



**South Dakota Department of Environment & Natural Resources (DENR)  
Title V Program Review**

Conducted by

**United States Environmental Protection Agency (USEPA)  
Region 8**

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## Executive Summary

In February 2015, the United States Environmental Protection Agency (EPA) conducted the third round review of the South Dakota Department of Environment & Natural Resources' (DENR) Title V operating permits program. This review was accomplished via a conference call with DENR as opposed to the site visits conducted during the first two reviews. The first round of the program review was conducted in fiscal year 2006. EPA issued the final report for the first round in September 2006. The second round review was conducted in fiscal year 2012. EPA issued the final report for the second round in December 2012. The third round evaluation (like the previous evaluations) consisted of a discussion of DENR's responses to the program evaluation questionnaire. The questionnaire was developed during the second review and revised slightly for the third round (the first round questionnaire was more expansive than the second and subsequent third round evaluation questionnaires). The evaluation also consisted of a Title V program fee audit questionnaire.

The goal of the third round evaluation was to review any concerns raised by DENR or EPA in the prior evaluation (second round), to determine how any unaddressed concerns might be addressed, to identify any good practices developed by DENR that may benefit other permitting authorities and EPA, document any areas needing improvement, and learn what assistance EPA can provide.

### EPA Concerns from the Second Round Evaluation:

Public Participation - EPA recommended that DENR include language indicating the date of the last day comments will be accepted in its public notices. The EPA believed this would avert potential issues if DENR made it clear that public comment periods end on a date certain. The DENR clarified the issue by explaining that South Dakota's newspapers vary on publication dates and may not publish on the days requested by DENR resulting in multiple public comment periods. The DENR now updates its website to reflect the public notice end date to help relieve the confusion. Since 2012, the DENR has also included the webpage link that provides the closure date on public notices currently printed in the local papers. A brief review of the notices indicated that some of the public notices are released without the link. The DENR is aware of this and is correcting the notices as they arise.

Permit Format - EPA recommended that DENR format permits for large facilities with several large emitting units be more reviewer-friendly, particularly for average citizens without formal training in the technical field. For example, large units could be reviewed for all pollutants at one section of the permit to prevent untrained reviewers from having to search for specific pollutant emission limits for a particular unit throughout the permit. The DENR stated that this comment revolved around the Hyperion Energy Center's Prevention of Significant Deterioration permit and the "form letter" comments DENR received during those public notice periods. The DENR does sympathize with the difficulty in understanding an air quality permit, especially in this case where they are dealing with a large complicated facility. Since 2012, the DENR has continuously attempted to improve the permit program and Statement of Basis to enhance the public's ability to understand the process. An example of one such improvement involves permit

conditions related to the federal requirements. Instead of having emission limits, recordkeeping, reporting, etc. located with state limits, the DENR has combined the federal requirements in their separate chapters. DENR also prepares a “statement of basis” which explains which state and federal rules are applicable and how compliance will be determined. DENR believes the statement of basis and recent changes to the air quality permit results in a permit both the facility and public can understand. It is also worth noting that there has been no public comments on this issue since it was first raised during the Hyperion Energy Center’s Prevention of Significant Deterioration permit.

**Inclusion of Underlying Applicable Construction Permit Requirements in Title V Permits –** The EPA recommended that DENR include all applicable construction permit requirements into Title V permits whenever the Title V permits are issued. This issue was highlighted because of the past practice, allowed by ARSD 74:36:05:02, to use Title V permits in-lieu of a construction permit. The EPA believed that the new construction permit chapter 74:36:20 would resolve this issue. In 2010 the DENR did modify the permitting process to require construction permits as requested by the EPA.

**Need to Expand Review of Modified Permits -** EPA recommended that DENR expand the scope of review of a modification to other parts of the permit that may be indirectly affected by the modification. For example, a source operates two units controlled by two separate bag houses for Particulate Matter (PM ) emissions and one of the units undergoes a modification (i.e. increase in capacity resulting in corresponding increase in PM emissions). The source submits an application for modification of the unit undergoing the expansion resulting in increased capacity and DENR limits the review and comment to this unit only because it is the only unit being modified. Although, this issue originates during underlying construction permit modification, the EPA believed all the permit conditions related to the baghouses at the source are subject to review including the baghouse for the unmodified unit. The DENR position was that, for a modification, the DENR only opens for public comments existing permit conditions being revised to reflect the modified operations and any new permit conditions added to the existing permit. DENR limits the public comments just to what is being revised since the unchanged existing permit conditions have already been through a public comment period. DENR considered EPA’s interpretation to be too broad and could be interpreted as having every condition of the Title V permit continuously re-opened for comment during every modification to the permit because they could be tied in some form or another to that modification. The source being discussed (Pacer Corp. Permit No 28.1107-21) was appealed to the EPA’s Administrator on May 18, 2007, the Administrator has not taken any action. DENR has not modified their process related to this concern. There have not been any additional public comments on this issue since it was first raised during the Pacer Inc. permit.

