

**OHIO EPA/INDUSTRY
PERMIT PROCESSING
EFFICIENCY COMMITTEE**

FINAL REPORT

JANUARY 22, 2002

STATEMENT OF AGREEMENT

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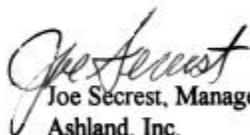
The following report describes the collaborative process between Ohio EPA and members of the Ohio Chamber of Commerce, Ohio Chemistry Technology Council, Ohio Manufacturers' Association, Ohio Petroleum Council, and National Federation of Independent Business - Ohio Chapter. This six-plus month process involved a detailed review of air permitting efficiency in Ohio, as well as discussion and development of achievable and measurable recommendations to improve permitting efficiency.

These recommendations vary in the level of effort needed to complete, the complexity involved to implement, and the number of external participants (e.g., USEPA, other business organizations and associations) that will need to be involved to move forward. Regardless, Ohio EPA and other Committee organizations and participants are committed to build upon this Committee's efforts to implement these recommendations.

As members of this Committee, and by the fact that all decisions were made by consensus, the Committee believes that each of the recommendations will have a positive impact in both overall environmental protection, as well as helping the industry/business community to remain competitive by creating additional efficiencies in the air permitting process. If at anytime during the planned discussions in 2002 and beyond, any participant organization believes that one or more of the recommendations cannot be implemented, the issue and the reasons for this belief will be discussed with the Committee with all efforts to achieve resolution.



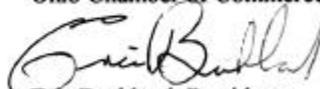
Christopher Jones, Director and Committee co-chair
Ohio Environmental Protection Agency



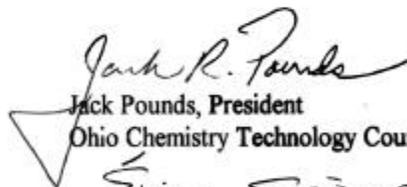
Joe Secrest, Manager State Government Relations and Committee co-chair
Ashland, Inc.



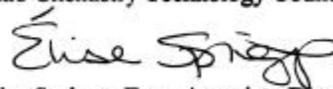
Andrew E. Doehrel, President
Ohio Chamber of Commerce



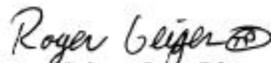
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ACKNOWLEDGMENTS

There are many people that contributed to the success of this project, however, a few deserve special mention. Committee co-leaders Joe Secret and Christopher Jones showed support and leadership during Committee meetings, as well as worked tirelessly behind the scenes to keep this process moving in a positive direction.

Dee Hammel of the Ohio Department of Natural Resources, who acted as a volunteer facilitator, was a valued resource during the initial planning stages of this process. Her efforts to help frame the discussions and keep Committee members on track is much appreciated.

In addition, the important role of all Committee, subcommittee members, trade association members, and Ohio EPA staff should be noted. Without the commitment and continued involvement in this process, this project would not have been a success. Finally, special thanks to the Ohio Manufacturers' Association for taking a leadership role in establishing this Committee and helping coordinate Committee meetings.

THE JOINT INDUSTRY/OHIO EPA PERMIT PROCESSING EFFICIENCY COMMITTEE

EXECUTIVE SUMMARY

This report describes the collaborative process between Ohio EPA and members of the Ohio Chamber of Commerce, Ohio Chemistry Technology Council, Ohio Manufacturers' Association, Ohio Petroleum Council, and National Federation of Independent Business - Ohio Chapter. This six-plus month process involved a detailed review of air permitting efficiency in Ohio, as well as discussion and development of achievable and measurable recommendations to improve permitting efficiency.

These recommendations/outcomes vary in the level of effort needed to complete, the complexity involved to implement, and the number of external participants (e.g., USEPA, other business organizations and associations) that will need to be involved to move forward. Regardless, Ohio EPA and other Committee organizations and participants are committed to build upon this Committee's efforts to implement these recommendations.

RECOMMENDATIONS/OUTCOMES

- Effective October 14, 2001, Ohio EPA will conduct a completeness review, and notify applicants in writing of the determination, within 14 days of receipt of all permit to install applications.
- The Ohio EPA will review and either issue the permit or issue a proposal to deny the permit within 180 days after the date of the application is determined complete, starting January 1, 2002.
- The Ohio EPA will collect information on the above recommendations and make this information available monthly via the agency web site (<http://www.epa.state.oh.us>).
- The Ohio EPA will develop the capability that will enable the Ohio EPA to track PTI processing time by source category.
- Work with USEPA to develop a new emissions based PTI exemption threshold while taking into consideration the environmental impact.
- Identify areas where an expanded use of permits-by-rule (PBR) would be effective and work with appropriate stakeholders to develop PBR language.
- Identify where the use of a general permit within DAPC would be effective and develop general permit language for appropriate types of permit categories.
- Develop, in consultation with USEPA, a permitting process that would allow flexible permitting through the use of a facility-wide emissions cap permit system.
- Develop an internal EPA training (Basic New Source Review) Class.
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- Develop an external EPA training (Advanced New Source Review) Class - This was discussed as a potential future need, but no goals have been established.
- The Reorganization subcommittee supports the DAPC Central Office reorganization as presented to the subcommittee. Final reorganization will be presented to the Committee.
- The Reorganization subcommittee will continue to track the Division of Air Pollution Control's reorganization in the following areas:
 - ① **Permitting** - The subcommittee encourages any changes to improve communication between DO/LAA and Central Office to get permits issued efficiently.
Permitting Goal - The subcommittee supports additional changes to the organization or allocation of resources to either issue the permit or issue a proposal to deny the permit within 180 days after the date of the application is determined complete, starting January 1, 2002.
After six months the subcommittee will meet to evaluate the effectiveness of the new organization, recognize successes, and identify possible solutions to any problems identified.

MOVING FORWARD

At the December 4, 2001 Committee meeting all of the subcommittees presented their final recommendations for the Committee's approval. The Committee accepted these recommendations and with the finalization of this report, this phase of the Committee process will be completed. To ensure that, where appropriate, subcommittee recommendations are implemented, the Committee will establish a schedule for 2002 whereby the Committee will meet at least quarterly to discuss the progress and/or limitations with implementing these recommendations. If at anytime during the planned discussions in 2002 and beyond, any participant organization believes that one or more of the recommendations cannot be implemented, the issue and the reasons for this belief will be discussed with the Committee with all efforts to achieve resolution.

INTRODUCTION

Historically, industry and the Ohio EPA have discussed the efficiency of the air permitting efforts and the changes made in the process on an ad hoc basis. In early 2001, several industry groups¹ and the Ohio Environmental Protection Agency (Ohio EPA) agreed that a joint committee should be formed to have a comprehensive discussion on improving the efficiency and effectiveness of the air permitting process in Ohio.

Initial planning for the committee by Ohio EPA and the Ohio Manufacturers' Association (OMA) identified three goals that the committee would use to guide its discussions. These included:

1. Build upon the existing relationships between Ohio EPA and industry;
2. Have industry understand the changes that the Division of Air Pollution Control (DAPC) is undertaking to improve overall operations and permit issuance timeliness; and
3. Have Ohio EPA understand the changes that industry wants DAPC to make to improve the permitting process.
4. Include other individuals, groups, and organizations on the Committee.

