

# Air Permits Regulatory Update

Todd A. Moore  
Air Resources Division  
Permitting & Environmental Health Bureau



# Scope: Air Pollution Regulation Update

## Stationary sources of air pollution

Air pollution control requirements

Air permitting requirements

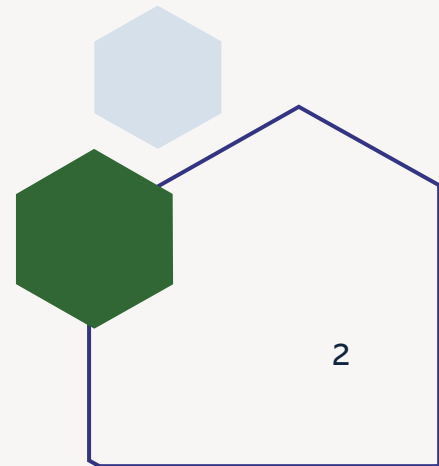
## Changes

Recent / In-Progress / Upcoming

## Background

What changes?

Why does it change?



# NH Air Pollution Regulation Changes

**What?:** *NH Code of Administrative Rules Subtitle 'Env-A'*

Roadmap for NH regulation of air pollution

Underlying Requirements

State statutes

Federal regulations

Direct: Requirements for stationary sources

Indirect: NH plan to satisfy federal requirements

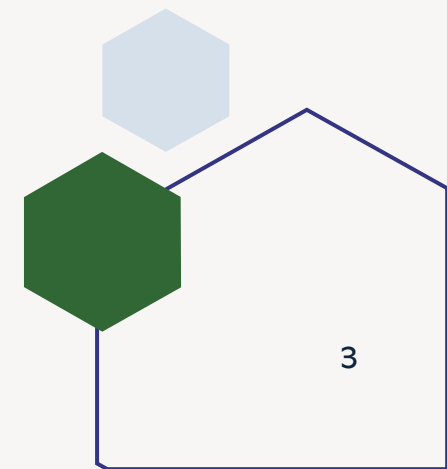
**Why?:** *Constant Change*

Address changes in underlying requirements

Incorporate current information

Periodic expiration/readoption of NH rules

Improve implementation



# Recent Changes

## NH Air Toxics (complete Feb 2022)

Update RTAPs & AALs

Compliance Boundaries

Rule re-organization

## Delegation of Federal Plan for Existing Landfills

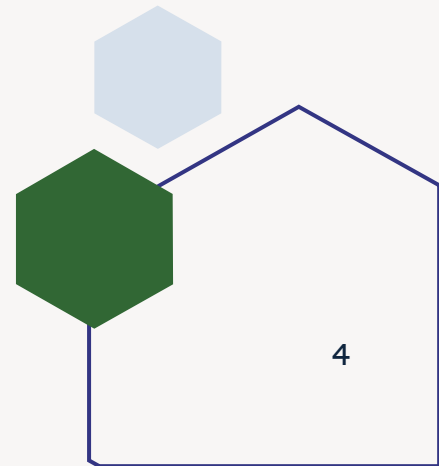
Rule complete May 2022

Delegation request pending

## Adoption of Updated Federal NAAQS (complete May 2022)

PM<sub>2.5</sub> annual 15.0 to 12.0 ug/m<sup>3</sup>

Ozone 8-hr 0.075 to 0.070 ppm



# In-progress Changes

## Ferrous & Non-Ferrous Foundries

Expiring/readoption (Env-A 2400)

Remove 'affirmative defense' provision

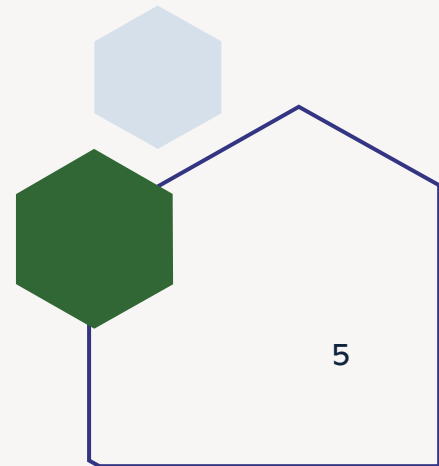
Comment period closed Sep 9, 2022

## Hot Mix Asphalt Plants

Expiring/readoption (Env-A 2700)

No requested/proposed changes

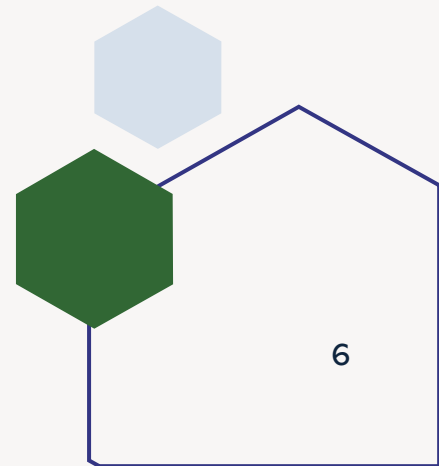
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# Upcoming Changes

## Air Permit Systems

- Thresholds & application types
  - New, amendments, modifications
  - Application submittal & processing procedures
  - Paper vs electronic
- Public input
- Limitations on Potential to Emit
- Primary rule: Env-A 600 *Statewide Permit System*



# Upcoming Changes

## Affirmative Defense

Current USEPA guidance = no 'affirmative defense'

Multiple rules:

Env-A 1900 *Incinerators*

Env-A 2100 *Particulate Matter & Visible Emissions Standards*

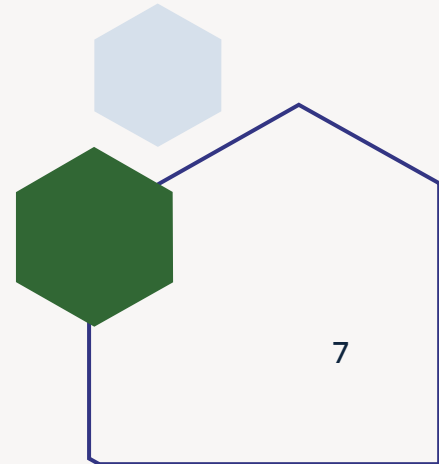
Env-A 2400, *Ferrous and Non-Ferrous Foundries, Smelters, and Investment Casting Operations* (in progress)

## Startup/Shutdown/Malfunction Exemptions

Current USEPA guidance = no blanket exemptions

Establish SU/SD requirements

Env-A 2000 *Fuel Burning Devices*





# Thank you

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[todd.a.moore@des.nh.gov](mailto:todd.a.moore@des.nh.gov)