



Air Permitting Webinar

May 15, 2013
David A. Carter

Kansas Small Business Environmental
Assistance Program (SBEAP)

Webinar Logistics

- Listen through computer or telephone; if not using a phone, will need a microphone to speak
- Everyone will be on mute
- We prefer you type any questions in the comment or question box; however, you can also “raise” your hand and we can unmute you so you can ask your question
- Webinar and all questions **WILL** be recorded and archived (www.sbeap.org)

Agenda

- SBEAP
- Common air quality violations
- Compliance tips
- Understanding your permit

What is Kansas SBEAP?

- Kansas State University
 - College of Engineering
 - Engineering Extension
 - Pollution Prevention Institute (PPI)
 - Small Business Environmental Assistance Program (SBEAP)

Small Business Environmental Assistance Program



K A N S A S

SBEAP

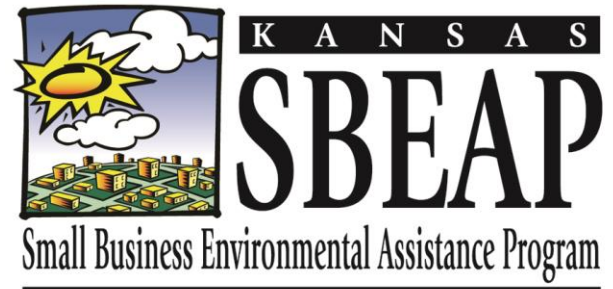
Small Business Environmental Assistance Program

SBEAP's mission is to help Kansas businesses comply with environmental regulations and identify pollution prevention opportunities.

- Nancy Larson, Wichita
- David Carter, Manhattan
- Ryan Hamel, Olathe
- Barb Goode, Salina

Small Business Environmental Assistance Program

- Environmental compliance assistance
- Multimedia [air (mostly), waste, water, energy, GHG inventory and reporting, and EMS]
- Small- and medium-sized businesses (KDHE funded)
- Free and confidential
- Staff located throughout the state
- Contact information
 - Web site: www.sbeap.org
 - Hotline: 800-578-8898
 - E-mail: sbeap@ksu.edu



Top Ten Air Quality Violations

1. Failure to maintain or submit required records or reports
2. Failure to perform required monitoring
3. Failure to obtain a construction permit or approval
4. Failure to obtain an air emissions operating permit
5. Failure to conduct required performance testing

Top Ten Air Quality Violations

6. Failure to install, maintain or operate required pollution control equipment
7. Open burning violations
8. Visible emissions violations
9. Excessive emissions of regulated pollutants
10. Failure to comply with requirements of an enforcement action

Tip 10

- Work Smarter
 - Automate the process
 - SBEAP tools
 - Kansas Emissions Inventory Web Submittal System
 - Capture data at source
 - CEMS
 - Dataloggers

Tip 9

- Know your process and the regulations
 - Process knowledge is KEY
- Regulatory applicability
 - Basis for specific permit conditions
 - May contain requirements not applicable to your facility
 - May offer opportunities for streamlining / permit hygiene

Tip 8

- Check, check, check
- Check, double check
- Internal check
- External check

Tip 7

- Implement warning systems
 - Know your limits and include in reports
 - Color coding
 - SBEAP tools
- Trend analysis – know where you're going; anticipate
- Missing data
- Deadline notifications

Explanation for "Additional action required?" section under *Data&summary* tab/worksheet

Reporting required?

YES = Your facility exceeds permit thresholds and it's the end of the calendar quarter. Reporting is required (see below).

WARNING = Your facility currently exceeds permit thresholds, but because it isn't the last month of the calendar quarter, reporting is not yet required.

Consider minimizing production to stay below threshold levels.

NO = Your facility is in compliance and does not exceed permit thresholds which would require reporting.

Notice of exceedance required?

YES = Your facility exceeds permit thresholds. Read the "Notice of exceedance required" section below to learn what is required.

