

Equipment Modification FAQ

This document has been developed to provide additional clarification to the Fact Sheet titled *Is Modification to My Air Construction Permit Needed?* The example applications listed below provide additional clarification to the Fact Sheet. The example applications listed below provide additional clarification to the Fact Sheet. The examples provided were developed from comments or questions received by industry, DNR, and other stakeholders during the Fact Sheet development and subsequent updates. The intent of these documents is to simplify the decision process for the applicant when encountering these common scenarios. However, the applicant may always seek a determination from the Linn County Air & Water Quality Branch (LCPH A&WQB) if the applicant believes that their particular modification or scenario falls outside these common scenarios specified in the Fact Sheet and FAQ.

General

- 1) The ownership of my permitted equipment has changed, is a modification to my air construction permits needed?

Yes, as specified in **Scenario 1** of the Fact Sheet, a modification is necessary. Pursuant to LCCO 10.5(6)"c", permits are not transferable from one person to another. Submission of the PTO application form and the filing fee should be submitted to the LCPH A&WQB within 30-days of the ownership change. Based on the age of the current permit(s), the Department may require additional forms and/or information to be submitted.

Equipment Relocation¹

- 2) I plan to relocate an externally vented equipment to a new location at my site. The new location of the stack will be different but all stack parameters will remain the same as permitted. Is a modification to my air construction permit needed?

Maybe, as specified in **Scenario 6** of the Fact Sheet. You should submit a request that LCPH A&WQB determine if an air construction permit modification is needed or submit an air construction permit application to the LCPH A&WQB.

Stack Parameter Alterations¹

- 3) A. The stack height specified in my construction permit is 60 feet above ground but the actual stack height is 72 feet above ground. Is a modification to my air construction permit needed?

No, as specified in **Scenario 11** of the Fact Sheet, a modification is not necessary at this time and notification to the LCPH A&WQB is not required as 12 feet is less than 125% of 60 feet.

- B. The stack height specified in my construction permit is 60 feet above ground but the actual stack height 59 feet above ground. Is a modification to my air construction permit needed?

No, as specified in **Scenario 12** of the Fact Sheet, a modification is not necessary at this time and notification to the LCPH A&WQB is not required. The stack is higher than 52 feet, and its height is within one foot of the permitted value.

¹ If the equipment involved in PSD, NA NSR or SIP maintenance plan permitting then additional evaluation may be necessary. Please contact LCPH A&WQB for additional guidance.

- 4) A. The stack height specified in my construction permit is 40 feet above ground but the actual stack height 45 feet above ground. Is a modification to my air construction permit needed?

No, as specified in **Scenario 11** of the Fact Sheet, a modification is not necessary at this time and notification to the LCPH A&WQB is not required as 45 feet is less than 125% of 40 feet.

- B. The stack height specified in my construction permit is 40 feet above ground but the actual stack height 39 feet above ground. Is a modification to my air construction permit needed?

Yes, as specified in **Scenario 13** of the Fact Sheet, a modification is necessary at this time. You should submit an air construction permit application to the LCPH A&WQB. The stack is less than 52 feet, and it is lower than the permitted height.

- 5) A. The stack diameter specified in my construction permit is 48 inches but the actual diameter is 43 inches. The stack height is 70 feet above ground. Is a modification to my air construction permit needed?

No, as specified in **Scenario 14** of the Fact Sheet, a modification is not necessary at this time and notification to the LCPH A&WQB is not required as the diameter is within 10 inches of the permitted diameter for stack greater than 65 feet above ground.

- B. The stack diameter specified in my construction permit is 48 inches in diameter but the actual diameter is 43 inches. The stack height is 60 feet above ground. Is a modification to my air construction permit needed?

Maybe, as specified in **Scenario 15** of the Fact Sheet, you should submit a request that LCPH A&WQB determine if an air construction permit modification is needed or submit an air construction permit application to the LCPH A&WQB. The diameter does not conform to the permitted diameter.

Emission Unit Alterations

- 6) I plan to replace my existing equipment with new equipment that has the same maximum operating capacity and is functionally equivalent equipment to my existing equipment (i.e. "like-kind replacement"). Is a modification to my air construction permit needed?

The installation of new equipment to replace existing equipment that is similar or the same in size or function is still considered new equipment and not a modification of existing equipment.

The owner or operator shall apply for an air construction permit for the new equipment or may qualify for an exemption from the requirement to obtain an air construction permit as specified in 567 IAC Chapter 22.1(2).

- 7) A. I want to combust a new fuel type in my existing equipment. To accommodate the new fuel a physical modification is not necessary to my existing equipment. Is a modification to my air construction permit needed?

Yes, as specified in **Scenario 19 or 23** of the Fact Sheet, a modification is necessary. You should submit an air construction permit application to the LCPH A&WQB as there could be an operating restriction limiting your fuel types and also because combusting a new fuel is considered a change in the method of operation.

If you want to combust a new fuel type in existing equipment that is potentially less emitting than existing fuels, the owner or operator may qualify for exemption from the requirement to obtain an air construction permit specified in 567 IAC Chapter 22.1(2)"g", seek a determination from the LCPH A&WQB or submit an air construction permit application for the new type of fuel combustion.

B. Is a permit modification necessary for equipment that is capable of accommodating fuels reviewed by LCPH A&WQB as part of the original permitting exercise but the permit does not establish limits for those fuels?

No, if the owner or operator would like to establish operating limits on any of the fuels, a permit modification will be necessary.

8) I want to replace my existing fan with a variable speed fan. The exhaust flow rate of the fan is rated at range of 1500 scfm to 3000 scfm. The exhaust flow rate specified in my construction permit is 2000 scfm. Is a modification to my air construction permit needed?

Yes, as specified in **Scenario 16** of the Fact Sheet, a modification is necessary at this time. You should submit an air construction permit application to the LCPH A&WQB since the exhaust flowrate change is greater than 25% of the permitted value. Provide the exhaust flow rate range of the variable speed fan in your air construction permit application submittal.

9) A. I want to add a piece of equipment that will exhaust with multiple emission units to a single emission point. Is a modification to my air construction permit needed?

Yes, as specified in **Scenario 24** of the Fact Sheet, a modification is necessary at this time since the addition of the new equipment needs to be evaluated for its ability to comply with any state and federal regulations.

B. I want to remove a piece of equipment that exhausts with multiple emission units to a single emission point. Is a modification to my air construction permit needed?

Yes, as specified in **Scenario 24** of the Fact Sheet, a modification is necessary at this time since the removal of equipment will require an update to the permitted emission units.

C. I want to leave equipment in place and not operate the equipment (equipment idling) for an extended period of time. Is a modification to my air construction permit needed?

The Fact Sheet does not address the idling of existing equipment for an extended period of time. If the owner or operator is considering this action seek additional guidance from the LCPH A&WQB.

This document is intended to serve as guidance only and may not be used as a substitute for reading and complying with all applicable statutes and rules or to legally bind the LCPH A&WQB. The scenarios depicted in this document are merely examples, and enforcement decisions will be made based on the specific facts and circumstances of each case. This document was compiled on **(02/01/18)**, and may not reflect the changes in the law, changes in the NAAQS, or changes in the modeling practices that occur after this date. The information included in this document has been compiled in an effort to simplify the permitting process for parties unfamiliar with LCPH A&WQB's rules.

For assistance, contact Linn County Public Health Air & Water Quality Branch at: 319-892-6000.