

US EPA ARCHIVE DOCUMENT

**From:** DAVE CAMPBELL  
**To:** RTPMAINHUB:RTPHUB:RTP3.RTMU542(CARRAWAY-CANDACE)  
**Date:** 7/9/99 2:40pm  
**Subject:** need comment on draft national plan for citizen involvement in title V -Reply

Candace-

The following are staff-level comments on the citizen involvement plan. I will seek formal management concurrence upon their return to the office.

We endorse the over-arching goal of the plan to enhance citizen input into the title V permitting process. We believe the plan should emphasize a stronger partnership between citizen, EPA, and the permitting authorities. We believe our initial efforts should be to encourage the permitting authorities to engage the public in the title V process, particularly in those areas where citizens feel disenfranchised by the process.

The permitting authorities have the resources to conduct the type of citizen oriented training envisioned by the plan and the understanding of how their various permitting programs are integrated, as well as, how there administrative procedures processes operate.

Region III has been trying over the last several years to encourage our permitting authorities to take "ownership" of title V permitting. By that we mean we want the states to see the process as less of burden/requirement (and source of revenue) and more of a tool for the effective management of their air resources. And both the regulated community and the general public have a stake in those air resources. We think having EPA taking the leadership role in educating citizen's, particularly in a given permitting authority's jurisdiction undermines our efforts towards this end. Again, we think our initial efforts should be focused on encouraging the permitting authorities to train their citizens. EPA could provide educational materials and some human resources at the training, but not in the lead role.

Depending on future resource levels, Region III would be willing to play a more active role in one or possible two regional training workshops over the next several years. We believe it would be effective in Region III to hold, for example, a training in Philadelphia that could draw citizens from 5 relatively local permitting authorities (PA, Phila., DE, MD, and the District of Columbia and possibly NJ). We think that is a better strategy than holding one per permitting authority. We have not heard a loud outcry from our citizen's regarding access to the title V process. We do, however, understand that silence is not always a good indicator of the true sentiment of the citizenry.

In summary, we think its important to encourage the permitting authorities to focus on citizen access to the title V process. Understanding first hand the amount of resources necessary to hold just a single training workshop for all of our title V permitting authorities, Region III is reluctant to commit to a plan where we would be the principles in a number of training workshops over the next few years.

If you have any questions, please let me know.

David Campbell  
EPA Region III

>>> CANDACE CARRAWAY 06/24/99 10:36am >>>

Please see attached memorandum from Steve Hitte requesting comment on the OAQPS draft plan for strengthening citizen involvement in the title V program (also attached). As we hope to finalize a plan in early August, **we would like your comments by July 15.**

Copies of this message are being sent to title V contact persons in each Region.

**CC:** kathleen, judy