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GUIDELINES

TO: New Source Review Section

FROM: Marty Gray, Permitting Branch Manager *MG*

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SUBJECT: Project Internal Reviews

Purpose

The purpose of this guideline is to standardize the internal review process for New Source Review (NSR) projects during peer, compliance, Title V, and management reviews. All NSR engineers should review this guideline to understand what is expected when conducting peer reviews or when preparing a document for peer review. The Compliance and Title V staff shall also review the parts of the guideline related to their reviews.

The guideline also describes the electronic records of review documents that should be maintained by staff. The purpose of these records is to document the discussion between engineers and reviewers and ensure that the internal review process is being conducted in accordance with the process described in this guideline.

This guideline describes the required reviews for an engineering review (ER) document, which has the most comprehensive level of reviews. The review steps described in this guideline may not be required for all project types.

Instructions on modeling, ITA, source reviews, response to public comments memos, etc. are not included in this guideline. Specifically, the modeling review of the NOI and draft ER should be conducted before the peer review to ensure that all modeling concerns are incorporated into the ER.

Milestones

The order and approximate turnaround time of all reviews required from the draft ER to the final AO issuance are listed below. This list includes all required reviews, including reviews not covered by this guidance. Days are listed in calendar days, except where noted.

- I. Internal Draft Engineering Review (ER) (up to 14 days total, electronic reviews)
 1. Modeler review (2 days)
 2. Peer review (5 days)
 3. Compliance and Title V (7 days each, concurrent reviews)
- II. Draft ER (up to 14 days total, electronic review)
 1. Section Manager (4 days)
 2. Source Review (10 business days)
- III. Intent to Approve (ITA) (up to 3 days)
 1. Modeler (1 day) (electronic)
 2. Section Manager (2 days, hard copy review)
- IV. Public Comment Period (30 days)
- V. Final AO (up to 6 days, hard copy review)
 1. Sections Manager if ITA changed due to public comments (2 days)
 2. Branch manager review (2 days)
 3. Director review (2 days)

Review Goals

- I. Peer Review Goals
 1. Technical Accuracy – Peers will check technical accuracy, including calculations, process description, BACT, and other project specific details.
 2. Legally Sound – Peers will ensure that conditions and determinations are legally valid, well documented, and in accordance to BACT and applicable rules/regulations.
 3. Meets DAQ Standards – Peers will ensure that the document meets DAQ standards for grammar and formatting, uses DAQ accepted language, and is clear and understandable to the source and public.
- II. Compliance Review Goals
 1. Enforceable Conditions – NSR will seek comments on whether conditions are enforceable and have adequate compliance mechanisms.
 2. Documentation – NSR will seek comments on whether the requirements of applicable rules and regulations have been appropriately incorporated into the AO.
- III. Title V Review Goals
 1. Title V Compatibility – Title V staff will review to ensure that the changes made can be incorporated into the Title V permit.
- IV. Section Manager Review Goals
 1. Comprehensive Review – Final review of ER before source review to ensure technical accuracy and consistency with other permits; verify that appropriate records and documentation are available for the project; and any other issues, as needed.

Implementation

I. Step-by-Step Instructions:

Peer Reviews

1. The peer should attend Pre-NOI meetings when possible.
2. The engineer will provide an electronic copy of the ER and the project source file to the peer for review. The project source file will include the NOI and all supporting documentation.
3. The engineer will specify a date when comments are due, typically 5 calendar days from date sent. The peer may request additional time, if needed.
4. The peer should notify engineer if the peer review cannot be completed by the requested date.
5. The peer will review the document electronically and provide feedback with track changes and/or comments (i.e. Peer-Reviewed Document). In-person discussions may be appropriate before peer comments are finalized; however, the peer should document all final comments in a Peer-Reviewed Document.
6. The engineer will respond to all comments in the Peer-Reviewed Document. The engineer should add comments to the Peer-Reviewed Document explaining how the peer comment was incorporated. If a peer comment is not incorporated, the engineer should explain why. This document will be referred to as the Response to Peer Document.
7. The engineer will make the changes from the peer review in Tempo and regenerate a revised ER. The engineer will send the peer the revised ER and the Response to Peer Document.
8. The peer will check the revised ER against the Response to Peer Document to ensure that all concerns have been addressed. If the peer has no additional concerns, then the peer should sign off on the project at this point. If the peer has additional comments or questions, the peer should continue to work with the engineer until all concerns have been addressed. If there is an impasse, the peer or engineer should involve management at this point.
9. The engineer will save all revised ERs, Peer-Reviewed Document, and Response to Peer Documents. Managers may request these documents during their reviews. These documents are considered internal documents should not be included in the Project File. Only the final ER should be printed and included in the Project File.

