

## UPDATE

### US EPA RCRA Organic Air Emission Standards 2-Day Workshop

November 29<sup>th</sup> & 30<sup>th</sup>, 2017

Doubletree Suites by Hilton Raleigh-Durham

2515 Meridian Parkway, 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 (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**

**1:15 – 2:45 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)**

**3:00 – 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

November 30<sup>th</sup>, DAY 2,  
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2515 Meridian Parkway, 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)**

**NEI (Mike Bellot)**

***HANDS-ON Leak Apparatus***

**Adjourn**

**2 PM**