

**ARKANSAS ENVIRONMENTAL FEDERATION - AIR COMMITTEE**  
**INITIAL COMMENTS TO DEQ STRAWMAN DRAFT OF FAQ DOCUMENT**

- As mentioned in the email from Ms. Treece to the permitting workgroup participants on January 13<sup>th</sup> 2020, a Version 1 of FAQ will be made available on the DEQ website once comments from the working group participants are incorporated. The Arkansas Environmental Federation (AEF) would like to confirm the opportunity to review and comment on the Version 1 of FAQ. In addition, AEF is aware that the strawman draft of the FAQ document does not include every topic that was suggested and discussed during the past few permitting workgroup meetings. In the same email from Ms. Treece, it was confirmed that, these topics will be incorporated in Version 2 of FAQ. AEF would like to confirm the opportunity to review and comment on Version 2 of FAQ.
- **General Comment:** Citation of “Regulation” should be replaced with “Rule” where it is appropriate throughout the document.
- **Legal Disclaimer (Title Page):** DEQ may want to add a legal disclaimer on the title page to note that the actual Regulations reign superior over this FAQ document.
- **Regulation 18 Permit (Page 1):** DEQ may want to add a paragraph to clarify a Minor Source Reg. 18 permit category per Reg. 18.301(b)(2) facilities.
- **Delegated NESHAP Rule (Page 12):** DEQ may want to add a link to the table of delegated rules to reduce the document size, making it more user friendly.
- **Volatile Organic Compound (VOC) (Page 21):** This comment may be evaluated during a review of the Version 2 draft. DEQ may want to add some example procedures to estimate VOCs from SDS information. Also, DEQ may want to add a definition of “Exempt Solvents” to clarify the difference. DEQ may want to consolidate a list of “Exempt Solvents” with chemical name and CAS number. Also inserting a link to the table of VOCs, may reduce the document size, making it more user friendly.
- **Polycyclic Organic Matter (POM) (Page 25):** This comment may be evaluated during a review of the Version 2 draft. DEQ may want to consolidate a list of “Common POM” with chemical name and CAS number. Also inserting a link to the table of POMs, may reduce the document size, making it more user friendly.
- **What Types of PM to Permit (Page 30):** DEQ may want to clarify that Condensable PM is included in Total PM<sub>10</sub> and PM<sub>2.5</sub> for permitting purposes.

- **Registration or Minor Source Permit (Page 33):** DEQ may want to add an additional bullet item to clarify a Minor Source Reg. 18 permit category per Reg. 18.301(b)(2) facilities.
- **Regulation under 40 CFR Part 60, Part 61, or Part 63 of June 27, 2008 (Page 36):** DEQ may want to clarify that for sources already holding a Minor Source Permit due to other qualifiers, then all NSPS/NESHAP regs should be addressed in the permit, regardless of the 6/27/2008 date. This syncs up with the “consolidated permit” concept.
- **Background Values (Page 39-40):** Background values listed in the linked table are up to 2015. DEQ may want to update.
- **Interim Authority and Variances (Page 40):** DEQ may want to add an approval timeline (range of period is good) which will help industry to estimate submission and approval timing.
- **When Do I Need To Apply for an Air Permit? (Page 46):** DEQ may want to add “involving air pollutants” at the end of the sentence. Background values listed in the linked table are up to 2015. DEQ may want to update.
- **Responsible Official (RO) (Page 49):** DEQ may want to mention that Plant Managers are typically the lowest position that can be the delegated RO.
- **What Document Must a RO Sign? (Page 50):** DEQ may want to clarify that RO’s are not required to sign each and every bit of the supplemental/changed information. This would bog down the quick exchange of info for permit applications. Example: If a figure needs to change on an ERT, does the RO have to be involved?
- **How Long Will My Permit Last? (Page 50):** It is of some AEF member’s personal opinion, that many minor source permits are outdated and incomplete, as compared to modern permits. Minor Sources typically only think about permit mods for new equipment and there is no driver for periodic permit review/updating. (Title V has the 5-year renewal driver to help ensure up-to-date permits).
- **Happens if a source violates its permit? (Page 51):** DEQ may want to add “what” in front of “Happens”.
- **What types of changes does DEQ want to know about? (Page 51):** DEQ may want to add “other than installation/modification of air pollutant emitting equipment” at the end of the paragraph.
- **Relocation of emission units? (Page 51):** DEQ may want to add “on site” after “relocated” in the sentence.

- **Is any permit required for a change in stack parameters? (Page 53):** DEQ suggests to submit a miscellaneous request through email to [airpermits@adeq.state.ar.us](mailto:airpermits@adeq.state.ar.us). Does DEQ plan to add an ePortal submission option for this type of request?
- **Baghouse Inspection (Page 58):** DEQ may want to remove the two bullet items regarding pressure monitoring because many fabric filters now only have VE reading requirements with no pressure drop requirements.
- **Fugitive Emissions Inspection? (Page 59):** DEQ may want to replace “hey” with “visible emissions crossing” in the sentence for the first bullet item.