

**US EPA RCRA Organic Air Emission Standards 2-Day Workshop**  
**September 12 – 13, 2017**  
**Durham, NC**

September 12<sup>th</sup>, DAY 1  
Offices of Booz, Allen & Hamilton  
511 Davis Drive Suite 400  
Durham, NC 27713

- 1. ROAES & The National Enforcement Initiative (Mike Bellot) 9:00 AM – 10:45 AM**
- i. **Introduction to the NEI**
  - ii. **Pre-Inspection**
    - ✓ Targeting
    - ✓ Factors to Select Targets
    - ✓ Fine Tuning of Target Selection
    - ✓ Facility Document Request and Review
    - ✓ Field Equipment Preparation:
    - ✓ LDAR Equipment Preparation
    - ✓ Other Sampling Equipment
  - iii. **Inspection**
    - ✓ Overview
    - ✓ Opening Conference
    - ✓ Walk Through
    - ✓ RCRA Inspection Example Facility
    - ✓ Document Review
    - ✓ Closing
- 15-Minute Break**
- 2. Standard Overview (Denise Housley, EPA Region RCRA OAES Contact) 11:00 – 12:15 PM**
- i. **RCRA and CAA Regulatory Requirements Overview**
    - ✓ General RCRA & Air Requirements
    - ✓ RCRA Subpart AA: Process Vent
    - ✓ RCRA Subpart CC: Tanks
    - ✓ RCRA Subpart BB: Equipment Leaks
    - ✓ Clean Air Act (CAA) LDAR
  - ii. **Overlap/Interaction between RCRA and CAA**
    - ✓ Regulatory Overlap: How it works, Equivalency & Exemptions
    - ✓ CAA & RCRA Statute Equivalency
    - ✓ Regulations & Permits
    - ✓ Overlap Table
  - iii. **Records & Documents, Demonstration of Compliance with Standard's Technical, Monitoring & Repair Requirements**

What should be in the Permit Application & Permit that Supports the Permit Conditions & What is in the be in the Operating Records (Generators & TSDs)

- ✓ Written LDAR Program & Inspection/Monitoring Form w Instructions
- ✓ Training Records for the LDAR Program & Monitoring
- ✓ Change Management Plans & Communication Chains
- ✓ Communication & Record System

**3. Third Party LDAR software: LeakDAS Narrated PowerPoint Presentation (Shannon Baker & Chris Patterson, InspectionLogic Corp (LeakDAS))**

- i. How does LeakDAS organize as facilities equipment information and LDAR Program and help the facility track its equipment requirement for RCRA BB?
- ii. How does LeakDAS communicate compliance needs to be done with all parts of the facility's organization?
- iii. How does LeakDAS help a facility address Change Management (Management of Change) to keep their equipment and requirements current?
- iv. What information or reports generated by LeakDAS demonstrate the facility's compliance with RCRA BB? (i.e., RCRA BB Leaker Details Report & Monitoring Summary Reports)

**LUNCH 12:15 – 1:15 PM**

**4. LDAR Services: Third Party Service (TBD)**

**1:15 – 2:00 PM**

How is the business practice and relationship between the Third Party and the Client address demonstration of RCRA Organic Air Emission Standards compliance relating to?

- i. The RCRA Permit Application: Identify and provide documentation of third party services, third party credentials and training, communication and SOPs, QA/QC of third party
- ii. Third Party Training and Equipment Service records.
- iii. Detailed Written LDAR Program & Monitoring/Inspection Forms w Instructions
- iv. Communication & Record Systems to demonstrate Communication with Client
- v. Tagging for ID & Leakers & Recordkeeping Coordination
- vi. Change Management Coordination, Communication & Recordkeeping

**5. LDAR Programs Compliance (Stephen Rieck & Kevin Taylor, USEPA R4 Air, Pesticides & Toxics Management Division, Air Enforcement) (LDAR: Best Practice Guide)**

**2:15 – 4:00 PM**

- i. Components of a Good LDAR Program
- ii. Method 21 Demo & Important Use Information Documentation
- iii. Types of Monitors and how they work
- iv. Training & Monitoring Expertise
- v. Calibration & Calibration Records
- vi. Use & Tips
- vii. Weaknesses

September 13<sup>th</sup>, DAY 2,  
Offices of Booz, Allen & Hamilton  
511 Davis Drive Suite 400  
Durham, NC 27713

EQUIPMENT Demonstration & Information Breakout Areas:

9 AM

There will be four instruments being demonstrated by an experienced user (i.e., PID, TVA, FLIR Camera & FID) Average demonstration per instrument 45 minutes.

NC Emergency Response TEAM (Brian Polk)

R4 LDAR TEAM Demo (Stephen Rieck)

*HANDS-ON Leak Apparatus*

Adjourn

2 PM