The committee concept was further strengthened by the clear commitment from Ohio EPA Director Christopher Jones and industry leaders to this process. Both the agency and industry leaders strongly supported the committee as a way to work cooperatively and make important changes to the air permitting system. Agency and industry leaders also recognized that improvements in permitting efficiency would help Ohio's regulated community be more competitive in national and global markets, as well as strengthen overall environmental protection in Ohio.

With this solid foundation, the Permit Process Efficiency Committee (PPEC or Committee) was formed. This report provides a brief description of the process that the Committee developed, and more importantly, the recommendations that the Committee developed to improve the efficiency and effectiveness of the permitting process. The report also describes when and how these recommendations will be implemented and measured to ensure that improvements are being made and maintained.

One final issue to address is that throughout this report, the name of the "Committee" or "PPEC" is used. This reflects a recent change in the name from the Industry/Ohio EPA Joint Permit Improvement Group. This name may be seen in the subcommittee reports and is synonymous with the PPEC.

¹ Ohio Chamber of Commerce, Ohio Chemistry and Technology Council, Ohio Manufacturers' Association, Ohio Petroleum Council, and later in the process the National Federation of Independent Business - Ohio Chapter.

COMMITTEE DYNAMICS AND ORGANIZATION

The first meeting of the Committee was held on July 10, 2001. Additional meetings were held roughly on a monthly basis. Initial meetings were dedicated to reviewing the goals of the Committee, selecting Committee leadership, developing the ground rules for Committee operations, and discussing the “mission” of the Committee. Subsequent meetings were dedicated to understanding permitting issues and developing air permit process efficiency improvements.

COMMITTEE LEADERSHIP AND OPERATIONS

Ohio EPA Director Christopher Jones (Al Franks, Chief Strategic Management, was chosen to represent Director Jones if he was unable to attend) and OMA President, Eric Burkland were initially selected as co-Committee leaders. At the July 23, 2001, meeting, Mr. Burkland nominated Joe Secrest from Ashland, Inc. to replace him as co-Committee leader; Mr. Secrest accepted this nomination and Committee members agreed with this change in leadership.

With Committee leadership established, Dee Hammel from the Ohio Department of Natural Resources (ODNR) worked as the Committee’s volunteer facilitator to ensure that the Committee got off to a productive start. Dee specifically helped the Committee develop ground rules and define how Committee decisions would be made to ensure smooth operation. This allowed Committee members to focus on the goals of the Committee.

The Committee also agreed that decisions would be made by consensus. Consensus did not mean 100% agreement. However, it did mean 100% support. In sentence form, consensus meant that “I understand your point of view and you understand mine, and I may not prefer this option, but I will support this idea and work to accomplish its implementation because it was reached fairly and openly.”

One final “housekeeping” decision by the Committee was to establish an end date of December 31, 2001. The Committee believed that selecting a date to complete its work would provide the incentive needed for continued progress. This was in response to a clear message from Committee members¹ that this Committee needed to be a Committee of action and that these actions needed to be readied and implemented quickly.

COMMITTEE MISSION STATEMENT

The Committee decided in its first meetings that it needed to develop a “mission statement.” Committee members thought it important to identify a clear mission - one that embodied the spirit of the goals, as well as clearly defined the intent of the Committee. After extensive discussions, the Committee agreed to the following mission at the August 28, 2001 meeting: *To work cooperatively to identify, develop, and implement efficiency improvements to Ohio EPA’s air permitting process while meeting regulatory requirements.*

¹ Appendix A contains a list of Committee participants.

COMMITTEE DISCUSSION OF PERMITTING AND INDUSTRY ISSUES

To clearly understand permitting issues, the Committee heard from both Ohio EPA and industry representatives about the current permitting process and where changes are or should be made. Below is a summary of these discussions.

OHIO EPA PERMITTING EFFICIENCY REPORT SUMMARY

Prior to the formation of the Committee, the Ohio EPA completed two separate reports on permitting efficiency. Both reports contained recommendations for improvements. These recommendations (and in many cases, how they are being implemented) were discussed. There is also a large internal effort to improve the STARS/STARSHIP computer system. Prior to developing new computer systems, DAPC tasked six internal process teams to make recommendations/changes to the permit system. This will ensure that these changes are incorporated in to the new computer system. The outcomes of these teams will also impact overall DAPC and permitting efficiency. Below is an overview of the recommendations outlined in these reports.

KEY POINTS/RECOMMENDATIONS:

1. Division Reorganization - a comprehensive look at DAPC staff and functions.
2. Hire and replace additional staff promptly for permitting reviews.
3. Hire additional primary permit coordinator in DAPC Engineering Section.
4. Conduct in-house training for permit writers on permit construction and review.
5. Develop a PTI permit backlog contingency plan for Local Air Agencies.
6. Enhance Internet/electronic access for PTI tracking.
7. Review resource and organizational allocation within the permit program.
8. Develop additional technical guidance documents to assist staff and industry with permitting.
9. Investigate ways to reduce permit review workload.
10. Investigate the internal permit process and develop more efficient ways of processing permits.

INDUSTRY PERMITTING PRIORITIES

After hearing the Agency's current efforts, the industrial members reported to the Committee on where they felt this Committee should direct its efforts to improve overall permitting efficiency. Below is a list of the four main areas that were identified by the group:

1. Establish refined air permit issuance goals and metrics and on-going tracking and reporting.
2. Develop or enhance "workload reduction" tools to focus Ohio EPA resources on permits with significant environmental issues.
3. Developing internal/external training that involves industry participation and improves Ohio EPA permit review efficiency.
4. Educate industry about the current or additional DAPC reorganization efforts and monitor the effectiveness of the changes.

OVERVIEW OF SUBCOMMITTEES AND RECOMMENDATIONS

Following these discussions, the Committee decided that four subcommittees would be formed and charged with developing recommendations. Based on interests, Committee members volunteered to participate on these subcommittees. Subcommittees included members from the business community and Ohio EPA.

Each subcommittee selected leaders and established work plans. Appendices B through E represent the detailed final recommendations of each subcommittee. Below is a summary of the recommendations that were developed and accepted by the Committee at the December 4, 2001 meeting. One important point to note is that, where appropriate, and at the direction of the Committee co-leaders, each recommendation also carries with it a discussion on how it should be implemented, as well as a suggested measurement method. This attention to not only the development of recommendations, but how they will be implemented is consistent with the focus of the Committee and its co-leaders on making positive improvements to the permitting system.

PERMIT ISSUANCE GOALS AND METRICS SUBCOMMITTEE

PURPOSE

This subcommittee was tasked with developing goals and metrics for the issuance of the many types of permits that Ohio EPA issues.

RECOMMENDATIONS/OUTCOMES

The subcommittee worked with DAPC to develop the following recommendations:

1. Effective October 14, 2001, Ohio EPA will conduct a completeness review, and notify applicants in writing of the determination, within 14 days of receipt of all permit to install applications.
2. The Ohio EPA will review and either issue the permit or issue a proposal to deny the permit within 180 days after the date of the application is determined complete, starting January 1, 2002.
3. The Ohio EPA will collect information on the above recommendations and make this information available monthly via the agency web site (<http://www.epa.state.oh.us>).
4. The Ohio EPA will develop the capability that will enable the Ohio EPA to track PTI processing time by source category.

WORKLOAD REDUCTION SUBCOMMITTEE

PURPOSE

The Workload Reduction Subcommittee (WRS) reviewed and discussed various options to reduce the permitting workload at Ohio EPA.

