DECISION TREE ‘C’ FOR INCORPORATING CHANGES AT A FACILITY INTO THE TITLE V PERMIT

From Decision Tree ‘B’

Q19: Does anything in the current permit conflict with or prohibit the change?

YES → Q20B: Is this a change to an existing unit or is this a new unit?

EXISTING

NO

NEW

Q20A: Does the permittee want the revision to be included in the federally enforceable side of the permit (however, only significant permit modifications qualify for the permit shield)?

YES → Q22B: was the change established in a PTI first (e.g., synthetic minor PTI)

YES → Q23: Is the change related to the establishment of or change in a case-by-case determination of a state-emission limitation or other standard (e.g. BAT)?

NO

SPM

YES

MPM

NO

If your scenario was not answered by any of the previous questions, it will likely qualify for a minor modification. Consult the guidance and/or your Ohio EPA contact prior to assuming your scenario meets the minor modification criteria.

Q21A: Does the change contravene an existing term or condition without affecting the compliance certification and MRR or resulting in the exceedance of an emission allowable?

NO

Q21B: Is this change related to establishing or seeking a change in an emission cap used to avoid a Title I modification; or is an alternative emission limit being approved under the early reduction law for hazardous air pollutants (section 112(i)(5) of the Act)?

NO

Q22A: Is the changed related to the establishment of or change in a case-by-case determination of: a federal emission limitation or other standard (e.g., BACT, LAER); a source-specific determination for temporary sources of ambient impacts; or a visibility or increment analysis?

NO

Operational Flexibility