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Title V Compliance Management

It's Time To Re-Think Your Approach to Air Compliance

Title V is more than just another air permit. It fundamentally changes the way plants must deal with air compliance issues. Key points to consider:

- Management of Title V is an operational function
- Quantity of required data is incompatible with past practices
- Process data must support environmental claims - credible evidence
- Lack of knowledge no longer shelters a plant - the burden has shifted
- Successful implementation may require specialized skills
- Failure converts directly to a large liability, both corporate and personal

These facts characterize the dramatic change Title V brings to compliance and the very significant challenge facing industry today.

What We Know

Isolated Databases (EMIS's) Can't Solve The Problem

These products have been designed to fit past practices and an outdated view of Title V monitoring and reporting. They fail to provide essential links to real-time plant process data and business systems. They focus on the needs of the environmental manager rather than on plant operations and the control room. Reporting flexibility is limited.

Strategic System Design Is Essential

Successful compliance management requires more than collecting monitoring data and issuing compliance reports. It requires careful consideration of operational impact and proactive control. Notifications of past problems will not do - alarming the control room will – thus providing corrective action before exceedences occur.

Success Requires Effective Teaming

Because compliance management spans a number of plant organizations - Operations, Maintenance, Purchasing, Environmental, Information Systems and Senior Management - teaming and stakeholder buy-in are essential.

Development Requires A Defined Process

Because the task crosses so many functional lines, a clearly defined process is essential to successful project implementation. Priorities need to be established, strategies defined, performance documented, budgeting completed, timelines established, work scheduled, system started up and performance evaluated.

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The Clean Air Engineering "Defensible Compliance Program"

Many Title V facilities generate thousands of data points daily. This data may come from electronic sources such as the plant DCS, the CEM data logger, spreadsheets, or it may come from manual sources such as logbooks. Often this data needs to be aggregated and averaged, processed by correlation equations, or combined with other data to generate final results.

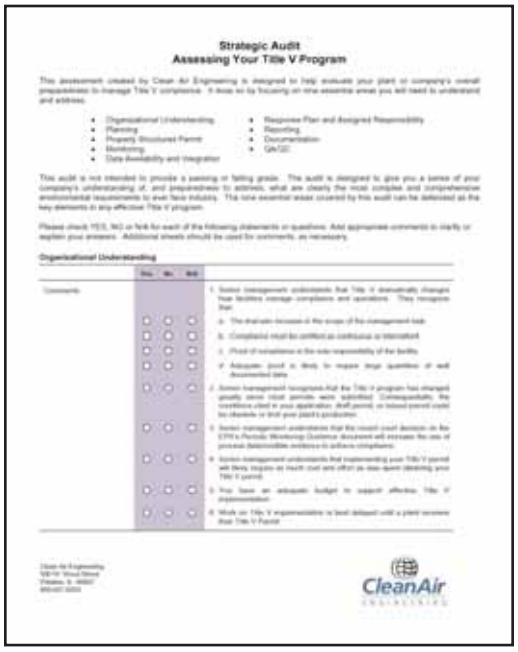
Clean Air Engineering, together with its IS partners and plant MIS personnel, will perform a comprehensive analysis of your current data management infrastructure with an eye to Title V compliance. We do not sell "canned solutions", but rather evaluate all options and deliver the solution that works best for your plant.

We will leverage your existing systems to the greatest extent possible and work to seamlessly integrate any new data management components. With over 30 years of air monitoring, regulatory, and engineering experience, CleanAir is uniquely qualified to assist companies manage Title V.

Program Elements

1. Setting Expectations and Team Building

CleanAir professionals meet with plant stakeholders to define program objectives including estimates for design, performance, priority, and timing. This step includes educating stakeholders on Title V issues as well as gaining the support of senior plant management.


Strategic Audit
Assessing Your Title V Program

2. Operational Impact / Compliance / Data Review

Your permit or application is reviewed for monitoring requirements, operational limitations and unreasonable conditions. Existing sources of plant data are studied and quantified for use as Title V monitoring and for potential liability when certifying compliance. IS needs and issues are Identified.

