

WESTAR Council

Effective Permit Writing

January 28-30, 2025

ONLINE

REGISTRATION DEADLINE

Friday, January 10, 2025



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, JANUARY 28, 2025

9:00 am (PACIFIC)

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

10:15 am (PACIFIC)

- Break

10:20 am (PACIFIC)

- Determining Applicability (PTE)
- Enforcement Concepts

11:00 noon (PACIFIC)

- Break

11:30 pm (PACIFIC)

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

12:45 pm (PACIFIC)

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

2:00 pm (PACIFIC)

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

WEDNESDAY, JANUARY 29, 2025

9:00 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

10:00 am (PACIFIC)

- Short Break

10:05 am (PACIFIC)

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

11:00 noon (PACIFIC)

- Long Break

11:30 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)

12:45 am (PACIFIC)

- Short Break

12:50 noon (PACIFIC)

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

2:00 pm (PACIFIC)

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

THURSDAY, JANUARY 30, 2025

9:00 am (PACIFIC)

- **Exercise:** Review of Permits

10:15 am (PACIFIC)

- Short Break

10:20 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

11:00 noon (PACIFIC)

- Long Break (to be taken during group exercise)

11:30 pm (PACIFIC)

- Continue Exercise

12:00 pm (PACIFIC)

- Short Break

12:05 pm (PACIFIC)

- Group Reports from Exercise
- Review of Pre-Test

2:00 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 30 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 or 503-744-0486 by Friday, January 10, 2025.

INSTRUCTIONAL STAFF

Matt Haber has been working on permits since 1980, when he began work at EPA preparing PSD permits, reviewing state and local permits, and reviewing the applicability of the PSD program to potential permit applicants. He was in the room during the development of the Title V permit program. He finished his EPA career in the headquarters enforcement office, where he was involved in several NSR enforcement initiatives. Since 2015, he has worked at ERG and has advised EPA, state, and local agencies about permit program development, implementation, and enforcement.

Liz Gorman recently joined ERG as an Environmental Engineer with over 15 years of air quality and environmental compliance experience. She has spent the majority of her career providing air quality consulting services to industrial clients in the oil and gas, refining, petroleum bulk terminal, chemical, and general manufacturing sectors. More recently, she provided on-site environmental compliance support to a DoD military installation. Liz assisted clients with compliance strategies for maintaining compliance with major and non-major construction and operating permits.