



ADEQ Air Integrated Regulation Update

Further work on ADEQ's Air Integrated Regulation may be shifting gears until decisions are made as whether to continue with the Air Integrated Regulation itself, or to simply make improvements to the existing four existing air regulations (Regulations #18, #19, #26, and #31). The Arkansas Environmental Federation (AEF) is working with the ADEQ on possible regulatory and air program improvements. The stated purpose of the effort is to clarify Arkansas air pollution control requirements by simplifying the regulatory provisions, consolidating overlapping provisions, and revising or removing confusing language. However, these goals have proved to be more challenging than originally thought. ADEQ received a considerable number of comments on its last working draft version of the Air Integrated Regulation.

Trinity's Air Quality Permitting in Arkansas Class

February 21, 2019 - Little Rock, Arkansas

Having trouble understanding your air permit? Do you have compliance and reporting questions? Do the engine rules frustrate you? Confused about when a permit modification is needed? The world of air permitting has become extremely complex and it is very easy to unknowingly be in violation of permitting requirements and regulations. If you or someone at your facility needs training on air quality permitting in Arkansas, this one-day class will be beneficial. Topics include:

- Basics of air pollution emissions and controls
- Special federal EPA air pollution regulations, such as New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (MACT/GACT) rules
- Ozone Depleting Substances (ODS) / Part 82
- Arkansas air permitting regulations and practices, including recent changes

- Permitting strategies and emissions calculations
- Tips for surviving ADEQ inspections and staying in compliance

Mr. Shannon Lynn, P.E., Ms. Jesslynn Hale, and Mr. Courtney Garland, P.E., of Trinity Consultants will be teaching the class. Students benefit from this team's over 60 years of combined Arkansas air permitting experience. Learn more and register online [here](#).

Minor Source Air Permits Reminders

Title V major air permit sources have a requirement to revisit and renew their permits every five years. Not so for minor sources, where there is no formal driver to prompt permittees to review their air permits for completeness. As a result, minor source permits can easily become outdated, opening the door for surprise enforcement actions. Some common problems include:

- Not all emissions sources are listed in the permit. It is surprisingly easy for small emissions sources, such as emergency generators and cooling towers, to be missing from minor source permits.
- Not all emitted pollutants are contained in the permit. In years past, it was common for permits to only address the main pollutants of concern during that era. Current common practice is to address all emitted pollutants. For older minor source permits, hazardous air pollutant (HAP) emissions may not be adequately addressed.
- Unrecognized applicability to special EPA regulations. EPA periodically issues new NSPS and NESHAP regulations. Older permits may have been issued before these newer regulations came into being, raising concerns about overlooked requirements. One common oversight is missed applicability to EPA's special rules for stationary engines (such as for emergency generators and emergency fire pumps).
- Do you even need an air permit anymore? In recent years, the state regulations have changed regarding what size facilities need formal minor source air permits. Many minor source facilities with smaller amounts of emissions are now eligible for the less onerous Registration Program, or may no longer be required to have an air permit at all.

Obviously, it is good practice to review your existing air permit periodically to make sure all is well, and to correct any shortcomings before they become enforcement issues. Trinity recommends an internal review once every five years, and has professional air permit consultants that can assist.

Upcoming Important Air Permitting Related Events and Dates

Trinity can assist with your environmental reporting chores. Contact the Trinity Little Rock office at (501) 225-6400.

Event	Date
Trinity's Air Quality Permitting in Arkansas Class	February 21, 2019 Little Rock, Arkansas
Tier II Reports	March 1, 2019
Annual Hazardous Waste Reports	March 1, 2019
Greenhouse Gas Emissions Inventory	March 31, 2019
ADEQ Annual Emissions Inventory (SLEIS), for Type A Sources Only	April 15, 2019
EPA Toxic Release Inventory	July 1, 2019
PHMSA Registrations	July 1, 2019
Trinity's Air Quality Permitting in Arkansas Class	August 8, 2019 Little Rock, Arkansas
Stormwater Annual Report	December 31, 2019

Your Issues! We Want to Hear From You!

Can't make it to a class? Can't make it to a luncheon seminar? We'd still love to hear from you! Feel free to reach out to us with your concerns and questions. Even if we're not your current provider, we'd appreciate the opportunity to hear from and visit with you. Please call us at (501) 225-6400, or e-mail slynn@trinityconsultants.com or

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