The Workgroup agreed to pull together the content of the guidance document first, and then organize based on user type (general public, plant environmental manager, consultant for complex projects) within the guidance.

General Discussion Points:

- Who needs a permit under Reg. 18 or 19 before construction? Should be one of the first FAQs, to guide user into further subsections of the guidance. What is brought into permits from Title V that may not apply to construction part of permit?
- Color code borders and include an explanation for what user type each section is geared for, with links to those sections.
- Include a general intro before breaking up into subsections, to outline what is included in each of the subsections.
- Highlight the basic point in a square above each topic in the guidance. Index it over and make it searchable.
- In Appendices section: Include note of deliberate IBR dates, why we chose to avoid the most recent. Include a copy of the language as it is, as of the IBR "as of" date, and a copy of CFR as it exists as of date of IBR. Group is supportive of this idea, believes it would be helpful.
- The online Shared Document has been revised to reflect the group's discussion.

Discussion of Topics from the Online Shared Document:

(I)(C)(6): What ADEQ doesn't do and what can't go into your permit
- Don't do:
    - Emergency response planning, 112r: Facilities have to have a Risk Management Plan, but we don't take formal action on them.
    - Car catalytic converter.
    - Indoor air quality, such as mold, radon
    - Freon program certifications
    - Sewers
    - Landscaping and tree removal
    - Radiation
    - Medical disposal
    - Occupational health
- Clarification that these are regulated by ADEQ, but aren't going to go into a permit
    - Open burning
    - Accidental releases

(II)(B): What is a VOC and is there a list of VOCs? (Lowest common denominator)
- There is an EPA method to determine VOC content

- How to understand if it is a VOC?
    - Vapor pressure number
    - List of lists (most of the common pollutants)
    - EPA method reference?
    - If it contains carbon and you are unsure ask the Department?
- Mention ADEQ Enterprise Services? (formerly Business Assistance)
- Safest to assume if it has carbon it's a VOC unless included in the exceptions list. There is a test method to determine VOC content. Some safety data sheets have a list of volatiles, but you have to be careful with this. These aren't always 100%. Sometimes you can get a technical bulletin from the supplier.

(II)(C): What is a HAP?
- If benzene is part of a chemical is it a HAP?
- Glycol ethers, there is a list, but it is not comprehensive.
- Ethylene glycols above a certain boiling point?
- There is a search engine for glycol ethers: associated with North Carolina (include link in this section) https://deq.nc.gov/about/divisions/air-quality/air-quality-data/glycol-ethers

(II)(D): How are GHGs regulated?
- 111d
- NSPS
- PSD

(II)(E): How is PM2.5 regulated?
- Make broader: how is PMregulated?
- Permit Applicability versus Emissions Inventory (EI)
    - EI
    - PM includes filterable only, but EI requires both filterable and condensable

(III)(A): Minor source registration vs. Minor source permit
Do I need a permit or registration? (This information is from the Regulations.)

- If a subpart came in after 2008, we haven't looked at it to see if we want to permit for that or not. This would require revision of the Regs.
    - Do we want to include in the guidance, or not?
    - Organize categorically?
- "Actual emissions" – no subtleties associated with this word?
    - For minor sources: Projection based on operations and associated emissions when applying?
        - Based on actual emissions, and by being outlined in the Regulations, it is an enforceable limit on a facility. Effectively limits Potential to Emit

(PTE) also, because a source can't actually emit above threshold. Haven't run into a lot of issues with people not understanding "actuals." PTE is more of the issue.

- Minor source permit (Reg. 19 permit or Reg. 18 permit) or Title V (Reg. 26 permit)
  - Minor source and major source have multiple meanings. PSD major, nonattainment major, Title V major. Minor: Reg. 18 Minor, Reg. 19 Minor.
  - If you need a permit because of one of the categories, a registration does not cover requirements.
  - "Am I excluded from a registration if I am just an NSPS"? If trigger permit requirements, you need permit. Otherwise, even if subject to an NSPS that does not need a permit, you are <u>not exempt</u> from the registration requirement.
  - Include a simple flow diagram. Number these and reference back to the flow diagram. (One member volunteered to create flow chart to share with the group.)
- Thresholds are facility-wide. Modification would need to be addressed somewhere else.
- For final guidance, create a "do I need a permit because I don't have one" flow chart
  - Separate flow chart for modification
  - Master flow chart directing to others
  - Flow chart for new places
- Project your actual emissions if small enough that a Title V isn't required.
- Add timing for permitting. This is information that they would want to know.
  - How soon is permit processed?
  - Do I need a permit, when do I need a permit?
  - Typical length of registration processing for minor, Title V
  - Reference (and/or link) to (VI)(A) – Timeframe for getting a permit.

(III)(E): New topic for guidance, "New Permit: Reg. 18, Reg. 19, or Title V?"

(V)(F): Expedited permits?
- ADEQ does not currently have a system in place to expedite a permit for an additional fee
- Use ePortal to reduce admin incompleteness
- Checking status in ePortal regardless of submission
- Break out a completeness section.
  - Don't leave things blank if you don't understand
  - Checklists?
- Remove "necessary" from "necessary information." This is ADEQ's determination to make.
- Suggested draft permit: proposed conditions
- Change "material safety data sheets" to "safety data sheets."

- If your calculations require something that is not publically available ADEQ still needs to be able to review it somehow

(VI)(G) and or (VII)(G): Fee section:
- Fees are based on limits requested by the applicant. Fees are not based on actuals. Don't over-permit because you will have to pay for it.
- Referencing to Reg. 9 doesn't make it clear either. Fee memo. Reference to fee memo.
- Include information about: "When will you get your bill? Permit issuance fee? Annual fees?
  - Permit fee due when the permit goes "draft"
  - Annual fee due on the date that the first permit was issued by ADEQ
- Minimum fees listed in the guidance, so people know what to expect

(VII)(E): Confidential information submission
- ADEQ had a presentation at 2019 AEF Air Seminar that might be helpful. (will include a link to the presentation)
- Don't send confidential info or documents through ePortal (or email)
- If you submit something confidential via email and it gets purged/deleted because it was submitted the incorrect way, then ADEQ doesn't have a record of that document.
- Certain types of info cannot be confidential

When do you need an RO signature?
- If you supplement an application with new or revised forms, you need an RO signature
- Would an RO signature for another media (i.e., Water or Land) work? No. It doesn't work as a blanket rule.
- One name change/ownership change form as a Department? Have to go with what CAA/our Air regs require.
- Clarifications:
  - Clarification on who can be an RO?
  - Is a plant manager automatically an RO?
  - Need an RO or can it be informal?
  - Delegations of RO? Applications, reports, etc.
  - Submission of specs?
  - Flesh out what needs to be certified by an RO. Helps with timelines for regulated community

Next EASE Permitting Workgroup meeting: Based on the results of the Doodle poll, the group will meet again on **June 4, from 1:00 p.m. to 3:00 p.m. at ADEQ headquarters.**

Next EASE Collaborative meeting/webinar: The Permitting Workgroup supports ADEQ presenting what has been covered by EASE Workgroups. Members don't necessarily want an active speaking role, but would like to be able to make comments/ask questions.