1 permit. They're detailed. There are obviously a lot
2 of reports that are involved with the FESOP's because
3 the facility has to show that they are continuing to
4 stay under whatever the limits are.
5 I would equate them to a Title V permit.
6 There are certainly Title V permits that are less
7 complicated than some of the more complicated
8 FESOP's.
9 MR. B. PAUL: I have a question for
10 Michael. John mentioned that he's going to be
11 submitting written comments. I'm sure there will be
12 others who will be submitting written comments.
13 I don't know if you guys have thought
14 through a process for how Task Force members would be
15 able to review those written comments other than
16 going out to the e-docket and searching for them that
17 way. Or will we be provided with a monthly listing
18 of people who have submitted comments so we can try
19 to search them out.
20 I'm just trying to think of a way that
21 will prompt us to find them or receive them or
22 whatever.

1 MR. LING: We've talked a little bit about
2 this. Ultimately these are the kinds of issues a
3 Task Force can decide for itself. But what we have
4 talked about when we addressed this in the past was
5 that we have a contractor on board who is going to be
6 summarizing these written comments. Of course, if
7 you'd like to read the comments themselves, they are
8 on e-docket.
9 I don't recall exactly when the comment
10 period is going to close. But we're going to close
11 the comment period at some period well before the
12 Task Force is expected to produce a report so that
13 the contractor can have a summary available and so
14 you can do your own research. And Ray may have
15 something to add there.
16 MR. VOGEL: The comment period is open
17 right now till March 1st of next year. We can always
18 extend it if necessary.
19 MR. LING: I believe the next question was
20 Keri.
21 MS. POWELL: Mr. Paul, thank you for
22 coming before us and answering questions. It's good

1 to get an opportunity to talk to you about your
2 program. I have a number of questions specific to
3 your testimony. And so I hope the others will bear
4 with me and let me just sort of run through them as
5 quickly as I can.
6 You mentioned that you thought -- I don't
7 know if you said this explicitly in your testimony.
8 But you seemed to be saying that you thought that
9 Ohio had a sufficient permit program in place prior
10 to adoption of the Title V program. Am I
11 understanding your testimony correctly?
12 MR. J. PAUL: Yes, certainly from our
13 view. Obviously I would have access, but I'm not
14 commenting on permits in northwest Ohio or something
15 like that. I'm commenting on the permits in our area
16 and the approach that we took early on to how we
17 wanted to write those permits and how we wanted to
18 use those permits.
19 MS. POWELL: Were the permits in your area
20 different from permits in other parts of the state?
21 MR. J. PAUL: There were parts that were,
22 yes.

1 MS. POWELL: So there's no statewide
2 regulation governing how the permits needed to be
3 structured?
4 MR. J. PAUL: There was. And over the
5 years that was one of the early concerns of Ohio
6 industry -- was the difference in the permit in
7 southwest Ohio and northeast Ohio.
8 So over the time there's been a lot of
9 work at the issue and some engineering guidelines and
10 other things. And there's been a lot of effort at
11 the state level to review permits to make sure that a
12 permit issued in one part of the state was equal to a
13 permit issued in the other part of the state.
14 That's good on that level. It's bad on
15 the level that now you have to make sure that every
16 permit, even if it's a gas station, has to be
17 reviewed at the state level.
18 Once again, there's parts even of that
19 that we thought could be simplified.
20 MS. POWELL: Do gas stations get Title V
21 permits in Ohio?
22 MR. J. PAUL: No.

