GUIDELINES

TO: Permitting Branch
FROM: Marty Gray, Permitting Branch Manager
DATE: June 30, 2018
SUBJECT: Synthetic Minors Sources and Emission Fees

Purpose
This guideline clarifies which sources are required to pay a Title V emission fee based on synthetic minor status.

Implementation and Analysis
All Part 70 sources must pay an annual fee, based on annual emissions of all chargeable pollutants. A Part 70 source is a source that meets any of the following:

1. Source emits 100 tons per year or more of any criteria pollutant (major criteria source);
2. Source emits 70 tons per year or more of PM$_{2.5}$, NO$_X$, SO$_2$, VOC, or ammonia in a PM$_{2.5}$ serious non-attainment area.
3. Source emits 10 tons per year or more of a single hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants (major HAP source).
4. Source is subject to a New Source Performance Standard (NSPS source) or National Emission Standard for Hazardous Air Pollutants (NESHAP/MACT source), unless the subpart exempts the source from Title V.

A synthetic minor source, with respect to Part 70, is one that has obtained federally-enforceable conditions (typically via an Approval Order) that reduces its potential-to-emit to a level below the major source threshold. If the source is subject to a NSPS or NESHAP (including MACT) and the subpart does not exempt it from Title V, then the source is a Part 70 source and must pay an annual emission fee whether it is a synthetic minor source or not.

If the source has synthetic minor status and is not subject to a NSPS or NESHAP (including MACT), the source is no longer a Part 70 source and does not need to pay a Title V emission fee.
Authority
UAC R307-415-9(2)

This guideline shall be audited every five years by the Operating Permits section manager to determine the current status and relevance of the information.