### Conclusions

DENR has provided all of the necessary information to EPA during this review and has responded to issues raised by EPA. DENR’s field experience and knowledge of air permitting has assisted EPA in understanding the challenges faced by the state. No significant deficiencies were noted during this review.

## **Introduction**

EPA conducted this program evaluation as part of its obligation to oversee and review state programs that have been approved by EPA, and in response to recommendations from an audit conducted in July 2002 by the Office of Inspector General.

The state of South Dakota operates a fully EPA approved program that allows it to implement the requirements of Title V of the Clean Air Act (CAA), including the issuance of operating permits. EPA has a statutory responsibility to oversee the programs it approved by performing oversight duties, including occasional program reviews. Such responsibilities include overseeing the activities of the State program to ensure that local, regional, and national environmental goals and objectives meet minimum requirements outlined by the federal regulation.

## **Objective of the Program Review**

Following the completion of the first and second round reviews for states in Region 8, EPA nationally committed to a third round of reviews. While the questionnaire used for the first round reviews was developed by a “national workgroup” for national consistency, the second and third round review questionnaires were developed by the Regions to emphasize Regional priorities that were identified during the first round reviews.

Region 8 consulted with other Regions about the approach and format of the questionnaire and the extent of the follow-up review of state programs. Region 8 concluded that the follow-up reviews do not need to be as extensive as the first round reviews, but should build on the findings and recommendations of the first round review.

The main objectives of the third round reviews are to conduct a follow-up to the first and second round reviews by: 1) ensuring that areas of concern identified by EPA during the first and second rounds have been addressed or are being addressed satisfactory; 2) ensuring that the DENR concerns have also been addressed or are being addressed to DENR’s satisfaction; 3) identifying and documenting new good practices that can benefit other permitting authorities; 4) identifying and documenting areas of concerns that need improvement; and 5) getting feedback on how EPA can be of service to the permitting authorities.

## **Program Review Process**

In February 2015, the United States Environmental Protection Agency (EPA) conducted the third round review of DENR’s Title V operating permits program. This review was accomplished via a conference call with DENR as opposed to the site visits conducted during the first two reviews. The first round of the program review was conducted in fiscal year 2006. EPA issued the final report for the first round in September 2006. The second round review was conducted in fiscal year 2012. EPA issued the final report for the second round in December 2012.

The first round review was conducted in response to the 2002 Office of Inspector General audit recommendations that EPA: examine ways it can improve permitting authorities’ Title V operating permit programs and expedite the permit issuance rate; note and document good

practices which other agencies can learn from; assess deficiencies in the program; and to learn how EPA can help the permitting authorities improve their overall program. In meeting these goals, EPA developed a questionnaire that was sent to each permitting authority and followed up with on-site visits to conduct interviews and file reviews. The findings of DENR Title V operating permit program's review were outlined in the September 2006 final report with the main categories as follows: a) Summary of Good Practices b) Recommended Improvements; and c) Title V program Fee Audit.

The second round December 2012 final report focused primarily on: a) Recommended Improvements; b) Second Round Findings and Comments; and c) Title V program Fee Audit.

The format of the third round review differed than the first two rounds. EPA provided a standard Title V questionnaire (Attachment 1) and fiscal tracking questionnaire (Attachment 2) to DENR as has been done in the previous two reviews. The EPA did not perform a site visit, but did coordinate a conference call with the DENR.

As mentioned above, a separate questionnaire was provided by EPA to DENR for the Title V fee audit (State/local Title V Program Fiscal Tracking Evaluation Document). The purpose of the fee audit is to determine whether the following are satisfied:

- Sources are being billed in accordance with fee requirements and are paying the required fees;
- Division of expenses is identified by DENR between Title V and non-Title V programs;
- Features are integrated into DENR's accounting/financial management system which will identify Title V revenue and expenditures separate from other funding, and which certify the disposition of Title V funds;
- Title V fees collected from sources are used by DENR to pay for the entire Title V program; and
- No such fees are used as CAA Section 105 grant matching.

During the third round review, EPA found that DENR had addressed the major issues identified by EPA as needing improvement during the first two reviews. The issues addressed included: a) public notices b) permit formats c) inclusion of applicable construction permit requirements; and d) expanded review of modifications.

## **Program Review Procedure**

EPA sent the third round review questionnaire and the Title V fee audit questionnaire to DENR on February 26, 2015. DENR submitted an electronic copy of the completed questionnaires to EPA on April 7, 2015. After the review of DENR's responses to both the Title V program review and Title V fee audit questionnaires, the final conference call was held on September 3, 2015.

During the final conference call, EPA's South Dakota Air Permit Coordinator (Robert Duraski) spoke with DENR's staff. DENR's staff in attendance was Kyrik Rombough (Air permitting and Enforcement Manager).

During the conference call, EPA staff began the review by briefly stating that the purpose of the review was to conduct a follow-up to the previous reviews. EPA informed DENR that EPA's main objectives of conducting an on-going review of States' program are twofold. First, EPA seeks to continue to effectively perform its regulatory oversight obligation under the Clean Air Act. Second, EPA hopes such periodic reviews will improve communication and the relationship between the agency and DENR and thus continue to improve state's Title V operating program. EPA and DENR then discussed topics as listed in the follow-up questionnaire.