RECOMMENDATIONS/OUTCOMES

It was quickly identified that one direct way to improve overall agency air permitting efficiency is to decrease the number of permit applications needing action. As such, this workgroup researched the options and developed the following recommendations:

1. Work with USEPA to develop a new emissions based PTI exemption threshold while taking into consideration the environmental impact.
2. Identify areas where an expanded use of permits-by-rule (PBR) would be effective and work with appropriate stakeholders to develop PBR language.
3. Identify where the use of a general permit within DAPC would be effective and develop general permit language for appropriate types of permit categories.
4. Develop, in consultation with USEPA, a permitting process that would allow flexible permitting through the use of a facility-wide emissions cap permit system.

INDUSTRY ROLE IN DEVELOPING INTERNAL/EXTERNAL TRAINING SUBCOMMITTEE

PURPOSE

This subcommittee identified and worked on the following projects: 1) integrate businesses/industry perspectives into internal Ohio New Source Review (NSR) basic and advanced training and, 2) develop and hold both basic and advanced NSR training for business/industry.

RECOMMENDATIONS/OUTCOMES

1. **INTERNAL EPA TRAINING - BASIC NSR CLASS** - Course content has been developed which includes a segment on industry issues and perspectives. Industry speakers have been identified to participate in the industry segment of the training. Training will be scheduled and conducted by Ohio EPA during the first quarter of 2002. Ohio EPA will contact Susan Montgomery, Ohio Chamber of Commerce, to notify and schedule industry speakers. The metric for this goal will be the number of permit-writers trained initially and the percent of new permit writers trained within the first six months on the job. DAPC will maintain records of employees who have completed this internal Basic NSR training class.
2. **INTERNAL EPA TRAINING - ADVANCED NSR CLASS** - The Ohio EPA will develop and begin presenting an Advanced NSR Class by Spring 2003. At this time, industry representatives will be invited to review and contribute ideas to the course content and to develop an industry segment as in the Basic NSR Class. The metric for this goal will be the number of permit writers trained and that the course be offered once a year. DAPC will maintain records of employees who have completed this internal Advanced EPA training.
3. **EXTERNAL TRAINING – BASIC NSR CLASS** – By October 2002, the subcommittee will develop the Basic NSR Class for industry designed to reduce the errors that applicants make in simple NSR permit applications. The Committee will be responsible for developing the content, determining the target audiences and the methods of delivery (e.g. video tapes, audio cassette, Internet downloads, classroom, printed material) and pursuing grant funding through the Ohio Air Quality Development Authority to help defray development and distribution costs. The Ohio EPA will assist in the development and will have final sign off on the final training program. The metric for this goal will be the percent of applications determined to be complete during the 14 day completeness review. DAPC will maintain the records. (The aim is to fulfill obligations put in place in 1993 in Ohio Revised Code 3704.038©.)

4. **EXTERNAL TRAINING - ADVANCED NSR CLASS** - This was discussed as a potential future need, but no goals have been established.

DIVISION OF AIR POLLUTION CONTROL REORGANIZATION SUBCOMMITTEE

PURPOSE

The Committee formed the Reorganization subcommittee to examine the current structure of DAPC, and ensure that the structure of DAPC supports the permit processing improvements which were being developed by the other workgroups. The workgroup was aware that DAPC was currently examining its organization and the workgroup chose to review the work already underway by DAPC, rather than repeat DAPC's effort.

RECOMMENDATIONS/OUTCOMES

1. The subcommittee supports the DAPC Central Office reorganization as presented to the subcommittee. Final reorganization will be presented to the Committee.
2. The subcommittee will continue to track the reorganization in the following areas:
 - A. **PERMITTING** - The workgroup encourages any changes to improve communication between DO/LAA and Central Office to get permits issued efficiently.

MEASURE – Conduct an industry survey after reorganization. DAPC will track the number of permit recommendations returned to DO/LAA by Central Office.
 - B. **PERMITTING GOAL** - The subcommittee supports additional changes to the organization or allocation of resources to either issue the permit or issue a proposal to deny the permit within 180 days after the date of the application is determined complete, starting January 1, 2002.

MEASURE - Subcommittee will meet six months after implementation of the reorganization to review monthly PTI permit processing statistics and meet quarterly thereafter.
3. After six months the subcommittee will meet to evaluate the effectiveness of the new organization, recognize successes, and identify possible solutions to any problems identified.

IMPLEMENTATION PLAN - MOVING FORWARD IN 2002

At the December 4, 2001 Committee meeting all of the subcommittees discussed their final recommendations for the Committee's approval. The Committee accepted these recommendations and with the finalization of this report, this phase of the Committee process will be completed. To ensure that the appropriate subcommittee recommendations are implemented, the Committee will establish a schedule for 2002 whereby the Committee will meet at least quarterly to discuss the progress and/or limitations with implementing these recommendations.

With the exception of the Workload Reduction subcommittee, the other three subcommittees will remain intact and continue to meet on a regular basis and focus on implementing their respective recommendations. Because of the size and complexity of the recommendations from the Workload Reduction subcommittee, four separate subcommittees will be formed to develop implementation plans and move forward.

All of these subcommittees will report to and gain concurrence from the larger Committee at the quarterly meetings. Appendix F is a graphical representation of how Ohio EPA and the major and affiliated trade associations will interact to implement the Committee's recommendations. Through this process, the Committee will be able to include many organizations, companies and associations that were not directly involved in developing the recommendations. Overall the Committee believes this structure will allow for maximum participation by all interested parties.

APPENDIX A

Industry / Ohio EPA Permit Processing Efficiency Committee

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APPENDIX B

Ohio EPA Division of Air Pollution Control

PERMIT TO INSTALL PROCESSING GOALS

GOALS

Effective October 1, 2001, Ohio EPA will conduct a completeness review, within 14 days, of all PTI applications received after this date. For each application, Ohio EPA will send a letter that either acknowledges that the application is complete or identifies the deficiencies along with the application. If after 14 days, Ohio EPA has not determined the completeness of the application and notified the applicant, that application will be considered complete for purpose of tracking processing time to completion of the permit review. The 180 day permit processing time will not start until an application has been determined to be complete. Ohio EPA will continue to place a higher priority on PTI applications that have not commenced construction on the source.

Ohio EPA will review and either issue or propose to deny within 180 days after the date that the application for the permit or modification was determined to be complete per OAC rule 3745-31-09, all PTIs received after January 1, 2002. Once this goal has been achieved, Ohio EPA will develop additional guidelines for reviewing PTIs that consider: the needs of the applicants, the citizens where the sources are built, the air quality impacts of the sources, the public notice provisions of Ohio law, and, consistent with the other priorities of the DAPC, such as issuance of Title V permits, state permits to operate, and air quality monitoring activities.

METRICS

The Ohio EPA shall maintain information on the date of receipt and date the completeness review was performed and whether the application was returned. The data on completeness reviews shall be produced on a monthly basis, identify the percentage of completeness reviews finished within 14 days, by field office. This summary information will be available within 15 days after the end of the month.

The Ohio EPA shall maintain information on the review time for PTIs. The information shall include the amount of time for a final permit to be issued from the date a completeness determination is made. Permits shall be distinguished between permits that are issued as draft and permits that are issued as direct finals. The reports shall also be available by district office and local air agency. This summary information will be available within 15 days after the end of the month.