Compliance and Title V Reviews

10. The engineer will send an electronic copy of the approved peer-reviewed ER to Title V and compliance.
11. Title V and compliance reviewers will review the document electronically and provide feedback with track changes and/or comments.

12. The engineer will respond to comments in a document with track changes/comments or in e-mail form.
13. The engineer will note in the comments section in the WAL when compliance or Title V comments were received. If no comments were received from a reviewer, the engineer will make a note of that in the WAL.
14. If any substantial changes are made during Title V or Compliance reviews, the engineer will send the ER back to the peer reviewer. Substantial changes include, but are not limited to, major changes to existing conditions and/or the addition of a new requirement.

Source and Manager Reviews

15. The engineer will send the ER and the project source file to the Section Manager to review electronically after reviews by peer, compliance, and Title V are completed.
16. The Section Manager will review the document electronically and provide feedback with track changes and/or comments.
17. The engineer will provide a response to comments received in a document with track changes and comments.
18. The engineer will work with the Section Manager until all comments have been addressed by following a similar process as detailed in Steps 5 through 9 above.
19. The engineer will send the ER to source review once the document is approved by the Section Manager. The source will be given 10 business days to review the document and provide comments.
20. The engineer will incorporate any comments from the source. Substantial comments may require the engineer to follow the process detailed in Steps 5 through 9 and/or Steps 18 and 19 above. Once the source approves the ER, the engineer will finalize the ER for public comment.
21. The engineer will give the final ER and signature page to the Office Tech, who will prepare the documents for public comment.

Additional Instructions

This section describes general responsibilities of the peer, Title V, and compliance reviewer. This section is not intended to be a complete list of responsibilities, but rather a list of minimum expectations from reviewers.

For specific instructions on each section of the ER document, engineers and peers should refer to the ER – Guidance & Template guideline.

Peer Responsibilities

- A. Peer should work closely with project engineers to make sure that the technical, legal, grammatical, and typographical errors are corrected.

- B. Peer will make every effort to catch all errors during initial review of the project. During any subsequent peer reviews, the peer should check previous comments to ensure all critical errors are corrected. If the ER contains incorrect information or statements, correction of these items is required.
- C. Peer should sign off in the Tempo WAL as soon as all major comments and concerns have been resolved. Grammatical and typographical errors or other personal preference suggestions should not delay peer sign off.
- D. If a peer reviewed document raises significant procedural or statutory concerns or an issue to be addressed through a policy change or guideline development, the peer along with the project engineer and management should meet to resolve the concerns.
- E. Peer should be notified when calculations are performed by the engineer. Peer should review calculations performed by the engineer to ensure that there are no calculation errors, correct assumptions are being used and documented, appropriate emission factors are used, etc. Any issues identified in calculations provided by the source should be brought up with the engineer; however, the engineer is responsible for addressing the problems with the source.
- F. Peer should ensure that any figures and data quoted in the ER are accurate and can be verified in the supporting documentation (NOI, calculations, etc.).
- G. Although peers should emphasize their reviews on sections of the AO that were modified or added for the project, peers should also review all other requirements and limitations in the AO, including those not affected by the current project.
- H. If a peer receives an ER with substantial mistakes, the peer should stop review and involve management. At this point, the manager will determine whether the peer review should continue or whether the project should return to the engineer. Substantial mistakes generally consist of mistakes that would significantly impact the permit or would require significant rework to correct.

Compliance Feedback

- A. If relevant, compliance will provide source-specific information gathered during recent compliance inspections.
- B. New and modified stack testing conditions should be reviewed by a compliance inspector with stack testing experience.
- C. Compliance will review the entire document as needed to verify that there are no issues that could impact compliance inspections and determinations.

Title V Responsibilities

- A. Title V engineer will review the ER to ensure the language can be incorporated into the Title V permit specifically with monitoring, recordkeeping and reporting (MRR) requirements added for the enhanced approval order process.

- B. The Title V review will look for MRR language from previous enhanced AOs that should be removed in the current permit.
- C. The Title V engineer should look for any monitoring requirements in the AO that could cause a conflict with the Title V permit monitoring and the ability to enhance it or make it more frequent.

Manager Review Responsibilities

- A. Managers will conduct an independent review of the ER to ensure technical accuracy, consistency with other permits, and address any other issues as needed. The level of review (i.e. detailed or high-level) will be up to the discretion of the manager.

The Major and Minor Source Section Managers shall audit this Guideline every five years to determine the accuracy and relevance of the information.