNESSEE**
  - Chattanooga, TN
  - Knoxville, TN
  - Memphis, TN
  - Nashville, TN
- **NORTH CAROLINA**
  - Forsyth County, NC
  - Mecklenburg County, NC
  - Western, NC
- **FLORIDA**
- **GEORGIA**
- **MISSISSIPPI**
- **SOUTH CAROLINA**



# Types of Permits

## Construction/pre-construction permits

- Major source
  - Attainment: Prevention of significant deterioration (PSD)
  - Nonattainment: New Source Review (NA NSR)
- Minor source (NSR)
- Synthetic minor source

## Operating permits

- Major source (Title V)
- Minor source
- Synthetic-minor source (FESOP/FEDOOP)



# New Source Review Program (NSR)

NSR is a CAA program that requires industrial facilities to install modern pollution control equipment when:

They are built  
(New Sources)

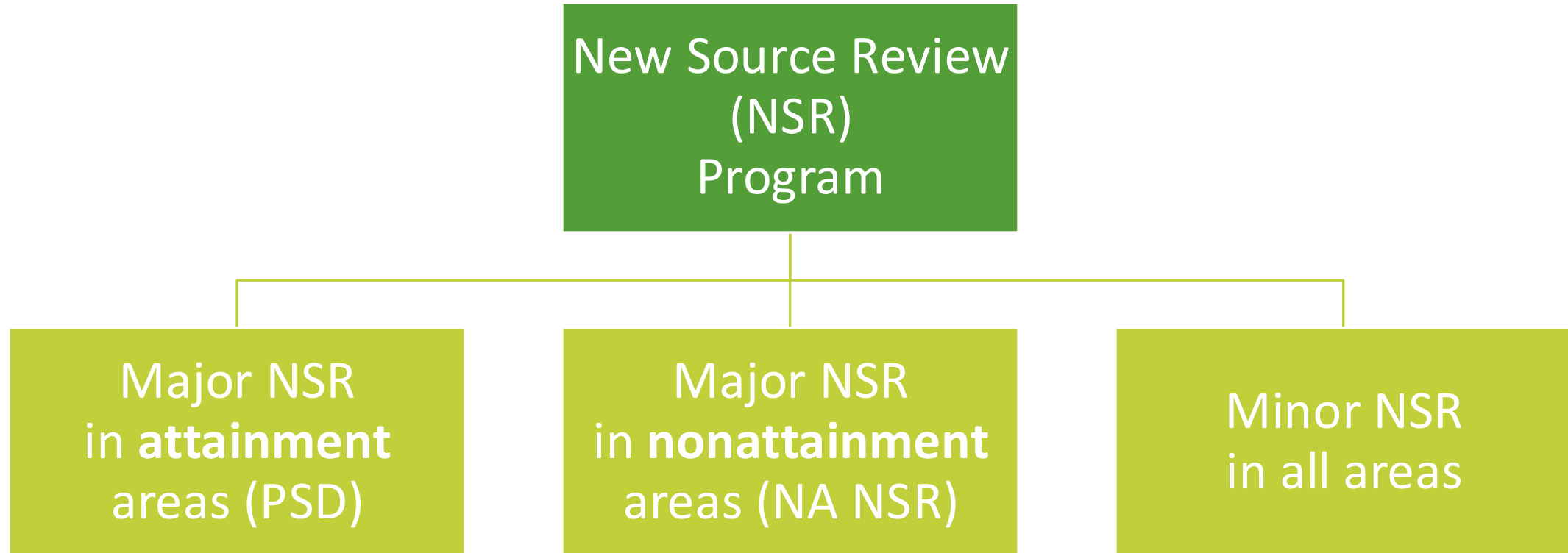


Or

Changes that significantly increase emissions  
(Modification to existing source)







## COMPONENTS OF THE NSR PROGRAM

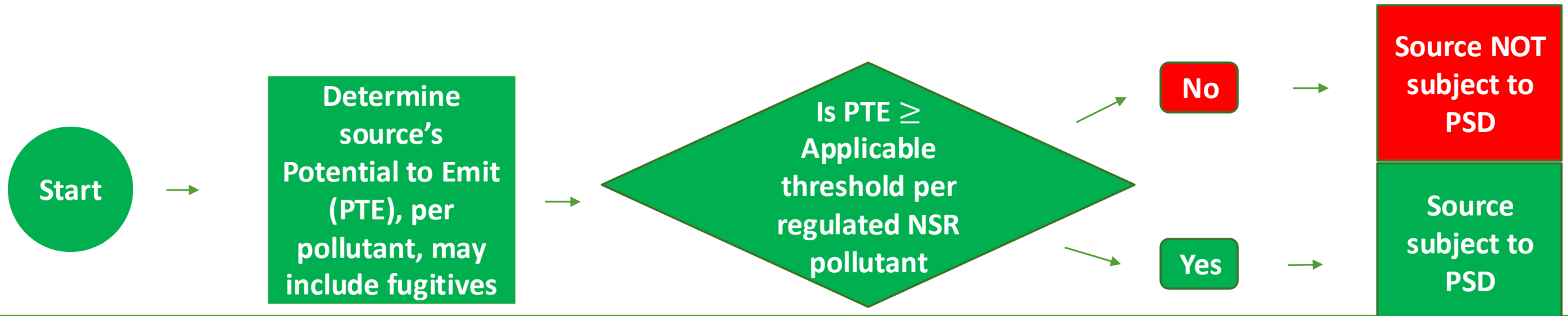
# WHAT ARE MAJOR NSR (PSD) THRESHOLDS?

