

US EPA ARCHIVE DOCUMENT

June 24, 1999

MEMORANDUM

SUBJECT: Office of Air Quality Planning and Standards' (OAQPS') Plan for Citizen Involvement

FROM: Steven J. Hitte, Group Leader /s/  
Operating Permits Group (MD-12)

TO: Air Program Manager  
Regions I-X

Sixty-three environmental organizations have requested that the Office of Air and Radiation sponsor a national workshop on citizen participation for the title V program. Prior to that request, OAQPS received a request from citizen groups in Ohio for training on the public participation opportunities under the title V program. These requests caused us to examine whether OAQPS should develop a coordinated national approach to citizen outreach on the title V program. Consequently, OAQPS has drafted a national plan for citizen involvement in the title V program. The draft plan is attached for your review.

The OAQPS believes that if citizens understand the permit program, its objectives, and how to effectively participate in the program, the result will be better programs and better permits. Citizens bring valuable perspectives to permitting issues and the heightened visibility of permitting decisions that are closely followed by the public can improve the permitting process.

From the Regional perspective, the component of the draft plan that mostly directly affects Regional resources is training, which is an activity for which Regions would have a major role. We are interested in learning what might be needed in order to make such training broadly available to citizens and how you could incorporate this into your Regional work plans. The Ohio citizens workshop (held in May 1999) focused primarily on permit review, although some broader implementation issues were also discussed. Judging from the evaluations, the training was very well received. Participants started from the position of not knowing how to use the title V process and left feeling they had enough of the basics to navigate the system, ask some good questions, and provide input on draft permits. Region V is considering repeating the citizen training in the Chicago area. Region V and OPG are working to revise (and streamline) the workshop materials for use by other Regions. The advanced training

proposed in the draft plan would be aimed at citizens who have already engaged in review of draft permits and need more technical information on the major issues involved with permit review and interpretation of program regulations. The OAQPS would have the lead on developing and supporting the advanced training and an appropriate cooperative agreement to support citizen trainings.

The second part of the draft plan is already under way. The OAQPS has begun to redesign its permits website and has obligated funds to have a citizen handbook on title V participation produced. If there are additional ideas on how to improve citizen access to information that they will need in order to effectively review permits and participate in the permit program, please share them with us.

The third component of the draft plan would address the problems that citizens have identified as they have engaged in permit review. Unfortunately, according to citizen reports, some permitting agencies have not developed citizen-friendly procedures for accessing permit information, and in some cases have failed to comply with the mandates of part 70 in their dealings with citizens. For example, citizens complain of (1) public notices of draft permits, which lack critical information; (2) being unable to get permit file information during the public comment period until after they have submitted a FOIA-type request; (3) States being unwilling to create a mailing list; and (4) charges for photocopying that make permit review prohibitively expensive. We would like to know if you have identified similar concerns of citizens in your Regions and what should be done to assure that citizens are afforded the opportunity to provide input and work collaboratively with permitting agencies.

Please send your comments to Candace Carraway of my staff (e-mail at [carraway.candace@epa.gov](mailto:carraway.candace@epa.gov)). As we intend to adopt a plan before the end of the fiscal year, we will need your comments by July 15, 1999. I also plan to discuss this with you at a future APM monthly call. If you have questions about the draft plan, please contact Candace Carraway at (919) 541-3189.

Attachment

cc: Regional Title V Contacts