

# Fact Sheet LRAPA's Parallel Processing of Title V Permits and Certain ACDPs

Updated: April, 2024 *For questions, contact:* Max Hueftle, Operations Manager, <u>Max@lrapa.org</u>, 541-736-1056 x231 Travis Knudsen, Public Affairs Manager, <u>Travis@lrapa.org</u>, 541-736-1056 x217

## What is LRAPA?

The Lane Regional Air Protection Agency (LRAPA) plays a crucial role in maintaining air quality within Lane County, Oregon. Tasked with issuing air quality permits, monitoring pollution levels, and ensuring compliance with air quality regulations, LRAPA safeguards the health of both the environment and its residents.

## What are ACDP and Title V permits?

- Standard and Construction Air Contaminant Discharge Permits (ACDPs) are two types of
  permits issued by LRAPA that can be used to approve some types of construction or
  modification changes that typically involve increases in emissions. In certain circumstances,
  Construction ACDPs or new or modified Standard ACDPs are required to be issued to facilities
  that currently have or will require Title V permits to allow for physical changes or changes in the
  method of operation. These permits often include facility-specific requirements such as
  emission limits, monitoring, and reporting obligations.
- Title V Operating Permits are federal permits designed for major sources of air pollution. They
  consolidate air quality requirements from all levels of regulation (federal, state, and local) into a
  single, comprehensive document. Facilities that have or will require a Title V Operating Permit
  that request increases in permitted emissions must first receive either a Construction ACDP or a
  new or modified Standard ACDP prior to operating the change(s) under their Title V Operating
  Permit.

## Why is LRAPA issuing two permits for the same source?

In certain circumstances, LRAPA will issue both permit types to ensure comprehensive coverage of state and federal requirements for major air pollution sources. Certain state- and local-specific regulations detailed in ACDPs must be established before they can be integrated into the broader framework of Title V permits. This process ensures that Title V permits encompass all relevant federal, state, and local air quality requirements, offering a clear, unified outline of a facility's obligations.

## Why is LRAPA processing Title V permits and ACDPs at the same time?

LRAPA processes Title V permits and ACDPs in parallel to ensure that the community is protected by the most current and stringent air quality regulations. By consolidating the permitting process, LRAPA can more efficiently review the facility's compliance with all applicable requirements and make any necessary updates to the permits. This approach also minimizes confusion and help for a clearer public comment process, allowing the interested public to review and provide input on both permits simultaneously.

## How does the parallel processing work?

1. Facilities submit applications for both an ACDP modification and a new or modified Title V Operating Permit.

- 2. LRAPA drafts a modified ACDP incorporating all applicable requirements.
- 3. These requirements are then mirrored in the Title V Operating Permit.
- 4. Both draft permits are subjected to a concurrent public comment period, inviting community input.
- 5. Following opportunity for public feedback, LRAPA issues the Construction ACDP or new or modified Standard ACDP and forwards the Title V permit to the EPA for up to a 45-day review.
- 6. After EPA opportunity to review, LRAPA finalizes the issuance of the Title V permit.

#### How can the Public Engage and Participate?

LRAPA strongly encourages public participation in the permitting process to ensure that community concerns are addressed. The public has the opportunity to review and comment on draft permits during the public comment period. LRAPA carefully considers all comments received and may make changes to the permits based on substantive public input. To learn more about current draft permits and how to submit comments, visit LRAPA's website at <u>www.lrapa.org</u> or contact the agency directly at (541) 736-1056 or <u>lrapa@lrapa.org</u>. Public involvement helps LRAPA protect air quality and public health across Lane County's communities.

#### For More Information

Engagement and participation are encouraged through LRAPA's public comment processes. For more information on air quality permitting, viewing draft permits, and participation details, please visit LRAPA's website at <u>www.lrapa.org</u>, or contact LRAPA directly at (541) 736-1056 or via email at <u>lrapa@lrapa.org</u>.