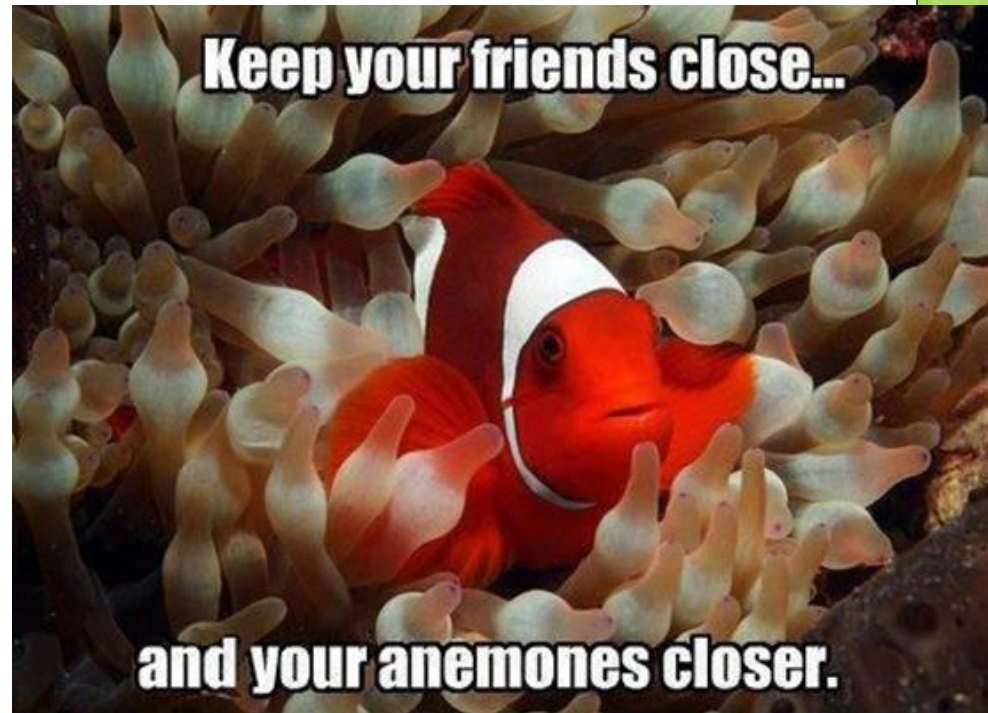
NO = Your facility is in compliance and does not exceed permit thresholds which would require a notice of exceedance.

Tip 6

- Calendars are your new BFF
 - What tasks are due when?
 - Recurring tasks
 - Add lead time
 - Notification
 - Add time for response/absences

Tip 5

- Keep your friends close...
 - Internal
 - Management
 - Data sources
 - Maintenance
 - External
 - KDHE
 - SBEAP
 - Consultants
 - Trade associations



Tip 4

- Everything changes
 - Facilities/processes/equipment
 - Staff changes
- Regulatory updates
 - MACT
 - NESHAPs

Tip 3

- Documentation
 - Include summary of activities in your files (continuity and reminders)
 - Don't rely on verbal agreements
 - Data management strategy

Tip 2

- Continuity
 - Loss (lottery, retirement, another job, death)
 - Coverage (sick leave, vacation, temporary assignments, sabbaticals)
 - Written procedures
 - Training
 - ISO 14001 system

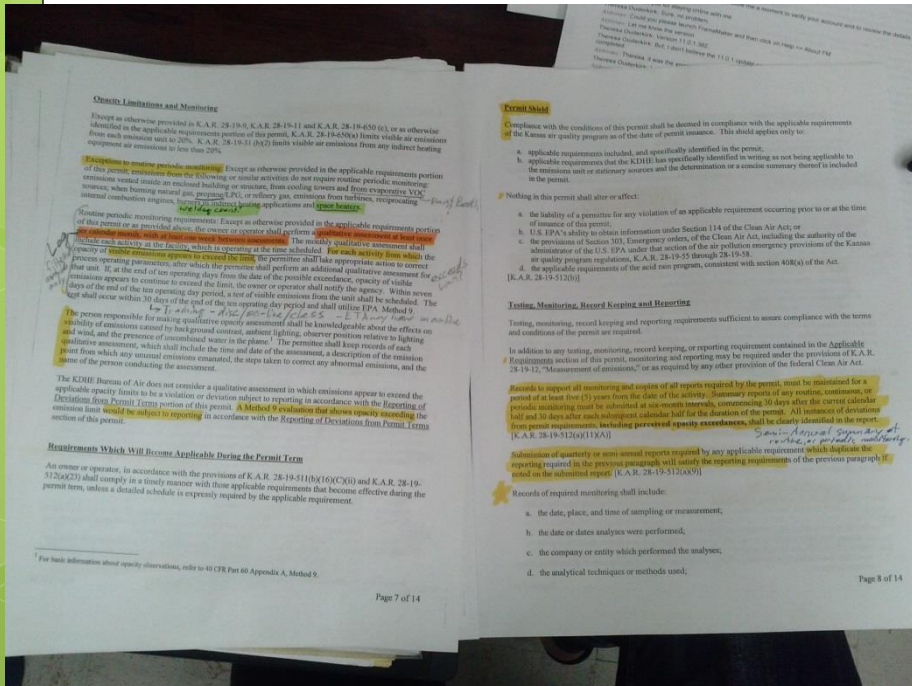


www.adweek.com

A composite image showing a Kansas Lottery Powerball ticket and a screenshot of the Kansas Lottery website. The ticket is orange and has the following text: "KANSAS LOTTERY POWERBALL POWERPLAY", "REMEMBER TO ENTER YOUR STAR TREK TICKETS BY NOON MAY 14 FOR OUR NEXT SECOND CHANCE DRAWING", "POWER PLAY NO", "POWER BALL", "A 06 13 19 23 43 - 16", "PRINTED 20:18:07 05/14/2013", "PRICE \$2.00", "MAY 15 13 040981", "RET 00015090 631-066191877-127215". The website screenshot shows the "CHECK YOUR POWERBALL NUMBERS" page with the following text: "CHECK YOUR POWERBALL NUMBERS", "Powerball numbers are available from 09/23/2009 to 05/11/2013", "Please select a starting and ending date for your numbers search", "Start Date May 11 2013", "End Date May 11 2013", "Enter Your Numbers", "6 13 19 23 43 Powerball: 16", "Check My Numbers!", "Date 5/11/2013", "NUMBERS 6 13 19 23 43 PB 16 PRIZE \$270,000,000". Red circles highlight the ticket numbers and the website results.

