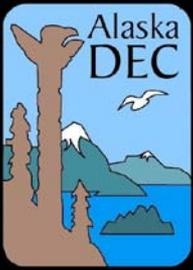


# Title V Permitting Update Workshop II

Status, Progress, and Process  
Enhancements

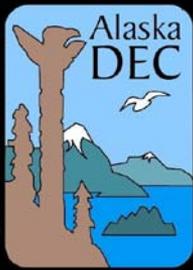


# Administrivia

- Welcome
- Copies of agenda at front
- Please fill-in the sign-in contact sheet
- Please quiet cell phones, etc
- Copies of presentation available

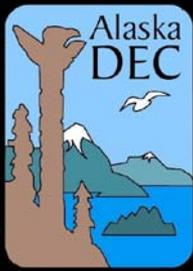
# Status Report

*As of 02/26/10*



# Current Trends

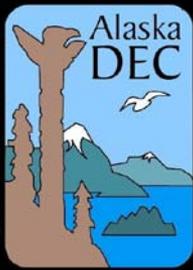
- Current Rate of Production
  - Since July 2008: 47 TV Permits finalized
    - 20 months = 2.4 permits/month
- Average Time: Start-to-Finish
  - High: 19 months (XTO), 16 months (Kodiak)
  - Low: 3 months - (CVEA CoGen), 4 months - (BPXA BOC\*), 6 – months (KPU-B)



# PRT Statistics

- Project Start:
  - Number of Applications: 112
    - Getting 1 - 2 applications per month TVP03's...
- Current Status
  - Number of Remaining: 65
- Production:
  - Permits / Month: ~3 is just ahead of intake

# Progress Report & Contractor Updates



# Update

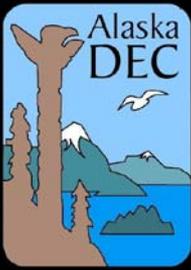
- Contractor Progress
- In-house Review
- Applicant Draft - Preview
- Public Notice
- Response to Comments
- EPA 45-Day Review
- Final Decision
- Appeals