## Major new sources:

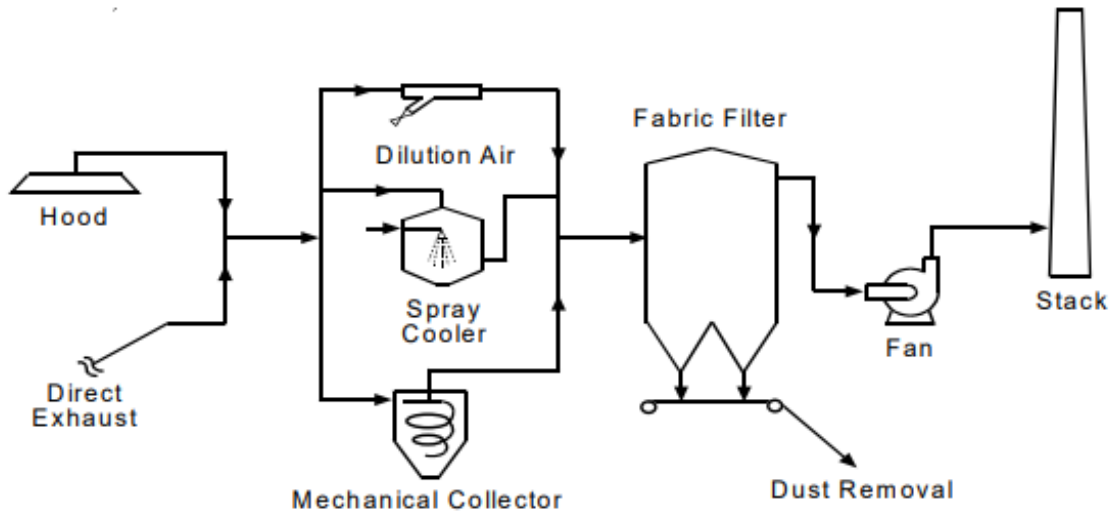
- 28 source categories: **100** tons per year (tpy) of any regulated NSR pollutant.
- Other sources: 250 tpy of any regulated NSR pollutant.

## Major modification of a major source:

- Significant Emissions Increase
  - 40 CFR 52.21(b)(3).
- Significant Net Emissions Increase of a regulated NSR pollutant
  - 40 CFR 52.21(b)(23).



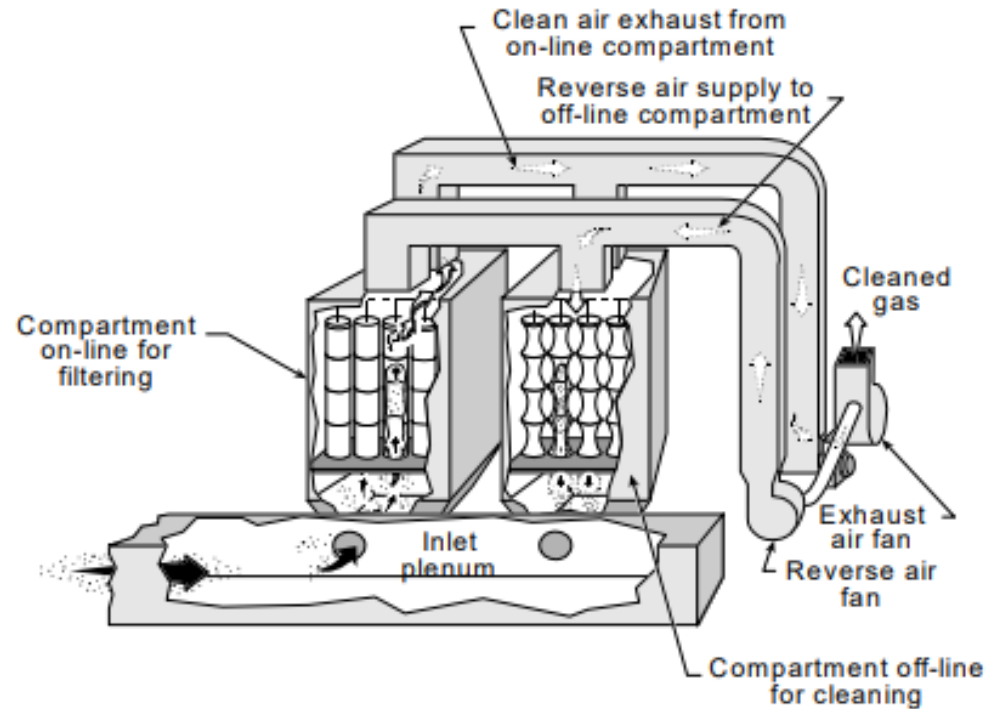
# WHAT DOES MAJOR NSR (PSD) REQUIRE?



## Main requirements:

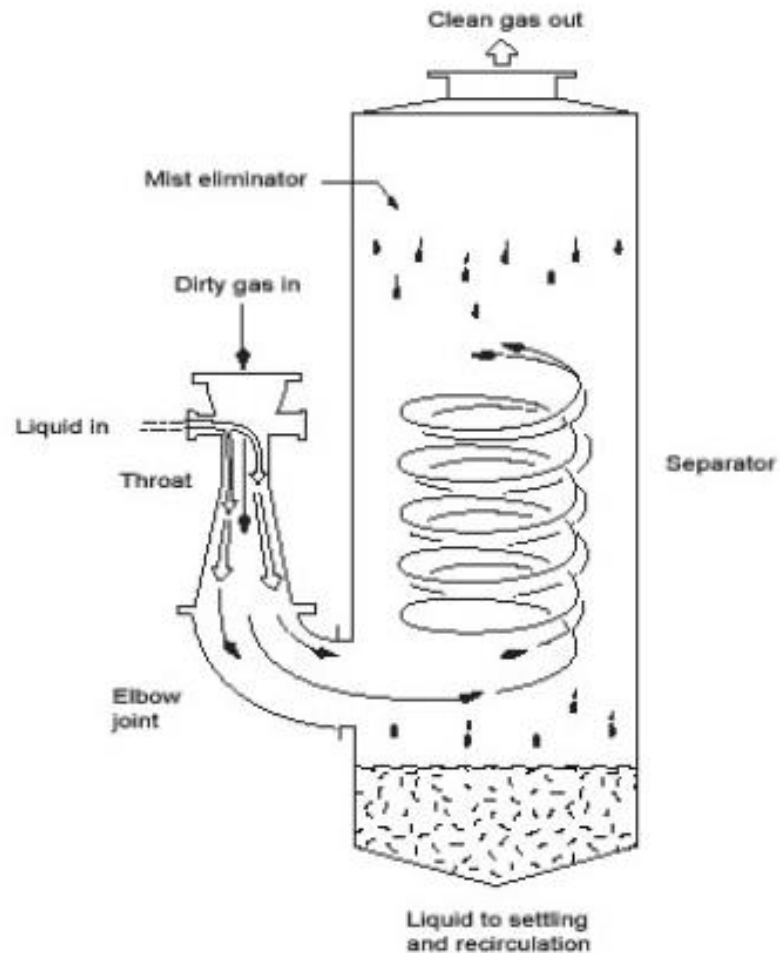
- Install Best Available Control Technology (BACT)
- Perform air quality analysis
- Assess impacts
- Allow public involvement

