

US EPA ARCHIVE DOCUMENT

**From:** <Coder.George@epamail.epa.gov>  
**To:** RTP3.RTMU542(CARRAWAY-CANDACE)  
**Date:** 6/29/99 2:35pm  
**Subject:** Comments on draft Plan

The draft plan for citizen training in the Title V process looks very good. I do, however, have several concerns.

First, I would like to see some protections against watering down of this process. Reading The Plain English Guide to the Clean Air Act will not prepare a citizen for permit review or for that matter teach him or her very much about CAA. Yet that is one of EPA's past efforts to teach citizens about CAA. This proposed training must produce citizens who can then go on to play an effective role in the process. That means it must be affordable to citizens. It must be held at convenient times and places. And the training itself must be to the point.

Second, after the training there should be some designated person in each of the Regional Offices a citizen can contact for help. When citizens get into the actual work of reviewing permits question will inevitably arise and there should be some to whom they can go to for help.

Third, in the Ohio workshop we had corporate spies who adamantly and deliberately refused to reveal their affiliations. Their names were later found on company documents whose permits were chosen for review. The corporate side bars citizens from their training conferences by charging outrageous fees. That tactic is not available to citizens but clearly some protections should be provided. People affiliated with permit holders should not be permitted in "citizen" training sessions.

Finally, although CAA is almost ten years old this is the first time EPA has considered citizen training. Training for the permit holders has been going on for a decade. Thousands of permits have already been issued. It will be impossible to bring citizens up to speed in one or two years. There should be ongoing funding for citizen training. The training should be available on demand. New citizens will have to be trained as time passes.

As I said the draft plan looks good but I think it could be strengthened for making provisions for the suggestions I have made.

Thank you,

George Coder