# Progress Discussion

Questions

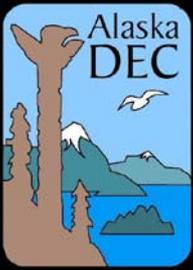
Break

10 minutes

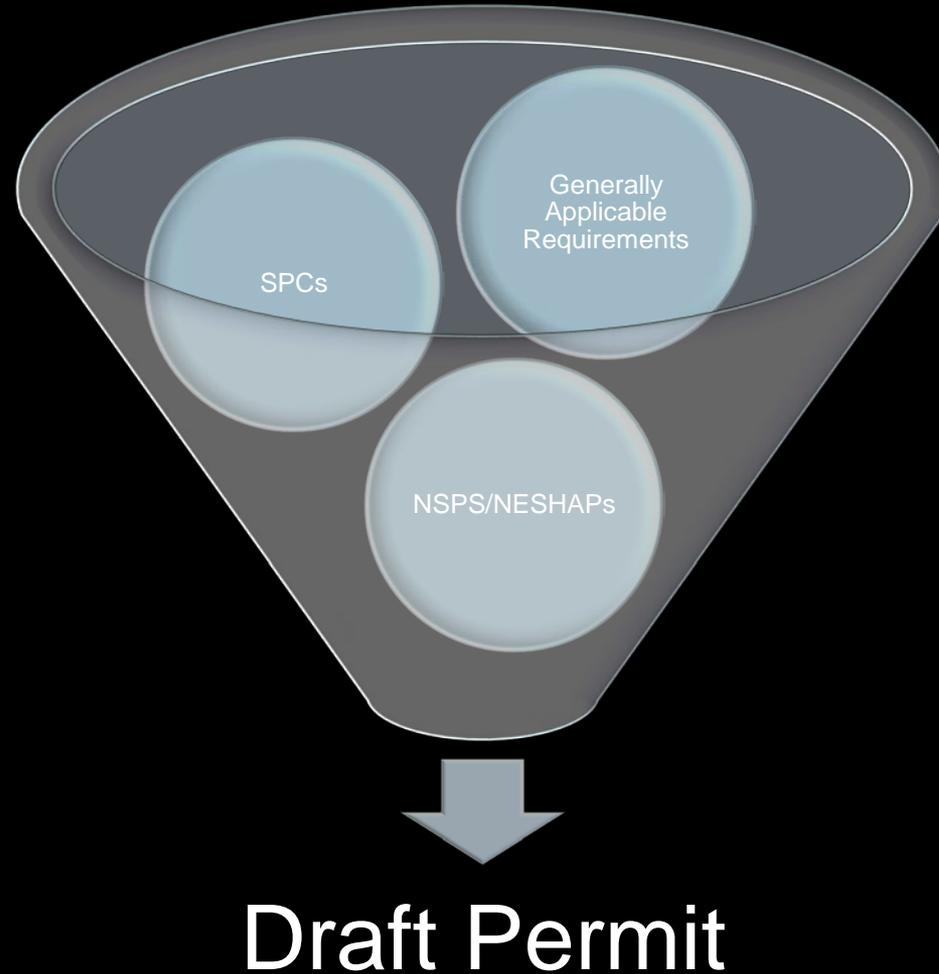


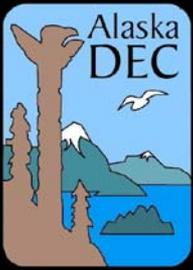
# Current Permit Format

- Generation II Template:
  - Pages:
    - 128 pages including cover, SoB, forms ...
  - Conditions:
    - 111 including SPC's, Generally Applicable items and boilerplate NSPS/NESHAPs
  - Places Needing Editing: e.g. cross-linked conditions (~200), PTE, renewal dates, edits for ST references and so forth...