Ohio EPA will review this information and determine whether additional measures/resources are necessary to consistently meet the goals identified above.

TRACKING

The DAPC will maintain records on the metrics associated with permit processing. On a monthly basis, DAPC will post the permit processing times on the DAPC web site. The posting shall be completed within 20 days after the end of the month. As part of the STARS rebuild, Ohio EPA will include a capability that will enable Ohio EPA to track PTI processing time by source categories.

APPENDIX C

Final Workload Reduction Subcommittee (WRS) Recommendations (12/04/01)

Recommended Reduction	What is it?	Benefits	Timeline	Comments
New PTI emissions threshold exemption	Increased emissions threshold	<ul style="list-style-type: none"> -Reduces number of permitted EUs -Applies across all industry sectors -Reduces PTIs in system-Reduces application development costs for industry -Allows Ohio EPA to focus on more substantial EUs/complex PTIs 	90 - 120 days for initial study 6 - 16 months for implementation	<ul style="list-style-type: none"> -Provides for widest benefit across industry sectors -May require substantial technical justification to US EPA -10 ton per year maximum w/analysis of lower thresholds
Permits by Rule (PBR)	Regulatory requirements for specific operations w/o written permit		(Varies with type of operation)	
Gasoline Dispensing Facilities (GDF)		<ul style="list-style-type: none"> -Takes 150+ PTIs & 3,000 out of system per year and 3000+ PTOs out of system -Frees up Ohio EPA resources for more complex permits 	90 - 180 days to produce package for public comment	<ul style="list-style-type: none"> -Largest single permit reduction in Ohio EPA's system -Substantial savings to petroleum industry
Process equipment vented inside w/dust collector		<ul style="list-style-type: none"> -Takes 30 permits out of system -Corrects potential non-compliance EUs -Takes PTOs out of system 	180 - 240 days to produce package for public comment	Indoor air quality legal/technical issues could complicate this exemption
Liquid storage tanks		<ul style="list-style-type: none"> -Takes 50 permits out of system -Takes 100's of PTOs out of system 	90 - 270 days to produce package for public comment (depends on Ohio EPA negotiations)	Need to negotiate thresholds/technical justification with Ohio EPA
General Permits	Boilerplate streamlined permit for specific operations	<ul style="list-style-type: none"> -Guaranteed permit processing time -Construction/business planning easier -Consistency in statewide regulation 	Minimum 18 months to establish general permit system (rulemaking)	<ul style="list-style-type: none"> -Requires new system for Ohio EPA to implement (e.g. stormwater permits) -More legal issues at outset -Vocal Ohio EPA support
Drycleaning operations		<ul style="list-style-type: none"> -Streamlining 80 PTIs per year -Reduces processing time -Takes 100's of PTOs out of system 	180 days after general permit system (rules) in place	Need to consult industry association
Industrial painting		<ul style="list-style-type: none"> -Streamlining 100 PTIs per year -Reduces processing time -Takes 100's of PTOs out of system 	6 - 12 months after general permit system (rules) in place	<ul style="list-style-type: none"> -Multi-sector benefits -Need to focus scope based on industry input
Emissions Caps (Implementation Group and Concept Paper)	Regulates all emissions with a facility-wide emissions cap	<ul style="list-style-type: none"> -Reduces the number of PTIs -Substantially increase operating flexibility -Reduces operational/manufacturing costs -Increases certainty in business planning 	2 - 4 years	<ul style="list-style-type: none"> -MOU, or similar cooperative agreement, needed between USEPA, OEPA and Industry -Widespread industry support -Requires legislation -Most difficult with highest development costs
Memorandum Of Understanding between Industry and OEPA	Signed document	Clarify and document expectations	Prior to implementation (i.e. commitment of resources) of any WRC recommendations	-in addition to MOU, or other similar agreement, between USEPA, OEPA and Industry on Emissions Cap program

WORKLOAD REDUCTION SUBCOMMITTEE

RECOMMENDATION FOR FURTHER STUDY OF A FACILITY-WIDE EMISSIONS CAP PERMIT PROGRAM IN OHIO

INTRODUCTION

The Workload Reduction Subcommittee (WRS), a part of the Joint Industry/Ohio EPA Permit Improvement Steering Committee, has discussed various options to reduce the permitting workload at Ohio EPA. One of the options recommended for further consideration is the development and implementation of a facility-wide emissions cap permit program in Ohio.

This type of permit would list and describe all emission units at the facility, list any emission limits and other regulatory requirements for each emission unit, and describe the facility-wide emission limits by air pollutant. Most importantly, this permitting option would allow most equipment changes be made without triggering the need for a new permit as long as a facility could maintain emissions below the permitted emissions caps. This option of using emissions caps has already been successfully employed to some degree in several other states on a case-by-case basis. Through various proposed changes to federal air permit regulations, U.S. EPA has endorsed the use of emission caps in state air programs.

The WRS concluded that a considerable level of effort would be required to develop and implement an emissions cap program in Ohio. Preliminary analysis indicates that the development and implementation of this type of program may require revisions to current Ohio air pollution control laws (under ORC 3704) as well as federal approval as a revision to the State Implementation Plan (SIP). It is anticipated by the WRS that the entire effort to develop and implement a program would take in the range of two to four years once work begins, and would require hundreds or thousands of hours of time on behalf of both industry and Ohio EPA staff.

RECOMMENDATIONS

The WRS generally supports the concept of facility-wide emission caps for use in Ohio, but believes that this issue demands more research and work by a separate, more focused group of interested parties prior to committing relatively large resources to develop and implement a program. The WRS therefore recommends that an Emissions Cap Implementation Group be formed to lead this effort under the on-going oversight of the Joint Industry/Ohio EPA Permit Improvement Steering Committee.

EMISSIONS CAP IMPLEMENTATION GROUP

The review and analyses of the WRS included soliciting input from numerous facilities and trade groups in Ohio. Interest was variable and widespread among those entities contacted. Based upon this finding, the WRS recommends the Emissions Cap Implementation Group include representatives from the chemical and petrochemical industries, the automotive industry, other industries or specific companies, attorneys or consultants expressing an interest to contribute, and the Ohio EPA. The WRS believes that for successful implementation of the program, each representative will need to make significant commitments of time and may incur expenses to meet the implementation group's objectives.

The WRS concluded the implementation group's efforts should be multi-phased. The goal of the first phase would be to develop a concept paper for use by the Director of Ohio EPA during preliminary discussions with the U.S. EPA Region V administrator. The concept paper could include a proposed Memorandum of Understanding (MOU) between U.S. EPA, Ohio EPA, and industry outlining the key components of a mutually acceptable emissions cap permit program in Ohio, and would, at a minimum, include the items listed below. If agreement on a MOU is not feasible within a short time frame, Ohio EPA and industry would try to reach another type of cooperative agreement with Region V.

