

Do I have to calculate both the project and five-year look-back emissions for a potential PSD project?

You will always have to determine the emission increase for the project. If none of the expected pollutants' emission increases are above "significant emission rates,"¹ your project is not subject to PSD permitting. On the other hand, if any one of the expected pollutants' emission increases is above its significant emission rate, you must estimate its/their ambient air impact using screening modeling software. From there, your analysis can go in one of two directions:

- If the screening modeling result says that the ambient air impact exceeds the "significant impact level,"² you will have to do a cumulative impact analysis. The cumulative impact analysis will include all emissions sources at your own and all other facilities whose emissions "significantly" impact within your project's "radius of influence."³ However, you won't have to perform the five-year look-back step.
- If the screening modeling result says the ambient air impact does not exceed the significant impact level, you will have to perform the five-year look-back to at least find all the emissions increases. Then, you must repeat the screening modeling analysis using the sum of the project and five-year look-back emissions.
 - If the result still fails to show a significant ambient air impact, you move on with your PSD application.
 - If the result shows a significant ambient air impact, you go to the cumulative impact analysis described in the immediately preceding paragraph. Obviously, it is to your advantage in this situation to find the emissions decreases in the five-year look-back if you can.

¹ Defined in 40 CFR 52.21(b)(23).

² New Source Review Workshop Manual, 1990, Draft, Table C-4, Page C-28.

³ The area surrounding the source within which the ambient impact of the net emissions increase exceeds each relevant pollutant's significant impact level. For more information refer to the discussion in the New Source Review Workshop Manual, 1990, Draft, section C.IV., starting on page C-24.