Tip 1

● Read and understand your permit



This...

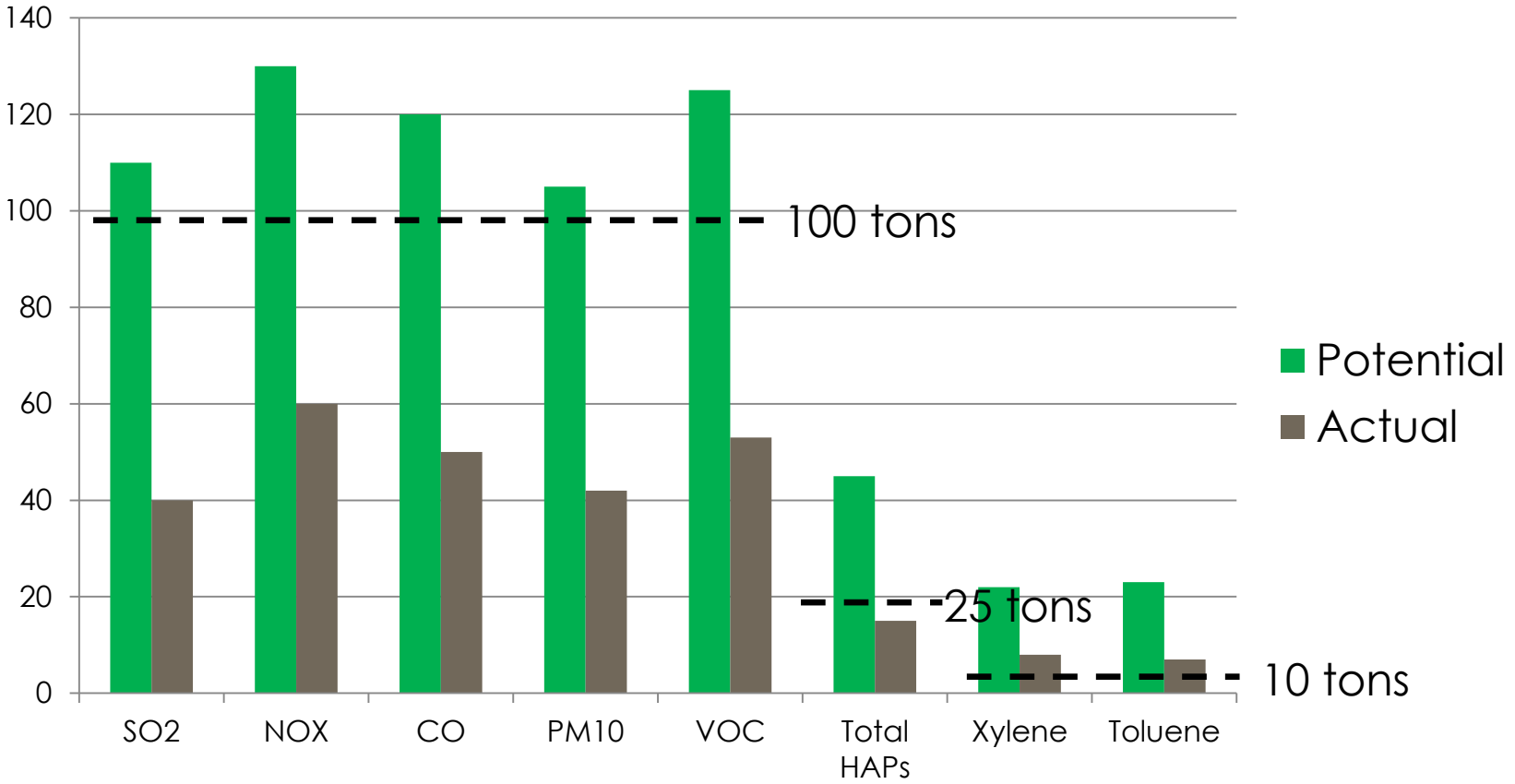
Not this...

Understanding your permit

- Template sections

1. Authority
2. Permit intent
3. Facility description
4. Emission source information
5. Summary of applicable requirements
6. Applicable requirements
7. Opacity summary
8. Facility-wide applicable requirements
9. Opacity limitations and monitoring
10. Requirements which will become applicable during the permit term
11. Permit shield
12. Testing, monitoring, recordkeeping and reporting
13. Reporting of deviations from permit terms
14. General provisions

Permit Thresholds



Resources

- KDHE BOA -
<http://www.kdheks.gov/bar/index.html>
- SBEAP – www.sbeap.org
- Kansas Air regulations -
<http://www.kdheks.gov/bar/regs.html>
- Electronic Code of Federal Regulations –
www.ecfr.gov

Contact Information

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