

# Attachment J: Non-Attainment Review Form

Applicant Name: \_\_\_\_\_

<b>DEEP USE ONLY</b>
App. No.: _____

Complete this form in accordance with the instructions (DEEP-NSR-INST-215) to ensure the proper handling this application. Print or type unless otherwise noted.

Questions? Visit the [Air Permitting](#) web page or contact the Air Permitting Engineer of the Day at [DEEP.BAM.AirPermits@ct.gov](mailto:DEEP.BAM.AirPermits@ct.gov) or 860-424-4152.

**Note:** This form is not required if Current Premises Potential Emissions and Proposed Allowable Emissions (from Part VII.B of *Attachment F: Premises Information Form - DEEP-NSR-APP-217*) from this project are each less than major source thresholds for each pollutant. (i.e. an existing minor premises adds a minor source which results in the premises becoming a new major source.)

If the proposed project is a modification at an existing major stationary source, first complete the *Major Modification Determination Form* (DEEP-NSR-APP-213).

## Part I: Applicability

**A. Indicate the option(s) below that apply to the proposed project and provide the requested emissions information. (Check all that apply)**

1. <input type="checkbox"/>	<b><i>New Major Stationary Source in a Severe Non-Attainment Area</i></b>								
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;">NOx Allowable Emissions from Proposed Project:</td> <td style="width: 20%; text-align: center;">tpy</td> </tr> <tr> <td>Are NOx Allowable Emissions from the Proposed Project Equal to or Greater Than 25 tpy?</td> <td style="text-align: center;"><input type="checkbox"/> Yes   <input type="checkbox"/> No</td> </tr> <tr> <td>VOC Allowable Emissions from Proposed Project:</td> <td style="text-align: center;">tpy</td> </tr> <tr> <td>Are VOC Allowable Emissions from the Proposed Project Equal to or Greater Than 25 tpy?</td> <td style="text-align: center;"><input type="checkbox"/> Yes   <input type="checkbox"/> No</td> </tr> </table>	NOx Allowable Emissions from Proposed Project:	tpy	Are NOx Allowable Emissions from the Proposed Project Equal to or Greater Than 25 tpy?	<input type="checkbox"/> Yes <input type="checkbox"/> No	VOC Allowable Emissions from Proposed Project:	tpy	Are VOC Allowable Emissions from the Proposed Project Equal to or Greater Than 25 tpy?	<input type="checkbox"/> Yes <input type="checkbox"/> No
NOx Allowable Emissions from Proposed Project:	tpy								
Are NOx Allowable Emissions from the Proposed Project Equal to or Greater Than 25 tpy?	<input type="checkbox"/> Yes <input type="checkbox"/> No								
VOC Allowable Emissions from Proposed Project:	tpy								
Are VOC Allowable Emissions from the Proposed Project Equal to or Greater Than 25 tpy?	<input type="checkbox"/> Yes <input type="checkbox"/> No								
2. <input type="checkbox"/>	<b><i>New Major Stationary Source in a Serious Non-Attainment Area</i></b>								
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;">NOx Allowable Emissions from Proposed Project:</td> <td style="width: 20%; text-align: center;">tpy</td> </tr> <tr> <td>Are NOx Allowable Emissions from the Proposed Project Equal to or Greater Than 50 tpy?</td> <td style="text-align: center;"><input type="checkbox"/> Yes   <input type="checkbox"/> No</td> </tr> <tr> <td>VOC Allowable Emissions from Proposed Project</td> <td style="text-align: center;">tpy</td> </tr> <tr> <td>Are VOC Allowable Emissions from the Proposed Project Equal to or Greater Than 50 tpy?</td> <td style="text-align: center;"><input type="checkbox"/> Yes   <input type="checkbox"/> No</td> </tr> </table>	NOx Allowable Emissions from Proposed Project:	tpy	Are NOx Allowable Emissions from the Proposed Project Equal to or Greater Than 50 tpy?	<input type="checkbox"/> Yes <input type="checkbox"/> No	VOC Allowable Emissions from Proposed Project	tpy	Are VOC Allowable Emissions from the Proposed Project Equal to or Greater Than 50 tpy?	<input type="checkbox"/> Yes <input type="checkbox"/> No
NOx Allowable Emissions from Proposed Project:	tpy								
Are NOx Allowable Emissions from the Proposed Project Equal to or Greater Than 50 tpy?	<input type="checkbox"/> Yes <input type="checkbox"/> No								
VOC Allowable Emissions from Proposed Project	tpy								
Are VOC Allowable Emissions from the Proposed Project Equal to or Greater Than 50 tpy?	<input type="checkbox"/> Yes <input type="checkbox"/> No								
3. <input type="checkbox"/>	<b><i>Modification in a Non-Attainment Area</i></b>								
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;">Is the Emission Unit Being Modified a Major Source?</td> <td style="width: 20%; text-align: center;"><input type="checkbox"/> Yes   <input type="checkbox"/> No</td> </tr> <tr> <td>Total NOx Emissions Increase from the Project <i>(see Part III of Major Modification Determination Form):</i></td> <td style="text-align: center;">tpy</td> </tr> <tr> <td>Are NOx Emissions from the Project Equal to or Greater Than 25 tpy?</td> <td style="text-align: center;"><input type="checkbox"/> Yes   <input type="checkbox"/> No</td> </tr> </table>	Is the Emission Unit Being Modified a Major Source?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Total NOx Emissions Increase from the Project <i>(see Part III of Major Modification Determination Form):</i>	tpy	Are NOx Emissions from the Project Equal to or Greater Than 25 tpy?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
Is the Emission Unit Being Modified a Major Source?	<input type="checkbox"/> Yes <input type="checkbox"/> No								
Total NOx Emissions Increase from the Project <i>(see Part III of Major Modification Determination Form):</i>	tpy								
Are NOx Emissions from the Project Equal to or Greater Than 25 tpy?	<input type="checkbox"/> Yes <input type="checkbox"/> No								

