March 17, 1994

<u>MEMORANDUM</u>

SUBJECT: Policy on Title V Permit Program Data Elements

FROM: John Seitz /s/

TO: Regional Air Division Directors

     The purpose of this memorandum is to set forth the data
elements that will be required on a national basis for all
permits in order to oversee and respond to inquiries concerning
the implementation of Title V of the Clean Air Act of 1990. In
order to respond to the questions raised by the Regional Offices
and States on why we need this permit information and how EPA
will manage it, we have formatted this memorandum in terms of
questions and answers. I believe that this format best sets
forth the policy, Regional and State responsibilities and
rationale.

Question: What data elements are needed and when?

Response: The following is a list of the required permit program
          data elements (PPDE's) and the party responsible for
          providing the information. Both the States and the
          Regions are charged with providing the required data
          elements. Because permit program implementation is a
          State function, the States have the principal
          responsibility for supplying the data. On the other
          hand, the Regions are the only party in a position to
          supply some of the data elements. It will ultimately
          require a team effort to ensure that this information
          is produced and this is the reason why we encourage
          this topic to be addressed in the EPA-State permit
          program implementation agreements.

          1. Permitting authority name (State)
          2. New permit or permit modification (State)
          3. AFS plant identification number (State)
          4. Permit number (State)
          5. Date that proposed permit or permit modification
              was received by the Regional Office (Region)
          6. Date that the EPA 45-day review period ends. [The
              computer system will generate this date. This
              date may need to be entered into the system for
              certain permit modifications where the EPA review
              period is less than 45 days.] (Region)

7. Date permit issued (State or EPA responsibility depending upon who issued the permit)

The following PPDE's would be entered only if the particular event occurs:

8. Date EPA objects to a proposed permit (Region)
9. Date that revised permit pursuant to an EPA objection is received (Region)
10. Date that EPA denies a revised permit submitted pursuant to an EPA objection (Region)
11. Date that the public petitions EPA on a proposed permit (Region)
12. Date that EPA takes action on a proposed permit based on a public petition. (Region)

With the exception of data element number 7, all information that is the responsibility of the State needs to be provided no later than when the State submits the proposed permit to EPA. All other information, whether supplied by the State or by EPA, needs to be provided within a reasonable amount of time after the action or event occurs (quarterly, at a minimum).

Question: Why does OAQPS need the PPDE's?

Response: OAQPS needs the PPDE's for the following reasons:

- Oversee the Title V and Part 70 requirements,
- Ensure program consistency, and
- Respond to reasonable requests for information regarding implementation of the operating permits program. Examples of these questions are:

    1. How many permits were submitted to EPA for review? How many were permit modifications?
    2. How many permits did EPA object to during the 45-day review period?
    3. How many revised permits did EPA deny pursuant to an EPA objection?
    4. How many public petitions did EPA receive?
    5. How many permits were issued by the States? By EPA?

As discussed later, the Aerometric Information Retrieval System (AIRS) will be designed to answer these questions. In all likelihood, however, there

will be requests for information beyond these questions
both on a permit-specific level and on a national
level. Requests about permit fees is one such example.
The Regions and States need to be prepared to answer
other information requests given a reasonable amount of
lead time. This can be accomplished by State or
Regional internal permit management systems that go
beyond monitoring the data elements required in this
policy.

Question: What system will be used to store the PPDE's?

Response: The AIRS Facility Subsystem (AFS) will be used to store
and retrieve the PPDE's. The AFS was chosen because of
the evolving efforts over the last few years to enhance
the system to accommodate operating permit information
and to make the system more user-friendly. The latter
has been accomplished by developing screen and field-
level HELP features, establishing a simple process to
access AFS through personal computers (PC's) that are
served by EPA local area networks capable of accessing
AIRS, expanding report retrieval capabilities, adding
new data elements, and improving/expanding table look-
up capabilities.

As mentioned, we are enhancing AIRS in order to
accommodate operating permit information. While
additional permit-related AIRS enhancements are still
underway, the system is now able to receive and store
the PPDE's shown above for those States that have
successfully merged their plant-level compliance and
emissions data in AFS. Those States that have not
completed this merging process will not be able to
successfully input the PPDE information into AIRS. The
data merging effort is essential to effectively using
the permitting enhancements to AFS and it is critical
that States that have not yet completed this process do
so as soon as possible. However, it is recognized that
some States may never merge their emission and
compliance data in AFS, thus complicating State and
Regional Office access to and entry of permitting data.
The AFS Permit Data Management Work Group will be
exploring system-related alternatives that will allow
entry of permitting information under conditions where
State data are unmerged. We also plan to provide AFS
with the capability to generate reports that produce
summary statistics from the questions listed earlier as
well as others. This capability will only be available
for those States with merged data.

Given the successful evolution of AFS into a more user-friendly system, more readily accessible from EPA LAN-connected PC's, and the need to merge compliance, emissions, and permits data, training becomes an annual "must" for all users. We presently are focusing our attention on outreach in the form of training and better system documentation. Over the next several months, detailed guidance and training schedules on AFS will be issued on the permitting enhancements, user support, and the merge process. Easy to follow instructions on inputting the PPDE's will be part of this guidance.

Question: Who is responsible for entering the PPDE's into AIRS?

Response: As shown above, the States and EPA share the responsibility for providing the PPDE information to AIRS. The Regions should assure that States do this by incorporating this requirement into the State-EPA permit program implementation agreements and/or by using grant commitments. If States do not provide the PPDE's to AIRS on all permits, then the Regions will be expected to do so. As noted above, entering the PPDE's into AFS is designed to be relatively simple and should require minimum effort. Where Regional resources become an issue, options can be pursued with OAQPS. Lack of having this information for all permits will result in the inability of the Regions and Headquarters to manage the program and to respond to questions about how we are overseeing implementation of the permits program.

This policy is effective immediately. Please ensure that the appropriate staff in your office receive this policy. We appreciate your continuing efforts to assure the success of the operating permits program implementation process.

cc: W. Becker
     Air Branch Chiefs, Regions I - X