# WHAT DOES MAJOR NSR (NA NSR) REQUIRE?



## Main requirements:

- Install Lowest Achievable Emission Rate (LAER) technologies
- Obtain emission offsets
- Perform alternative sites analysis
- Show statewide facility compliance
- Allow public involvement



# BACT and LAER

## Both are technology forcing ways to reduce emissions

- Applicants must look at control methods used around the world for similar processes
- Any feasible controls must be considered
- BACT allows for applicants to consider:
  - Energy Impacts
  - Other Environmental Impacts
  - Cost/Economic Impacts
- LAER does not allow for the consideration of these other impacts
- [RACT/BACT/LAER Clearinghouse](#) (RBLC) is an online database used to find limits and controls at facilities

## Minor NSR Source Thresholds (in Attainment Areas)

Pollutant	Threshold (tons per year)
Carbon monoxide (CO)	10
Nitrogen oxides (NOX)	10
Sulfur dioxide (SO <sub>2</sub> )	10
Volatile Organic Com-pounds (VOC)	5
Particulate Matter (PM)	10
PM ≤10 microns (PM <sub>10</sub> )	5
PM ≤ 2.5 microns (PM <sub>2.5</sub> )	3
Lead	0.1
Fluorides	1
Sulfuric acid mist	2
Hydrogen sulfide (H <sub>2</sub> S)	2
Total reduced sulfur (including H <sub>2</sub> S)	2
Reduced sulfur com-pounds (including H <sub>2</sub> S)	2
Municipal waste combus-tor emissions	2
Municipal solid waste landfill emissions (as non-methane organic com-pounds)	10

### Example NSR Thresholds

# WHAT DOES MINOR NSR REQUIRE?

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- CAA does not have specific requirements
- New sources and modifications cannot interfere with attainment of the NAAQS
- State program requirements vary greatly

# New Source Review Regulations

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## Clean Air Act

- PSD – Title I, Part C
- Nonattainment – Title I, Part D

## Federal regulations:

- PSD – [40 CFR 51.166](#) and [52.21](#)
- Nonattainment – [40 CFR 51.165](#)
- Appendix S (in [40CFR Part 51](#))

## State and local regulations





# POP QUIZ

---



True or False: PSD requires Best Available Control Technology also known as (BACT). The source is required to use the most stringent technology UNLESS there are energy, environmental or economic reasons that follow specific guidelines and demonstrated analyses.

---

True

False



---

CORRECT  
ANSWER

Next Slide

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**WRONG ANSWER**

Back to Question

Next Slide



# Title V Permit 40 CFR Part 70

- State Operating Permit Programs
- Regulation implementing **Title V** of the Clean Air Act Amendments of 1990
- Identifies minimum elements of operating permit programs
- Defines sources and applicable requirements covered by the program

CODE OF FEDERAL REGULATIONS

CFR

# Purpose of Title V Program

---

## Enhance compliance with the Clean Air Act by:

- Consolidating documentation for facility's air pollution control requirements
- Adding monitoring, testing, and record keeping requirements where needed
- Reporting requirements for monitoring emissions
- Yearly certification requirements
- Federally enforceable terms

## Is not a program that can be used to:

- issue construction permits
- impose new emission limits or applicable requirements



# WHICH SOURCES MUST APPLY FOR TITLE V PERMITS?

---

## Major sources of regulated air pollutants

- $\geq 100$  tpy for criteria pollutants;  $\geq 10/25$  tpy for HAPs

Hazardous waste combustors and portland cement manufacturers

Municipal solid waste landfills with capacity  $>2.5$  million megagrams or 2.5 million cubic meters

Acid rain sources (*e.g.*, fossil fuel-fired power plants)

Any source required to have a major source NSR permit

Solid waste incineration units under section 129(e) of the Act

Any source in a source category designated by EPA (some area sources of HAPs)

State of Tennessee  
 Department of Environment and Conservation  
 Division of Air Pollution Control  
 William R. Snodgrass Tennessee Tower  
 715 Rosa L. Parks Avenue, 15<sup>th</sup> Floor  
 Nashville, TN 37243  
 Telephone: (615) 532-0554



APC 1

**TITLE V PERMIT APPLICATION  
 FACILITY IDENTIFICATION**

SITE INFORMATION			
1. Organization's legal name		APC company position	
2. Sec name (if different from legal name)		APC Log Position	
3. Site address (St. Rd. Hwy.)		NAICS or SIC Code	
City or distance to nearest town		Zip code	County name
4. Site location (in Lat/Long)	Latitude	Longitude	
CONTACT INFORMATION (RESPONSIBLE OFFICIAL)			
5. Responsible official contact		Phone number with area code	
6. Mailing address (St. Rd. Hwy.)		Fax number with area code	
City	State	Zip code	Mail address
CONTACT INFORMATION (TECHNICAL)			
7. Principal technical contact		Phone number with area code	
8. Mailing address (St. Rd. Hwy.)		Fax number with area code	
City	State	Zip code	Mail address
CONTACT INFORMATION (BILLING)			
11. Billing contact		Phone number with area code	
12. Mailing address (St. Rd. Hwy.)		Fax number with area code	
City	State	Zip code	Mail address
TYPE OF PERMIT REQUESTED			
13. Permit requested for:			
Initial application to operate:	<input type="checkbox"/>	Minor permit modification:	<input type="checkbox"/>
Permit renewal to operate:	<input type="checkbox"/>	Significant modification:	<input type="checkbox"/>
Administrative permit amendment:	<input type="checkbox"/>	Construction permit:	<input type="checkbox"/>