	<b>Total VOC Emissions Increase from the Project</b> <i>(see Part III of Major Modification Determination Form):</i>	tpy
	<b>Are VOC Emissions from the Project Equal to or Greater Than 25 tpy?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<b>Net Increase in NOx Emissions from the Premises</b> <i>(see Part V of Major Modification Determination Form):</i>	tpy
	<b>Is the Net Increase in NOx Emissions Equal to or Greater Than 25 tpy?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<b>Net Increase in VOC Emissions from the Premises</b> <i>(see Part V of Major Modification Determination Form):</i>	tpy
	<b>Is the Net Increase in VOC Emissions Equal to or Greater Than 25 tpy?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>4. <input type="checkbox"/></b>	<b><i>New Major Stationary Source or Major Modification in an Attainment Area</i></b>	
	<b>NOx Allowable Emissions from Proposed Project:</b>	tpy
	<b>Do the NOx Allowable Emissions from the Proposed Project have an Ambient Impact Equal to or Greater Than 1µg/m<sup>3</sup>, averaged annually?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No

**B. De minimis Emissions Aggregation:**

Calculate the net emissions increase of NOx and VOC during the 5-year contemporaneous period (as defined below), including the current project. (“De minimis Rule”)

Provide the following information to determine the 5-year contemporaneous period for the De minimis Rule review:

<b>Proposed Calendar Year when Project will Commence Construction</b>	<b>to</b>	<b>Four Calendar Years Prior to Project Proposed Commence Construction Year</b>

**1. Contemporaneous Creditable Emissions Increases and Decreases**

Provide the following information for all contemporaneous creditable NOx and VOC emissions increases and decreases during the 5-year contemporaneous period defined above. Be aware that this contemporaneous period differs from the contemporaneous period used on *Attachment H – Major Modification Determination Form* and *Attachment I – PSD Form*. Calculate the *Total Contemporaneous Increases/Decreases* for the subject pollutant and enter the results in Part I.B.2. Duplicate this page if necessary.

Change Type (NEW, MOD, REM, PBR, DB)	Equipment Description	License or Regulation No. (P)	Date of Change	Pollutants (tpy)			
				NOx		VOC	
				New ACT	2-yr ACT	New ACT	2-yr ACT
			/ /				
			/ /				
			/ /				
			/ /				
			/ /				
			/ /				
			/ /				
<b>Totals (tpy)</b>							
<b>TOTAL CONTEMPORANEOUS INCREASES/DECREASES (tpy) (New ACT – 2-yr ACT)</b>							

<p>The 2-yr ACT emissions for each changed unit must be based on the average actual emissions for the two years immediately preceding the change. New units would enter a “0” since they did not previously exist. If the most recent two year period was not selected as the representative two year period for actual emissions for any changed unit above, check here and submit written justification for using a period other than two years of actual emissions immediately preceding the change as Attachment 215-A.</p>	<input type="checkbox"/> Attachment 215-A
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**2. Emission Summation**

Add the *Total Project Emission Increase* from Part III of *Attachment H: Major Modification Determination Form* to the *Total Contemporaneous Increases/Decreases* from Part I.B.1 of this form to calculate the *Net Emissions Increase* for the subject pollutant.

