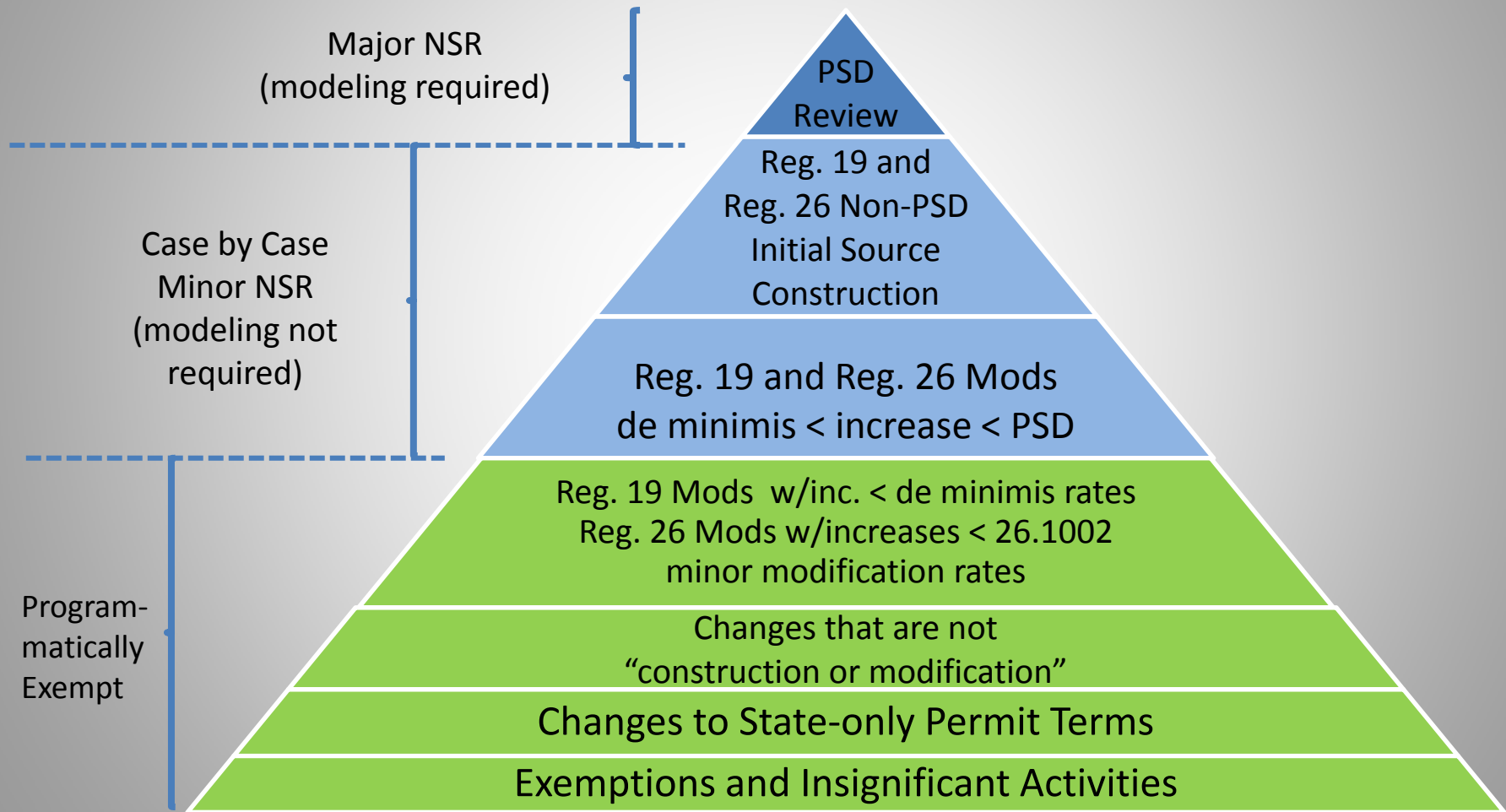


What is Minor NSR?

- “The procedures [*SIP*] must identify the types and sizes of facilities...which will be subject to review...” 40 CFR 51.160(e)
- Generally, Minor NSR applies, *as specified in the applicable SIP*, to
 - The construction of any minor stationary source (i.e., with PTE less than the applicable PSD/NNSR major source thresholds)
 - The modification of any minor stationary source
 - The modification of any major stationary source resulting in emissions increases less than the applicable PSD/NNSR significant increase thresholds
- Minor NSR requirements
 - May include a case-by-case permit review and issuance
 - May include controls or other substantive requirements
 - May include modeling, source testing, or monitoring
 - Vary widely from state to state

The Arkansas NSR NAAQS Review Pyramid



EPA Comments on NAAQS Sweep

- “The proposed addition of Reg. 19.305 is potentially not approvable into the Arkansas SIP because it does not ensure that all sources permitted under the Minor NSR Program will not cause or contribute to a NAAQS violation or interfere with the maintenance of the NAAQS.”
- “[The 19.407(C) thresholds] should take into consideration a source-by-source evaluation, as well as, provide that the cumulative impacts from all anticipated exempted sources will not cause or contribute to a violation of the NAAQS or interfere with NAAQS attainment or maintenance.”
- “If we are not able to approve the [19.407(C) thresholds], any permits issued...in accordance with these thresholds...may require additional action... including amendments to existing permits or the issuance of permits to those sources claiming exemption under the state effective permitting thresholds.”

