



# DESIGNING A PERMIT YOU CAN LIVE AND COMPLY WITH

Massie Hatch, PE

June 28, 2017



# Inaccurate Permit = Compliance Issues

- Incorrect or incomplete equipment description
- Emission and/or usage limits that are too low
- Physical constraints that are not right for your operation (e.g., pressure drop range)
- Monitoring requirements that are difficult to meet
- Recordkeeping requirements that are unnecessarily stringent

# Designing a Workable Permit

- Start with the end in mind – Permit you can comply with
- Fully understand the project – New Source or Modification
  - Discuss details with owner and operators
  - Understand operational constraints
  - Collect material and usage information
  - Collect points of contact information
- Research all applicable rules and regulations
  - Identify and document exemptions (SCAQMD Rule 219)
  - Push the envelope, but be reasonable
  - Identify all emission limitations and other requirements

# Designing a Workable Permit

- On complex projects, request an upfront meeting with the AQMD to discuss permit requirements
- Make sure the application package accurately reflects the operation, usage, emissions
- Request to review the draft permit before it is issued
- Review the permit with the operators and equipment manufacturers
- Provide timely comments to the AQMD
- Negotiate changes to facilitate compliance and meet the requirements

# Monitoring Requirements

- Examples:
  - Continuous emission monitoring (CEMS)
  - Parametric Monitoring
    - Pressure drop across filters or catalysts
    - Catalyst temperature
  - Visible emissions
  - Fuel sulfur content
- Basis: prohibitory rule requirements or NSR
- Review carefully and negotiate less frequent monitoring, if possible
- Must be documented – train operators
- Can be achieved via data acquisition systems or paper records

# Recordkeeping Requirements

- Contained in nearly all permits
- Many NOVs are issued for recordkeeping gaps or mistakes
- May be hourly, daily, monthly or annual
- Examples:
  - Records of paint/solvent usage (typically daily)
  - Fuel throughput for combustion equipment (engines, boilers, etc.)
  - Records of maintenance performed
  - Records of all monitoring performed
- Frequency depends on the underlying rule
- Review carefully and negotiate less frequent recordkeeping if possible
- Standardized paper or electronic records are recommended

# QUESTIONS?

Massie Hatch, PE  
Principal  
949.333.3243

[massie.hatch@mshatch.com](mailto:massie.hatch@mshatch.com)