1 MS. POWELL: Is your testimony that before
2 the Title V program you thought that permits in your
3 region might have been better than permits issued by
4 some other regions in Ohio?
5 MR. J. PAUL: They might have been better
6 on some and they might not been not as good on some
7 others.
8 MS. POWELL: In what ways might permits,
9 prior to the Title V program, have been better in
10 your region than in other regions?
11 MR. J. PAUL: We would make sure that we
12 had all of the testing requirements and that we had
13 the precise limits and just that everything was real
14 clear.
15 MS. POWELL: So other regions might not
16 have been issuing permits that had all the testing
17 requirements and limits.
18 MR. J. PAUL: It's possible. Anything's
19 possible. You can actually ask Bob that question.
20 MS. POWELL: I'll ask him later.
21 MR. HODANBOSI: Just to put some
22 perspective, we have 80,000 emission units in our

1 system. Certainly with that number of sources we
2 have 12 different agencies reviewing permits.
3 One of the challenges that we particularly
4 have in Ohio is the consistency issue and how do we
5 keep permits going, but yet how do make sure that the
6 permits that RAPCA issues are consistent with what is
7 being done in some of our district offices as an
8 example.
9 Overall I think RAPCA's permits were
10 probably of a higher quality than, generally
11 speaking, the others in the state. But yet that
12 wouldn't necessarily mean that the other ones were in
13 some way deficient. They just maybe didn't have
14 quite as much detail that RAPCA put into their
15 permits.
16 But the magnitude, I think, of the point
17 John is trying to make here is that our previous
18 permit system covered a lot of services. We had a
19 permit system in place that covered a lot of
20 services.
21 MS. POWELL: I just want to find out a
22 little bit more about ways in which you think that

1 your prior program did the job that needed to be done
2 and you didn't need the Title V program.
3 For a facility like the Air Force base
4 that you're describing in your comments, about how
5 many permits would that source have had prior to the
6 Title V program?
7 MR. J. PAUL: Well, it would have had at
8 least 33. That's how many significant emission units
9 are out there. And then probably the whole 1,000
10 insignificant emission units may have -- a great
11 number of those may have had permits to install.
12 Permits to install are required in Ohio
13 for virtually everything. We were just starting to
14 put some de minimus things in place. I would say
15 virtually everything was covered.
16 MS. POWELL: Are you saying that of those
17 1,000 insignificant emission units they might of each
18 had their own preconstruction permit?
19 MR. J. PAUL: They might have depending on
20 when they were installed and, you know, the size of
21 some of them. I don't know how many, but I would
22 feel confident that everything significant out there

1 was covered by a permit.

2 MS. POWELL: So now that you have the

3 Title V permit, you have finalized that Title V

4 permit for the Air Force base; is that correct?

5 MR. J. PAUL: Yes.

6 MS. POWELL: Does that one permit cover

7 the information contained in all 1,000+ permits that

8 were subject to that facility?

9 MR. J. PAUL: Yes, it does.

10 MS. POWELL: My next question is I

11 understand the frustration of having a 600-page

12 permit. As an advocate we have trouble even

13 downloading a permit that size onto our computers.

14 Certainly some ways to streamline the

15 permits would, I think, be in everyone's interest.

16 However, I do have some questions about your

17 testimony that the 600-page permit might have added

18 complexity to the system.

19 Prior to issuance in the Title V program

20 if somebody wanted to find out what requirements

21 applied to the source, was there one place where they

22 could go to see what all those requirements were?

1 MR. J. PAUL: Yes, they would have been
2 listed in the individual permits to operate. The
3 reason this would have been simpler -- let's say that
4 you're interested in just looking at the boilers in
5 Ohio. You could have called up just all of the
6 boiler permits and seen how those are being handled.
7 Now you have to call up all the Title V
8 permits. So rather than just looking at the boiler
9 permits at Wright Patterson Air Force base, now you
10 have to look at the whole Title V permit.
11 MS. POWELL: But if you wanted to look at
12 what the entire facility was doing prior to the Title
13 V program, an advocate would have had to look up at
14 least 33 operating permits and possibly as much as a
15 1,000 pre construction operating permits.
16 MR. J. PAUL: Right. Actually -- and this
17 is where it differs a little bit with the local
18 agency -- you would come in. You would sit down.
19 And we would make available the whole file to you.
20 You'd go through the file and say, "Okay, I'm only
21 interested in these major sources."
22 MS. POWELL: Your prior permits, were they

on line? Were they available on the Internet?