How is a NAAQS review performed for minor NSR changes?

The NAAQS review can be satisfied by consideration of several factors, such as:

- The level of the emissions increase
 - in comparison to the de minimis thresholds or PSD significance thresholds,
 - in comparison to the facility PTE or area-wide emissions inventory, and/or
 - in comparison to previous NAAQS evaluations.
- The location of the construction or modification
 - in an attainment or unclassifiable area,
 - in relation to other pollutant-emitting activities or industrial sources,
 - in relation to ambient monitoring stations, and/or
 - in relation to potentially sensitive receptors
- The nature of the source or emissions unit

Act 1302

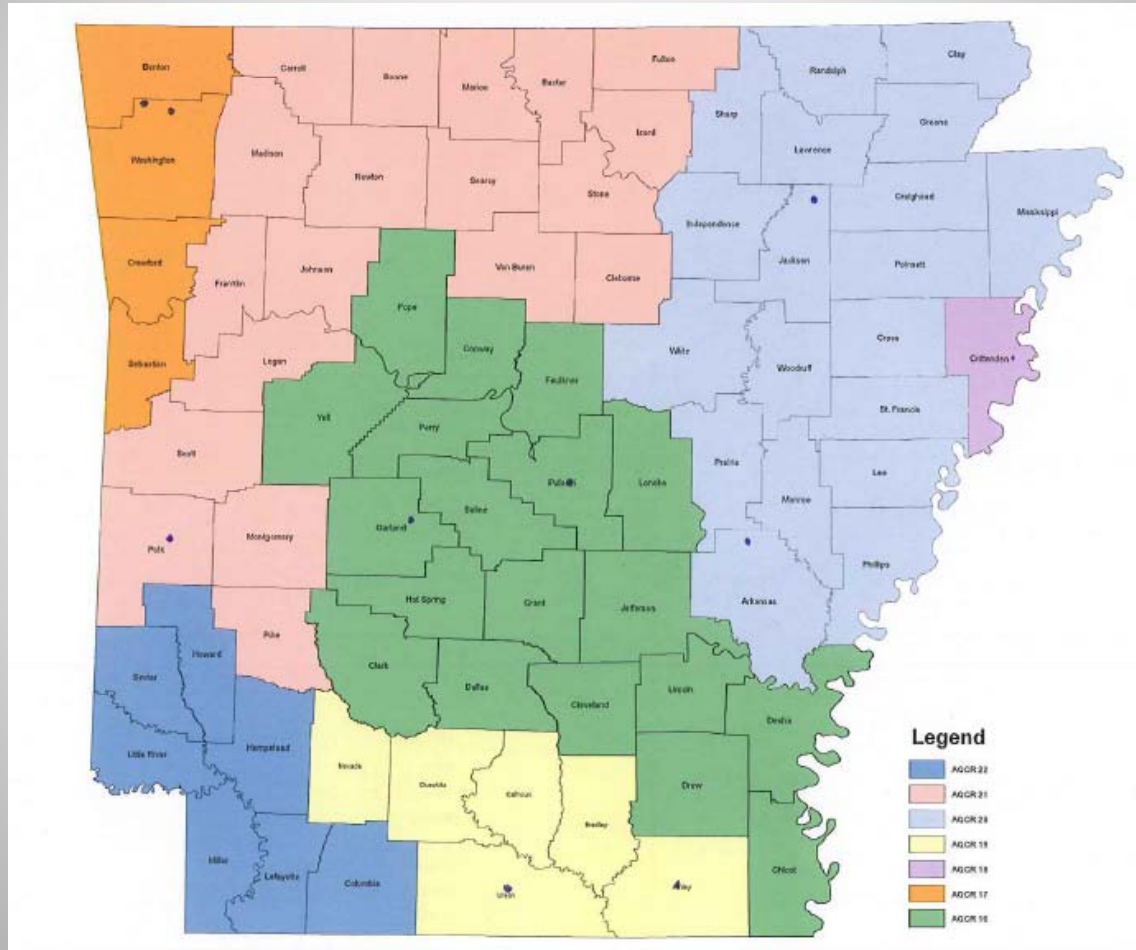
Unless otherwise voluntarily proposed and agreed to by the owner or operator of a stationary source, the department shall not require or consider air dispersion modeling of an air contaminant for which a National Ambient Air Quality Standard has been established in air permitting decisions for stationary sources except:

(A) As required by Part C of Title I of the Clean Air Act, [42 U.S.C. § 7401](#) et seq., and the federal regulations promulgated thereto, for the permitting of major source construction;

(B) If necessary in the judgment of the department, with respect to permitting of a temporary source under [42 U.S.C. § 7661c\(e\)](#); or

(C) Pollutant-specific or facility-specific air dispersion modeling explicitly required by an applicable NAAQS state implementation plan submitted to the United States Environmental Protection Agency.

Air Quality Control Regions



Pollutant-specific NAAQS SIP

- Monitored background concentrations for each AQCR
- EPA-approved classifications for each AQCR (40 C.F.R. § 52.171)
- Exclusion for intermittent sources
- Consideration of corresponding emission reductions (Reg. 19.407(C)(2))