

## New Source Review

**N**ew Source Review (NSR) refers to the complex major source pre-construction air permitting program that has long been the subject of debate and controversy. Zephyr personnel have worked with the NSR program for more than 30 years, tackling challenging projects that span the gamut of the program's requirements. Not only do we understand the rules, we strive to stay familiar with the court decisions affecting NSR as well as EPA and state NSR guidance and policies.



### ZEPHYR UNDERSTANDS NSR

Over the past 10 years, Zephyr has managed more than 65 NSR applications, including applications under both Prevention of Significant Deterioration (PSD) and Nonattainment NSR program. We have provided NSR support to a myriad of industries, including utilities, chemicals, food processing, pharmaceuticals, cement, and refining. Specifically, Zephyr has provided NSR support to clients in the following areas:

- Making complex NSR applicability determinations for modifications to existing facilities
- Developing strategies to avoid or mitigate NSR, such as identifying emissions reductions and workable operating restrictions
- Conducting control technology analyses, under Best Available Control Technology (BACT) and Lowest Achievable Emissions Rate (LAER) requirements, including BACT analyses for Greenhouse Gases
- Effectively working with lawyers and plant management to objectively analyze options related to NSR permitting and enforcement issues
- Providing technical support related to stack tests and continuous emissions monitoring systems
- Reviewing draft permit conditions and negotiating with state and federal regulators
- Participating as experts in public meetings, hearings, and licensing proceedings
- Conducting ambient impact analyses to demonstrate compliance with National Ambient Air Quality Standards and PSD Increments; our efforts have included:
  - Conducting 1-hr NO<sub>2</sub> and 1-hr SO<sub>2</sub> NAAQS, with consideration given to start-up and shut down emissions
  - Conducting ozone impact analyses using ambient ozone measurements and conservative assumptions, for example at VOC-limited sites, on precursor NO<sub>x</sub> emissions conversion to ozone
  - Preparing PSD Class I area assessments and working with Federal Land Managers

*Assisting clients worldwide with their EHS consulting, training, and data systems needs.*