MR. J. PAUL: No.

MS. POWELL: Your current Title V programs are available.

MR. J. PAUL: Yes.

MS. POWELL: If an advocate wants to find out what the Air Force base has to comply with now, they can go on the Internet and download that permit; is that correct?

MR. J. PAUL: Sure.

MS. POWELL: Is it possible to word search that permit?

MR. J. PAUL: I would assume that once you download it, you could word search it.

MS. BROOME: I answer that question. You can. I've done it.

MS. POWELL: So if an advocate was interested in boilers and however you identify your boilers with a particular number, they could type into the PDF version of that permit the number for the unit and find each requirement that applies to it.

1 MR. J. PAUL: That's correct.

2 MS. POWELL: I'm going to let the other

3 Task Force members ask some questions. I might have

4 some follow-up. Thank you.

5 MR. LING: The next one I saw was Bob

6 Morehouse.

7 MR. MOREHOUSE: Thanks, John, for your

8 comments. Can you tell us a little bit about your

9 experience on the permit revision process in your

10 area. Do you get a lot of requests for permit

11 revisions, time to process, pluses minuses with that?

12 I realize some of these questions are

13 probably the ones you're going to be answering and

14 you've had a chance -- or we'll have a chance over

15 the next few months to put thoughts together.

16 But I'm interested in initial comments.

17 MR. J. PAUL: I'm not obviously as

18 familiar with this as staff are, but I did ask some

19 questions about that before coming here today.

20 People are concerned, I guess especially

21 with significant modifications, that they'll have to

22 through -- I guess they have to go through the four-

1 part process. So if you're making a significant
2 modification to your Title V permit, that's going to
3 be a long process.
4 I don't even know all the steps. It's
5 triple P, double P, single P. I don't know what
6 happens when you run out of P's. But I think there's
7 four parts to that. That's a significant process.
8 MR. MOREHOUSE: You were commenting about
9 the burden and high costs associated with
10 implementation. Will you be pulling together any
11 information on that in your comments?
12 And the reason I mention that is if you go
13 back to the original rule back in '92, at that time
14 the estimate was, the total program nationwide would
15 cost just over $500 million. The math was about
16 $15,000 per permit. And it is a reference point for
17 which we ought to be taking a look in terms of just
18 one measure on the program.
19 I think some of your comments were
20 suggesting it could be much higher than that. I can
21 speak as an industry representative that it's higher
22 than that on a per permit basis. But I was curious.

1 MR. J. PAUL: I would not go higher. I
2 would go less. Seriously, I think -- I know that we
3 as a local agency -- I think we have adequate
4 resources to do the job. But that depends on us
5 defining the job.
6 And the more complicated it becomes, that
7 requires more resources. But I don't necessarily
8 think those resources are really necessary to do an
9 adequate job. So I would redefine the job rather
10 than raise the resources.
11 MR. MOREHOUSE: Thanks.
12 MR. LING: Don VAN DER Vaart.
13 MR. VAN DER VAART: Thanks. This is a
14 great little overview and it's one of these cases
15 where I agree with everything you say, but I don't
16 agree with your conclusion. And that is the benefit
17 side.
18 The costs I agree that there's a lot of
19 things here I should mention that I think part of
20 some of the details, issues here may perhaps be due
21 to the way that you all are implementing the
22 insignificant activities issue.

