

US EPA ARCHIVE DOCUMENT

You have a very noble goal; however, it appears that you expect States to develop a program for public education and encouragement on their opportunities for participation in permit issuance and revision. Your measure of success would be based on how many citizens drank after they were led to water (what if they weren't thirsty?).

After a quick look at title V and part 70, I can find only requirements that States provide adequate public notice and opportunity for public review and public hearing [502(b)(6), 502(b)(8), 503(c), 70.7(h)]. Are there any other provisions that I missed?

I expect that the only thing that will ever make this program work is the citizens getting involved, but what rang my bell is your statement about "complying with part 70 requirements for citizen participation." From what I read, neither title V or part 70 require anything beyond adequate notice and opportunity. They do not require active encouragement or training. Making this some kind of program requirement is fine, but insinuating that it could be a regulatory requirement of part 70, for which we have to have authority from title V, is (in my non-lawyer opinion) not appropriate.

And finally (I am sure you are glad to hear), measuring success according to public action is not fair. Success is holding training sessions or making information available. Failure of the public to get off their duffs is not a measure of how well the State or Region tried.