

## RCRA Organic Air Emission Standards Workshop

September 15<sup>th</sup>, 16<sup>th</sup> & 17<sup>th</sup>, 2020

ORLANDO

Florida Department of Environmental Protection Central District Office

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### September 15<sup>th</sup>

8:00 AM – 9:00 AM	<b>Brief ROAES Overview</b> Denise Housley, US EPA, R4, RCRD, RCAPS Topics: <ul style="list-style-type: none"><li>▪ Quick look at the ROAES Subparts AA, BB &amp; CC;</li><li>▪ RCRA Overlap with Clean Air Act (CAA) Subparts, and;</li><li>▪ Recordkeeping Importance to RCRA Compliance.</li></ul>
9:00 AM – 9:15 AM	Break
9:15 AM – 9:45 AM	<b>Leak Detection And Repair (LDAR) Program Equipment &amp; Procedures</b> Stephen Rieck, USEPA R4 Air, Pesticides & Toxics Management Division, Air Enforcement Topics: <ul style="list-style-type: none"><li>▪ Leak Detection and Repair overview;</li><li>▪ Standard Operating Procedures;</li><li>▪ Equipment overview;</li><li>▪ Field investigations.</li></ul>
9:45 AM – 10:00 AM	Break
10:00 AM – 11:30 AM	<b>First Looks: Emissions Monitoring Equipment Demonstrations</b> Stephen Rieck, USEPA R4 APTMD, Air Enforcement, Brian Polk, NCDENR, NCDWM Safety & Risk Management Mike Bellot, Michael Bellot, US EPA, OECA, WEB Topic: <ul style="list-style-type: none"><li>▪ Individual monitor demonstration and calibration on various types of monitoring instruments.</li></ul>
11:30 AM – 12:30 PM	Lunch
12:30 PM – 1:00 PM	<b>Introduction: The RCRA Organic Air Emission Standards (ROAES), the Why? and the National Enforcement Initiative (NEI),</b>

	Michael Bellot, US EPA, OECA, Waste Enforcement Branch Topics: <ul style="list-style-type: none"> <li>▪ ROAES History: Reasons for a NEI;</li> <li>▪ Early Insights &amp; Trends;</li> <li>▪ NEI Data Review.</li> </ul>
1:00 PM – 1:15 PM	Break
1:15 PM – 2:15 PM	<b>Tank Inspections &amp; ROAES Issues</b> John Webb, TNDEC, Division of Solid Waste Management Topics: <ul style="list-style-type: none"> <li>▪ Common Emissions Issues Identified During Inspection.</li> </ul>
2:15 PM – 2:30 PM	Break
2:30 PM – 3:30 PM	<b>The ROAES Inspection</b> Michael Bellot, US EPA, OECA, WEB Topics: <ul style="list-style-type: none"> <li>▪ Pre-Inspection;</li> <li>▪ Inspection;</li> <li>▪ RCRA Inspection Example Facility;</li> <li>▪ Document Review;</li> <li>▪ Closing.</li> </ul>
3:30 PM – 4:00 PM	<b>Attendee Site-Specific Issues &amp; Questions</b>
4:00 PM	Adjourn

**September 16<sup>th</sup>**

8:00 AM	<b>Morning Folks and Notes</b>
8:15 AM – 9:30 AM	<b>Compliance Tool Box: The Basics of LDAR Software</b> Dwight Celestin, InspectionLogic Corp. Topics: <ul style="list-style-type: none"> <li>▪ Building the Initial Component Inventory;</li> <li>▪ How Components are Scheduled for Monitoring;</li> <li>▪ How the Monitoring Data is Gathered &amp; Stored;</li> <li>▪ Documenting and Repairing Leaking Components;</li> </ul>

	<ul style="list-style-type: none"> <li>Where Does the Field Technician Fit in All of This?</li> </ul>
9:30 AM – 9:45 AM	Break
9:45 AM – 11:00 AM	<b>Compliance Tool Box: How to audit a LDAR database for Compliance</b> Dwight Celestin, InspectionLogic Corp. Topics: <ul style="list-style-type: none"> <li>Good Data vs. Bad Data;</li> <li>What Does the Data Look Like If the Technician is Cheating?</li> </ul>
11:00 AM – 11:30 AM	<b>Attendee Site-Specific Issues &amp; Questions</b>
11:30 AM – 12:30 PM	Lunch
12:30 PM – 2:00 PM	<b>PID Monitoring Overview</b> Brian Polk, NCDENR, NCDWM Safety & Risk Management Topic: <ul style="list-style-type: none"> <li>Demonstration and Hands-On Use of PIDs to Detect Equipment Leaks</li> </ul> Hands-ON with: <ul style="list-style-type: none"> <li>Brian Polk, NCDENR, NCDWM Safety &amp; Risk Management;</li> <li>Mike Bellot, Michael Bellot, US EPA, OECA, WEB;</li> <li>Stephen Rieck, USEPA R4 APTMD, Air Enforcement</li> </ul>
2:00 PM – 2:15 PM	Break
2:15 PM – 3:30 PM	<b>ROAES Regulatory Compliance Issues and Interpretations</b> Laura Welles, US EPA, OCE, WCED, Attorney Advisor
3:30 PM – 4:00 PM	<b>Attendee Site-Specific Issues &amp; Questions</b>
4:00 PM	Adjourn

## September 17<sup>th</sup>

8:30 AM – 8:45 AM	<b>Morning Folks and Notes</b>
8:45 AM – 9:45 AM	<b>The Importance of Detail of the ROAES Information in RCRA Permit Application</b>

	Denise Housley, US EPA, R4, RCRD, RCAPS
	Topics: <ul style="list-style-type: none"> <li>▪ Example of ROAES Permit Application Before &amp; After;</li> <li>▪ Demonstration vs Recitation</li> <li>▪ Written LDAR Plan – Communications &amp; Instructions</li> <li>▪ Inspection Forms, Criteria &amp; Corrective Action</li> <li>▪ CAA Information Inclusion</li> <li>▪ Change Management</li> <li>▪ Unit Specific ID</li> </ul>
9:45 AM – 10:15 AM	Break
10:15 AM – 11:00 AM	<b>Permit Conditions for ROAES</b> Denise Housley, US EPA, R4, RCRD, RCAPS Topics: <ul style="list-style-type: none"> <li>▪ Commonly Drafted ROEAS Conditions</li> <li>▪ How to Address Claimed Exemptions</li> <li>▪ Addressing CAA Overlap in the RCRA Permit &amp; ReOpener Conditions</li> </ul>
11:00AM – 12:00 PM	<b>Attendee Site-Specific Issues, Questions &amp; Hands-ON with Equipment</b> <ul style="list-style-type: none"> <li>▪ Last chance for experience with and questions on monitoring equipment, procedures, regulatory interpretation and application.</li> </ul>
12:00 PM	<b>Adjourn</b>