

Questionnaire

CAGW Participant,

The General Counsel's office is trying to assess the likely impact of anticipated GHG requirements on DOE's facilities. Your answers to the questions below, about your facility, will help us to that end. Please e-mail your responses to Christy.King-Gilmore@hq.doe.gov and Felix.Amerasinghe@hq.doe.gov by December 9th. Please note your name and facility's name somewhere on this document.

For additional information on anticipated Title V and PSD permitting requirements and EPA efforts, through the proposed Tailoring Rule, to provide relief from these requirements for certain small sources, please refer to the *Tailoring Rule Info-Brief, Nov. 30 2009*.

(1) Title V Permits

(i) Assuming that EPA retains the current, statutory threshold for triggering Title V requirements (≥ 100 tpy) for CO₂-equivalent (hereafter referred to as GHGs), will your facility need to update its existing Title V permits?

(ii) Under the current statutory thresholds, will your facility need to obtain a Title V permit for the first time, solely because of GHG emissions?

(iii) EPA has proposed, in the Tailoring Rule, to raise the Title V threshold to 25,000 tpy for GHGs. Under the proposed 25,000 tpy GHG threshold, would your facility need to update an existing or obtain a new Title V permit?

(iv) What type of GHG sources are expected to trigger the Title V permitting requirements at your facility (e.g., fans, boilers)? How many of these sources are there at your facility? (Please provide answers for both the 100 tpy and 25,000 tpy thresholds)

(2) PSD Permits

The PSD program applies to new, major stationary sources and existing major stationary sources that undergo a modification that results in a "significant" net emissions increase of a regulated pollutant (major modification). Typically, a major stationary source is one that emits ≥ 250 tpy (for certain sources, ≥ 100 tpy) of a pollutant regulated under the Clean Air Act (CAA). Major modifications are those whose emissions exceed "significance levels" established by EPA. Until EPA establishes a significance level for a pollutant, however, the significance level for that pollutant is 0 tpy. EPA has proposed a significance level for GHGs between 10,000-25,000 tpy, but until the proposal is made final, the significance level remains zero.

(i) As an administrative matter, is it your facility's practice to obtain from the relevant PSD permitting authority (EPA or the State) a single PSD permit for the entire facility that reflects PSD requirements for each regulated source? Or do you obtain a PSD permit for each regulated source? In the case of a major modification, does your facility update its existing PSD permit or obtain a new one?

(ii) Typically, how many PSD permits do you obtain per year at your facility? For what type of sources?

(iii) If EPA regulates GHGs under the CAA and retains the current PSD thresholds (100/250 tpy) for GHGs, how many additional PSD permits do you estimate that your facility will need to obtain/update each year? For what type of sources?

(iv) If EPA regulates GHGs but raises the PSD threshold to 25,000 tpy and raises the significance level to 10,000 tpy, how many PSD permits do you estimate your facility will need to obtain/update each year? For what type of sources?

Thank you for your help. If you have questions related to this questionnaire, please contact Christy (202) 586-5102 or Felix (202) 586-3416.