1 I think EPA -- Mike could have done a
2 little better job in explaining the way that needs to
3 be implemented. As a result of a lawsuit some years
4 ago -- but what I want to ask you is -- and you kind
5 of spoke to it when you were you referring to your
6 previous permitting program. I wasn't sure I was
7 hearing you right.
8 Do you think a big benefit of the program
9 could have been or is or was the definitive nature of
10 the obligations? In other words, while you've got
11 all these, in your case you seem to -- you actually
12 write all the standards in the permit rather than
13 paraphrasing them or referencing them.
14 But at the bottom of all those, do you
15 have some monitoring that says do this? Would you
16 feel that the benefit of the permit program would be
17 greater if that was very clear for every requirement
18 so that third parties could see it and so that the
19 responsible official could see it and we could see it
20 as regulators and that that defined compliance,
21 rather than just listing all these things in there
22 and then letting a third party try to decipher what

1 that regulation really meant in terms of how to
2 comply with it?
3 MR. J. PAUL: Yes. And I agree. The
4 original permits that we were issuing -- that was the
5 primary purpose. That was our biggest purpose --
6 was to make sure that any readable form be
7 requirements for that source were very clearly
8 spelled out.
9 MR. VAN DER VAART: So in other words, you
10 distilled these mammoth -- and they are even more
11 mammoth no -- but these large requirements and
12 requirements that necessarily were written for
13 general application. You then applied those to the
14 specific source.
15 MR. J. PAUL: Yes.
16 MR. VAN DER VAART: And translated them
17 into the definition of capacity for that source.
18 Now, here's the $64 question. Why do you feel Title
19 V should have been a different permit because North
20 Carolina -- it was absolutely the opposite.
21 We had permits prior to Title V that they
22 were like my seventh grade history tests. They had a

1 list of all these folks on the left-hand side and a
2 list of these things they did on the right-hand side.
3 And my obligation to try to get a passing grade was
4 to draw a line from one to the next.
5 And that was what our permits were. You
6 have a list of sources and we had a list of
7 applicable requirements. First of all, we didn't
8 even draw the lines. And second of all, we didn't do
9 what you did, which was distill the applicable
10 requirements down to an actual obligation.
11 We view Title V as the requirement to do
12 so. And I guess maybe we just had a terrible permit
13 program. But why do you feel Title V was not that
14 same obligation to distill?
15 MR. J. PAUL: I think we just felt that it
16 just added so many things to that that basic
17 explanation gets lost in the paperwork. I do think
18 that you could look at a 200-page permit and go
19 through and distill that down to a five-page permit.
20 MR. VAN DER VAART: I'm going to let these
21 other folks get in, but I'm trying to make sure I
22 understand. You're actually writing your

1 observation.

2 Of course, North Carolina treats

3 insignificant activities totally differently. And I

4 think we need to get together and understand. I

5 think you're in region V and region IV, how many you

6 go through.

7 But if I can just ask the next question.

8 We have a lot of military bases as well. If I took

9 your 600-page permit and used black ink for the

10 rendition of all the requirements, the rules, the

11 various MACT's, all the SIP standards which you have

12 in the department clearly, but then I'll use green

13 ink to specify that punch line, the monitoring that

14 defines compliance, would that be a reasonable way --

15 and I'm not saying I'm doing this. But I'm trying

16 to understand your permit.

17 That is still possible, right? I could

18 then still just look at the green ink and determine

19 whether these folks were in compliance or not? Sort

20 of like your old permit.

21 MR. J. PAUL: I would assume so. But I'll

22 check that. I like your suggestion. Yes.

1 MR. LING: Shannon.

2 MS. BROOME: Thanks, Mike. A couple other

3 people hit some of the questions I was going to ask,

4 so I'll be brief.

5 The two things that I want -- you probably

6 will come back with because they're more detailed.

7 One question is, in terms of public participation on

8 the permits and the revisions that you've done so

9 far, what has been -- have you been having a lot of

10 requests for hearings? Have you had a lot of public

11 comments to respond to?

12 Because I look at the format of your

13 permits and I think they are pretty -- I'm not going

14 to impugn other states right now. But you have a

15 nice little table. And these are the limits. Here's

16 the monitoring. Here's the other things.

