

Air Permitting Considerations

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What Is It That Makes Permitting a Successful Venture?

Proper Preparation

Communication

Understanding

Flexibility

Consensus

Proper Preparation

Project “Basics”

- Project Scope
 - With respect to permitting, know as much as possible
- Schedule
 - When is the permit required to support the facility’s need?
 - Does the facility need to expedite permitting?
 - When does the Agency need certain information?
 - ◆ Emissions estimates, netting analysis, modeling, applications
- Regulatory Review
 - What regulations apply? (PSD/BACT, MACT, NSPS, other state or Federal)
 - ◆ Part of application
 - What control options may be required, if any

Communication

Kick off meeting

- Discuss scope, business objectives, need for permit (time)
- Review emissions
 - Basis (production/business), factors, netting, conclusions
- Review regulatory applicability determination
 - What applies, what does not apply & why
- Review concerns, issues, watch outs
- Agreements
 - To communicate
 - Estimated timeline to permit issuance

Internal Facility Discussions

- Permit timeframe.... facility management needs to know
- Regulatory requirements for the facility....the facility needs to prepare
 - SSM plans, Monitoring, CAM, Recordkeeping, Reporting, etc.

Understanding

A lack of understanding is often a pitfall to successful permitting

- The regulator does not understand the project, its intent, emissions estimates and basis, the needed timing for permit, etc.
- The facility does not understand the detail needed in its application, emissions estimates, etc., and does not supply enough information... or the right kind of information

A lack of understanding almost always results in permit delays.... and conflict

- There may be a time where “going up the line” is necessary and warranted
- Often, management is not aware of problems and issues that exist

The way to ensure understanding is...communicate!

Flexibility

Be flexible – it's a key to our changing environment

- Be open to ideas and “outside the box” thinking
 - Permit simplification & consolidation, i.e., reduce redundancies
 - Efficient recordkeeping & reporting
 - What are the real requirements?
- Collaborate on solutions
 - Precedence set in other states, regions?
 - Applicable to the project?
- Keep the target in sight... what are the project and permit objectives?
Do they agree?
- Being flexible and creative does not mean contravening legal and regulatory requirements
 - Ask why, or why not?

Consensus

Reach consensus on a permitting approach as quickly as possible

All issues known and discussed

- No late surprises
- All resources used, i.e., Federal review, past permitting decisions, other similar issues
- Constraints, givens

Can WE live with it?

- Are regulatory requirements and facility needs balanced and met?
- Are there agreements on limits, recordkeeping, reporting?
- Does the timing meet the facility need?

Conclusion

Successful and timely permitting requires teamwork and a respectful relationship.

By working together, and not apart, solutions can be found resulting in permits that meet regulatory requirements and facility needs.



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