

US EPA ARCHIVE DOCUMENT

Summary of comments of Mary Carter of Blackburn & Carter  
on the draft plan for citizen involvement in Title V program  
received by phone on 7-29-99

1. Overall, Ms. Carter was very supportive of the draft plan. She believes that EPA should be actively engaged in providing the public information on the title V program. There is no comparable ongoing effort in Texas. She hopes that TNRCC will be involved in an introductory training for Texans. There are many groups in TX, perhaps as many as ten, that would be interested in the introductory training. She would be interested in participating in the advanced training proposed in the draft plan.

2. Ms. Carter believes that it is important to have a resource list of technical people who are available on a limited basis for consultation with individuals who are reviewing permits. For example, retired engineers and others in the private sector may be willing to assist in this way. Trade groups and professional associations may be a source of information on persons with technical experience. There is an Office of Public Interest Counsel (that is connected to TNRCC through the budget process) that comprises attorneys who take on big cases for protestants. However, they do not have funds to hire a separate person to be a technical expert. There is also a need for general mentors who are familiar with the title V process who can keep the public on the right track as they review permits.