

Preapplication Communication – Modeling Parameters

Title I Permit Issuance Procedures

Revised 4/24/06

1. Proposed Permit Conditions

To issue a preliminary decision, modeling has to be complete and correct, including ambient boundary issues.

For many minor permits, the most important elements that will be subject to public comment are about modeling – the modeling itself, its conclusions, and associated conditions. 18 AAC 50.542(d)(1)(E) says that we can make a preliminary decision to approve the application

only if the application includes all information required by 18 AAC 50.540, and the department finds that the approval criteria of (f) of this section will be met

18 AAC 50.542(f) says that we will deny an application if we find that construction and operation would violate an ambient standard.

Modeling that shows compliance often depends on assumptions about the equipment, structures, and boundaries. Those assumptions should be rolled into the permit. **Applicants must understand that they must not make assumptions they are not willing to live with as permit conditions. Many assumptions will become permit conditions.**

2. Changes after the Preliminary Decision

Applicants sometimes wish to change their application after they see the permit conditions that result from the modeling assumptions made. To do so, that applicant must submit both comments and complete and correct revised modeling during the comment period. Accepting late information could jeopardize the legality of the permit, and our ability to issue permits in the time allowed by statute.

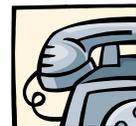
After the comment period, the department CAN accept

- ⊕ Clarification of issues raised during the comment period.

After the comment period, the department CANNOT accept

- ✘ Comments on new topics, or
- ✘ New work.

New work includes revised modeling submitted after the comment period, even in support of comments received during the comment period.



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If an applicant wants to change a project after the comment period closes, they will need to:

- 1) seek a subsequent revision to the permit, or
- 2) request us to deny the permit and begin the process over.

3. Communicate to the Applicant and Consultant

During any preapplication meetings or teleconferences, staff should routinely communicate the above information to BOTH applicants and consultants.

Failure to account for the above in an application WILL result in one or more of:

- Unfavorable permit conditions,
- Delays in issuing the permit, and
- Denial of requested change, and possibly denial of the permit.