From: Smith, Judy
To: "Rob Davis"
Subject: Response to your inquiry on Title V
Date: Thursday, February 11, 2016 4:23:00 PM
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Hi Rob – Here is our response to your questions.

To clarify, the Clean Air Act Title V permit program does not apply to art glass facilities such as Bullseye Glass in Portland. This size of facility is regulated under the state permitting program.

EPA and ODEQ work together to ensure that monitoring, permitting and review under the Clean Air Act are sufficient to implement the statute. EPA works with ODEQ to identify the priority work that is needed to accomplish the statutory requirements in the Clean Air Act. The Title V permit program is a fee based program by design, and ODEQ must collect the funds necessary to administer the program. EPA periodically reviews the Title V program to assess whether sufficient funds are being collected to manage to program. EPA and DEQ also collaborate regarding the monitoring network needed for implementation of the National Ambient Air Quality Standards (NAAQS).

Consistent with the Clean Air Act and the implementing regulations, Title V permits are periodically revised to ensure they include all applicable requirements. Such revisions are in addition to the five-year renewal process. Title V permits are often administratively extended beyond their expiration date and the permits remain in effect. Facilities with administratively extended permits must continue to meet the limits of their permits until the permits are reviewed and renewed.

EPA is scheduled to complete a Clean Air Act Title V permit program review for Oregon this year. The two reports you referenced are compliance/enforcement related reviews, called the State Review Framework, which are separate from the Title V program review. The current report for the State Review Framework has been drafted and is now under review. The State Review Framework is a standard review of state compliance and enforcement programs and it has a Clean Air Act component.

Please let me know if you need anything else.

Judy

From: Rob Davis [mailto:RDavis@oregonian.com]
Sent: Thursday, February 11, 2016 11:11 AM
To: Smith, Judy <Smith.Judy@epa.gov>
Subject: Re: MEDIA INQUIRY (deadline Thursday!): The Oregonian re Portland air tox metals and ODEQ Title V air permits

Fantastic — I appreciate the follow up Judy.

From: "Smith, Judy" <Smith.Judy@epa.gov>
Date: Thursday, February 11, 2016 at 11:10 AM
To: Rob Davis <RDavis@oregonian.com>
Subject: FW: MEDIA INQUIRY (deadline Thursday!): The Oregonian re Portland air tox metals and ODEQ Title V air permits

Hi Rob – I wanted to let you know that I'm working on getting the response to your inquiry and will have something to you shortly. Judy

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Judy Smith, EPA
Public Affairs Specialist
503-326-6994 desk
503-545-2540 cell
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From: Rob Davis [mailto:RDavis@oregonian.com]
Sent: Wednesday, February 10, 2016 3:33 PM
To: Skadowski, Suzanne <Skadowski.Suzanne@epa.gov>
Subject: from the oregonian: title V

Suzanne,

Thanks for the time just now. As I mentioned, I'm looking at Oregon DEQ's administration of the Title V permit program. From an initial review of mine, it appears that 46% of Oregon's Title V permits are expired. Some appear to have been expired since 2000; the bulk lapsed between 2011-2015.

Given EPA's delegation of this authority to Oregon, I want to know:

- Is EPA concerned with Oregon's funding, monitoring, permitting and review of major air pollution sources?
- Is it normal for a state to be so far behind in its permit reviews?
- Has EPA audited Oregon's Clean Air Act administration since these reports circa 2007 and FY10? (Linked here: http://www.epa.gov/compliance/oregon-state-review-framework). If so, can you provide them?

Thanks for a prompt followup. My deadline is this time tomorrow (2/11).

All best,
Rob

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