PROPOSED SCOPE OF CONCEPT PAPER

1. Identify which emission cap concepts should be included in Ohio EPA's program, including whether the program would be used for minor facilities, major facilities, or both, and whether to include a percent reduction on emissions per year or per permit term.
2. Identify conceptually how facilities would switch between the existing emission unit-specific permit program and a new emissions cap permit program.
3. Identify conceptually how the new program would be used for projects that are accompanied by emission increases.
4. Identify conceptually the issues that participating facilities may have in demonstrating compliance with federal, state, and local regulations while being allowed to make equipment modifications or installations (e.g., determining the impact on ambient air quality).
5. Identify the key issues that Ohio EPA and industry have regarding industry's need for operational flexibility under a successful emissions cap permit program.
6. Identify roadblocks or other potential conflicts that U.S. EPA Region V may have in approving this type of permit program in Ohio as a SIP revision.
7. Identify Ohio EPA regulatory and organizational changes that may need to be made in order to implement this type of permit program.
8. Review emissions cap permit programs in other states or promoted by the U.S. EPA that are similar to this proposal (e.g. PALs).
9. Develop a Phase 2 implementation task list, deliverable list, and implementation schedule.
10. Summarize any changes to laws and rules that may be required to implement an emissions cap permit program in Ohio.
11. Consider developing a MOU or some other type of cooperative agreement with U.S. EPA Region V.

RECOMMENDED SCHEDULE

The WRS recommends that Phase 1 be completed within 120 days of formation of the Emissions Cap Implementation Group and include a draft concept paper for review and comment by the Joint Industry/Ohio EPA Permit Improvement Steering Committee. Once comments are received, a final concept paper will be provided to the Director of Ohio EPA for use in discussing the proposed emissions cap permit program with U.S. EPA Region V. The WRS feels that the Ohio EPA should discuss the proposed emissions cap permit program with U.S. EPA Region V early in the process in order to identify issues that need to be addressed and to assess whether the U.S. EPA would approve such a program in Ohio.

The WRS recommends that Phase 2 implement the task list developed during Phase 1, which could take a period of two to four years. However, the WRS recognizes that due to the complexity of the project, Phase 2 could be further split into multiple phases depending on the conclusions of Phase 1.

The WRS feels that the Ohio EPA should discuss the proposed emissions cap permit program with U.S. EPA Region V early in the process in order to identify issues that need to be addressed and to assess whether the U.S. EPA would approve such a program in Ohio.

Workload Reduction Subcommittee Top 10 Priorities Weighting Factors (9/12/01)

<u>Item</u>	<u>Total Score</u>	<u>Short Term Goals (<18 months to implement)</u>	<u>Long Term Goal (>18 months to implement)</u>	<u>Relative "Degree of" Difficulty</u>	<u>Comments</u>
Exemption-New PTI Emissions Thresholds	77	Short		Moderate	Relative level of effort for justification is projected as high, important across industry sectors
PBR-Gasoline Dispensing Operations	55	Short		Easy	Important to Ohio retail petroleum marketers
PBR-Indoor PM Equipment w/ Baghouse	37	Short		Moderate	Level of justification is a function of exemption scope
PBR-Liquid Storage Tanks	36	Short		Moderate	Difficulty level is a function of the scope of the exemption
PBR-Paved and Unpaved	32	Short		Moderate	Questionable level of significant benefit for workload reduction, maybe important across industrial sectors
PBR-Storage Silos w/pneumatic conveying w/ baghouse	28	Short		Easy	May want to pursue as categorical exemption
PBR-Drycleaners	24	Short		Easy	Relatively large number of facilities across industrial sectors covered
PBR-Material Storage	17	Short		Easy	
PBR-concrete Plant	10	Short		Moderate	Questionable level of significant benefit for workload reduction, maybe important to cement/aggregates industry
Exemption- Acid Storage Tanks	8	Short		Easy	
Exemption-Small Radionuclide Emissions	5	Short		Moderate	Questionable level of significant benefit for workload reduction
Exemption- Internal Combustion engines	4	Short		Moderate	Needs to be defined better
Exemption-Oil/Water Separators	3	Short		Easy	
PBR-Autobody Shops	2	Short		Easy	Questionable level of significant benefit for workload reduction
Exemption-Acid Storage Tanks	2	Short		Easy	
PBR-portable rock crushers	1	Short		Moderate	Questionable level of significant benefit for workload reduction, maybe important to aggregates industry
Exemption-Blow Molding Operations	1	Short		Difficult	Probably require a lot of technical data being developed to justify
Natural Minor Emissions Caps	33		Long	Difficult	May require legislation; easiest of emission cap options
GP-Industrial Painting Operations	32		Long	Difficult	Process as GP or PBR; Will require administrative rulemaking in addition to general permit development
All Facilities Emissions Caps	30		Long	Very Difficult	May require legislation; difficult technically and legislatively
GP- Maintenance Paint Booth	27		Long	Moderate	Questionable level of significant benefit for workload reduction
GP- Gasoline Dispensing Operations	26		Long	Easy	Will require administrative rulemaking in addition to general permit development
GP-Liquid Storage Tanks	14		Long	Moderate	Will require administrative rulemaking in addition to general permit development
GP-Soil Screening Plants	13		Long	Moderate	Will require administrative rulemaking in addition to general permit development
Major/Synthetic Minor Emissions caps	11		Long	Very Difficult	May require legislation, will require USEPA approval possible on a case-by-case basis and substantial technical justification for rulemaking
GP-Gas/#2 oil boilers	10		Long	Moderate	Will require administrative rulemaking in addition to general permit development
GP-Drycleaners	8		Long	Easy	Will require administrative rulemaking in addition to general permit development
GP-Paved and Unpaved	6		Long	Moderate	Questionable level of significant benefit for workload reduction
GP-storage silos w/pneumatic conveying w/baghouse	6		Long	Easy	Will require administrative rulemaking in addition to general permit development
GP-gasoline/diesel loading racks	5		Long	Moderate	Will require administrative rulemaking in addition to general permit development; important to petroleum industry
GP-Humane Society	3		Long	Moderate	Will require administrative rulemaking in addition to general permit development, questionable level of workload reduction

Score- Highest points have highest priority

<u>Item</u>	<u>A</u>	<u>B</u>	<u>C</u>	<u>D</u>	<u>E</u>	<u>F</u>	<u>G</u>	<u>H</u>	<u>I</u>	<u>J</u>	<u>K</u>	<u>Total Score</u>
Exemption-New PTI Emissions Thresholds	10		9	10	3	10	7		10	8	10	77
PBR-Gasoline Dispensing Operations	9	2			10			9	8		7	45
PBR-Indoor PM Equipment w/ Baghouse	7	8		7						6	9	37
Natural Minor Emissions Caps		1		9	6		8		9			33
PBR-Liquid Storage Tanks	4	4		8	9				1	2	5	33
PBR-Paved and Unpaved	8					9	6			9		32
GP-Industrial Painting Operations	6							6	7	10	3	32
All Facilities Emissions Caps			10	2			10				8	30
PBR-Storage Silos w/pneumatic conveying w/ baghouse	2	10		6	1			2		7		28
GP- Maintenance Paint Booth		7				7		5		4	4	27
GP- Gasoline Dispensing Operaitons					8	8		10				26
PBR-Drycleaners	3						2	7	6		6	24
PBR-Material Storage	5						6	4		5		20
GP-Liquid Storage Tanks				4	7	3						14
GP-Soil Screening Plants		9					4					13
Major/Synthetic Minor Emissions caps				1			9			1		11
PBR-concrete Plant							5		5			10
GP-Gas/#2 oil boilers				5	4						1	10
GP-Drycleaners								8				8
Exemption- Acid Storage Tanks		6									2	8
GP-Paved and Unpaved	1						5					6
GP-storage silos w/pneumatic conveying w/baghouse				3				3				6
Exemption-Small Radionuclide Emissions		5										5
GO-gasoline/diesel loading racks					5							5
Exemption- Internal Combusion engines									4			4
GP-Humane Society		3										3
Exemption-Oil/Water Separators										3		3
PBR-Autobody Shops									2			2
Exemption-Acid StorageTanks					2							2
PBR-portable rock crushers							1					1
Exemption-Blow Molding Operations								1				1