(OVER)

# WHEN MUST A SOURCE SUBMIT A TITLE V PERMIT APPLICATION?

- Within a year of starting operations, and
- Prior to the permit's **5-year** anniversary (to get permit renewed), and
- When a change or modification at the source triggers the permit modification requirements

## Title V Permitting Process

- Source submits timely application to the Permitting Authority (PA)
- PA reviews application for completeness
- If complete, PA drafts permit and related documents (e.g., statement of basis)
- PA issues public notice, initiating 30-day comment period on draft permit
- PA addresses comments received (if any) and makes appropriate changes (if any)
- PA proposes the permit to EPA, initiating a 45-day review period
- If EPA does not object, PA may issue the permit as final; if EPA objects, PA must address concerns in timely manner





# POP QUIZ

There are 3 situations in which a source must submit a Title V permit application. Select the situation that is NOT true.

---

A) Before an existing permit's 5-year expiration date

B) When the facility changes its name or ownership

C) When a change or modification at the source triggers the permit modification requirements

D) When the facility is within a year of starting operation



---

CORRECT  
ANSWER

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**WRONG ANSWER**

Back to Question

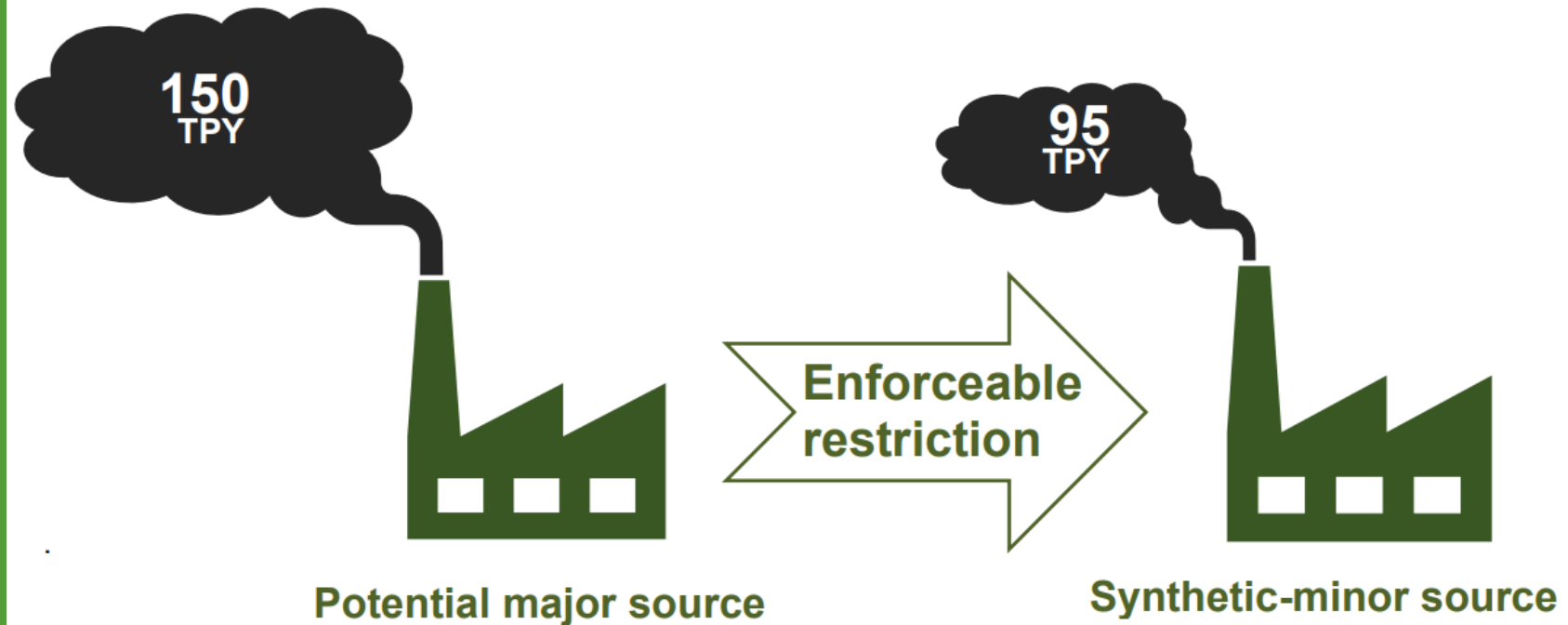
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# Synthetic Minor Sources

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To be considered synthetic minor, sources must:

- **Have the potential** to emit regulated pollutants at or above major-source thresholds
- And have **taken enforceable restrictions** so that their emissions are below those major source thresholds



# Enforceable Restrictions for Synthetic Minor Sources

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Permit requirements that can restrict a sources potential to emit include:

