



DRAFT - Advanced PSD Workshop - Outline and Schedule (2 days of instruction)

All times are approximate. Two ten minute breaks will be taken in the AM and PM each day, or when needed.

February 11

8:15 am to 9:00 am

History and overview of the Clean Air Act - Title 1
Background and evolution of PSD (40 CFR 52.21)
KDHE implementing regulation (K.A.R. 28-19-350)

9:00 am to 12:00 pm

Key regulatory definitions contained in 40 CFR 52.21

- Regulated NSR pollutants
- Potential-to-Emit
- Fugitive emissions (definition and applicability for NSR purposes)
- Major stationary source
- Significant Emission Rate thresholds
- Non-road engines

12:00 pm to 12:45 pm

Lunch

12:45 pm to 4:00 pm

PSD permit applicability

- Major Modification
- Net Emissions Increase (definition)
- Modification exclusions – RMRR, changes in fuel/raw materials, etc.
- PSD Applicability – Step 1 Analyses
 - New, existing, and replacement emission units, EUSGUs
 - Modifications/project emissions change calculations/records
 - Baseline Actual to Projected Actual emissions assessments
 - Baseline Actual to Potential emissions assessments
 - Upstream/downstream affects, debottlenecking, and increased utilization
 - Modified units
 - Other affected units
- PSD Applicability – Step 2 Analyses
 - Net Emissions Increase
 - Differences in calculating emissions versus Step 1
 - Contemporaneous period
 - Creditable emissions
- Treatment of precursor emissions (for PM_{2.5} and ozone)
- Excluded emissions – emissions not related to the project (“Demand Growth” exclusion)
- Project aggregation, project related decreases in emissions, and other Step 1 issues

February 12

8:15 am to 9:15 am

PSD permit applicability (cont.)

- Project emissions accounting
 - Source obligation
 - 5 and 10-year recordkeeping periods
 - Reporting triggers

9:15 am to 9:45 am

- Greenhouse Gas PSD permit applicability assessments

9:45 am to 12:00 pm

PSD control device (BACT) reviews

- What is BACT?
 - Definition
 - Unit applicability
 - Limit/enforceability
- BACT top-down process (Step 0, Step 1, Step 2, etc.)
 - Availability and applicability criteria for control technologies – new and modified emission units
 - Control costs
 - Overall and incremental costs of control
 - Cost calculations – resources for cost estimates
 - Grouping of emission units
- EPA's Clean Air Technology Center/RBLC
 - Consideration of control options and emissions limitations

12:00 pm to 12:45 pm

Lunch

12:45 pm to 1:30 pm

PSD control device (BACT) reviews (cont.)

- Variable BACT limits based on operating mode
- Amending or relaxing existing BACT limits
- BACT and phased projects
- GHG BACT
 - General EPA guidance
 - Emerging technologies

1:30 pm to 3:00 pm

Preconstruction monitoring requirements

PSD Ambient Impact Assessments

Additional impacts analysis

3:00 pm to 4:00 pm

Non-attainment NSR

- Kansas nonattainment area
- Significant emission rates
- Offsets
- Alternatives analysis
- LAER