

Alabama Air Update

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ADEM

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Biggest changes recently:

Clean Power Plan

Start-up, Shutdown, and Maintenance Rule

Clean Power Plan

- ACE: Affordable Clean Energy Rule
- Legal
- Uses incremental cost/benefit analysis
- State discretion

Title V Emission Fees

- Chargeable tons down = \$/ton up
- Problem in most States

Rulemaking

- Keeping up with EPA rules
- Problem with repeated rulemakings

Permitting

- Modelling issues
- NGO's appeals

Enforcement and Compliance

- Stack tests
- Operating permit certifications

Electronic Communication

- Already have electronic: Inventory submissions
Routine MACT & NSPS reports
Electronic facility files available to public
- Coming (2 to 3 year timeframe): Permit applications
All reports

Staffing Issues

- Staff level turnover average or below
- Hard to find entry-level scientists and engineers

Management Turnover

- Several retirements of upper level management imminent