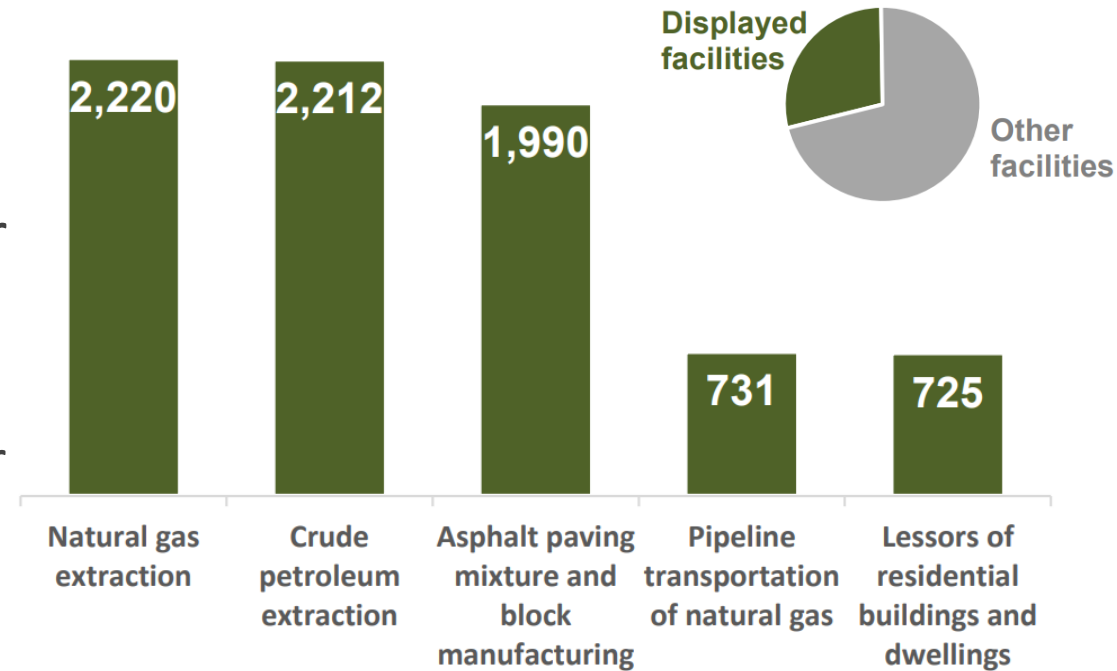
- **Emission limits:** restrictions over a given period of time on the amount of a pollutant that may be emitted from a source into the outside air.
- **Production limits:** restrictions on the amount of final product that can be manufactured or otherwise produced at a source
- **Add-on control requirements:** conditions that specify that the source must install and maintain add-on controls that operate at a specified emission rate or efficiency
- **Other operational limits:** include all other restrictions on the manner in which a source is run, including hours of operation, amount of raw material consumed, or fuel combusted

All requirements must be enforceable as a practical matter.

# Synthetic Minor Permit Requirements

- Synthetic Minor sources are not subject to the same requirements as major sources.
  - NSR's BACT/LAER requirements do not apply
  - Title V petition process does not apply
- Permitting requirements vary based on your state/local permitting authority
  - Renewal periods vary
  - Public notice and EPA review periods and their associated requirements vary
  - Reporting requirements may not be as frequent

**Top five industries with the most permitted synthetic-minor sources in 2019**



Source: OIG analysis of data from ICIS-Air and the EPA's Enforcement and Compliance History Online database. (EPA OIG image)

# SUMMARY

---

**NSR permits are pre-construction permits that focus primarily on the six criteria pollutants**

**PSD and NA NSR programs require sources to install pollution controls**

**3 kinds of NSR programs**

**Title V operating permits identify minimum elements, define sources and applicable requirements**

**All major sources must apply for a Title V permit within a year of starting to operate**

**Title V permits contain all the applicable requirements for a source**



# Useful Resources

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## Check

- Check EPA Region 4's website for the latest status of [Proposed Title V Permits](#), by clicking on your state
- Check your permitting authority's webpage for their specific requirements
- Check your permitting authority's webpage for Public Notices and Hearings

## Ask

- Ask to be added to the email list for notifications of permitting actions
- Ask for a copy of the application and supporting material if you cannot access it online
- Ask when your facility of concern's operating permit is coming up for renewal and whether a new/renewal permit is in the works