Other "write-in" suggestions provided to consider:

- PBR-aggregate plant
- Exemption-Storage silos w/pneumatic ocrveying & baghouses
- Exemption-Indoor PM equipment w/baghouse (2)
- GP-Maintenance Booth combine with Industrial Painting
- GP-Autobody shops combine w/ industrial painting
- GP-Gas/Diesel loading racks/combine w/ gasoline dispensing
- GP-Indoor PM equipment w/ baghouse

WORKLOAD REDUCTION SUBCOMMITTEE PRIORITIES SELECTION LIST
 (Select and number (i.e. #1, #2, #3, etc.) items with your highest priority)

New Air Permit Exemptions		New Permits By Rule		New General Permits		Emissions Caps	
Priority	Item	Priority	Item	Priority	Item	Priority	Item
	New PTI Emissions Thresholds		Paved and Unpaved roadways/parking areas		<u>Industrial Painting Operations</u>		Natural Minor Facilities
	Paint Burn-Off Ovens		Material Storage Piles		<u>Paved and Unpaved roadways/parking areas</u>		Major /synthetic Minor Facilities
	Rented Equip to buy		Crematoriums		Maintenance Painting Booths		All Facilities
	Acid Storage Tanks		Autobody Shops		Concrete batch Plants		
	Blow Molding Operations		Drycleaners		Grain Elevators		
	Oil-Water Separators		Gasoline Dispensing Operaitons		Landfills		
	Small Radionuclide Sources		Liquid Storage Tanks		Crematoriums		
	Temporary Portable Electric Generators		Internal Combustion Included in 3745-31-03(A)(1)(c)		Autobody Shops		
			Indoor PM equipment w/ baghouse		Drycleaners		
			Non-Emergency Gas Engines		Gasoline Dispensing Operations		
			Portable Rock Crushers		Liquid Storage Tanks		
			Storage Silos w/pneumatic conveying w/ baghouse		Small Sawmill Facilities		
					Humane Society Incinerators		
					Gas/Diesel Fuel Loading Racks		
					Sandblasting bridges/buildings		
					Gas#2 oil boilers		
					Soil Screening Plants		
					Storage Silos w/pneumatic conveying w/ baghouse		

Joint Industry/Ohio EPA Permit Improvement Steering Committee

***Recommendations to
Joint Industry/Ohio EPA
Permit Improvement
Steering Committee***

**Workload Reduction Subcommittee
(WRS)
December 4, 2001**

WORKLOAD REDUCTION SUBCOMMITTEE RECOMMENDATIONS

New PTI Emissions Threshold Exemption (not 'de minimis')
Additional Permits by Rule [OAC 3745-31-03 (A)(4)]

- gasoline dispensing
- process equipment vented inside with dust collector
- liquid storage tanks (beyond existing exemptions)

General Permits (new rule, existing law)

- dry-cleaning operations
- industrial painting

Facility-Wide Emission Caps

- longer term, no existing law/regulatory structure

OEPA/Industry MOU - get 'commitment', support

WRS RECOMMENDATION: Facility-Wide Emission Caps

Facility-Wide Emission Cap Concept

➤ New air permitting option

- list and describe all emission units
- describe facility-wide emission limits by pollutant
- allow equipment changes without PTI, remain within caps, comply

➤ EPA-endorsed concept, successful in MN (Region V), NY, AZ

➤ Reg. V/OEPA/Industry MOU or other cooperative agreement

➤ Emission Cap Implementation Group (trades, law, consultants)

- Phase 1: Concept Paper in 4 months, cap types to consider, changes to allow, issues with rule compliance, other states, tasks and schedule
- decision whether to proceed
- Phase 2: Implementation in 2 to 4 years
- possible dual track: synthetic minors vs. majors

IMPLEMENTATION PROCESS

FUTURE PLANS

- **Develop estimated overall time for each project**
- **All considerable amount of effort**
- **Need steering committee review**
- **Need Ohio EPA prioritization**
- **Develop rough implementation plan**
- **New project groups must be formed**

**Ohio EPA
Division of Air Pollution Control**

Task Listing for the Raise Exemption Threshold Project

Est. Task Effort ¹	Task Description ²
Short	Analyze current Chapter 31 to determine if it needs to be reorganized to allow for all future rules changes (permit-by-rule, general permits, threshold exemptions, etc.).
Short	Review current fee statute. Will we need to change the statute to allow for increased fees in non newly exempt areas?
Short	Continue to research and review exemption “thresholds” that other states employ and that U.S. EPA has approved. Decide on a proposed new threshold limit for Ohio.
Short	Discuss this potential limit with U.S. EPA and ask for guidance and information on what would be needed to justify this limit to U.S. EPA.
Short	Based on feedback from U.S. EPA, reset the proposed threshold limit for Ohio.
Medium	Obtain permit information and the number and type of emissions units that would be impacted in Ohio by this new exemption. Determine the types and sizes of each emissions unit that would be affected by the new exemption. Determine how many emissions units would be newly exempt for each type and size of emissions unit. Determine what percent of emissions units per category obtain permits. Determine what percent of permitted and non permitted emissions units comply with any associated rules.
Short	Based on the number of impacted emissions units, determine the amount of emissions increase/decrease that would be associated with the new exemption.
Short	Complete a review of how this new exemption would impact fees. If the fees collected are reduced, then determine sources of “make-up” funding.
Short	Complete a review of how the new exemption will affect any other agency processes including permit review processes and the needs of other divisions.
Short	Get feedback from U.S. EPA on the acceptability of this new limit.
Short	Reevaluate exemption level based on U.S. EPA comments.
Short	If the new exemption results in significantly increased state-wide emissions, determine if additional control/regulation is required from other air pollution sources (typically by asking U.S. EPA).
Medium	Draft language for the Rule. Draft language for any additional rules for additional make-up emissions.
Short	Draft rule support package (Emissions Inventory Information, units impacted, etc.).
Short	Evaluate what other rule changes would be needed.
Long	Process rule package (Send out rule package for interested party review, revise, public hearing, JCARR review, etc.).

¹ The Estimated Effort column is intended to give the reader a sense for how much work is involved to get each task done. These are very rough estimates and represent only the amount of labor involved. Short means zero to 159 labor-hours, medium means 160 to 279 labor-hours and Long means 280 to 400 labor hours. Please also note that no attempt has been made to determine a work schedule because priorities have not been developed for all projects desired by the workgroup.

² Although some effort was made to put the tasks in sequential order, they do not necessarily need to be done sequentially. Further effort will be needed to properly define dependent tasks in order to determine sequential order.

