

Proposal Course Agenda

Effective Permit Writing Agenda

Day 1	
Note: break times are approximate	
11:00	<p><i>Welcome, introduction, student poll</i></p> <ul style="list-style-type: none"> • Course objective, today’s learning objectives • Air permit program basics • Types of permits, sources of authority • General information about permit applications (e.g., content and appearance)
12:15	<p><i>Short Break</i></p> <ul style="list-style-type: none"> • Determining applicability, PTE • Enforceability concepts
1:00	Long Break/Lunch
1:30	<ul style="list-style-type: none"> • Determining application completeness <p><i>Exercise—Determine PTE, application completeness</i></p> <ul style="list-style-type: none"> • Translating an application into a permit • Defining the source
2:45	<p><i>Short Break</i></p> <ul style="list-style-type: none"> • Key make/break decision points <ul style="list-style-type: none"> ▪ NAAQS compliance ▪ Prohibitory rule compliance <p><i>Exercise—Prohibitory rule compliance</i></p>
4:00	Adjourn
Homework: Review of permit application—identify potential problem areas in PTE and applicability	

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Day 2	
11:00	<p><i>Welcome—Review homework from Day 1, today’s learning objectives</i></p> <ul style="list-style-type: none"> • Key discretionary decisions • BACT/LAER, sometime RACT decisions • Offsets • Sometimes state NEPA equivalent • Environmental Justice approaches • Technical support document • Elements of an effective permit • Standard conditions <p><i>Exercise—Discuss differences and similarities among standard conditions brought by students</i></p>
12:00	<p><i>Short Break</i></p> <ul style="list-style-type: none"> • Setting emissions limits • Control technology operational requirements • Startup/Shutdown • Malfunction <p><i>Exercise: Determine emissions limits based on TSD</i></p>
1:00	<p>Long/Lunch Break</p>
1:30	<p><i>Monitoring, record keeping, reporting</i></p> <ul style="list-style-type: none"> • Other key permit terms: determining compliance <ul style="list-style-type: none"> ▪ Monitoring ▪ CEMS ▪ Process data ▪ Manual source tests ▪ Surrogate monitoring ▪ Flare gas monitoring example <p><i>Exercise—Determine monitoring for example sources (group exercise)</i></p>
2:45	<p><i>Short Break</i></p> <ul style="list-style-type: none"> • Title V permits <ul style="list-style-type: none"> ▪ Additional twists for Title V ▪ CAM ▪ Streamlining ▪ Permit shield ▪ Consent decree compliance
4:00	<p>Adjourn</p>
<p><i>Homework: Review TSD of permit to prepare for Day 3 permit drafting exercise</i></p>	

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Day 3	
11:00	<i>Welcome—Final day learning objectives</i> <i>Exercise: Review of Permits</i>
12:15	<i>Short Break</i> <ul style="list-style-type: none">• Writing permits• General principles (e.g., clarity, enforceability) <i>Exercise—conduct full permit review. Students will begin to draft a permit, using lessons learned in the prior three days.</i>
1:00	Long/Lunch Break (to be taken during group exercise)
1:30	<i>Continue exercise</i>
2:00	<i>Short Break</i> <ul style="list-style-type: none">• Group Reports from exercise• Review of pre-test
4:00	Adjourn