

Questions/Issues for NSR Reform Workgroup Consideration

1) General: How should the State adopt these rules (i.e. by reference, write them into our SIP, go with portions of the Menu of Options, etc.)?

2) Issues/questions for each subgroup:

PCP:

- listed projects, incorporate by reference or list in rules?
- how do we add a new project to the list?
- what are the requirements for case specific PCP?
- what kind of modeling demonstration is required, who does it?
- modeling for any increase or just significant increase?
- what are the monitoring and recordkeeping requirements?
- what is the level of reduction required for a PCP? 50%, 90%?
- can you get out of PCP and get regular permits?

Clean Unit:

- what types and levels of investment are allowed?
- what kind of modeling is required to be comparable to BACT? PTE, actuals?
- for comparable to BACT how can they apply before 12/31/04 if our rule isn't in place yet?

PAL:

- will there be a separate PAL permit?, who will design it?
- what are the monitoring requirements?
- how good do the emission factors have to be to be used?
- what is a significant emission unit?
- what happens if the unit operates outside the emission factor's normal range?
- what types of dispersion modeling setups are required? worst case? typical layout?
- how are support facilities handled?
- what is the mechanism for terminating a PAL?

BAE:

- how do we handle debottlenecking?
- how do we estimate and include startup/shutdown/malfunction emissions?
- how do we handle fugitive emissions?
- What is considered "demand growth" as there is no definition?
- Under the netting recordkeeping what is considered a "reasonable possibility"?