Which Do You Need: A New Owner Requested Limit or A Revision to an Existing Limit?

Should a minor permit applicant request:

- A new Owner Requested Limit (ORL) [18 AAC 50.508(5)]; OR
- To Revise or Rescind a Title I Permit Condition [18 AAC 50.508(6)]?

To decide which, the Air Permits Program considers that:

- A request for a new limit is a **revision to an existing limit** [50.508(6)] only if an existing Title I permit term or condition¹ must be rescinded or revised in order to incorporate the new requested limit.
- A request for a new limit is a **new ORL** if an existing Title I permit term or condition does not have to be rescinded or revised in order to incorporate the new requested limit.

Ambient Analysis Required?

An application under 50.508(6) must include the effect of revising or rescinding permit terms or conditions [18 AAC 50.540(k)(3)]:

- If an existing limit being revised or rescinded was established to protect the AAAQS or the effect of the limit was used in modeling to demonstrate compliance with the AAAQS, then an ambient analysis is required to show compliance with the AAAQS for each applicable pollutant.
- If an existing limit being revised or rescinded was established to protect increment or the effect of the limit was used in modeling to demonstrate compliance with the increment, then an ambient analysis is required to show compliance with the increment for each applicable pollutant

An application under either 50.508(5) or 50.508(6) which is also classified under 50.502(c) must include an ambient analysis [18 AAC 50.540(c)(2)] to show compliance with the AAAQS for each applicable pollutant.

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¹ An ORL established under 18 AAC 50.225 is not a Title I permit term or condition.