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EPA Region 10 and the NWCAA are putting on a Title 5 Workshop

What: **Title V Workshop for Regulators Only – NO REGISTRATION FEE**

When: **November 3 & 4, 2009** (1 ½ day)

Where: Suncadia Resort, Cle Elum, Washington – (Accommodations note below)

Target Audience: Title V enforcement and permitting staff at the local and state agencies and EPA

Workshop Overview: This Title V Workshop will be a candid discussion of how local, state, and EPA offices are addressing current air operating permit issues – sharing what works and what doesn't.

EPA will provide a legal and policy update to bring everyone up to date and summarize the current administration's priorities.

Proposed Workshop Agenda:

- Introduction and brief overview of workshop goals
- Incorporation of requirements under NSPS, MACT hammer rules, and area source MACT rules – Inclusion of state adoptions/delegations
 - Local perspectives
 - Permitting issues associated with portable sources
- Renewal issuance –
 - "Boutique" permit conditions verses standardization
 - Lapsed permits – what is the status?
 - Gap-filling and Compliance Assurance Monitoring (CAM rule) – incorporating monitoring into the terms of the permits and Statement of Basis detail
 - Statement of Basis content
 - What is required for public notice and federal register notice?
- NOV criteria – When does your agency issue NOVs? What rises to NOV? There appears to be a difference between agencies
 - Tracking and review of excess emissions and deviations
 - Approaches to enforcement for startup, shutdown, malfunction provisions
- EPA rule and policy updates and "what's new at EPA" – Doug Hardesty
- Electronic document receipt and signatures – How does your agency do it or plan to do it?
- Enforcement and permitting programs working together
- FCE format – how is your agency doing it?

Accommodations: Please see the Pacific Northwest International Section (PNWIS) A&WMA Annual Conference accommodations website for information:

<http://www.pnwis.org/PNWIS2009/suncadia.htm>

Please note there will also be a summary session of Title V issues at the PNWIS A&WMA Annual Conference following the workshop, chaired by Doug Hardesty, EPA Region 10.

For questions or information, please contact Toby Allen at 360-428-1617 ext. 209 at Northwest Clean Air Agency; toby@nwcleanair.org ; www.nwcleanair.org

Title 5 Workshop Agenda Specifics:

8:00 am - November 3, 2009

- Introduction and brief overview of workshop goals – *Toby Allen, NWCAA and Doug Hardesty, EPA Region 10*
 - Welcome
 - Title 5 in 5 minutes (101 introduction)
 - Hot topics not on agenda?
- Incorporation of requirements under NSPS, MACT hammer rules, and area source MACT rules, inclusion of state adoptions/delegations, BART incorporation, public notice
 - PSCAA perspectives – *Agata McIntyre, PSCAA*
 - Title 5 thresholds for dry kilns –it's all in the emission factors – *Paul Mairose, SWCAA*
 - How close is too close? Avoidance limits case study for T5 & MACT. –*Lyn Tober, NWCAA; plus* further group discussion of what are policies in use?
 - Permitting issues associated with portable sources – *Doug Hardesty, R10*
- Renewal issuance –
 - "Boutique" permit conditions verses standardization - *Jim Plosay, AK*
 - Title V Renewal Issues for a coal-fired electric generating plant – NSR, BART, Hg, Acid Rain, Public Notice – *Mark Fisher, ODEQ*
 - Gap-filling and Compliance Assurance Monitoring (CAM rule) – incorporating monitoring into the terms of the permits and Statement of Basis detail – *Geoffery Glass, ORCAA*
- WA State 2009 T5 review:
 - Highlights from the review (permits, Statements of Basis, and FCE documentation) – *Crystal Alford, WA DOE*
 - Tracking and review of excess emissions and deviations – Overview of WA differences – *Lynnette Haller (tentative), WA DOE*
- NOV criteria – When does your agency issue NOVs? What rises to NOV? There appears to be a difference between agencies
 - Approaches to permitting and enforcement for startup, shutdown, malfunction provisions – Case Study – *TBD (Steve Van Slyke or Brian Renninger), PSCAA*

Finish at 5:00 pm

8:00 am – November 4, 2009

- EPA rule and policy updates and “what new at EPA” – *Doug Hardesty*
- Electronic document receipt and signatures – How does your agency do it or plan to do it? What does it take? - TBD
- Enforcement and permitting programs working together – Case Study TBD
- FCE documentation and approach – how is your agency doing it? TBD
- Closure

Finish at 12:00 pm

Other possible suggested topics:

- AFS – what to enter, when to enter, how to enter
- Special databases and submittals – PSCAA has elaborate tracking database and electronic submittal. Would like to know more and whether other folks have similar.
- Notice – 2008 audit indicates that not all activities are being included in WA Permit Register. What's required for notice (newspaper, internet, Permit Register, Affected States, EPA, etc.)
- WA 2008 Audit – Auditors used existing data for starting point. Did this work well? Would it work better if data was different (ex., TOPS may need more detail)?
- **Future case study – PSCAA – fluidized bed hog fuel boiler downtown Seattle – what will that look like?**