

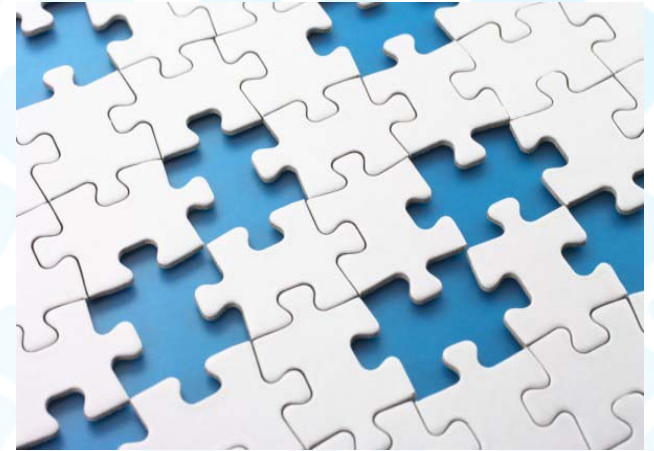
Building Relationships with your Regulators

Permitting Perspective



Air & Waste Management Association
Annual Southern Section Conference
September 21, 2016
Krystal Rudolph, MDEQ
krudolph@mdeq.ms.gov
601.961.5096

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



Questions