

US EPA ARCHIVE DOCUMENT

From: DONALD DAHL
To: RTP3.RTMU542.CARRAWAY-CANDACE
Date: 7/15/99 1:25pm
Subject: HQ guidance on public involvement

Hi Candace, the following are our comments on the public outreach material. I will be out of the office until August 2 so if you have any questions please call Ida.

- 1) A successful permit program will have low comment letters because a state will have adequately addressed citizen's concerns. People do not have time these days to write comprehensive letters.
- 2) Citizen petitions that are legitimate are a measure of the program's failure, not a measure of successfully involving citizen's. A well educated citizen will have their concerns addressed prior to permit issuance and avoid the petition process.
- 3) Tracking the number of comment letters will not be viewed important by our states. Additional data gathering and record keeping will slow down permit issuance.
- 4) Our experience with public awareness group shows that this type of training is needed for new source review, not Title V. People are interested in shutting down facilities or not allowing them to construct. People usually do not have the expertise to determine if monitoring is adequate or a SIP requirement is missing. It has taken us several years of working full time to gain this expertise and it is unrealistic to believe my neighbors would be willing to invest the necessary time to gain such knowledge.

CC: GAGNON-IDA