3. Gap Analysis

A thorough Gap Analysis is conducted to identify all monitoring, reporting and compliance requirements not currently available for certifying compliance. In addition, IS limitations are carefully studied to identify data not available for electronic collection, as well as system interface and compatibility issues.

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4. Functional Specification / Designing The System

Based on the permit review and gap analysis, a functional specification is developed for a data management system. Working with plant MIS personnel, we find the most cost effective software/hardware mix that meets your needs from "off the shelf", to integrating existing data systems, to custom built. This specification details exactly what is to be built and how it is to perform. It establishes your compliance strategy, timing and budget.

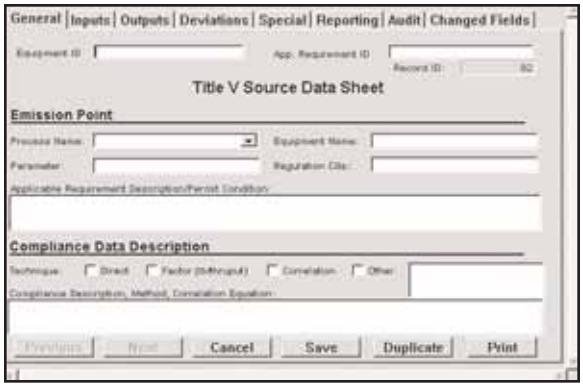
5. System Implementation

CleanAir helps plant stakeholders assign work elements to the most appropriate resource. This could be an internal group, another outside contractor or CleanAir. It will vary from plant to plant because of differences in staffing, workload and preference.

A successful Title V management system requires more than IS implementation. We will train your plant operators and environmental staff. We will help develop and revise plant SOPs to incorporate compliance management objectives. Most important, CleanAir will insure the documentation for your system meets state and federal requirements as well as your internal needs. In short, our job is not done until your program is a success.

CLEAN AIR ENGINEERING'S WEB-BASED TEAMING

We often work on projects where the participants and stakeholders are widely scattered. It's a real challenge to get such far-flung teams working together on the same page. To address the problem, CleanAir developed a web-based work environment specifically for Title V projects.



This system uses a secure on-line database that provides all stakeholders and participants with real-time access to the work product without the confusion of multiple copies. Changes to the work product are automatically collected and posted on a password-protected discussion site for review and comment. Experience has shown it to be an outstanding tool for allowing operations and engineering personnel to participate in the process.

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About Clean Air Engineering

Clean Air Engineering's measurement and analytical services are tools you can use to further your company's success. We pride ourselves on the superior training and experience of our technical staff - unrivaled in the industry. Over 33 years of experience in a wide variety of process environments gives our engineers and technicians a unique ability to provide high value to our customers. We deliver more than data - we uncover the knowledge and information hidden in the numbers that turn environmental costs into bottom line savings.

Environmental Consulting

- Environmental Strategic Planning
- Permitting and Permit Implementation
- Compliance Reporting
- Audits / Operational Review
- CAM Plans
- Training

Process Engineering

- APC Equipment Specification, Optimization and Troubleshooting
- Combustion / Boiler Tuning
- Emissions Reduction Strategy
- Sequential Process Optimization
- Fuel Switching Studies

CleanAir Instrument Rental

- Continuous Emission Monitoring Systems
- Calibration Gases
- Data Acquisition
- Air Monitoring Instruments
- Instrument Repair

CleanAir Express Equipment Sales

- EPA Reference Method Test Equipment for Particulate, Organics and Metals
- Emission Measurement Supplies
- Test Method and Equipment Training
- Sample Gas Delivery Systems
- Portable Combustion Analyzers

Measurement and Analytical Services

- Stack Testing
- Emissions Inventories
- Performance / Guarantee Testing
- Trial Burns
- Onsite GC / FTIR Analysis
- Particle Characterization / Resistivity

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