AIR QUALITY

Trinity's 8 Step Guide to Successful MSS Permitting

Trinity Consultants is a leading global environmental consulting firm that brings 50 years of experience providing services and solutions in the EHS Regulatory Compliance, Built Environment, Life Sciences, and Water & Ecology markets. Trinity has the technical expertise, industry depth, and specialized capabilities to help clients achieve their goals across the natural and built environments.

In January 2006, revisions to Title 30 of the Texas Administrative Code (30 TAC) Chapter 101 provide a schedule for the phasing out of affirmative defense for emissions from planned and predictable Maintenance, Startup, and Shutdown (MSS) activities. Revisions to 30 TAC Chapter 101, General Air Quality Rules, federal New Source Review (NSR) rules, and ongoing implementation of the Federal Operating Permits Program resulted in considerable interest and inquiries from the regulated community regarding which MSS, and other episodic releases of emissions, should (and can) be authorized by the Texas Commission on Environmental Quality's (TCEQ's) permitting program. To respond to the interest and inquiries, TCEQ has proposed criteria for determining if (and when) the planned and predictable MSS emissions generated outside of normal production operations should be covered under a NSR permit or Permit by Rule (PBR). TCEQ has developed a framework for authorizing those emissions.

Included in MSS are activities such as plant turnarounds, preventive maintenance, and routine replacement of facility parts that are regular and quantifiable. The planned and predictable MSS emissions exclude emissions resulting from acts of God, accidents, malfunctions, noncompliant operations, and other releases not consistent with good engineering practices. These non-MSS emissions will continue to be reported under the Emissions Events/Scheduled MSS program under 30 TAC Chapter 101. It should be noted that any authorized portion of emissions from "planned and predictable MSS" must comply with the TCEQ and United States Environmental Protection Agency (EPA) regulations including Best Available Control Technology (BACT) evaluations, National Ambient Air Quality Standards (NAAQS), and state emission standards (health impacts review).

The TCEQ rule requires the submittal of MSS applications by all affected facilities that have not yet submitted MSS applications to date. Affected facilities must submit an application to authorize the planned and predictable MSS emissions or opacity **no later than January, 2013, except for some Oil and Gas sources which have an extended MSS deadline of January 5, 2014 or the 120th day after a new or amended permit takes effect.**

Considerations for your MSS application

Step 1: Identify the maintenance activities that occur at the site.

- Work with maintenance to determine what kinds of maintenance activities the site has and the durations/frequencies of those activities
- Review all affected processes
- Review prior Emissions Events/MSS reports and Emissions Inventories
- Review maintenance work order system in place, if any
- Conduct on-site interviews and meetings with personnel regarding MSS activities
- Review vendor specifications, work orders, accounting data, purchasing orders, and other on-site systems to prepare a list of all the previous MSS activities
- Review any previously identified activities through other regulatory requirements such as Texas Commission on Environmental Quality (TCEQ) rules and federal rules

Step 2: Identify Startup and Shutdown Events

- Review all affected processes
- Review Standard Operating Procedures that specify how equipment is started up and shutdown (and maintenance, if not covered above), including to what degree the equipment is cleaned up and quantities of materials used for clean-up
- Review uncontrolled or cold emissions estimates from previous start-ups and shutdowns or from vendors
- Review prior Emissions Events/MSS reports and EIs
- Review vendor specifications, work orders, accounting data, purchasing orders, and other on-site systems to prepare a list of all the previous MSS activities
- Review any previously identified activities through other regulatory requirements such as TCEQ rules and federal rules

Step 3: Differentiate between planned/predictable MSS activities versus unplanned/unpredictable activities.

Step 4: Quantify emissions for the planned and predictable MSS activities.

- Identify duration of events
- Identify number of events
- Chemicals or other items used during maintenance
- Identify appropriate emission factors (if available)
- Identify fuel usage or throughput (as needed)
- Review all processes and ensure that all emissions during MSS are accounted for, including miscellaneous sources of emissions. This could include particulate emissions relating to boiler clean out, plant turnaround, and any other activities that may require quantification

Step 5: Evaluate NSR Authorization Options

- Permits by Rule
- Standard Permits
- New Source Review (NSR) Permits

Step 6: Prepare NSR Authorization Documents

- Evaluate Best Available Control Technology (BACT) for all MSS activities
- Prepare air dispersion modeling analyses
- PM/CAM evaluation
- Evaluate PSD and NSR applicability

Step 7: Evaluate Title V Authorization Options

- Operational Flexibility (Off-Permit)
- Minor Revision
- Significant Revision

Step 8: Prepare Title V Revision Documents

- Form preparation
- Public notice (if applicable)
- Periodic Monitoring/Compliance Assurance Monitoring (PM/CAM) evaluation
- Other elements, as applicable

Why Choose Trinity

In short, there's no better choice for your MSS permitting needs. Trinity has assisted facilities with preparing MSS applications throughout the state of Texas since 2006.

ISO 9001:2015 certified at our corporate office in Dallas, Texas

CONTACT OUR TEAM!

For more information about how we can help your organization, please contact us.

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