

What if I switch, but can't comply. How do I go back to a Class I?

This can easily be done without incurring penalties, as long as you are consistently monitoring your operational parameters. Your Class II permit will place restrictions on your operations to insure actual emissions won't exceed thresholds that would require your plant to have a Class I permit. If, in any four consecutive calendar quarters, actual operations have exceeded 85% of operation restrictions, the owner or operator must report actual operations to KDHE [K.A.R. 28-19-501 (c)(1)]. At this time, it could be determined whether re-filing a Class I application is needed. Since the plant previously held a Class I, its re-application process would be relatively simple.

Mailing Address Line 1
Mailing Address Line 2
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Municipal Power Plants

Do you really need a Class I air operating permit?



This project is paid for (in part) by the Kansas Department of Health and Environment. (June 2008)

Why consider a change to a Class II permit?

Many municipal power utilities unnecessarily hold a Class I permit when the significantly less burdensome and less costly Class II permit is just as legal. Your municipal power plant qualifies for a Class II permit if acid rain, sulfur dioxide allowance tracking requirements do not apply to your plant and your **actual** annual emissions are **less than** the following criteria:

- 10 tons of any hazardous air pollutant (HAP)
- 25 tons of any combination of HAPs
- 100 tons of any other regulated air pollutant
 - Nitrogen oxides (NO_x)
 - Sulfur oxides (SO_x)
 - Particulate matter < 10 microns (PM10)
 - Volatile organic compounds (VOCs)
 - Carbon monoxide (CO)



Note the differences between Class I and Class II permits.

Class I permit application	Class II permit application
Process is complex, time consuming, and expensive.	Two-page application accompanied by two- to three-page equipment form(s)
\$1000 application fee	\$200 application fee
Application requires signature of responsible official (city manager or mayor).	Application requires NO signature.
Class I permit	Class II permit
Semi-annual reports	No semi-annual reports
Annual certification to KDHE and EPA	No annual certification
Annual emissions inventory—complex forms	Annual emissions inventory—one-page form (www.kdheks.gov/emission/download/electricpower.pdf)
Annual emissions inventory calculations—municipal power plant does calculations based on emission factors, fuel type, and usage rates.	Annual emissions inventory calculations—KDHE does calculations based on kilowatt hours provided by municipal power plant on one-page form.

What do I have to do to switch to a Class II?

Six to 18 months before your Class I permit expires, submit an application for a Class II permit. For a copy of the two-page Class II operating permit application (with instructions), go to www.kdheks.gov/air-permit/download.html and click on the applicable link. The application must be accompanied by the appropriate equipment description form (for most municipal power plants this will be Form 8-1.0). Also, include forms for control equipment, if applicable. Submit the completed application to the appropriate agency as directed on the instruction page.

Questions?

Kansas Department of Health and Environment Bureau of Air and Radiation, Permit Section, call **785-296-0616**.

Kansas Small Business Environmental Assistance Program, call **800-578-8898**.