Trinity Consultants

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Instructor: Jay Hofmann

Day 1

8:00 AM to Noon (Lunch) – Two 10 minute breaks before lunch
Applicability for Non-Attainment Areas (NSR) and Attainment Areas (PSD)
- What are the criteria pollutants? (Including discussion on when GHGs regulated)
- New Sources
- Modifications at Existing Minor Sources
- Modifications at Existing Major Sources
- Exemptions from NSR/PSD including RMRR

1:00 PM to 4:30 PM – Two 10 minute breaks
Determining Project Emissions Increases
- Before NSR reform (actual to potential)
- After NSR reform (actual to potential, BAE to PAE, replacement unit, hybrid calculation)
- Other items to consider in calculations including demand growth (what is it and when to include), project aggregation, increased utilization and debottlenecking

Netting
- Before NSR reform
- After NSR reform
- What is creditable?

Day 2

8:00 AM to Noon (Lunch) – Two 10 minutes breaks
GHG PSD Applicability Assessments
Class Exercises
Requirements for Major Projects in Attainment Areas (PSD)
- BACT (GHG and non-GHG)

1:00 PM to 4:30 PM – Two 10 minute breaks
- Ambient air assessment (NAAQS and Increments)
- Additional impacts including growth, class I areas
- Pre and post construction monitoring

Day 3

8:00 AM to 9:30 AM
Plant-wide Applicability Limits (PALs)
- What is it and how do you get one?
- Monitoring requirements
- Increasing a PAL limit
- PAL re-openings
- PAL renewal or expiration

9:45 AM to Noon (Lunch) – One 10 minute break before lunch
Requirements for Major Projects in Non-Attainment Areas (NSR) and
- Non-Attainment Areas
- Applicability Assessments
- LAER
- NSR offsets

1:00 PM to 3:30 PM – One 10 minute break
Additional Class Exercises
NSR Developments
- Review of significant policy and guidance documents and court decisions
- Recent EPA policy and guidance documents and implications/impacts
- Recent court decisions and implications/impacts#