



Air Permit Compliance for Dummies

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Motivation

➤ Positive

- Job Well Done
- Personal Performance Objectives
- Promotion / Career Growth
- Paycheck



Motivation

➤ Negative

- Fines - \$10k to \$25k per day
- Negative PR
- Criminal penalties



Recent Compliance Actions

- EPA vs. du Pont – July 20, 2007
 - \$4.1 million penalty
 - 4 SAPs (KY, LA, OH, VA)
 - Failure to comply with NSPS
- CITGO – trial July 9, 2007
 - Guilty of felony criminal violations
 - 2 tanks without proper controls
 - Possible fines up to \$500,000 per count and 5 years probation

Tip Number 10

- Work Smarter – Not Harder
 - Simplify the process
 - Automate & distribute data management systems
 - Capture data from the source
 - Data loggers
 - Laboratory electronic deliverables



Tip Number 9

- Read the Permit(s)
 - Specific Conditions
 - General Conditions
 - How often reviewed?
 - Strict Interpretations
 - Units of measure
 - Regulatory Citations
 - How often reviewed?

Tip Number 8

- Check
- Double check
- Internal cross check
- External review



Tip Number 7

- Implement Warning Systems
 - Know your limits
 - Put limits on report(s)
 - Green / yellow / red
 - Trend analysis
 - Missing data / deadline notifications
 - E-mail tree
 - Pager
 - Auto-dialer

Tip Number 6

➤ Calendaring

- What tasks when
- Recurring
- Lead time
- Notification
 - Acknowledgement
 - Completion
 - High importance if not complete



Tip Number 5

➤ Develop Relationships

➤ Internal

- Management
- Facilities/Maintenance
- Production Staff

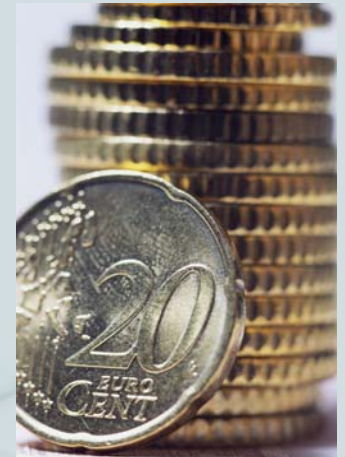
➤ External

- Regulatory Agencies
- Local Businesses
- Industry Groups



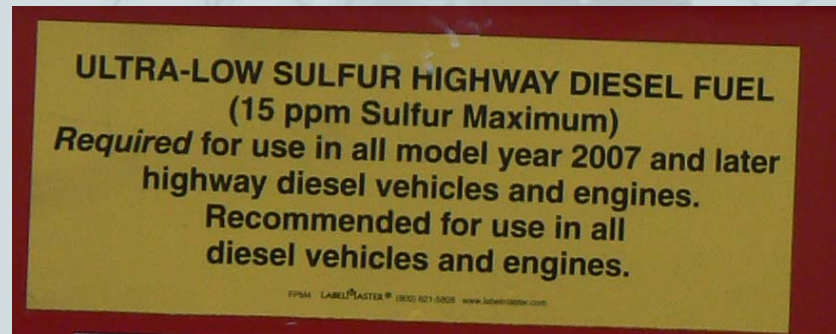
Tip Number 4

- Management of Change
 - The only thing constant is change
 - Jack Welch Quotes
 - Equipment / Facilities / Properties
 - Easier to include in original construction than to retrofit
 - Staff
 - Promotion
 - Growth



Tip Number 4

- Regulatory Updates
 - Boiler MACT officially vacated – July 30, 2007
 - NSPS for ICE – Subpart III (generators)
 - Proposed NSPS and amendments - Subpart J and Ja (petroleum refineries)
- ULSD



Tip Number 3

➤ Documentation / “Paper Trail”

➤ Include in files summaries of activities

➤ Data management strategy

- What to print
- What to archive
- How to backup



➤ Regulatory correspondence

- Periodic file reviews
- Do not rely on verbal agreements

Tip Number 2

- Written Procedures / Instructions
 - ISO 14000 like
 - Transition (lottery)
 - Coverage (vacation / illness)

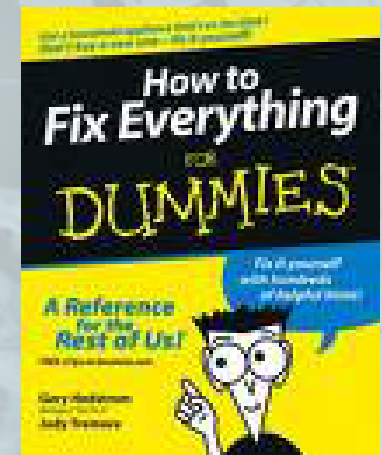


Tip Number 2

➤ Written Procedures / Instructions

➤ ISO 14000 like

- Documents how the particular tasks are performed
 - AOR documentation
 - Annual compliance report
- Continuity Binder
 - Document a full month of compliance procedures
 - Show all calculations
 - Process flow diagrams



Tip Number 1

- Know Thy Process and Regulations
 - Process knowledge is KEY
 - Regulatory applicability
 - Basis for specific permit conditions
 - May contain requirements not included in your permit
 - May offer opportunities for streamlining / permit hygiene



Questions?

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