Pollutant	Total Project Emissions Increase (tpy)	Total Contemporaneous Increases/Decreases	Net Emissions Increase	Is NET EMISSIONS INCREASE equal to or greater than 25 tpy?
NOx				<input type="checkbox"/> Yes <input type="checkbox"/> No
VOC				<input type="checkbox"/> Yes <input type="checkbox"/> No

**If “No” to all questions in Part I.A and Part I.B.2 pertaining to the level of pollutant emissions:**

This pollutant *is not* subject to Non-Attainment Review and the Non-Attainment Review determination is complete.

**If “Yes” to any question in Part I.A or Part I.B.2 pertaining to the level of pollutant emissions:**

This pollutant *is* subject to Non-Attainment Review. Continue to Parts II and III of this form for the subject pollutant.

## Part II: Application Requirements for Non-Attainment Areas

Check the applicable box below for each attachment being submitted with this application form. When submitting any supporting documents, please label the documents as indicated in this Part (e.g., Attachment 215A, etc.) and be sure to include the applicant's name as indicated on this application form. All Attachments are **REQUIRED**.

<p><b>Analysis of Alternatives</b>          Submit an Analysis of Alternatives for each non-attainment pollutant that includes:</p> <ul style="list-style-type: none"> <li>• Alternative sites for the proposed activity;</li> <li>• Alternative sizes for the subject source or modification;</li> <li>• Alternative production processes;</li> <li>• A demonstration of whether the benefits of the subject source or modification would significantly outweigh its adverse environmental impacts, including secondary impacts and cumulative impacts, and social costs imposed as a result of the location, construction or modification.</li> </ul>	<input type="checkbox"/> <b>Attachment 215-B</b>
<p><b>Secondary or Cumulative Impact Analysis</b>          Submit an evaluation of secondary impacts or cumulative impacts for each non-attainment pollutant with potential emissions in excess of the amount listed in Table 3a(k)-1 of RCSA section 22a-174-3a(k).</p>	<input type="checkbox"/> <b>Attachment 215-C</b>
<p><b>Offsetting Emission Reductions or Emission Reduction Credits Determination</b>          Submit documentation for each subject pollutant demonstrating that the planned use of any internal offsets and certified emission reduction credits comply with the requirements of RCSA section 22a-174-3a(l)(4)(B) and RCSA section 22a-174-3a(l)(5).</p>	<input type="checkbox"/> <b>Attachment 215-D</b>
<p><b>Required Number of Certified Emission Reduction Credits (CERCs) Determination</b>          Submit the calculation method for the number of required CERCs for approval for each non-attainment pollutant.</p>	<input type="checkbox"/> <b>Attachment 215-E</b>  Number of CERCs Required:  NOx:  VOC:

### Part III: Lowest Achievable Emission Rate (LAER) Review

**Note:** Complete this part for each non-attainment pollutant.

Pollutant:       NOx       VOC

To ensure a sufficiently broad and comprehensive search of control alternatives, sources other than the RBLC database should be investigated and documented. These sources include: Any limitation found in a State Implementation Plan, EPA/State air quality permits, control equipment vendors, trade associations, international agencies or companies, technical papers or journals. Attach documentation of investigation to this form. The source of information, (e.g., RBLC, South Coast AQMD, state permit, vendor, etc.) and sufficient information for verification of the achievable limit, (e.g. contact information to include: name, affiliation, address, phone, email of contact; any relevant permit; RBLC ID; etc.) should be included for each control system.

#### A. Achievability

List all LAER found for a unit which is the same or similar to the subject unit and determine if the emissions limitation has been demonstrated in practice.

LAER	Achievable?	If No, Explain (be specific)
	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	<input type="checkbox"/> Yes <input type="checkbox"/> No	

## B. LAER Information

Complete this table for each LAER listed in Part III.A of this form.

LAER Option:

<b>Unit Description</b>	
<b>Facility/Location</b>	
<b>Permitting Authority with Contact Information</b>	
<b>Permit No.</b>	
<b>Capacity (specify units)</b>	
<b>LAER Determination</b>	
<b>Compliance Achieved?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Method of Compliance Determination</b>	
<b>Post-LAER Emissions Rate (specify units)</b>	
<b>Reference</b>	

## C. Proposed LAER Determination

<b>LAER Option Proposed:</b>	
<b>Justification:</b>	