



MDE Maryland Department of the Environment

Air Quality Permitting for Poultry Litter Projects

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Air Quality Permits Program

MDE - ARMA





Pre-Construction Permits: Why?

- Legal and regulatory requirement – i.e. a permit is needed before any new emission source can be installed or built. See COMAR 26.11.02.09 and .10.
- Overall purpose is to ensure that emissions of criteria pollutants do not contribute to a violation of federal ambient air quality standards and that emissions of air toxics do not endanger public health.
- Permit conditions often include source specific emission limits as well as testing, monitoring and recordkeeping requirements as deemed appropriate.





Overview of Permit Types

- General permits
- Permits to Construct (PTC)
- State Permit to Operate (PTO)
- Prevention of Significant Deterioration (PSD)
- Non Attainment New Source Review (NA-NSR)
- Federal Title V Operating Permit





Permit Types (cont)

For Smaller Projects

- **General Permits** – limited to dry cleaning equipment, char broilers, auto refinishing, small boilers, ready mix asphalt, etc. Based on standardized permit conditions.
- **Permit to Construct** – required for the majority of projects discharge emissions to the outside air unless specifically exempt under COMAR 26.11.02.10
- **State Permit to Operate** – required only for source listed under COMAR 26.11.02.13



Permit Types (cont)

For Larger Projects

- **NA–NSR**, applies to a major source locating in a non – attainment area and which has the potential to discharge significant emissions of NO_x or VOC, precursors to ozone formation. Must install the most effective control equipment option.
- **PSD**, applies to a major source locating in an attainment area and which has the potential to discharge significant quantities of a criteria pollutant.
- **Title 5 Operating Permit** is a state issued federal operating permit required for major stationary sources.





Current Scope of Biomass Processes

- Anaerobic digestion
- Pyrolysis
- Gasification
- Combustion
- Incineration





Permitting Requirements

Process	PTC	PTO	NA-NSR	PSD	Title 5
Anaerobic Digestion*	N	N	N	N	N
Pyrolysis	Y	Maybe	N	N	N
Gasification	Y	Maybe	N	N	N
Combustion	Y	Maybe	N	N	N
Incineration	Y	Y	N	N	N

* The addition of any biogas fuel burning equipment to the project scope will likely require a PTC.





Permitting Issues to Consider

- Nuisance regs (COMAR 26.11.06.08) - applies even if PTC is not issued.
- Odor regs (COMAR 26.11.06.09) – applies even if PTC is not issued.
- Transportation of poultry litter from other may require Land Mgmt approval.
- Generating and selling electricity to the power grid will like require PSC approval.



QUESTIONS ??