Task Listing for the Permit-by-Rule Expansion Project

Est. Task Effort ¹	Task Description ²
Short	Continue to research and review permit-by-rule exemptions and that U.S. EPA has approved. Decide on proposed new permit-by-rule exemptions for Ohio.
Short	Discuss new permit-by-rule exemptions with U.S. EPA and ask for guidance and information on what would be needed to justify new permit-by-rule exemptions to U.S. EPA.
Short	Based on feedback from U.S. EPA, reset the proposed new permit-by-rule exemptions for Ohio.
Medium	Obtain permit information and the number and type of emissions units that would be impacted in Ohio by the new exemptions. Determine the types and sizes of each emissions unit that would be affected by the new exemptions. Determine how many emissions units would be newly exempt for each type and size of emissions unit. Determine what percent of emissions units per category obtain permits. Determine what percent of permitted and non permitted emissions units comply with any associated rules.
Short	Based on the number of impacted emissions units, determine the amount of emissions increase/decrease that would be associated with the new exemptions.
Short	Complete a review of how this new exemptions would impact fees. If the fees collected are reduced, then determine sources of "make-up" funding.
Short	Complete a review of how the new exemptions will affect any other agency processes including permit review processes and the needs of other divisions.
Short	Get feedback from U.S. EPA on the acceptability of new permit-by-rule exemptions.
Short	Reevaluate new permit-by-rule exemptions based on U.S. EPA comments.
Short	If the new permit-by-rule exemptions results in significantly increased state-wide emissions, determine if additional control/regulation is required from other air pollution sources (typically by asking U.S. EPA).
Medium	Draft language for the Rule. Draft language for any additional rules for additional make-up emissions.
Short	Draft rule support package (Emissions Inventory Information, units impacted, etc.).
Short	Evaluate what other rule changes would be needed.
Long	Process rule package (Send out rule package for interested party review, revise, public hearing, JCARR review, etc.).

¹ The Estimated Effort column is intended to give the reader a sense for how much work is involved to get each task done. These are very rough estimates and represent only the amount of labor involved. Short means zero to 159 labor-hours, medium means 160 to 279 labor-hours and Long means 280 to 400 labor hours. Please also note that no attempt has been made to determine a work schedule because priorities have not been developed for all projects desired by the workgroup.

² Although some effort was made to put the tasks in sequential order, they do not necessarily need to be done sequentially. Further effort will be needed to properly define dependent tasks in order to determine sequential order.

Task Listing for the General Permit Project	
Est. Task Effort¹	Task Description²
Short	Examine current statute to see if this is sufficient or if it needs to be modified.
Short	Work to draft an overall outline of the general permit program/process. Use other states, Ohio EPA programs, as a template or resource. Outline should describe the process by which applicants apply for the general permit, the Ohio EPA review process to approve the general permit and the process for issuance of an approval or permit.
Short	Review Ohio EPA internal processes to determine if any changes will need to be made to accommodate general permit issuance.
Short	Define universe of potential sources that would be eligible for a general permit - list possible industry sectors.
Short	Review general permit impact on agency fee collection. Determine if new rules are needed to appropriately charge fees. Determine process needed to charge fees and process fees.
Short	Select "test sector" to develop specific rules and have this work concurrently with overall general permit process issues.
Medium	Draft language for the Rule.
Short	Draft rule support package (summary of rule, description of process, etc.).
Long	Process rule package (Send out rule package for interested party review, revise, public hearing, JCARR review, etc.).

¹ The Estimated Effort column is intended to give the reader a sense for how much work is involved to get each task done. These are very rough estimates and represent only the amount of labor involved. Short means zero to 159 labor-hours, medium means 160 to 279 labor-hours and Long means 280 to 400 labor hours. Please also note that no attempt has been made to determine a work schedule because priorities have not been developed for all projects desired by the workgroup.

² Although some effort was made to put the tasks in sequential order, they do not necessarily need to be done sequentially. Further effort will be needed to properly define dependent tasks in order to determine sequential order.

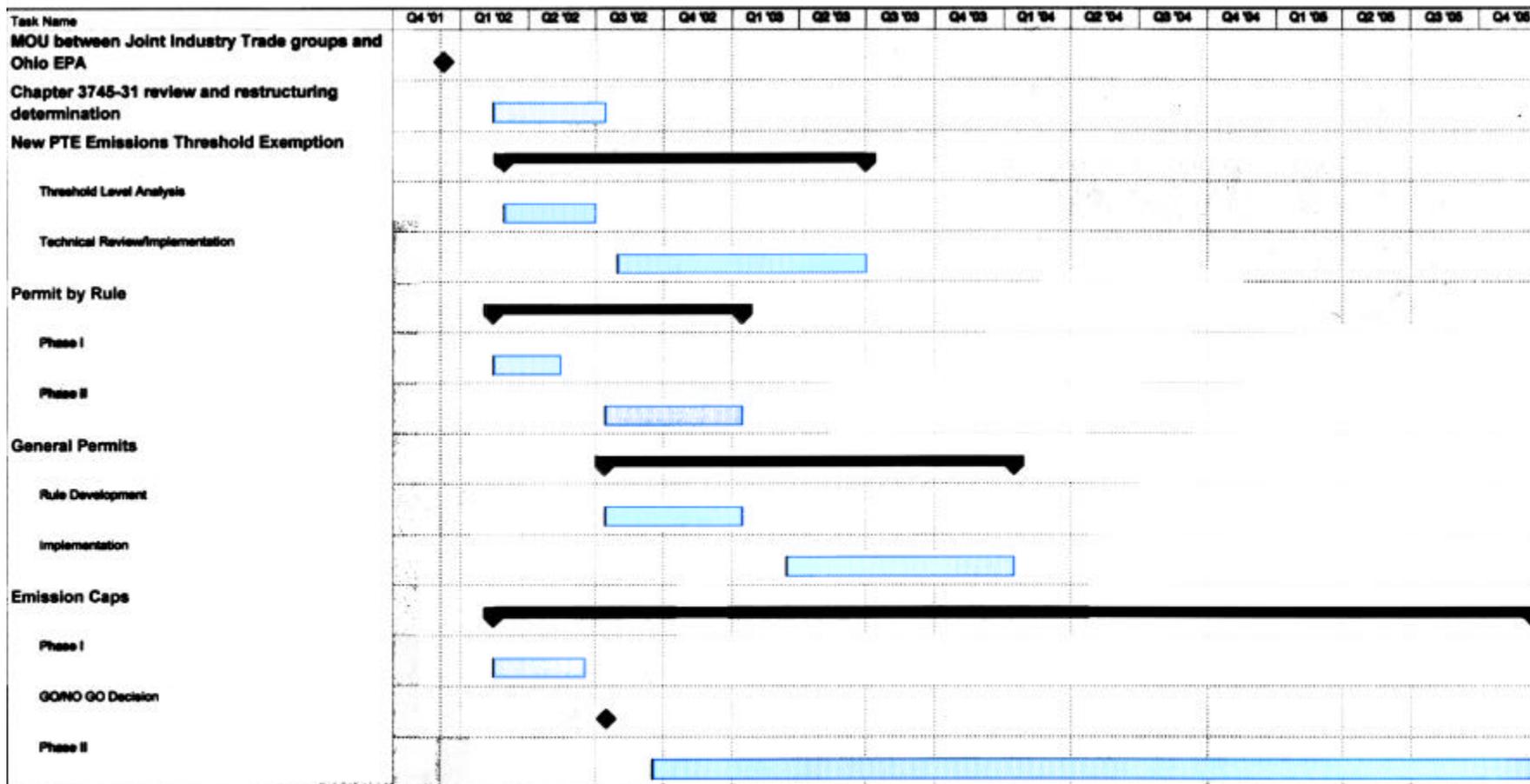
Task Listing for the Emissions Cap Project

