



Walter Wright, Jr.
wwright@mwlaw.com
(501) 688.8839

Advanced Air Permitting Topics: Courtney Garland/Jesslynn Hale (Trinity Consultants) Arkansas Environmental Federation Convention Presentation

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Courtney Garland, P.E., and Jesslynn Hale of the Little Rock, Arkansas office of Trinity Consultants undertook a presentation titled Advanced Air Permitting Topics at the Arkansas Environmental Federation Convention.

The Clean Air Act topics addressed included:

- Permit Flexibility
- Non-Criteria Pollutant Control Strategy
- New Source Performance Standards ("NSPS") and National Emission Standards for Hazardous Air Pollutants ("NESHAP") Regulations
- PM / PM10 / PM2.5 Permitting Issues

Under the topic of Permit Flexibility the presentation noted the difference between some facilities that are "static" (i.e., do not need much permit flexibility), citing as examples:

- Raw materials, fuels, and equipment arrangement not likely to change

In contrast, facilities that were deemed as needing permit flexibility included:

- Multi-fuel boilers
- Painting operations
- Multiple end products produced from same equipment

Garland and Hale noted that permit flexibility is not automatic and you need to ask the agency for needed flexibility in the permit application.

Examples of flexibility scenarios were provided along with tips such as reviewing other Arkansas Department of Environmental Quality ("ADEQ") air permits for alternative conditions.

Under the topic of Non-Criteria Pollutant Control Strategy Garland and Hale noted the improvements that have occurred in regards to this issue. Characterized as the "biggest helpful change":

- Initial screening step limited to air toxics emitted at --> 10 tons/year, or ACGIH ILV of < 1 mg/m3

Problem areas that remain were identified as:

- Painting operations
- Metal fabrication operations

Also noted was a “confusing” paint hazardous air pollutant permit condition along with a discussion of emission calculations.

The NSPS and NESHAP regulations topic noted what is characterized as the “explosion” of new regulations in the past several years. Many of these NSPS and NESHAP regulations were stated to affect smaller facilities, citing as examples:

- Emergency generators and fire pumps
- Some painting operations
- Some metal fabrication operations

Garland and Hale emphasized that such regulations are self-implementing (i.e., even if they are not in your permit).

The benefits of preparing a NSPS/NESHAP “compliance binder” was also addressed.

Finally, under the topic of PM / PM10 / PM2.5 Permitting Issues, Hale and Garland discussed condensable PM issues and noted that ADEQ recently incorporated PM2.5 into the state regulations. Differences between the different types of PM were discussed including ADEQ’s PM10 / PM2.5 policy.

[A copy of the presentation can be downloaded here.](#)