

# **Koch's Title V PAL Permit**

Presentation to

CAC

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# Koch's Title V PAL Permit

- Why does Koch need this new permit?
- What is a PAL Permit?
- What are the “Benefits” of a PAL permit?

# Why a new Title V PAL permit?

- Clean Air Act Amendments (CAAA) of 1990 Requirements
  - Title V of the CAAA
  - A PAL is a type of Title V operating permit

# What is a PAL Permit?

- Sets Plantwide Applicability Limits or “caps” on Koch’s emissions for each primary pollutants
- The PAL allows changes at the refinery, so long as the overall emissions remain below the limits set by the PAL
- The PAL restricts these changes to refinery related processes (e.g., we can’t build a new paper mill or a new power plant)

# What is a PAL Permit (cont.)?

- Specific Emission limits will still apply to certain units as set by existing regulations
- “Continuous” emission monitors on the largest sources and additional emissions tracking and reporting

# What are the Benefits?

- **Cleaner Air**
  - Reduces the level of allowable emissions from the refinery
  - Delivers cleaner fuels faster (e.g., Blue Plant II, Lower Sulfur Diesel, Low Benzene Gasoline)
- **Transparent Reporting**
  - Koch-MCEA website
  - Environmental performance data
  - Accessible, understandable, verifiable

# What are the Benefits (cont.)?

- **Koch Benefits**
  - Adds flexibility for the refinery
  - Clarifies the Emission Limits for the refinery