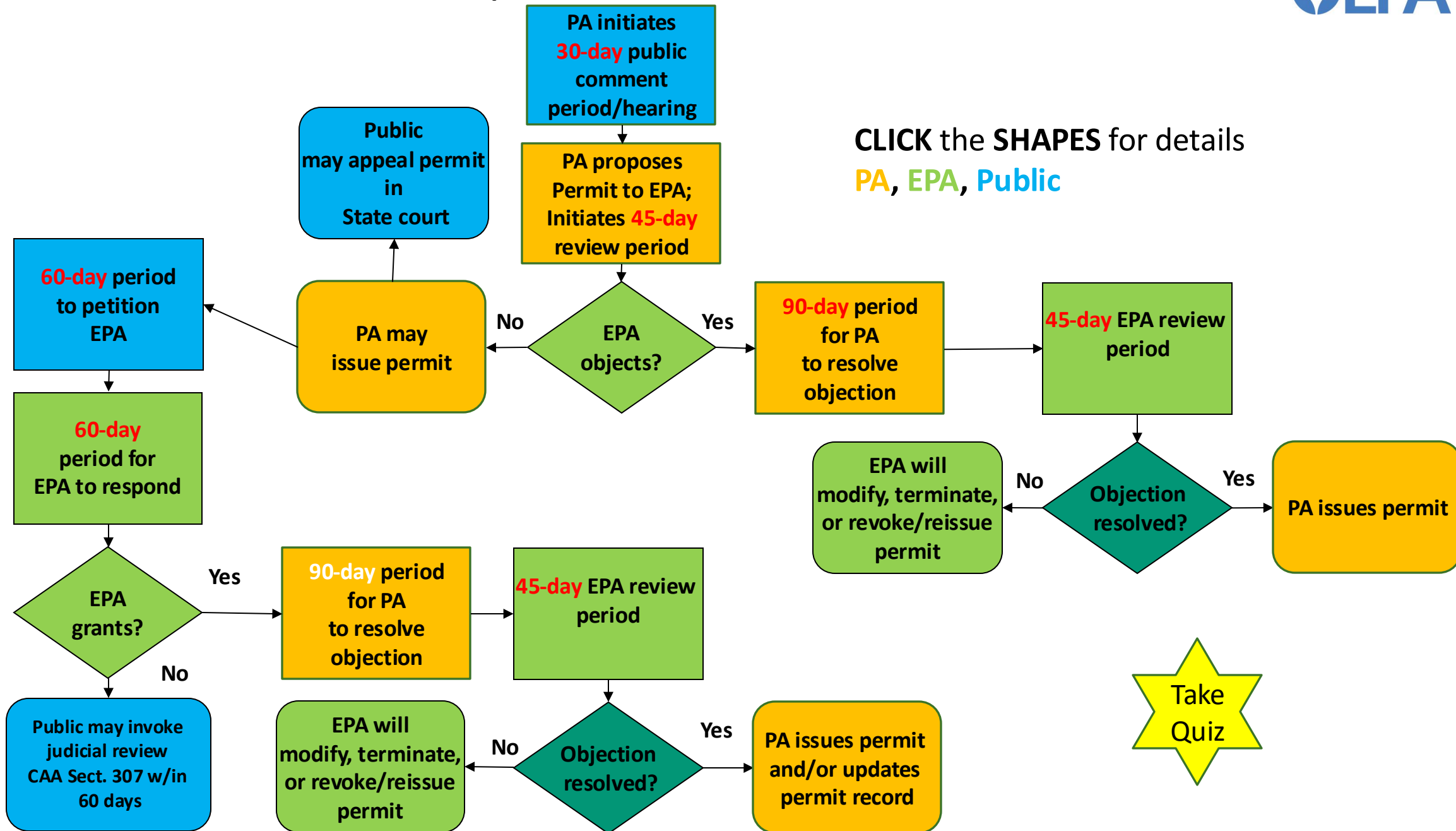
## Participate

- Participate in [Title V](#) and [NSR](#) permit review process
- [Proof in the Permit Videos](#) for additional information on the permitting process

# Title V Public Participation & EPA Review Flowchart



CLICK the **SHAPES** for details  
**PA**, **EPA**, **Public**



# PERMITTING AUTHORITY INITIATES 30 DAY PUBLIC COMMENT PERIOD

Slide Continued

Back to Flowchart

Before a title V permit can be approved and called final, the law requires a public comment period to occur.

- Before a permit to operate is issued for the 1<sup>st</sup> time -- (while in draft form)
- When a permit to operate comes up for renewal every 5 years
- And when a permit must be reopened for some reason, such as to be modified based on new federal requirements

Source submits permit application within one year of becoming subject to Title V

PA issues public notice, initiating 30-day comment period on draft permit

Public/affected states may submit comments on the draft permit (to the PA) during the 30-day public comment period

If not already scheduled, public may request a hearing in accordance with established procedures

PA addresses comments received (if any) and makes appropriate changes (if any)

# WHAT IS INCLUDED IN A TITLE V PERMIT APPLICATION?

Slide Continued

Back to Flowchart



Identifying information



Description of processes and products



Emissions-related information

major pollutants  
emission points and emission rates  
control equipment



Applicable requirements



Compliance plan



Certification of compliance



Certification of truth, accuracy, and completeness

# WHAT IS INCLUDED IN A TITLE V PERMIT?

Slide Continued 

Back to Flowchart 

## All “applicable requirements”

- Defined at [40 CFR 70.2](#)
- Examples – state and federal rules, state permit terms

## Standard permit conditions required by part 70

- [40 CFR 70.6](#) – Permit Content
- Examples – permit expires after 5 years, duty to provide information

## Monitoring, Recordkeeping and Reporting (MRR)

- [40 CFR 70.6\(a\)\(3\)](#)
- Examples – testing requirement, “periodic monitoring”

## Schedule of Compliance If Source is Out of Compliance

- [40 CFR 70.6\(c\)\(3\)](#)

## Citation of Origin and Authority

- [40 CFR 70.6\(a\)\(1\)\(i\)](#)

# HOW TO GET RESULTS

[Back to Flowchart](#)

## Successful comments:

- Clearly identify which specific parts of the permit, permit record, or permit process are not in consistent with the CAA, part 70 requirements, or the approved State/Local Title V program
- Demonstrate that the applicable requirements cannot be enforced as the permit is currently written
- Make a clear argument and cite to statutes and regulations (whenever possible) to support argument
- Provide specific language recommendations

## Key Questions:

- Does the permit contain all applicable requirements that apply to the source?
- Are the applicable requirements accurately reflected in the permit?
- Is there adequate periodic monitoring to assure compliance?
- Are the applicable requirements practicably enforceable?

# PA PROPOSES PERMIT TO EPA AND INITIATES 45 DAY REVIEW PERIOD

**Permitting Authority is required to submit all information necessary for an effective review by EPA. The 45-day review period does not begin until all necessary materials are received by EPA.**

*[Sect. 505(a)(1)(A) and (B) of the CAA and [40 CFR § 70.8\(a\)\(1\)](#)]*

- Permit application (or application summary)
- Compliance plan (if applicable)
- Copies of draft and proposed permits
- Statement of Basis
- Written response to comments

Slide Continued 

Back to Flowchart 

PA PROPOSES  
PERMIT TO EPA  
AND INITIATES  
45 DAY REVIEW  
PERIOD (Cont.)

Back to Flowchart 

**EPA must object to any proposed permit that is deemed to be not in compliance with the Clean Air Act.**

*[Sect. 505(b)(1) of the CAA and 40 CFR § 70.8(c)(1) and (2)]*

[Proposed Title V permits](#) at EPA Region 4's website



## 90-DAY PERIOD FOR PA TO RESOLVE EPA OBJECTION

**PA has 90 days (from receipt of objection) to submit a revised proposed permit; otherwise, EPA will issue or deny the permit.**

*[Sect. 505(c) and [40 CFR § 70.8\(c\)\(4\)](#)]*

Back to Flowchart 

## 45-DAY EPA REVIEW PERIOD

**EPA has 45 days to review the PA's response**

*[40 CFR § 70.8(c)]*

Back to Flowchart 

EPA WILL  
MODIFY,  
TERMINATE, OR  
REVOKE/REISSUE  
PERMIT

**If the PA fails to respond or resolve any objectionable issues, EPA will take necessary action (i.e., modify, terminate, or revoke and reissue the permit)**

*[CAA Sect. 505(c) and 40 CFR § 70.8(c)(4) and 70.8(d)]*

Back to Flowchart 

# PA MAY ISSUE PERMIT

**If EPA does not object, PA may issue the permit as final**

*[Sect. 505(c) and [40 CFR 70.8\(c\)](#)]*

Back to Flowchart 

# PA MAY ISSUE PERMIT

**If EPA does not object, PA may issue the permit as final**

*[Sect. 505(c) and [40 CFR 70.8\(c\)](#)]*

Back to Flowchart 

# PUBLIC MAY APPEAL PERMIT IN STATE COURT

The appeal procedures will depend on the state the source is located in. For state-specific information, get in touch with the appropriate contact listed under [Permitting Authorities by State](#)

Back to Flowchart 

# 60-DAY PERIOD TO PETITION TO EPA

If EPA does not object, any person may petition EPA to object within 60 days of EPA's 45-day review period. [CAA Sect. 505(b)(2) & [40 CFR § 70.8\(d\)](#)]

The public can view petition deadlines for currently proposed title V permits at EPA Region 4's website

Petition must have a date or time stamp of receipt through EPA's electronic submission system or EPA's designated email address, or a postmark date generated for a paper copy mailed to EPA's designated physical address. [[40 CFR 70.12\(b\)](#)]

Petition shall be based on objections raised during the public comment period (including any public hearings), unless:

- Petitioner demonstrates it was impossible to raise such objections within such period; or
- The grounds for such objections arose after such period.

