

July 12, 1999

Ms. Michele Brown
Commissioner, Alaska Department of
Environmental Conservation
410 Willoughby Avenue, Suite 105
Juneau, AK 99801-1795

Dear Ms. Brown:

The purpose of this letter is to request your support in expediting the issuance of operating permits under the title V permit program. I believe that, working together, we have made and are continuing to make considerable progress in implementing the title V program, and I am committed to doing all that I can to resolve the issues that remain. We have made implementation of the permitting program a high priority and established a goal of issuing all of the initial permits (approximately 20,000) by January 2001. To date, about one-third of those permits have been issued. By statute, we should have issued most of these permits by now.

To meet this goal, we will need your support in addressing issues raised by a number of States as obstacles to completing the first round of permit issuance. These focus on the recruiting and retention of experienced permit staff. Many States have advised us that even though the funding necessary for new hires is provided through permit fees, the permitting agencies cannot hire because of State-imposed freezes and noncompetitive salaries. In addition, due to intense competition with the private sector and relatively low salaries for permit engineers, there seems to be high staff turnover rates which lead to hiring and training challenges. We are prepared to augment our current training opportunities with additional training specifically focused on title V program new hires, but we must look to you for solutions on the hiring and retention issues, to the extent they constitute a problem in your State. If you have already taken steps to address these issues, I would welcome feedback on your experiences that might be helpful to other States in dealing with this situation.

I am confident that, together, we can meet these challenges and successfully implement the title V program. As we proceed, I would very much appreciate your thoughts and suggestions on how we can we can work together better to accomplish this goal.

Sincerely,

/s/

Robert Perciasepe
Assistant Administrator

(Same letter sent to Environmental Commissioners in all states.)