

# WESTAR Council

## Effective Permit Writing

September 19-21, 2023

**ONLINE**

**REGISTRATION DEADLINE**

Friday, August 25, 2023



### TO REGISTER

1. Log onto EPA's AirKnowledge and create a profile, or log onto your existing AirKnowledge account.  
<https://epaapti.csod.com/client/epaapti/default.aspx>
2. When you complete your profile, you will receive a confirmation e-mail to activate your new account. It may take several minutes before receiving the email.
3. Once activated, log into your account.
4. Click the "Instructor Lead Training Calendar" link under the "My Training" tab.
5. Search the calendar for the training date(s). On the calendar you will see a course description. Hover over the text for additional information.
6. To register click the course title link.
7. In the lower righthand corner of the page you will see a "Request" button. Click it.
8. At this point you have requested a seat in the training. Because demand for WESTAR sponsored training frequently exceeds availability all registrants are placed on a waitlist.
9. You will receive an email from Jeff Gabler confirming your request.
10. WESTAR attempts to accommodate all requests but at times it may be necessary to prioritize attendees.

### AGENDA

**TUESDAY, SEPTEMBER 19, 2023**

10:00 am (PACIFIC)

- Welcome & Introductions
- Learning Objectives
- Air Permit Program Basics
- Types of Permits, Sources Authority
- General Information about Permit Application (e.g.; content & appearance)

11:15 am (PACIFIC)

- Break

11:20 am (PACIFIC)

- Determining Applicability (PTE)
- Enforcement Concepts

12:00 noon (PACIFIC)

- Break

12:30 pm (PACIFIC)

- Determining Application Completeness
- **Exercise** – Determine PTE, Application Completeness
- Translating an Application into a Permit
- Define Source

1:45 pm (PACIFIC)

- Key Make/Break Decision Points
  - NAAQS Compliance
  - Prohibitory Rule Compliance

3:00 pm (PACIFIC)

- Adjourn for the Day
- **Homework:** Review of Permit Application – Identify Potential Problem Areas in PTE and Applicability

## WEDNESDAY, SEPTEMBER 20, 2023

10:00 am (PACIFIC)

- Review of Homework from Day 1 & Learning Objectives
- Key Discretionary Decisions
- Offsets
- Sometimes State NEPA Equivalent
- Environmental Justice Considerations
- Technical Support Document
- Elements of an Effective Permit
- Standard Conditions
- **Exercise** – Discuss Differences/Similarities Among Standard Conditions Brought by Students

11:00 am (PACIFIC)

- Short Break

11:05 am (PACIFIC)

- Setting Emissions Limits
- Control Technology Operational Requirements
- Startup/Shutdown
- Malfunction
- **Exercise** – Determine Emissions Limits based on TSD

12:00 noon (PACIFIC)

- Long Break

12:30 pm (PACIFIC)

- Monitoring, Recordkeeping & Reporting

- Other Key Permit Terms: Determining Compliance

- Monitoring
- CEMS
- Process Data
- Manual Source Tests
- Surrogate Monitoring
- Flare Gas Monitoring Example

- **Exercise** – Determine Monitoring for Example Sources (Group Exercise)

1:45 am (PACIFIC)

- Short Break

1:50 noon (PACIFIC)

- Title V Permits
  - Additional Twists for Title V
  - CAM
  - Streamlining
  - Permit Shield
  - Consent Decree Compliance

3:00 pm (PACIFIC)

- Adjourn for Day
- **Homework:** Review TSD of Permit to Prepare for Day 3 Permit Drafting Exercise

## THURSDAY, SEPTEMBER 21, 2023

10:00 am (PACIFIC)

- **Exercise:** Review of Permits

11:15 am (PACIFIC)

- Short Break

11:20 am (PACIFIC)

- Writing Permits
  - General Principles (e.g.; Clarity, Enforceability)
- **Exercise:** Conduct Full Permit Review. Students will Begin to Draft a Permit using Lessons Learned

12:00 noon (PACIFIC)

- Long Break (to be taken during group exercise)

12:30 pm (PACIFIC)

- Continue Exercise

1:00 pm (PACIFIC)

- Short Break

1:05 pm (PACIFIC)

- Group Reports from Exercise
- Review of Pre-Test

3:00 pm (PACIFIC)

- Adjourn

## ABOUT THE TRAINING COURSE

**COURSE DESCRIPTION:** This course presents information on the major national programs in air pollution stationary source permitting. This course was designed to provide methods and procedures used to effectively draft and review permit conditions used with a variety of permit programs. This course is designed for personnel of state and local permitting agencies who are new to permit programs, managers of programs which are impacted by permits, and inspectors who must read and interpret permit conditions. Examples of the various types of permit conditions are presented along with practical exercises.

### **MAJOR TOPICS:**

- Identification of the components required in a complete permit application evaluation,
- Explanation of the functions and purposes of each component of a complete permit application,
- Description of the characteristics of an effective permit,
- Explanation of the process, approaches that can be used to assure an effective permit is produced.

**SPACE LIMITATION:** Registration is limited to 45 attendees. Air quality staff from the fifteen western states receive registration preference.

**REGISTRATION FEES:** There are no registration fees for state, local or tribal air quality agency staff.

## ACCESSIBILITY

WESTAR strives to host inclusive, accessible training events that enable all individuals, including individuals with disabilities, to engage fully with the instructor and course content. To request an accommodation or for inquiries about accessibility, please contact Jeff Gabler at [jgabler@westar.org](mailto:jgabler@westar.org) or 503-744-0486 by Friday, August 25, 2023.

## INSTRUCTIONAL STAFF

Instructional services provided by Matt Haber and Steve Rapp at Eastern Research Group (ERG). Matt worked at EPA Region 9 working in the Permits Office with responsibilities for all permitting activities in the Pacific Southwest. Steve worked in EPA R1 as a permit writer, industrial permits section manager, and Chief of the Air Technical Unit/Air Compliance Section.