# Current Process



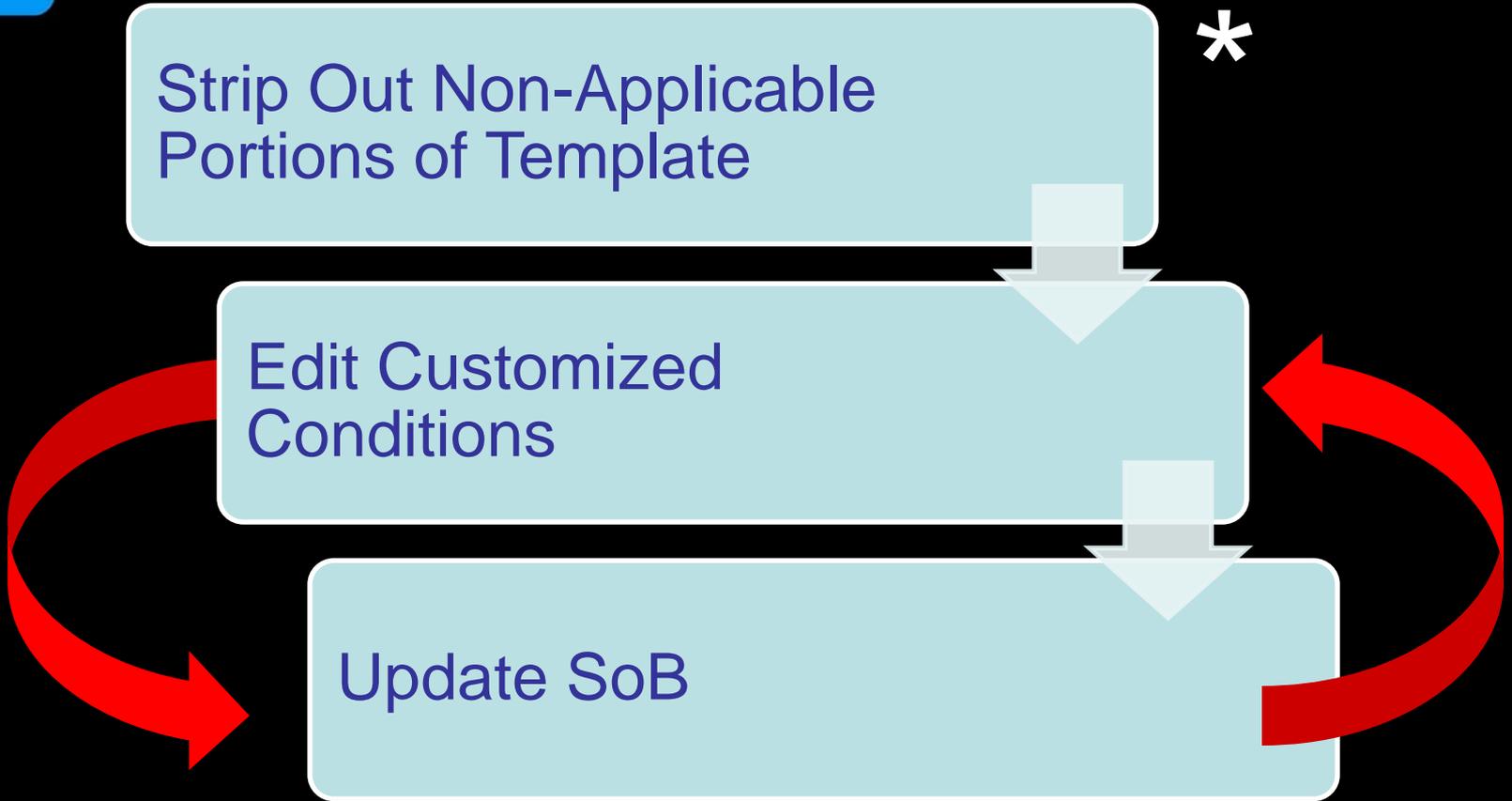


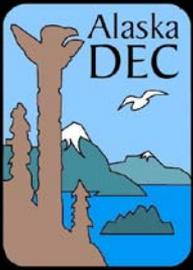
# Process Sinks

Strip Out Non-Applicable Portions of Template \*

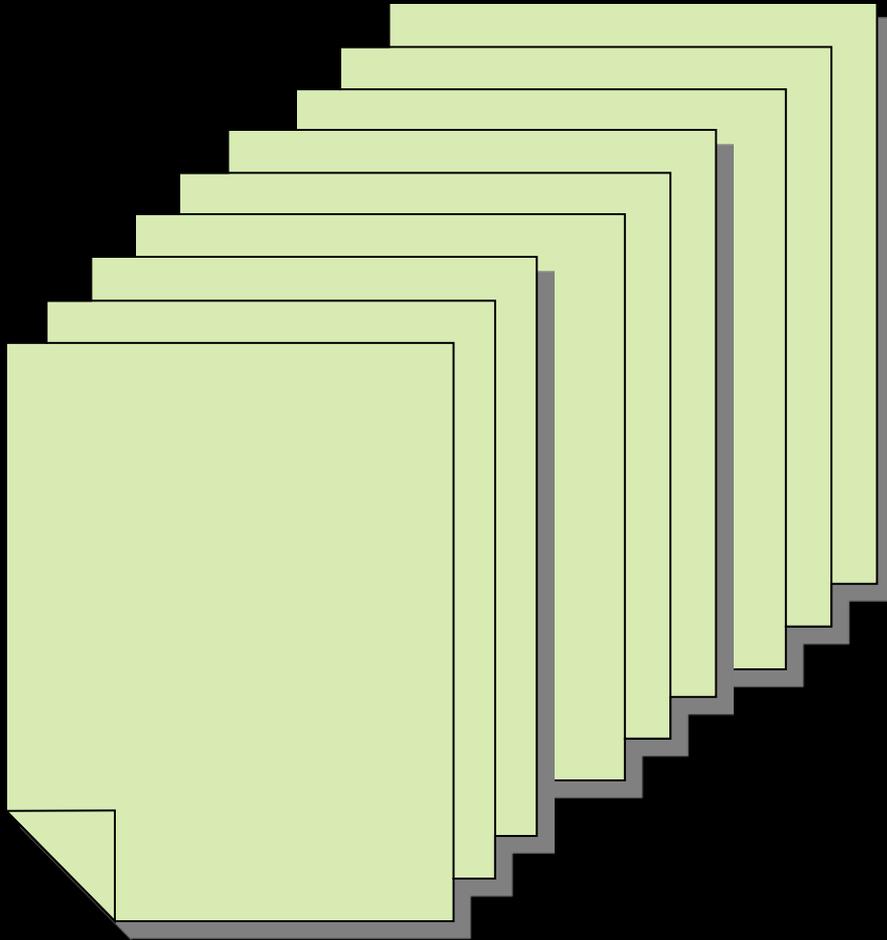
Edit Customized Conditions

Update SoB

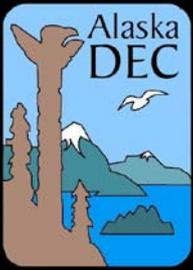




# Resulting Draft

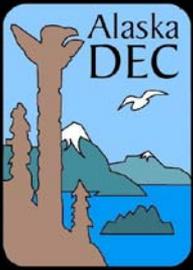


- Basic Information, Table A
- State Conditions
- Legacy Conditions
- Federal Conditions
- General Conditions
- Gen. Source Testing
- General Record Keeping
- Permit Changes
- Compliance
- Shields
- Standard Forms
- SoB



# Improvements?



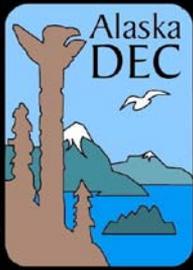


# Areas to Review

- What changes, and what (*almost*) never changes?
- How many links need to be updated?
- How many links can be generic?
- What should we concentrate on?
  - Areas of Emphasis in the Permit?



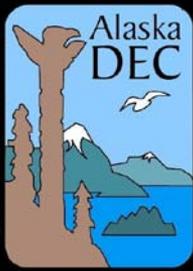
EU-specific conditions



# Goals of the Department

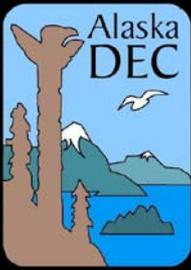
## The Department's Quality Policy Statement

“.... to increase the speed, accuracy and consistency of work products and services in order to exceed the expectations of the regulated community while protecting the Air Quality of Alaska.”



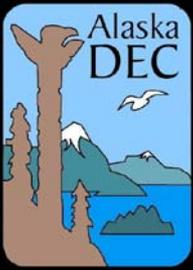
# Speed, Accuracy and Consistency

- Remove as many non-essential “editable” items as possible
- Reduce number of cross-linked items
- Formalize SPCs (AS 46.14.010(e))
  - “(e) When incorporated into more than one permit, emission standards and limitations, emissions monitoring and reporting requirements, and compliance verification requirements that are generally applicable statewide or are generally applicable to individual emissions unit or stationary source types shall be adopted in regulation unless they have been requested by the owner and operator to whom the permit is issued. The department shall, by regulation, adopt a standard, limitation, or requirement described in this subsection as soon as its general applicability is reasonably foreseeable.”



# Emphasis

- Generally Applicable Requirements (GAR)
  - Common to every permit
    - Source testing, open burning, general compliance, etc
- EU-based Specific Conditions
  - State Standards
  - Federal Standards
  - Legacy Conditions
    - Title I, Permit-to-Operate, Title V ORLs

