Building Relationships with your Regulators

Permitting Perspective

Air & Waste Management Association
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EPD Staff Changes

- Continued Staff Turnover
- Branch Manager vacancies
  - Service and Miscellaneous
  - Solid Waste and Mining (Interim – Trent Jones)
  - Energy and Transportation (Interim – K. Rudolph)
  - Chemical Manufacturing (Interim – C. LaFontaine)
  - Ensite/ePermitting
EPD Staff Changes

- Other Items of Interest
  - Metals/Metals Manufacturing Branch
    - All 4 Permit Writers with approx. 1 year experience
  - Agricultural Branch
    - 2 of 3 permit writers with approx. 1 yr
  - Service and Miscellaneous
    - No Staff

- Modeling moved to Air Division
How does that Impact Relationships?

- Who to contact?
- What is their knowledge of the facility/industry?
- What is their knowledge of regulations?
Building Relationships/Sharing Knowledge

- Request In Person Meetings
  - Upcoming Project
  - Renewal Changes
  - Discuss Draft Permit Conditions
  - Meet & Greet
Building Relationships/Sharing Knowledge

- **Offer Site Visit**
  - General Process Knowledge
  - Available Monitoring
  - Recordkeeping Techniques
  - Relationship Building

- **Email/Telephone**
Building the Relationship in the Permitting Process

- Recommend In Person Meetings / Calls
- Pre-Application Meeting Essential for New Projects and Modifications
  - Describe Project
  - Discuss Permitting Options (Construction Permit / Operating Modification)
  - Discuss Timelines
  - Understand What is Needed in the Application
  - Meet the Permit Writer/Branch Manager/Modeler
How Can I Assist the Permit Writer?

- **Submit a Complete Application**
  - Correct Form, Proper Signature, Emission Calculations, Detailed Applicable Regulation Section (Section N)

- **Provide Additional Information not REQUIRED by the Application**
  - Detailed Process Description
  - Flow Diagram
  - Evaluation of Potential Regulations that were deemed NOT APPLICABLE
How Can I Assist the Permit Writer?

- Work with MDEQ to answer application questions
- Check on the Project (Phone/Email)
- Consider How the Permit Should Look
  - Propose Practically Enforceable Emission Limits (lb/hr, ppm, averaging times, etc)
  - Suggest Monitoring/Recordkeeping (Stack Test, Parametric Monitoring, Fuel Tracking)
Last but not Least...

- **READ AND COMMENT ON YOUR DRAFT PERMIT** (and supporting Documents)
  - Ask for Additional Time to Review if Needed
  - Ask for a meeting to Discuss if Needed
  - **NEGOTIATE** the DRAFT Permit prior to Public Notice and Final Permit Issued