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Arkansas Environmental Federation Air Seminar: Jesslyn Hale (Trinity Consultants) Presentation Addressing Major Source Boiler MACT

Arkansas Environmental, Energy, and Water Law Blog

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Jesslyn Hale of Trinity Consultants undertook a presentation at the April 12th Arkansas Environmental Federation Air Seminar titled *Major Source Boiler MACT: 2016 Action Items ("Presentation")*.

Ms. Hale's *Presentation* addressed a number of issues associated with the Clean Air NESHAP Act Major Source Boiler Maximum Available Control Technology ("MACT") requirements.

The *Presentation* addressed:

- Boiler MACT Recent Timeline
- Initial Compliance Test
- Notification of Compliance Status
- Compliance Report
- Records

The Records portions of her *Presentation* provided suggestions in terms of documents that should be maintained including those associated with the boiler process heater.

"Common Pitfalls" were identified which included:

- Forgot to complete Energy Assessment or Tuneup for Gas 1 Boiler
- Forgot about the 60 day notification for performance test
- No operating parameter strategy/planning before day of performance test
- Don't have all required records during ADEQ inspection
- Don't have Startup Shutdown Plan if applying definition (2) of "startup" in §63.7575.

[Click here to download a copy of the *Presentation*.](#)