Any person may petition the EPA to object to certain Part 70 permits. Submitted petitions and EPA responses may be viewed at the [EPA Title V Petition Database](#).

Slide Continued 

Back to Flowchart 

# WHAT CONTENT IS REQUIRED IN A PETITION?

Slide Continued

Back to Flowchart

## Identify the permit on which the petition is based

### 40 CFR 70.12(a)(1)

- Permit number, version number or other information needed to identify the permit
- The petition must also specify if the permit action is
  - Initial issuance
  - Renewal
  - Modification/revision (including minor modification/revision)

## Identify the petition claims

### 40 CFR 70.12(a)(2)

- Clearly identify which specific aspects of the permit, permit record, or permit process are not in compliance with the CAA, requirements under part 70, or the approved Title V program.
- Identify where the issue in the claim was raised during the public comment period (unless it was impracticable to raise the claim during the public comment period).
- Identify where the permitting authority responded to the public comment and explain how the permitting authority's response is inadequate.
- If the permitting authority did not address the public comment, the petition should state that.



## For a claim to be considered by the EPA, the issue must be raised in the body of the petition

- If the issue is raised in an attachment, the petition must provide a specific citation to the referenced information in the attachment.
- Citations should also be used to support claims, along with an explanation of how the cited material supports the claim. Find an example claim [here](#).
- The information you provide in the petition and the analysis of the permit and record should be accurate.

## WHAT CONTENT IS REQUIRED IN A PETITION? (Cont.)

Slide Continued

Back to Flowchart

# WHERE DO I FILE A PETITION?

Slide Continued

Back to Flowchart

- **Preferred Method:** Please file Title V petitions electronically through the [Central Data Exchange](#)
- **Backup Method:** If you are unable to use the Central Data Exchange to file your petition, please send your petition and associated attachments to the following e-mail address: [titleVpetitions@epa.gov](mailto:titleVpetitions@epa.gov).
- **Last Resort Method:** If you are unable to successfully submit your petition electronically, please submit a hardcopy of your petition to the following address:
  - US EPA
  - Office of Air Quality Planning and Standards
  - Air Quality Policy Division
  - Operating Permits Group Leader
  - 109 T.W. Alexander Dr. (C-504-01)
  - Research Triangle Park, NC 27711
- Only submit petitions through one of the three methods listed above, **please do not send your petition directly to the Administrator.**

# WHERE DO I FILE A PETITION? (Cont.)

Slide Continued

Back to Flowchart



You must also provide copies of your petition to the permitting authority and the permit applicant.



Contact information for the permitting authority should be available in the public notice for the permitting action.



Contact information for the permit applicant should be available in the draft permit, or from the permitting authority.

## WHERE CAN I FIND MORE INFORMATION?

- Do you have a question about how to file a Title V petition? If so, please send us an email at [titleVpetitions@epa.gov](mailto:titleVpetitions@epa.gov).
- If you have a question about a specific permit or a specific due date for a petition, please contact the EPA Regional Air Permitting Office for the state in which the source is located. Air permitting contacts are available on the [Permitting Under the Clean Air Act](#) webpage.
- All petitions submitted to the EPA are posted on the Agency's [title V petition database](#). This database also has PDF files of the Agency's responses to petitions.

Back to Flowchart 

# 60-DAY PERIOD FOR EPA TO RESPOND

## EPA has 60 days to respond to the petition

*[CAA Sect. 505(b)(2)]*

- EPA shall grant the petition (i.e., object to the permit) if petitioner demonstrates that the permit is not in compliance with the CAA
- If not already issued, PA may not issue the permit until the objection is resolved
- If already issued, the petition does not change the effectiveness of the permit

Back to Flowchart 

PUBLIC MAY  
INVOKE JUDICIAL  
REVIEW CAA  
SECT. 307 WITHIN  
60 DAYS

**If EPA denies the petition, such denial is subject to judicial review under section 307 of the CAA**

*[CAA Sec 307 US. Code 7607. Administrative proceedings and judicial review]*

Back to Flowchart 

# 90-DAY PERIOD FOR PA TO RESOLVE EPA GRANTED PETITION

**PA has 90 days (from the granting of a petition) to submit a revised proposed permit; otherwise, EPA will issue or deny the permit.**

*[Sect. 505(c) and [40 CFR § 70.8\(c\)\(4\)](#)]*

Back to Flowchart

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## 45-DAY EPA REVIEW PERIOD

**EPA has 45 days to review the PA's response**

*[40 CFR § 70.8(c)]*

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EPA WILL  
MODIFY,  
TERMINATE, OR  
REVOKE/REISSUE  
PERMIT

**If the PA fails to respond or resolve any objectionable issues, EPA will take necessary action (i.e., modify, terminate, or revoke and reissue the permit)**

*[CAA Sect. 505(c) and 40 CFR § 70.8(c)(4) and 70.8(d)]*

Back to Flowchart 

PA MAY ISSUE  
PERMIT OR  
UPDATE PERMIT  
RECORD

**If EPA does not object, PA may issue the permit as final or update the permit record.**

*[Sect. 505(c) and 40 CFR 70.8(c)]*

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# Knowledge Test

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AIR PERMITTING PUBLIC  
PARTICIPATION

