



Benefits/Drawbacks of Synthetic Minor or Title V Air Permits

Synthetic Minor		Title V ^{(a)(b)}	
Benefits	Drawbacks	Benefits	Drawbacks
Only APEN reporting required.	Limits to production and/or fuel burning capability	Do not have to limit production beyond values in existing construction permits and values provided in operating permit application.	Semiannual Monitoring Deviation Reporting and Permit Deviation Reports
No semiannual monitoring and deviation reports or annual compliance certifications required.	Must keep an updated emission inventory, including insignificant activities	All requirements will be listed in one permit	Annual Compliance Certification
Division Inspection only every 2-3 years	The Division may require additional recordkeeping or monitoring beyond what is currently required	Permit application must be submitted by 12 Months after the redesignation date	Compliance Assurance Monitoring may be required
	Updated construction permit must be issued by 12 months after the redesignation date ^(c)	Can commence construction on projects meeting certain requirements once modification paperwork has been submitted	Division Annual inspections, either on-site or remote (records only)
	Construction permit must go through public comment		Title V Permits must be renewed every 5 years, application submitted 12-18 months before expiration.
	For changes and new projects, source must wait to commence construction until permit is issued		
	Determining proper permitting requirements for changes and new projects can be more complicated		

- a) Title V Applicability is determined based on Potential to Emit (PTE).
- b) PTE includes insignificant sources.
- c) For synthetic minor sources that do not receive the updated permit before the deadline an operating permit application will have to be submitted and then withdrawn when the construction permit is issued.