

US EPA Region 4 RCRA Organic Air Emission Standards 2-Day Workshop  
September 19, 20 & 21, 2016  
US EPA Sam Nunn Atlanta Federal Center  
61 Forsyth Street  
Atlanta, GA  
EPA 3<sup>rd</sup> Floor, Conference Center Atlanta/Augusta Rooms

**September 19<sup>th</sup> @ 1 PM – 3 PM**

- 1. Standard Intent & Rulemakings (Denise Housley, RCRA OAES Contact)**
- 2. Applicability (Denise Housley, RCRA OAES Contact)**
  - ✓ 3 Different Concentration Triggers for 3 Standards.
  - ✓ Total Organic vs Volatile Organic: It's different.
  - ✓ Method 25D: Definitive, And, Specific about Sampling & Analysis. **(Method 25D)**
  - ✓ Large Quantity Generators, Recycling Units, X Units, But Not Remedies.
- 3. Records & Documents, Demonstration of Compliance with Standard's Technical Control, Monitoring & Repair Requirements (Denise Housley, RCRA OAES Contact)**
  - ✓ What to see in the Permit Application
  - ✓ What to see in the Operating Records (Generators & TSDs)

**September 20<sup>th</sup> @ 9 AM**

- 4. Regulatory Overlap: How it works, Equivalency & Exemptions (1.5 hrs)**
  - ✓ CAA
    - ✓ CAA & RCRA Statute
    - ✓ Equivalency
  - ✓ DOT, CWA & NRC
  - ✓ Treatment Exemptions
- 5. LDAR Services: Third Party Service Contracts, Coordination & Communications (Colin Sheffield, Bloc Environmental) (1.5 hrs)**
  - ✓ Permit Application:
    - ✓ Training Records
    - ✓ Written LDAR Program & Forms/Instructions
    - ✓ Communication & Record System
  - ✓ Operating Records Actual Examples of Third Party LDAR Program, Monitoring Forms, Inspection Forms

**Noon to 1:30 PM Lunch**

- 6. LDAR Programs: Demonstrating Compliance (Stephen Rieck & Kevin Taylor, USEPA R4 Air, Pesticides & Toxics Management Division, Air Enforcement) (LDAR: Best Practice Guide) (3 hrs)**
  - ✓ Components of a Good LDAR Program
  - ✓ Instructive Inspection/Monitoring Forms & Follow Through Communication Documentation

- ✓ *Method 21 Demo & Important Use Information Documentation*
  - ✓ *Training*
  - ✓ *Calibration*
  - ✓ *Field Observations: The Equipment & Units to look at First & Usual Leakers*

**September 21<sup>st</sup> @ 9 AM**

- ✓ ***Compliance Demonstration in Practice: Permit Application to Operating Records: TN Eastman Emissions Control Program (Mark Williams, TN Eastman) (2.5 hrs)***
    - ✓ *Permit Application:*
      - ✓ *Training Records*
      - ✓ *Written LDAR Program & Forms/Instructions*
      - ✓ *Communication & Record System*
    - ✓ *Operating Record Actual Examples*
- 7. Briefsheet Tool: Book Use/Demo (Denise Housley, RCRA OAES Contact) (0.5 hrs)**