

STAR Advisory Group Timeline

February 20, 2009

- Presentation:** Background
 - STAR status report
 - District objectives for the STAR Advisory Group
 - Overview of appropriate topics of discussion
- Presentation:** Explanation of drafting objectives
- Discussion:** Timeline and topics

March 6, 2009

- Discussion:** Recategorizing or delisting TACs (Regulations 5.01, 5.20, and 5.23)
 - Delist only if IARC or ATSDR delists
 - Ethyl acrylate
 - Should ethyl acrylate be recategorized as a non-carcinogen?
 - Cr⁺³ vs. Cr⁺⁶
 - Should total chromium be broken out by valence?
 - Radon and radionuclides
 - TACs vs. HAPs
 - Should the category 4 TAC list be updated to conform to EPA's list of hazardous air pollutants (HAPs)?
- Discussion:** Toxic air pollutants (TAPs) regulated under Regulations 5.11/5.12 and STAR
 - Clarifying TAP regulations
 - What happens to sources that currently have TAP-conditioned permits?
- Discussion:** Sources subject to or exempted from STAR (Regulations 5.01 and 5.21)
 - Introductory comments by District staff
 - Title V and FEDOOP sources, and sources that become Title V or FEDOOP sources
 - Should exempted FEDOOPs report chemical usage annually?
 - Clarifying de minimis TAC emissions
 - Should the cumulative impact of all de minimis emissions be considered?
 - Should the use of propane be considered de minimis similar to the use of natural gas?

March 20, 2009

- Discussion:** Permits for STAR-regulated sources (Regulation 5.21)
 - STAR permitting requirements
 - Should permits be required for all sources doing environmental acceptability demonstrations?
 - Should a specific permit called a STAR permit be issued, or could existing types of construction and operating permits be used to include STAR-related conditions?
 - What sort of monitoring, recordkeeping and reporting should be required, and can they follow the types of monitoring, recordkeeping and reporting already used in permits?
 - Should any operational flexibility be built into permits, and if so, how?
 - Should sources have process-specific emission limits?

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- Should a facility be required to get a STAR-based permit if that facility has a toxic air pollutant (TAP) based permit?
- Should prior notice be required as a permit condition for changes in concentration or identity of TACs?
- How should fugitive emissions be addressed?
- Environmental acceptability demonstrations
 - Should deadlines to submit environmental acceptability demonstrations or compliance plans for Group 2 sources be extended, and if so, for how long?
 - Should FEDOOPs be required to perform an environmental acceptability demonstration for Category 2 TACS?

April 17, 2009

- Discussion:** Updating models and model inputs (Regulations 2.11 and 5.22)
 - Current use of models
 - Use of EPA guidance
 - Requirements for use of an alternative model
 - Should AERMOD be used for modeling needs going forward?
 - When a model is rejected what test will be used?
- Discussion:** Enhanced emissions inventories for TACs
 - Comparing TACs and HAPs
 - Using the HAPs inventory approach for TACs
 - Process-specific reporting versus plant-wide reporting
 - Stack and fugitive information
 - Listing specific source categories in addition to the general requirements (auto body shops and dry cleaners)
 - Gasoline throughput reports
- Discussion:** Postcards for first- and second-tier property owners identified by Metro planning
- Discussion:** Intermittent rates and maximum ambient TAC concentration.
- Discussion:** Flow charts in regulations

May 8, 2009

NOTE: This date is reserved for an additional meeting if necessary to conclude stakeholder discussion and finalize the STAR Advisory Report.