17 And whether or not I agree with what those

18 are, I at least know where to find them. So I think

19 they're fairly accessible to somebody who doesn't

20 know a facility. What's been your experience?

21 MR. J. PAUL: We've had no requests for

22 public hearings.

1 MS. BROOME: Have you had any public
2 comments?
3 MR. J. PAUL: Not that I'm aware of.
4 MS. BROOME: That's why I said it's kind
5 of asking for something that you probably didn't
6 think about before you came in here.
7 MR. J. PAUL: I know we've had comments
8 from the region. I know we've had comments from the
9 company. So I don't think we've had any comments
10 from the public.
11 MS. BROOME: And I know EPA views
12 themselves as standing in the shoes of the citizens
13 as well. And then on staffing you mentioned
14 turnover. I was just wondering, you mentioned the
15 problem of keeping people interested in some of the
16 stuff as they go along.
17 Is finding good people an issue for you to
18 do a good job?
19 MR. J. PAUL: We're about to find out.
20 Our permit clerk -- and I mean anybody that has a
21 clerk knows that our permit clerk, who has been with
22 us for 29 years, is retiring at the end of July. So

1 we're about to find out how difficult it is to
2 replace her.
3 But actually right now hiring of
4 replacement staff has actually improved. There's
5 some real quality people that are apparently having
6 problems in the consulting field that are applying
7 for jobs with the agency. So that has helped.
8 MS. BROOME: Do you think -- you know, you
9 mentioned the long time it took to issue permits. Do
10 you think part of it was just in finding the right
11 people who could do the job efficiently?
12 Or if you knocked out the insignificant
13 emission units, could you have cut off three years
14 from your issuance process?
15 MR. J. PAUL: Within Ohio it's more a
16 problem of Ohio trying to fulfill their obligation to
17 review them all? So you have 12 different agencies
18 drafting permits, sending them. They're being
19 reviewed at the state level, sent back.
20 MS. BROOME: By one particular person at
21 the state level?
22 MR. J. PAUL: Or several, yes.

1 MS. BROOME: I'm familiar. Thank you.

2 MR. LING: I'm just going to make a

3 process point. Clearly there's a lot more interest

4 in this than just by EPA and the Task Force, a lot of

5 good questions being asked. We have a couple of

6 people who need to testify before lunch.

7 So I'm going to cut off questioning for

8 John at 11:00. Then we can talk to the Task Force

9 about maybe getting John to come back or a way to

10 follow up with him separately if we don't get all the

11 questions asked before 11:00.

12 Kathleen was the next questioner I saw.

13 MS. ANDERSON: I'm targeting this toward

14 your relationship as a local to your state authority.

15 Just in looking through your comments I can see

16 several areas where you can actually streamline your

17 permit through incorporation by reference and other

18 techniques.

19 And even the way you bring new source

20 review permits onto the Title V permit can be a

21 streamlined process. Are you precluded from doing

22 that because of state oversight? If you are aware of

1 all the different areas in which you can actually
2 streamline this permit, are you precluded from doing
3 that without the concurrence of Ohio?
4 MR. J. PAUL: I would say no, we're not
5 precluded. We work really closely with Ohio. And
6 I'm sure if there were identified ways of
7 streamlining the permit, that we could come to
8 agreement on that.
9 MS. ANDERSON: I think I agree with Don's
10 comments. There are different ways of dealing with
11 some of the problems that you highlighted. I can
12 think really of some ways to relieve that burden and
13 to make the permit a little bit more concise.
14 I don't know if it's just a matter of you
15 not being aware of what's available to you. I don't
16 know your specific regulations, but I can say, you
17 know, on behalf of Title V that there are actually
18 ways that can make the permit more concise.
19 MR. J. PAUL: That will be a great help.
20 If this Task Force had as one of its product a list
21 of ways to streamline permits that EPA would sign off
22 on, that would be a great help to states and locals.