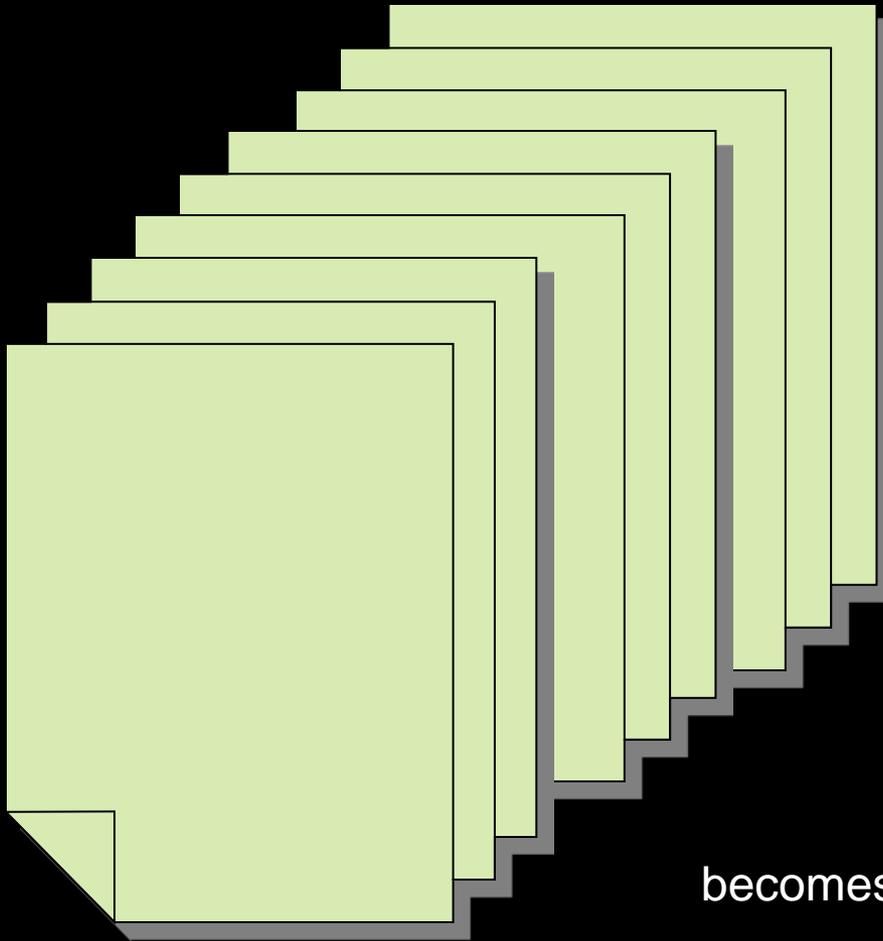


# How to Achieve

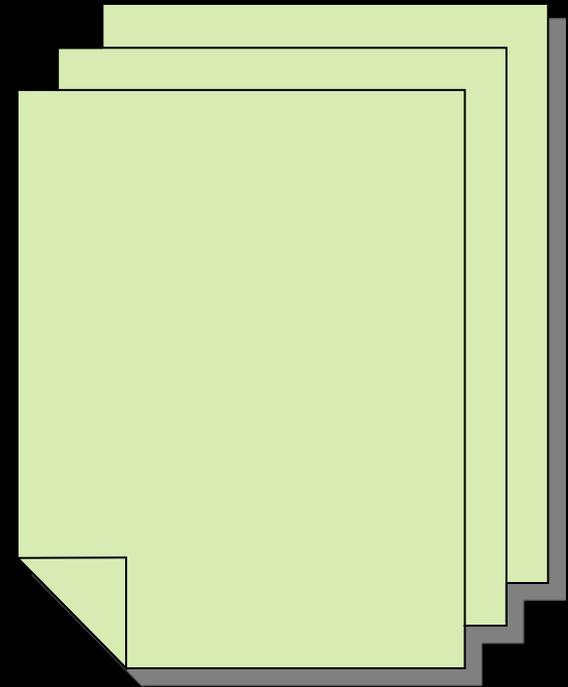
- Finalize the SPCs into the GAR Section
  - **How?** Remove all the Generally Applicable Requirements and promulgate as an ADEC Policy incorporated by reference into each permit:
    - GAR Section contains: (unchanging)
      - 48 Conditions
        - » 48/111 or 43% !
      - 46 Pages
        - » 46/128 or 36% !

