2017 AAPCA Best Practice

Title V Engineer’s Notebook

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Do you face these problems?

- Inconsistent organization of voluminous information
- Erratic documentation of decisions
- Turnover/loss of knowledge
- Rigorous and active construction permitting
- Manager/peer reviews take too long
- Renewals inefficient due to rework
- Facility history missing
Wyoming’s Solution: The Engineer’s Notebook

Brainchild of Maggie Endres

- Consistent organization
- Promotes thorough and accurate permits
- Eliminates redundant research
- Documents full background of all decisions
- Anyone familiar with protocol can find information quickly
The Notebook (con’t)

- Chain-of-custody tracking of all applicable requirements
- Memorializes relevant notes of every permit writer who’s touched the facility
- Promotes continuity
- Streamline manager/peer review and renewals
- Designed to evolve over time
Post Operating Permit Renewal Application

I am submitting a permit renewal application for the Greybull Bentonite mining operation and enclosed four copies of the operating permit renewal.

If you have any questions regarding the permit renewal, please contact the number listed above or write to us at the email address provided.

05-04-2012 032124
Chain-of-Custody Tracking
Emission
Units
Applicable Requirement Tracking

UIN-15  #2 Coal Fired Boiler

8A-EE (7/19/74): SO$_2$ scrubber

CT-355 (1/27/81): PM, SO$_2$, NO$_x$, COM$_2$; CEM$_2$, subpart D

MD-69 (5/5/87): PM, SO$_2$, NO$_x$

OP-222 (9/30/91): PM, SO$_2$, NO$_x$

MD-12487 (6/12/13): perf, test, NO$_x$, SO$_2$, PM/$M_O$, PM$_{10}$, CEM, test, op, subpart D
We love our notebooks…
FIRE!
Lessons Learned

- Title V permit background work is tedious… do it once, do it right, make sure others can understand
- Human factor: note-taking, having everything at your fingertips (literally)
- Every element is there for a reason
- Does the change minimize rework, save time?
- Changes are reviewed and beta tested by all
QUESTIONS, HAVE YOU?

ANSWERS, HAVE I.