

Day 1 — Foundations of NSR/PSD & Common Violations (all times Central)		
Welcome & Introductions	- Instructor introductions - Course overview and learning goals - Review of key topics	9:30 – 10:30
Clean Air Act Background	- Purpose and structure of the CAA - Role of NSR/PSD	10:30 – 11:00
Purpose of NSR/PSD & Enforcement	- Practical regulatory requirements for PSD/NANSR major vs. non-major sources - Ensuring a level playing field - Ensuring expected emissions reductions occur	11:00 – 11:30
Basic Permit Concepts	- Source determinations (SIC, common control, contiguous/adjacent)	11:30 – 12:00
Lunch		12:00 – 12:30
Basic Permit Concepts (continued)	- Potential to Emit (PTE) - Enforceability of permit conditions	12:30 – 1:00
NSR Applicability Pitfalls	- Construction without a permit - Wrong type of permit - Violating permit terms (incl. becoming a major source) - Incorrect PTE calculations - Circumvention - Failure to disclose full information - Incorrect netting - Multi-state violations - Discussion: What is not considered a violation?	1:00 – 2:00
Breakout	- Violations Review - Scenario analysis - Identifying violations or potential enforcement concerns	2:00 – 2:30
Applicability of PSD	- Major Sources - Major Modifications - Reasonable Possibility	2:30 – 3:00

Day 2 — PSD and NANSR		
Applicability of PSD, continued	- Netting, PTE vs. PAE - Contemporaneous Emissions - Debottlenecking - 2020 PEI change - RMRR and other exemptions - Excluded emissions, demand growth, “Could have accommodated”	9:30 – 12:00
Lunch		12:00 – 12:30
Breakout	- Major Modification Calculations	12:30 – 1:00
Key Requirements of a PSD permit	- BACT - NAAQS/increment modeling - Pre-application monitoring - Visibility/Class I impacts	1:00 – 2:00
Breakout	- PSD violations	2:00 – 2:30
Plantwide Applicability Limits (PALs)		2:30 – 2:45
Applicability of NANSR	- Major Sources - Major Modifications	2:45 – 3:00

Day 3 – NANSR and Enforcement Case Studies		
Key Requirements of NANSR Permits	- LAER - Offsets - Alternatives analysis - Statewide compliance	9:30 – 10:15
Breakout	- NANSR violations	10:15 – 10:45
Enforcement Principles	- Overview/Enforcement Case Lifecycle: a. Targeting b. Pre-Inspection Data Gathering c. Inspections d. Post-Inspection Data Gathering e. Negotiations f. Settlement & Injunctive Relief g. Potential Criminal Violations - Consultation between enforcement and permits a. During drafting of permit: Enforceability of terms, Continuous compliance assurance, Source category-specific concerns b. During enforcement action: when permits need to be revise, process and timing considerations, permits required for new controls before installation	10:45 – 12:00
Lunch		12:00 – 12:30
Breakout	- Enforcement Experiences	12:30 – 1:00
Breakout	- Review of existing permits for enforceability	1:00 – 1:45
Review of Recent State Enforcement Actions	- Recent actions - Discussion of patterns, trends, and lessons learned - Multi-state enforcement	1:45 – 2:30
Course Wrap Up	- Wrap up - Post-test - Course evaluation	2:30 – 3:00