

Pre-Notice of Intent Meeting Checklist
April 5, 2011

The purpose of the pre-Notice Of Intent (pre-NOI) meeting is to assist a source in the preparation of its NOI so that the processing time within the DAQ can be minimized. While there is no requirement to hold such a meeting, the DAQ highly recommends having a pre-NOI meeting to provide clarity on the information that should be provided in the NOI. It is suggested that the pre-NOI meeting be held less than three months prior to the NOI submittal to ensure the source has a better idea of the project scope and to make the meeting useful to both parties.

Typically, the source should contact the Minor New Source Review Manager or the Major New Source Review Manager to explain the project. The manager will then assign a permit engineer to work with the source based upon the project description. The permit engineer will contact the source and schedule a pre-NOI meeting. The pre-NOI meeting may also be scheduled directly with a manager. The more information that DAQ has prior to and during the meeting, the better able DAQ will be able to address potential issues or concerns at the meeting. (Checklists and guidance available for highlighted items):

Prior to the meeting, the source should provide:

1. An agenda of items applicant wishes to discuss at the meeting
2. A list of people attending that will represent the source
3. Each person's responsibility in relation to the project
4. Location of the new or modified source
5. Source type and SIC code (if known)
6. Brief summary of applicant process or project description
7. Anticipated project timeline/start date
8. Anticipated controls, estimated emission rates, and the basis for the estimates
9. List of nearby sources that are under common control and are contiguous/adjacent to the source being permitted
10. MACT/NSPS/NESHAPS applicability (if known)
11. Any other state or federal applicable regulations (if known)
12. Equipment requiring BACT analysis – see BACT Guidelines in this Guide
13. Any other factors, i.e., compliance issues, citizen involvement, etc.
14. Information requested on the pre-NOI modeling checklist

Items to be discussed at the pre-NOI meeting:

1. Review NOI completeness checklist
2. Forms suggested for use in the application
3. Clarify the permitting process for the source, including public comment
4. Discuss site-specific issues
5. Discuss the BACT process
6. Discuss pending regulatory changes that could impact the project

To be inserted between existing Section II and Section III of the NOI Guide

7. Local air quality concerns (NAAQS, increment, others)
8. Modeling protocol and modeling guidance (if necessary)
9. Potential permit conditions
10. Identify similar permitting examples (BACT, monitoring, testing, recordkeeping, etc.)
11. Establish communication expectations, procedures and responsibilities
12. Discuss application formatting and number of copies required
13. Establish the timeline for the review process
14. Determine who will provide the written summary of the meeting and by when

DAQ participants should include:

1. Project engineer and peer
2. Optional participants determined by the information provided by the source or if requested to attend by the source:
 - a. DAQ Modeler
 - b. Compliance staff
 - c. Legal staff
 - d. Title V staff
 - e. DAQ management
 - f. DEQ community relations representative