1 MS. ANDERSON: One of the things that may
2 come out as a result of this Task Force is maybe even
3 some inconsistencies. We have inconsistencies among
4 states, but there also may be some inconsistencies
5 among EPA regional offices. It will be interesting
6 to see how that plays out in this discussion.
7 MR. LING: Verena.
8 MS. OWEN: Thank you. Shannon asked a
9 question I would have asked about how many public
10 comments you had on your permits. I believe the
11 answer was you didn't really have any and no requests
12 for hearings.
13 I would be interested in your written
14 comments maybe -- what kind of public outreach
15 activities you do. I once raised that question with
16 another permitting agency and the answer was very
17 truthfully that they felt they didn't have any public
18 involvement because we're doing such a good job.
19 That might be the case in your case too.
20 But on the other hand maybe the public wants to pat
21 you on the shoulder too. But they should be given
22 that opportunity.

1 A quick question about the 100-page
2 permits. Really don't scare me. How much of your
3 100-page permits actually have facility-specific
4 requirements? And how much of those 100-pages are
5 boiler plate language? Give me just an estimate.
6 That's fine.
7 MR. J. PAUL: I'll give you an estimate.
8 Maybe it's 50-50.
9 MS. OWEN: 50-50?
10 MR. J. PAUL: It's just an estimate. It
11 could be higher. It could be lower. We do both. We
12 do both facility-specific and there are boiler plate
13 certainly. Yes.
14 MS. OWEN: I'm going to cut this short. I
15 would also especially be interested in your written
16 comments and discussion of the staff time and the
17 value of a good statement of basis.
18 I believe you said that you felt that the
19 Title V added requirements to existing permits.
20 Illinois also has or had a state operating permit
21 program.
22 Actually my experience is more the other

1 way around -- that I have more problems identifying
2 streamlining procedures in the Title V permits, the
3 conditions that in my view disappeared out of the
4 existing state operating permit. I'd be really
5 interested in your view on that too.
6 MR. J. PAUL: Okay.
7 MR. LING: Lauren or David, I don't recall
8 who.
9 MS. FREEMAN: Thank you. I wanted to come
10 back to two points I heard you make and explore
11 whether you think there's an interrelationship
12 between them.
13 One was your comment on the endless
14 pursuit of the perfect permit and the extraordinary
15 resources that go into that as opposed to some other
16 things that might be more beneficial.
17 The other point was problems that
18 sometimes occur with staff turnover and how that
19 slows down the review of reports.
20 I'm wondering whether you see an
21 interrelationship with staff turnover and
22 interpretation of permits and whether there's a

1 concern that a permit has to be perfect in order for
2 it to be consistently interpreted by a permit writer
3 and enforcement and perhaps new people coming in.
4 MR. J. PAUL: We see that. The staff
5 turnover is more a problem with the people that are
6 reviewing our permits than it is with people that are
7 writing them.
8 The first draft was reviewed by one
9 person. They left the agency. The second draft is
10 reviewed by another person -- maybe one person liked
11 the word "will" and the other person likes the word
12 "shall." That just drives people crazy.
13 So to the extent that it's possible, stuff
14 like that just needs to be eliminated. Nobody to me
15 is served by permits going back and forth in draft
16 form. They're best served when the permit's issued.
17 And I think there's a point where obviously you want
18 an accurate permit.
19 But there's a point where further pursuit
20 of this perfect permit just doesn't make sense.
21 Hopefully that's something that will go more smoothly
22 in the renewals. We'll see pretty soon.

1 MR. LING: Did you have a follow-up?

2 MS. FREEMAN: I'm curious. Maybe you

3 could cover this in any written comments -- whether

4 there are instances of disagreements among the staff

5 in the final permit as to what the meaning of a term

6 is.

7 MR. J. PAUL: I'll ask on that.

8 MR. LING: Dave.

9 MR. GOLDEN: Just a couple of quick

10 questions. Your pre-Title V permits, do they include

11 compliance certifications by responsible officials?