Est. Task Effort* (Weeks)	Task Description
Short	Continue to research and review emissions caps programs that other states employ and that U.S. EPA has approved. Decide on a proposed emissions caps program format for Ohio.
Short	Develop a detailed outline and position paper on the proposed emissions caps program and on how it would be integrated into Ohio's existing program.
Short	Schedule and hold a meeting with U.S. EPA Region V to discuss the proposed program and to obtain their support for the program. Discuss this potential limit with U.S. EPA and ask for guidance and information on what would be needed to justify this limit to U.S. EPA.
Medium	Draft proposed law changes and needed legislation.
Medium	Obtain permit information and the number and type of emissions units that would be impacted in Ohio by this new program. Determine the types and sizes of each emissions unit that would be affected. Determine the effect, if any, on the expected emissions from these facilities.
Short	Complete a review of how this new program would impact fees. If the fees collected are reduced, then determine sources of "make-up" funding.
Short	Complete a review of how the new program will affect any other agency processes including permit review processes and the needs of other divisions.
Short	Send out proposed law changes, proposed legislation and supporting information to participants, citizens and other interested parties to gather comments.
Short	Based on feedback from interested parties, revise proposed law changes and legislation.
Medium	Obtain sponsor for legislation. Propose legislation. Monitor and revise legislation as it moves through the legislation process.
Medium	Draft language for the Rule(s).
Short	Draft rule support package (Emissions Inventory Information, units impacted, etc.).
Long	Process rule package (Send out rule package for interested party review, revise, public hearing, JCARR review, etc.).

¹ The Estimated Effort column is intended to give the reader a sense for how much work is involved to get each task done. These are very rough estimates and represent only the amount of labor involved. Short means zero to 159 labor-hours, medium means 160 to 279 labor-hours and Long means 280 to 400 labor hours. Please also note that no attempt has been made to determine a work schedule because priorities have not been developed for all projects desired by the workgroup.

² Although some effort was made to put the tasks in sequential order, they do not necessarily need to be done sequentially. Further effort will be needed to properly define dependent tasks in order to determine sequential order.

**Workload Reduction Subcommittee (WRS)
Recommended Implementation Plan
12/04/01 Draft for Discussion**



Project: WRS Date: 12/04/01	Task	▬	Milestone	◆	*Rolled Up Task	▬	*Rolled Up Progress	▬
	Split	Summary	▬	*Rolled Up Split	External Tasks	▬
	Progress	▬	Project Summary	▬	*Rolled Up Milestone	◆	External Milestone	◆

Note: Starting date and timelines are subject to completed final report and steering group decisions on priorities.

APPENDIX D

OHIO EPA DIVISION OF AIR POLLUTION CONTROL

PERMIT TO INSTALL INTERNAL/EXTERNAL TRAINING WORKGROUP GOALS DECEMBER 4, 2001

- 1. INTERNAL EPA TRAINING - BASIC NSR CLASS** – Course content has been developed which includes a segment on industry issues and perspectives. Industry speakers have been identified to participate in the industry segment of the training. Training will be scheduled and conducted by Ohio EPA during the first quarter of 2002. Ohio EPA will contact Ohio Chamber staff, Susan Montgomery to notify and schedule industry speakers. The metric for this goal will be the number of permit-writers trained initially and the percent of new permit writers trained within the first six months on the job. DAPC will maintain records of employees who have completed this internal Basic NSR training class.
- 2. INTERNAL EPA TRAINING - ADVANCED NSR CLASS** – The Ohio EPA will develop and begin presenting an Advanced NSR Class by Spring 2003. At this time, industry representatives will be invited to review and contribute ideas to the course content and to develop an industry segment as in the Basic NSR Class. The metric for this goal will be the number of permit-writers trained and that the course be offered once a year. DAPC will maintain records of employees who have completed this internal Advanced EPA training.
- 3. EXTERNAL TRAINING - BASIC NSR CLASS** – By October 2002 the Joint Permit Improvement Group will develop the Basic NSR Class for industry designed to reduce the errors that applicants make in simple NSR permit applications. The Group will be responsible for developing the content, determine the target audiences and the methods of delivery (e.g. video tapes, audio cassette, internet downloads, classroom, printed material) and pursue grant funding through the Ohio Air Quality Development Authority to help defray development and distribution costs. The Ohio EPA will assist in the development and will have final sign off on the final training program. The metric for this goal will be the percent of applications determined to be complete during the 14 day completeness review. DAPC will maintain the records. (The aim is to fulfill obligations put in place in 1993 in Ohio Revised Code 3704.038(C).)
- 4. EXTERNAL TRAINING – ADVANCED NSR CLASS** – This was discussed as a potential future need but no goals have been established.

APPENDIX E

REORGANIZATION SUBCOMMITTEE

Members: Jack Pounds, Isaac Robinson, Mike Snyder, Cindy DeWulf, Karen Heyob, Mike Hopkins, Bill Burkhart and Al Franks

OVERVIEW OF WORK

The Joint Permit Improvement Group formed the Reorganization Subcommittee to examine the current structure of DAPC, and ensure that the structure of DAPC supports the permit processing improvements which were being developed by the other subcommittees. The subcommittee was aware that DAPC was currently examining its organization and the subcommittee chose to review the work already underway by DAPC, rather than repeat DAPC's effort.

DAPC launched an organizational efficiency workgroup in May 2000. The project team recognized that DAPC had evolved and had been shaped around individuals' capabilities rather than the logical or equitable distribution of work. New programs had been added to existing sections, and some activities, such as enforcement, have been conducted by multiple sections. The organizational efficiency workgroup was formed to examine the efficiency of the structure of DAPC Central Office, and evaluate whether or not it would be beneficial to modify the current structure.

The Joint Permit Improvement Group's Reorganization Subcommittee reviewed the work conducted by the DAPC organizational efficiency workgroup to date. DAPC staff outlined the proposed changes to DAPC's table of organization. Attachment 1 identifies the current distribution of work in DAPC by Section, and Attachment 2 identifies the draft future structure of DAPC. The DAPC workgroup should finalize its recommendations in February 2002. The recommendations will be forwarded to this subcommittee for review. The Joint Permit Improvement Group's Reorganization Subcommittee agreed to continue to monitor the DAPC reorganization, and review the effect of the reorganization on permitting efficiency.

SUBCOMMITTEE RECOMMENDATIONS

1. The subcommittee supports the DAPC Central Office reorganization as presented to the subcommittee. *final reorganization will be presented to the subcommittee
2. The subcommittee will continue to track the reorganization in the following areas:
 - A. Permitting - The subcommittee encourages any changes to improve communication between DO/LAA and Central Office to get permits issued efficiently.

Measure – Industry survey after reorganization. DAPC will track the number of permit recommendations returned to DO/LAA by Central Office.
 - B. Permitting Goal - The subcommittee supports additional changes to the organization or allocation of resources to make final decisions on 100% of PTI applications within 180 days.

Measure - The subcommittee will meet six months after implementation of the reorganization to revise monthly PTI permit processing statistics and meet quarterly thereafter.
3. After six months the subcommittee will meet to evaluate the effectiveness of the new organization, recognize successes, and identify possible solutions to any problems identified.

APPENDIX F

IMPLEMENTATION PROCESS FOR THE RECOMMENDATIONS OF THE INDUSTRY/OHIO EPA PERMIT PROCESSING EFFICIENCY COMMITTEE

