

Day 3

RCRA Organic Air Emission Standards

8:00 AM – 9:00 AM

Session 9: Brief ROAES Overview

Denise Housley, US EPA, R4, RCRD, RCAPS

Topics:

- Quick look at the ROAES Subparts AA, BB & CC;
- RCRA Overlap with Clean Air Act (CAA) Subparts, and;
- Recordkeeping Importance to RCRA Compliance.

9:00 AM – 9:15 AM

Break

9:15 AM – 9:45 AM

Session 10: Leak Detection & Repair (LDAR) Program Equipment & Procedures

Stephen Rieck, USEPA R4 Air, Pesticides & Toxics Management Division, Air Enforcement

Topics:

- Leak Detection and Repair overview;
- Standard Operating Procedures;
- Equipment overview;
- Field investigations.

9:45 AM – 10:00 AM

Break

10:00 AM – 11:30 AM

Session 11: First Looks. Emissions Monitoring Equipment Demonstrations

Stephen Rieck, USEPA R4 APTMD, Air Enforcement, Kimberly Chavez, US EPA, OECA, WEB

Topic:

- Individual monitor demonstration and calibration on various types of monitoring instruments.

11:30 AM – 12:30 PM

Lunch

12:30 PM – 1:00 PM

Session 12: Introduction: The RCRA Organic Air Emission Standards (ROAES), the Why? and the National Compliance Initiative (NCI),

Kimberly Chavez, US EPA, OECA, WEB

Topics:

- ROAES History: Reasons for a NEI;
- Early Insights & Trends;
- NCI Data Review.

1:00 PM – 1:15 PM

Break

1:15 PM – 2:15 PM

Session 13: Tank Inspections & ROAES Issues (Via Skype)

Jason Simpson, TNDEC, Division of Solid Waste Management

Topics:

- Common Emissions Issues Identified During Inspection.

2:15 PM – 2:30 PM

Break

2:30 PM – 3:30 PM

Session 14: The ROAES Inspection

Kimberly Chavez, US EPA, OECA, WEB

Topics:

- Pre-Inspection;
- Inspection;

3:30 PM – 4:00 PM
4:00 PM

Attendee Site-Specific Issues & Questions
Adjourn

- RCRA Inspection Example Facility;
- Document Review;
- Closing.

THURSDAY January 16th

Day 4

RCRA Organic Air Emission Standards

8:00 AM

Morning Folks and Notes

8:15 AM – 9:30 AM

Session 15: Compliance Tool Box: The Basics of LDAR Software

Dwight Celestin, InspectionLogic Corp.

Topics:

- Building the Initial Component Inventory;
- How Components are Scheduled for Monitoring;
- How the Monitoring Data is Gathered & Stored;
- Documenting and Repairing Leaking Components;
- Where Does the Field Technician Fit in All of This?

9:30 AM – 9:45 AM

Break

9:45 AM – 11:00 AM

Session 16: Compliance Tool Box: How to audit a LDAR database for Compliance

Dwight Celestin, InspectionLogic Corp.

Topics:

- Good Data vs. Bad Data;
- What Does the Data Look Like If the Technician is Cheating?

11:00 AM – 11:30 AM

Attendee Site-Specific Issues & Questions

11:30 AM – 12:30 PM

Lunch

12:30 PM – 2:00 PM

Session 17: DOT Compliant Containers & How to Inspect for DOT Compliance

Bob Burns, PHMSA, DOT

Topic:

- Determining if a Container is a DOT Container;
- Types of DOT regulated Containers (i.e., Containers, Bulk Containers and lab Packs)
- Determining if the Container is DOT Compliant;
- How a DOT Inspector inspects a Container.
- Questions & Answers

2:00 PM – 2:15 PM

Break

2:15 PM – 3:30 PM

Session 18: ROAES Regulatory Compliance Issues and Interpretations

Negin Mostaghim, US EPA, OCE, WCED, Attorney Advisor

3:30 PM – 4:00 PM

Attendee Site-Specific Issues & Questions

4:00 PM

Adjourn

FRIDAY January 17th

Day 4

RCRA Organic Air Emission Standards

8:30 AM – 8:45 AM

8:45 AM – 9:45 AM

Morning Folks and Notes

Session 19: The Importance of Detail of the ROAES Information in RCRA Permit Application

Denise Housley, US EPA, R4, RCRD, RCAPS

Topics:

- Example of ROAES Permit Application Before & After;
- Demonstration vs Recitation
- Written LDAR Plan – Communications & Instructions
- Inspection Forms, Criteria & Corrective Action
- CAA Information Inclusion
- Change Management
- Unit Specific ID

9:45 AM – 10:15 AM

10:15 AM – 11:00 AM

Break

Session 20: Permit Conditions for ROAES

Denise Housley, US EPA, R4, RCRD, RCAPS

Topics:

- Commonly Drafted ROEAS Conditions
- How to Address Claimed Exemptions
- Addressing CAA Overlap in the RCRA Permit & ReOpener Conditions

11:00AM – 12:00 PM

Attendee Site-Specific Issues, Questions & Hands-ON with Equipment

- Last chance for experience with and questions on monitoring equipment, procedures, regulatory interpretation and application.

12:00 PM

Adjourn