12 MR. J. PAUL: No.

13 MR. GOLDEN: It seems to me there's kind

14 of two approaches to Title V compliance, to

15 paraphrase Mr. Eastwood. Again, there's the do-you-

16 feel-lucky approach. Then there's the second, which

17 would be the a-man's-got-to-know-his-limitations

18 approach, where you kind of get a handle on it.

19 With you and your working with regulated

20 entities, do you find that the attention to

21 compliance has been increased or heightened because

22 of responsible officials now doing a certification?

1 MR. J. PAUL: I don't know on that yet.
2 We did have a criminal enforcement case with an
3 official who falsified records. So we did pursue
4 that.
5 MR. GOLDEN: Pre or post?
6 MR. J. PAUL: Post. That's something
7 we're going to get experience on. I think, you know,
8 the first cut that we're trying to look at right now
9 is if somebody certified compliance and they're on
10 our significant violators list. Well, that's a
11 problem.
12 We will look seriously at these. We have
13 had some preliminary discussions within the agency
14 about just the fact that we need to look for some of
15 the more obvious cases, where they obviously didn't
16 pay attention and pursue those. And I think that's
17 something there will be a growing awareness as we
18 pursue some of those.
19 MR. GOLDEN: Finally, do you find many
20 sources going on an entire without reporting any
21 deviations?
22 MR. J. PAUL: There are some, but there

1 are a lot of deviations. And some are significant
2 and some are not. And we look at different
3 enforcement discretion cut-offs for down time with
4 equipment and exceedences of opacity and different
5 things like that.
6 MR. GOLDEN: If a source reports no
7 deviations for a year, does that appear kind of
8 suspicious to you?
9 MR. J. PAUL: It certainly sounds
10 suspicious to me, yes.
11 MR. GOLDEN: Thanks.
12 MR. LING: Bernie, is yours a quick
13 question?
14 MR. B. PAUL: It's a very quick question.
15 I'm interested in knowing what your Title V operating
16 permit program fees are that you assess to the
17 regulated entities and whether you feel that
18 adequately covers the resources that you apply to the
19 program.
20 MR. J. PAUL: The fees are the standard
21 fees. They start out at $25 and increase.
22 MR. B. PAUL: I'm curious. For those 60-

1 some odd sources that you have under your program,
2 what's the total amount of fees that you collect? Is
3 it $5 million? $2 million?
4 MR. J. PAUL: For Dayton, it's what?
5 MR. HODANBOSI: For the entire state it's
6 $15 or 16 million.
7 MR. J. PAUL: I think we're at 800,000 or
8 something like that. That question is almost like a
9 trick question because it's like, you know, asking
10 your kid, "Do you have enough money?" when they go
11 out on a date. You could always use more money.
12 But at the same time you recognize there
13 are limits. There are so many things that we really
14 honestly need to do a good program. So I think we
15 have enough money to do a good program. But I'm
16 concerned with the increasing demands on those
17 limited resources that we have.
18 MR. LING: Go ahead, Keri. This will be
19 the last one for John.
20 MS. POWELL: I promise this will be quick,
21 but I might sneak in two quick ones.
22 The first one: in your written testimony

1 you provided us -- you mentioned among the burdens of
2 the Title V program that one of those burdens is the
3 agency obligation for inspectors to assure all the
4 listed requirements are being met on an annual basis.
5 I just want to know are you testifying
6 that prior to the Title V program you weren't
7 burdened with issuing compliance of all requirements
8 on an annual basis?
9 MR. J. PAUL: Correct. I want to make it
10 clear that we think the most important thing is
11 getting inspectors out to the sources. And prior to
12 Title V with the more simple permits and the permits
13 that just look at the major -- really the significant
14 sources that was a simpler process.
15 I'm not sure yet what our obligations are
16 with regard to verifying things with regard to the
17 insignificant emissions sources. That's something I
18 don't want our inspectors spending a lot of time on.
19 I'm hoping that the Title V system does not force
20 that on our inspectors.
21 MS. POWELL: Which leads right into my
22 last wrap-up question. There are 1,000 significant

