
Title V and Conditional Major Source

Rogers & Callcott has prepared numerous Title V Major Source Operating Permits for our clients since the inception of the 1990 Clean Air Act Amendments Title V Program.

These projects have involved:

- Review of all potential air pollutant emission sources at the facilities,
- Determination of worst case emissions for identified sources following EPA potential-to-emit methodologies,
- Review of each rule potentially applicable to the sources and preparation of application package including explanatory text and required application form.

In addition to completing the federally-required portions of these applications, often it was determined that complex dispersion modeling was required by state authorities for newly identified emission sources. Rogers & Callcott provided this modeling to demonstrate compliance with concentration-based state limits.

Many of these major source permits have now been issued and Rogers & Callcott continues to assist these clients with ongoing compliance monitoring and reporting services with the goal of uninterrupted compliance.

Rogers & Callcott has also prepared many Conditional Major Source Operating Permit applications for clients where it is more advantageous to operate below the major source thresholds, thus avoiding burdensome compliance requirements.

Air Quality Construction Permits

Rogers & Callcott has assisted clients with applying for and obtaining air quality construction permits expeditiously for many years. Our staff has experience in both the regulatory and industrial sector. We combine this knowledge to help bridge the gap of understanding that often plagues the process of obtaining needed permits. Our well-organized construction permit application submittals anticipate and answer the typical questions regulatory review staff may have. As a result, our clients have received permits that allow flexibility for operation while still protecting environmental interests.

Air Pollutant Dispersion Modeling

Often the only hurdle standing in the way of obtaining a permit—from a simple permit for a new boiler to a complex permit for multiple new processes—is meeting the concentration-based standards imposed either by State rules or Federal Prevention of Significant Deterioration (PSD) / New Source Review (NSR) rules. Rogers & Callcott staff have the training and experience necessary to bring all of the pieces together for both simple and complex dispersion modeling analyses.

