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**Sunday, January 29, 2012**

## **Workshop 1 - Permitting & Compliance Strategies**

**Presenter:** Eric Hiser, Jordan, Bischoff & Hiser , PLC

### **Workshop Description:**

This seminar will provide participants with critical information on new developments in clean air regulation, including recent developments in NAAQS, new source review, NESHAP regulation and GHG reporting. The seminar will also address current EPA enforcement priorities, planning and preparing for an inspection, and using the permit process to minimize your enforcement exposure.

- **NAAQS and SIP Regulation.** This session provides an overview of the National Ambient Air Quality Standards (NAAQS), including recent and pending revisions; and likely issues arising from NAAQS changes. The session also provides an overview of the State Implementation Plan (SIP) process, the timeline for implementing changes, and how that process will affect sources.
- **New Source Review: New Source Performance Standards (NSPS), Prevention of Significant Deterioration (PSD), Nonattainment New Source Review (NNSR).** This session will provide an overview of the NSPS program, including applicability triggers and structure of standards; a detailed review of the PSD program, including applicability, modifications, the scope of routine maintenance, repair and replacement, control technology, monitoring, modeling and impact analyses; how the NNSR and PSD programs vary; and common traps in PSD and NNSR permitting.
- **Regional Haze and Visibility.** This session will review the regional haze and visibility rules, their incorporation into SIPs, and their potential application to electric utilities and large sources, including BART analysis.
- **Title IV Acid Rain Regulation and CAIR.** This session will review the principles of the Acid Rain Program (ARP), discuss common applicability issues affecting ARP and CAIR, and touch on the role of the Designated Representative.
- **Title V Operating Permits.** This session reviews fundamental concepts of permitting, including the tension between NSR and Operating Permits, regulatory flexibility, revision and modification issues, and developing enforcement trends.
- **Permitting and Compliance Strategies.** This session evaluates various permitting approaches that sources can use to minimize future compliance and liability exposures, including alternate operating scenarios and use of the permitting record.

- **Greenhouse Gas Reporting.** This session provides an overview of the GHG reporting rule, including sources subject, the “Tier” approach to reporting combustion emissions, and the rules for when CEMS are or are not required. An overview of the less commonly discussed administrative requirements of the rule is also provided.
- **Enforcement Initiatives and Preparing for an Inspection.** This session evaluates current agency enforcement priorities, evaluates the compliance and enforcement process, and provides concrete advice on steps to prepare a facility to successfully undergo a comprehensive air compliance inspection.
- **Questions and Adjournment**