1 emissions units for an Air Force base. What's the
2 maximum amount of pollution that could be emitted by
3 one insignificant emissions unit?
4 MR. J. PAUL: Do you know, Bob? It's like
5 maybe a ton maybe.
6 MR. HODANBOSI: No. It might be higher
7 than that. It might be five tons.
8 MS. POWELL: For the Air Force base those
9 thousand insignificant emissions units that are not
10 that important could emit a total of up to 5,000 tons
11 of pollution a year?
12 MR. J. PAUL: No. I mean, theoretically
13 yes. But no.
14 MS. POWELL: Do you know what the total
15 pollution is from those 1,000 insignificant emissions
16 units?
17 MR. J. PAUL: I can find out.
18 MS. POWELL: I'd appreciate that.
19 MR. J. PAUL: But I'm not going to have a
20 person spend three weeks finding out.
21 MS. POWELL: I agree with that too, but I
22 would like to know whether you know.

1 MR. J. PAUL: Sure. Good question.

2 MR. LING: John, Lee has told me -- oh, go

3 ahead.

4 MR. HODANBOSI: John, that facility -- the

5 insignificant emissions unit should be part of the

6 total fee package that they're reporting.

7 MR. LING: John says he has a question

8 that doesn't take long to answer. I'm going to let

9 him go even though I said it was the last question.

10 MR. HIGGINS: It's a question I'd like to

11 ask everybody that testifies. I'm just curious if

12 you're grading it A to F, what grade do you give

13 Title V?

14 MR. J. PAUL: I would grade it on a curve.

15 (Laughter.)

16 MR. J. PAUL: I would compare it to the

17 existing permit system and I would say that the value

18 added is not that great. But that's because we put a

19 lot of time and effort into the previous permit

20 system.

21 So I would not grade it a C or below. I

22 would grade it at least a B because it is a good

1 program. It is a valuable program.

2 But it is one that we have to watch very,

3 very carefully to make sure that we don't get so

4 wrapped up in the details that we forget the

5 objective, which is to control air pollution. That's

6 my major concern with the Title V program.

7 MR. LING: Thank you, John, for your

8 statement and for patiently answering a lot of

9 questions.

10 MR. J. PAUL: I appreciate it. Thank you.

11 MR. LING: If anybody else who is

12 scheduled to speak hasn't left the room screaming

13 after what happened with John, I'm pleased with the

14 amount of information that is being able to be

15 exchanged here.

16 Bernie, did you have a question?

17 MR. B. PAUL: Yes. I'd like as a follow-

18 up to the issue that Bob Morehouse raised about the

19 total cost of the program, I would like to know

20 whether EPA or STAPPA-ALAPCO have compiled an

21 analysis of the total operating permit fees that

22 sources have paid since the inception of the program

1 so we can get an understanding of that element.

2 Of course, there are other costs the

3 companies have incurred on their own -- hopefully

4 many companies will bring to the table. That should

5 be an easier piece of data to find than maybe some of

6 the other stuff.

7 MR. HITTE: I did that in '99 or 2000

8 where I answered two questions: what were the fees

9 permitting authorities were charging, and up to that

10 point in time what was the amount of money they had

11 collected.

12 I have been tempted to do that again. But

13 it would be best if I could do it through STAPPA and

14 ALAPCO's help as opposed to just coming from me.

15 I'll get probably better cooperation.

16 MR. LING: The next speaker is Lyman

17 Welch.

18 MR. WELCH: I have a Power Point

19 presentation. I don't know if this is a good time to

20 take a break while we load that up.

21 MR. LING: If anyone needs a break, you

22 can take it. We can load that up quickly.