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Effect on Existing Permit

- References to regulatory authority
- Cited Regulations that may have changed
 - Upset reporting conditions
 - Specific text of Regulations changed
 - Permit conditions already are modified versions
 - No effect anticipated
 - Opacity

Transition – Chapter 30

- Current permits contain 18, 19, 26 references
- Title V updates
 - Upon renewal (or modification)
- Minor sources updates
 - De minimis, administrative amendments, modifications
 - Remaining as necessary with Dept. initiated AA's

Routine Replacement

- “Routine” added
 - Modification, major modification
 - Routine maintenance, repair, and routine replacement shall not be considered a physical change
- Generally, replacement of emission units is not an exempt activity

“Draft”, “Proposed” Permit

- Combined the definition of “Draft permit” and “Proposed permit”
- Title V issue involving EPA review
 - Section: EPA Objection to Draft Part 70 Permit (35.1905/26.605)
- Conflicts with Regulation 8 procedures
- Change reflects current practice with EPA

De Minimis and Administrative Applications

- Removed “as expeditiously”
 - The Department shall revise the permit ~~as expeditiously~~ as practicable and may incorporate such revisions without providing notice to the public
- This would allow a permit to be revised to incorporate the change at the next renewal or modification
 - Would still issue acceptance letters within 15/30 days

Minor Modifications

- Public participation section
 - deleted minor modification from the public notice requirements
 - Contradicts the initial applicability part of the same section
 - Not required in Part 70 rules
 - Not required in Regulation 8

Minor Modifications

- Deleted Reg. 26.1006 Timetable for issuance of minor permit modification
 - Duplicative of EPA notices
 - Already has 15 days to respond requirement
 - Confusing
 - Allows grouping together minor mods for later permit revision

Public Notices

- Regulations 18/19 and 26 had different requirements
 - Net effect was using Regulation 19
 - Required duplicate newspaper notices
- Now reference Regulation 8

Public Notices

- Not duplicating Regulation 8 procedures
- Not sending minor source permits to EPA
 - Unless requested
 - Title V still sent
 - Carry-over from before Title V where EPA needed NSR permits

Miscellaneous Changes

- Merged requirements
 - Visible emissions limitations
 - Upset reporting
- Language not identical
- No practical changes

Miscellaneous Changes

- Defined working days
 - Changed business to working
- Combined federally regulated air pollutant and regulated air pollutant for federally-regulated air pollutant
- Updated the definition of “Volatile Organic Compounds”