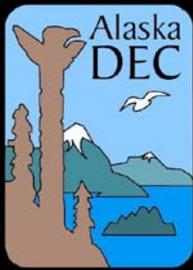


# Results (A)



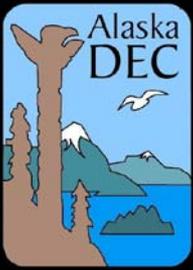
becomes ....





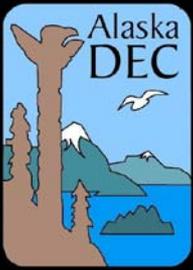
# Implications

- Removes ~40% (aggregate) of the permit template from edits
  - Once Coal Fired Boilers section is removed, percentage jumps
  - Less paper to revise, less time in RTC
    - SPEED!!! -> ACCURACY!!! -> CONSISTENCY!!!
  - Reduces permit to EU limits and specifics
- Promulgates and issues a vast majority of SPCs as required

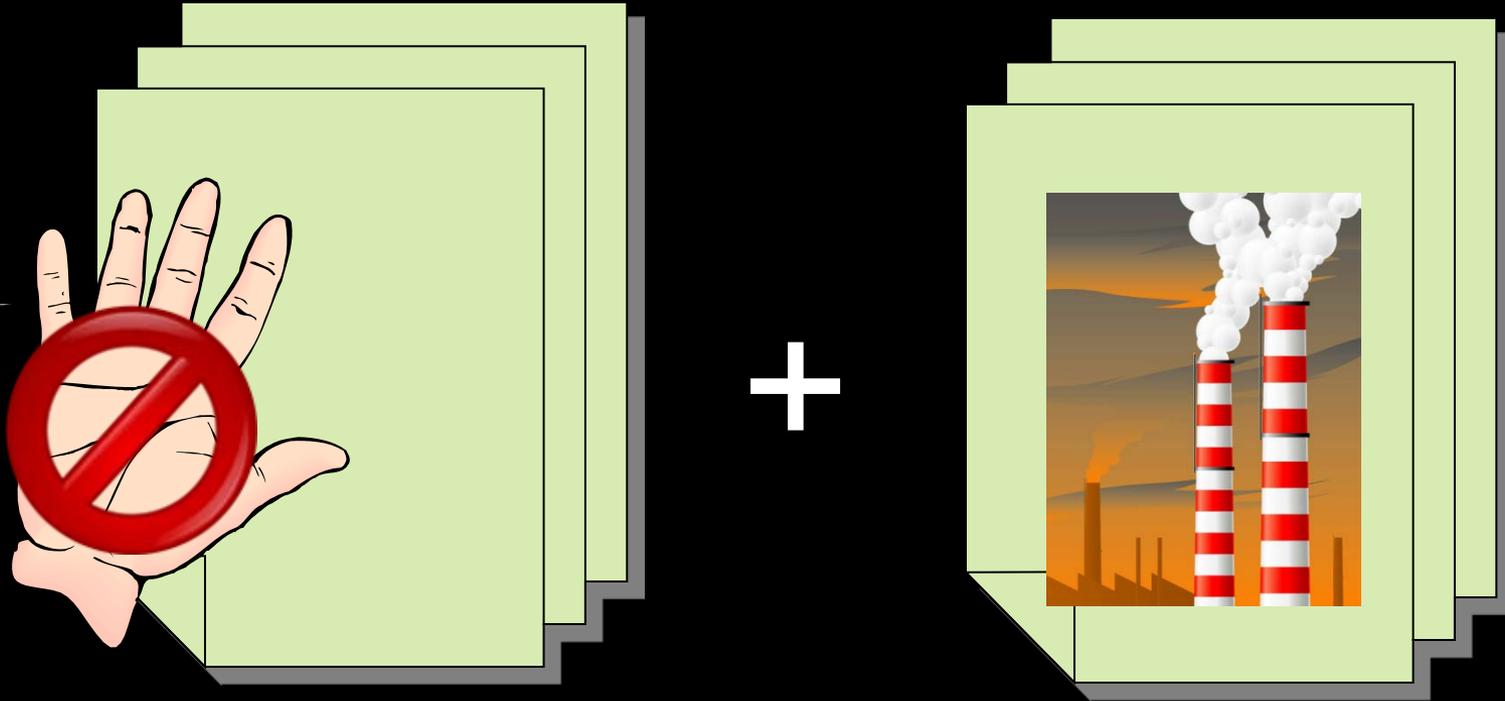


# Can it Be Done

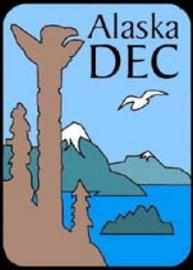
- GAR is 95% ready-to-go to PN
  - We accept PN comment on this once, and then just during periodic rulemaking
- Legal?
  - No different than a GPA-style permit
  - Other States use this process: e.g. PSCAA, BAAQMD,



# Results (B)

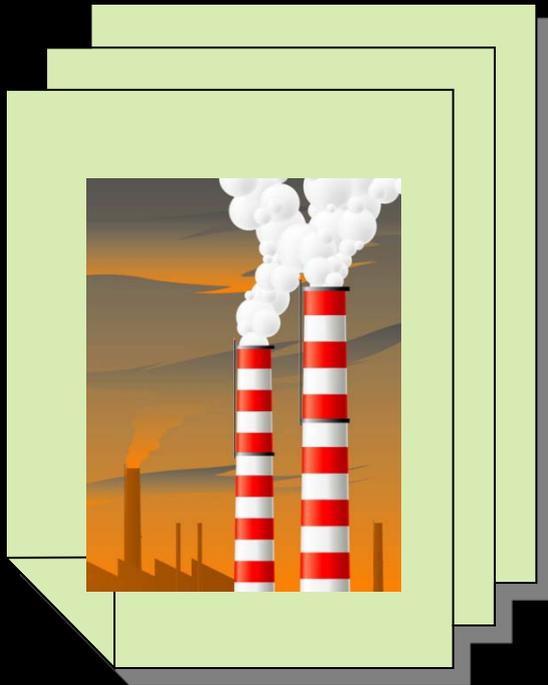


GAR "SPC" Section .....plus ....EU-Specific Permit Conditions

