

RCRA Organic Air Emission Standards Workshop

November 26th – 28th, 2018

CHATTANOOGA

DoubleTree Hotel Chattanooga

407 Chestnut Street, Chattanooga, TN

(423) 756-5150

EPA Coordinator: Denise Housley (404-562-8495)

November 26th

8:00 AM – 9:00 AM	<p>Introduction: The RCRA Organic Air Emission Standards (ROAES), the Why? and the National Enforcement Initiative (NEI), Michael Bellot, US EPA, OECA, Waste Enforcement Branch</p> <p>Topics:</p> <ul style="list-style-type: none">▪ ROAES History: Reasons for a NEI;▪ Early Insights & Trends;▪ NEI Data Review.
9:00 AM – 9:10 AM	Break
9:15 AM – 10:15 AM	<p>Tank Inspections & ROAES Issues John Webb, TNDEC, Division of Solid Waste Management</p> <p>Topics:</p> <ul style="list-style-type: none">▪ Common Emissions Issues Identified During Inspection.
10:15 AM - 10:20 AM	Break
10:20 – 11:30 AM	<p>The ROAES Inspection Michael Bellot, US EPA, OECA, WEB</p> <p>Topics:</p> <ul style="list-style-type: none">▪ Pre-Inspection;▪ Inspection;▪ RCRA Inspection Example Facility;▪ Document Review;▪ Closing.
11:30 noon – 1:00 PM	Lunch
1:00 PM – 2:00 PM	<p>Compliance Tool Box: The Basics of LDAR Software Chris Patterson, InspectionLogic Corp.</p> <p>Topics:</p> <ul style="list-style-type: none">▪ Building the Initial Component Inventory;▪ How Components are Scheduled for Monitoring;▪ How the Monitoring Data is Gathered & Stored;▪ Documenting and Repairing Leaking Components;▪ Where Does the Field Technician Fit in All of This?

2:00 PM – 2:15 PM	Break
2:15 PM – 3:30 PM	<p>Compliance Tool Box: How to audit a LDAR database for Compliance</p> <p>Chris Patterson, InspectionLogic Corp.</p> <p>Topics:</p> <ul style="list-style-type: none"> ▪ Good Data vs. Bad Data; ▪ What Does the Data Look Like If the Technician is Cheating?
3:30 PM – 4:00 PM	Attendee Site-Specific Issues & Questions
4:00 PM	Adjourn

November 27th

8:15 AM – 9:45	<p>Leak Detection And Repair (LDAR) Program Equipment & Procedures</p> <p>Stephen Rieck, USEPA R4 Air, Pesticides & Toxics Management Division, Air Enforcement</p> <p>Topics:</p> <ul style="list-style-type: none"> ▪ Leak Detection and Repair overview; ▪ Standard Operating Procedures; ▪ Equipment overview; ▪ Field investigations.
9:45 AM – 10:00 AM	Break
10:00 AM – 11:30	<p>First Looks: Emissions Monitoring Equipment Demonstrations</p> <p>Stephen Rieck, USEPA R4 APTMD, Air Enforcement, Brian Polk, NCDENR, NCDWM Safety & Risk Management Mike Bellot, Michael Bellot, US EPA, OECA, WEB</p> <p>Topic:</p> <ul style="list-style-type: none"> ▪ Individual monitor demonstration and calibration on various types of monitoring instruments.
11:30 AM – 1:00 PM	Lunch
1:00 PM – 2:15 PM	<p>ROAES Regulatory Compliance Issues and Interpretations</p> <p>Laura Welles, US EPA, OCE, WCED, Attorney Advisor</p>
2:15 PM -2:30 PM	Break
2:30 PM – 4:00 PM	<p>PID Monitoring Overview</p> <p>Brian Polk, NCDENR, NCDWM Safety & Risk Management</p> <p>Topic:</p> <ul style="list-style-type: none"> ▪ Demonstration and Hands-On Use of PIDs to Detect Equipment Leaks

4:00 PM	<p>Hands-ON with:</p> <ul style="list-style-type: none"> ▪ Brian Polk, NCDENR, NCDWM Safety & Risk Management; ▪ Mike Bellot, Michael Bellot, US EPA, OECA, WEB; ▪ Stephen Rieck, USEPA R4 APTMD, Air Enforcement <p>Adjourn</p>
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November 28th

8:00 AM – 9:00 AM	<p>Brief ROAES Overview</p> <p>Denise Housley, US EPA, R4, RCRD, RCAPS</p> <p>Topics:</p> <ul style="list-style-type: none"> ▪ Quick look at the ROAES Subparts AA, BB & CC; ▪ RCRA Overlap with Clean Air Act (CAA) Subparts, and; ▪ Recordkeeping Importance to RCRA Compliance.
9:00 AM – 9:15 AM	Break
9:15 AM – 10:00 AM	<p>The Importance of Detail of the ROAES Information in RCRA Permit Application</p> <p>Denise Housley, US EPA, R4, RCRD, RCAPS</p> <p>Topics:</p> <ul style="list-style-type: none"> ▪ Example of ROAES Permit Application Before & After; ▪ Demonstration vs Recitation ▪ Written LDAR Plan – Communications & Instructions ▪ Inspection Forms, Criteria & Corrective Action ▪ CAA Information Inclusion ▪ Change Management ▪ Unit Specific ID
10:00 AM – 10:15 AM	Break
10:15 AM – 11:00 AM	<p>Permit Conditions for ROAES</p> <p>Denise Housley, US EPA, R4, RCRD, RCAPS</p> <p>Topics:</p> <ul style="list-style-type: none"> ▪ Commonly Drafted ROEAS Conditions ▪ How to Address Claimed Exemptions ▪ Addressing CAA Overlap in the RCRA Permit & ReOpener Conditions
11:00AM – 12:00 PM	<p>Attendee Site-Specific Issues, Questions & Hands-ON with Equipment</p> <ul style="list-style-type: none"> ▪ Last chance for experience with and questions on monitoring equipment, procedures, regulatory interpretation and application.
1:00 PM	Adjourn

