From: Smith, Judy
To: "FLYNT Jennifer"
Subject: COURTESY REVIEW: EPA response to Oregonian inquiry
Date: Thursday, February 11, 2016 1:53:00 PM

Hi Jennifer – The reporter has a deadline in one hour, but we wanted to make sure that you were aware of his questions and our draft response. It is still being reviewed here at EPA. Judy

Reporter questions: 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?

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

EPA and the ODEQ work together to ensure that the monitoring, permitting and review under the Clean Air Act are sufficient to protect air quality and people's health. 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 is charged with periodically reviewing 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).

Title V permits are often administratively extended beyond their expiration date and the permits remain in effect. Facilities with administratively extended permits retain permit

coverage and 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 reference above are compliance/enforcement related audits, 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 under review. The State Review Framework is a standard review of state compliance and enforcement programs that has a Clean Air Act component.