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September 2022

Pre-Application Meetings for Air Quality Construction Permits

The Nebraska Department of Environment and Energy (NDEE) offers a pre-application meeting for any applicant in need of an air quality construction permit. Pre-application meetings can be beneficial for applicants in new or specialty industries, Prevention of Significant Deterioration (PSD) projects, modification projects, or for any other project that may be complex in nature. The meeting can help establish open communication between applicants and the NDEE, as well as help ensure that each permit application is as complete and accurate as possible. This can help to minimize the time needed by NDEE to work with the applicant to prepare a draft permit for public notice. In some cases, it may be helpful to schedule a preliminary “project planning” meeting or conference call when the proposed project is in its early planning stages and before setting up the pre-application meeting. To schedule a meeting for a proposed project, please contact the Air Program by email at NDEE.AirQuality@Nebraska.gov.

Timing

Consider requesting a pre-application meeting when you have a majority of your application completed, typically one to three months prior to the planned permit application submittal. If you have worked through much of the application before the meeting, you will be better prepared to discuss the specifics of your planned application and provide information needed for the NDEE to ask and respond to more specific and detailed questions.

Meeting Location

Pre-application meetings are held at the offices of NDEE, 245 Fallbrook Blvd., Suite 100, in Lincoln. If you would like to have the pre-application meeting at an alternate location or the project site, please contact NDEE to discuss.

Meeting Participants

It is important that you provide the NDEE with an agenda well in advance of any meeting to help ensure that the NDEE has time to review any materials and has the appropriate NDEE personnel in attendance. Appropriate staff may include personnel from the Permitting and Engineering Division, Inspection and Compliance Division, and possibly representatives from other state agencies or the US EPA. Your representatives might include a Responsible Official for the owner/operator, a plant manager, project engineer, or environmental consultant.

Information Needed Prior to Pre-Application Meeting

Please provide an agenda to the NDEE at least one week prior to the planned meeting date. Consider or include the following in the proposed agenda:

- Expected attendees,
- Facility location,
- Summary of proposed construction and changes planned,
- Planned controls and potential to emit for air pollution emissions sources,
- Identify nearby facilities that could be considered support facilities or under common control,
- Identify applicable federal and state rules/standards (i.e. MACT, NSPS),
- Control technologies that are anticipated (preliminary Best Available Control Technology [BACT] analysis),
- Local air quality concerns (ambient air quality, PSD increment, nearby sources),
- Identify if this is a PSD project and address or discuss need for one year of pre-construction monitoring if existing air quality data does not exist or is not representative,
- Additional PSD-related information (i.e. additional impacts analysis),
- Review of dispersion modeling requirements and need for modeling protocol,
- Identify similar permit/fact sheet examples/templates (if known),
- Any other site-specific issues you are aware of,
- Questions about a specific form or any specific questions you may have about application forms in general, and the required format of submittal (paper, electronic, and number of copies required),
- Communication expectations, procedures and responsibilities,
- Confidentiality request procedures (if applicable),
- Review of permitting process, project schedule and permit timeline, and
- Allowable pre-permit construction/dirt work activities.

For more information or to request a meeting please contact the Air Program by email at NDEE.AirQuality@Nebraska.gov.

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