# Which pollutant is NOT a criteria pollutant?

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- A) PM<sub>2.5</sub>
- B) Mold
- C) Carbon Monoxide
- D) Lead
- E) Nitrogen Dioxide

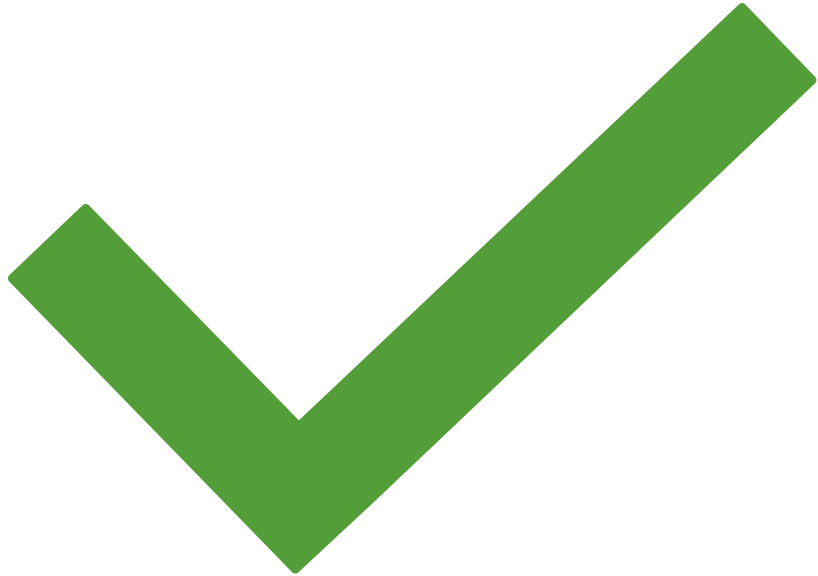


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**WRONG ANSWER**

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[Next Question](#)



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CORRECT  
ANSWER

Next Question 

# What is the preferred method of submitting a Title V petition?

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A)  
Electronic  
mail

(B)  
Central Data  
Exchange

(C)  
EPA  
Administrator

(D)  
Physical  
Mail

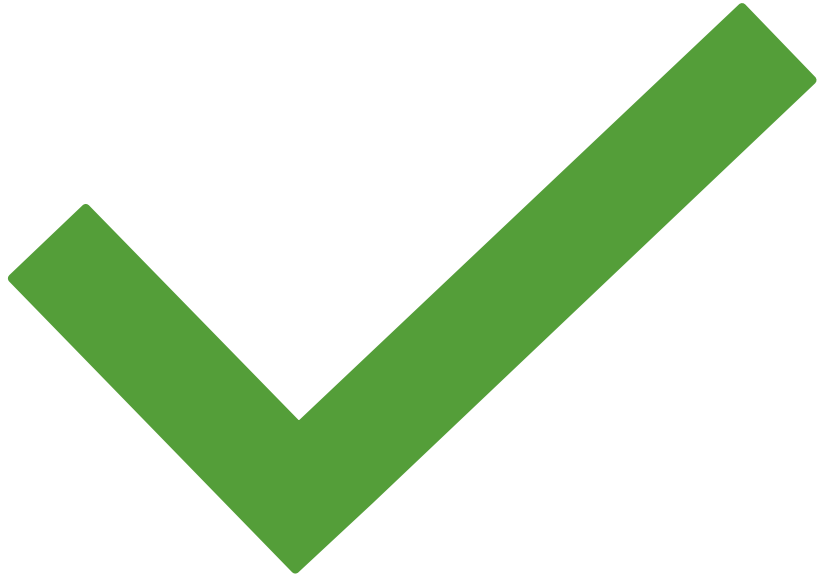
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**WRONG ANSWER**

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CORRECT  
ANSWER

Next Question



True or False. The 45-day review period does not begin until all necessary materials are received by EPA.

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True

False

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**WRONG ANSWER**

[Back to Question](#)

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CORRECT  
ANSWER

Next Question 

True or False. Any person may petition the EPA to object to certain Part 70 permits.

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True

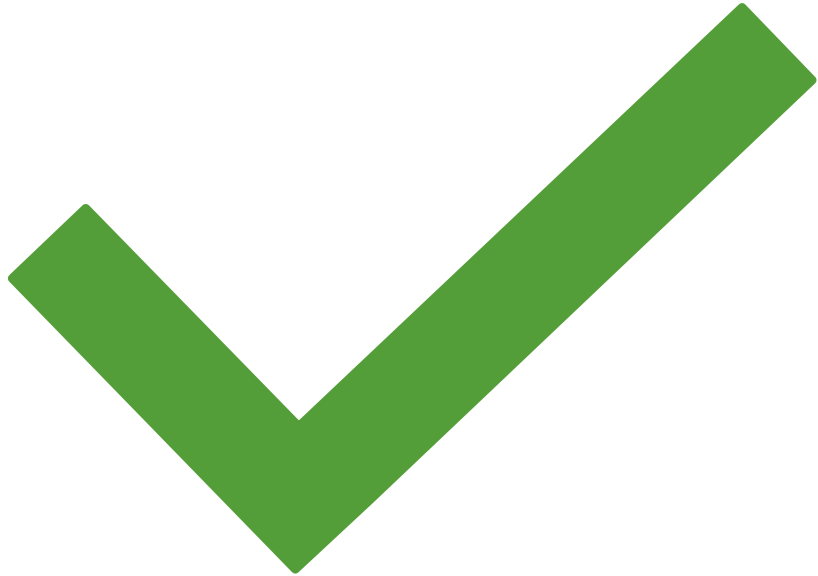
False

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**WRONG ANSWER**

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CORRECT  
ANSWER

Next Question



True or False. You DO NOT need to provide copies of your petition to the permitting authority and the permit applicant. 

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True

False



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**WRONG ANSWER**

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[Complete Training](#)



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CORRECT  
ANSWER

Complete Training 

# Congratulations!

You've completed the EPA Region 4 Air Permits Training for Meaningful Involvement!

Please reach out to Emily Ferrando at [Ferrando.Emily@epa.gov](mailto:Ferrando.Emily@epa.gov) with any questions.