

PRACTICAL EXERCISES – NETTING

EXERCISE 1

An existing minor source (subject to the 100 ton per year threshold for the list of 28) proposes a modification. The modification involves the shutdown and removal of an old emissions unit (providing an actual contemporaneous reduction in NOx emissions of 75 tpy) and the construction of two new units with a total projected actual NOx emissions of 110 tpy.

Does PSD apply to the new units?

Why or Why not?

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EXERCISE 2

An existing major source is located in an area which is attainment for all criteria pollutants. The source had less-than-significant increases of NO_x (30 tpy) and SO₂ (15tpy) two years ago, and a 50 tpy decrease of SO₂ three years ago. The source now proposes to add a new process unit with an associated projected increase in emissions of NO_x (35tpy) and SO₂ (80 tpy). The 80 tpy increase in SO₂ is significant before netting. The 35 tpy increase in NO_x is not significant.

Would either the NO_x or SO₂ emission increase trigger PSD after netting?

Why or why not?

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EXERCISE 3

A plant which manufactures automobile and truck tires – an existing major source – proposes to increase its production of both types of tires. For its automobile tire line, the source applies for – and is granted – a minor modification permit for a new extruder that will increase projected VOC emissions by 39 tons per year. A few months later, the source applies for another minor modification permit to construct a new tread end cementer on the same line. This will increase projected actual VOC emissions by 12 tons per year.

Should the extruder modification have been subject to PSD?

Why or why not?

Should the tread-end cementer modification cause the plant to be subject to PSD?

Why or why not?