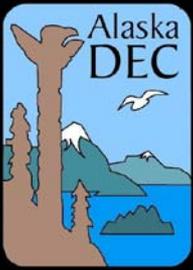


# Speed, Accuracy, Consistency!

- This is where we concentrate our time and effort



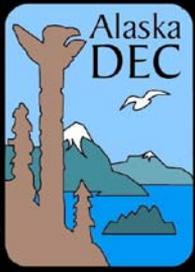
- Basic Information, Table A
- State Conditions
- Legacy Conditions
- Federal Conditions
- ~~General Conditions~~
- ~~Gen. Source Testing~~
- ~~General Record Keeping~~
- ~~Permit Changes~~
- ~~Compliance~~
- Shields
- Standard Forms
- SoB (greatly reduced)



# Results (C)

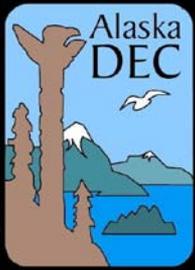
- Speed?
  - Accuracy?
  - Consistency?
- 
- Trifecta on all counts.....





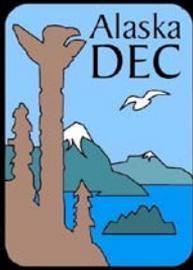
Questions?

# Discussion



# Custom –vs- Standard Permit Conditions

- Open discussion



# 18 AAC 50 Rulemaking

- CFR adoption-by-reference updates
- Minor changes to current SPCs
- Separate from this workshop
  - ADEC TV staff not prepared to discuss in this forum

Recap

Adjourn