## **Follow-up to Second Round Review**

As described in the Executive Summary, all the following EPA recommendations made during the second round review were resolved:

- Public Participation
- Permit Format
- Inclusion of Underlying Applicable Construction Permit Requirements in Title V Permits
- Need to Expand Review of Modified Permits

## **Third Round Review's Findings and Comments**

- When reviewing DENR documents, it was noted that some of the public notices published in the local papers were missing the link to the webpage that provides the closure date for public comments. This was discussed with DENR and is being corrected.
- The DENR's practice of assigning a new EPA Facility Wide ID Number, also called the AFS number, to each new owner of a facility should be reconsidered. The AFS number is plant specific and changing numbers with each new owner could lead to confusion. For example, when responding to a FOIA request for a site's history, the AFS number is a common search term.
- The DENR's reason for assigning a new number is that the public is not aware that other companies previously owned both the facility and the AFS number and that violations committed by previous owners do not reflect the current owner's operating practices. This confusion can result in both the DENR spending excessive time explaining the issue and the public being misinformed about a facilities' operating history. It must be noted that the AFS number is not a mandatory entry in the AFS database. If an AFS number is entered, the procedures in the *AFS User's Guide AF3 AFS Data Storage Version 8.1* (EPA-456\B-95-001) should be followed.

## **Issues affecting the Title V program that DENR considered particularly important.**

DENR stated in the questionnaire that:

*“DENR is still concerned with the process EPA developed for finalizing Title V air quality operating permits. EPA allows individuals to submit comments on a Title V air quality operating permit during the state’s public comment period and does not require that individual to exhaust the state’s permitting process before being allowed to petition EPA on a Title V air quality operating permit. This allows individuals to bypass the state’s process which are designed to give the public an opportunity to revise draft Title V air quality operating permits they are concerned about.*

*For the petitions in South Dakota, the individuals are simply repeating objections made during the comment period in their EPA petitions. In a February 18, 2005 decision, the Environmental Appeals Board for the United States Environmental Protection Agency denied a petition for this same reason by a facility petitioning its Title V air quality operating permit issued by EPA (i.e., Peabody Western Coal Company CAA Appeal No. 04-01). This same logic should hold true for individuals petitioning Title V air quality operating permits.*

*By requiring the individual to exhaust the state’s permitting process before being allowed to petition EPA on a Title V air quality operating permit will reduce the state’s and EPA’s workload because it would eliminate frivolous petitions.*

*Another EPA process that can be improved upon is EPA’s 45-day review period. EPA does not have the resources to review every Title V air quality operating permit during its 45-day review period and must pick and choose which ones to review. The proposed permits not reviewed are essentially allowed to sit on EPA’s desk until the 45-day review period ends. This process can delay economic development in a state. Therefore, DENR recommends that EPA develop a process in which if it decides a proposed permit will not be reviewed, EPA should notify the state there are no issues and allow the state to issue the Title V air quality operating permit.”*

If the DENR wishes to accelerate a 45 day review, they can contact the EPA and request the permit become a high priority. The other issues, while valid, will likely require a change in the applicable federal rule.

### **Permit issuance**

The following data was provided by the DENR on the questionnaire.

Percent of Title V initial permits issued within the regulatory timeframe specified in 40 CFR 70.7(a)(2)- DENR reviewed the time frame from 2010 to 2014 to respond to this question. During that time frame DENR issued three initial Title V air quality operating permits. All three (i.e., 100%) were issued within the regulatory timeframe specified in 40 CFR 70.7(a)(2).



Percent of Title V significant permit modifications issued within the regulatory timeframe specified in 40 CFR 70.7(a)(2) and (e)(4)(ii)- DENR reviewed the time frame from 2010 to 2014 to respond to this question. During that time frame DENR issued 26 significant permit modifications (i.e., modification) for Title V air quality operating permits. Twenty-four of the 26 or 92% were issued within 9 months of a complete application as specified in 40 CFR 70.7(e)(4)(ii). Therefore, a majority were issued within 9 months of a complete application. Of the remaining two, both were issued with 18 months of a complete application which is in compliance with 40 CFR 70.7(a)(2).

Percent of Title V permits expire before they can be renewed- From 2010 through 2014, there were 85 Title V air quality operating permits up for renewal. Of those 85, 76 or 89% were renewed within the time frame specified in 40 CFR 70.7(a)(2).

## **DENR Organization and Staffing**

The DENR is currently fully staffed. There is a challenge with the high employee turnover rate. In the last three years the DNER has had to replace four of their six permit engineers. The current DENR organization chart is provided as Attachment 3.

## **Training**

The DENR stated in their questionnaire that currently, the available training has been sufficient. However, EPA should continue to provide funding to WESTAR for training and training through the long distance learning network.

## **Fee Audit**

EPA did not conduct a formal Title V operating permit fee audit during the first round review. A fee audit was conducted during the second round review. A fee questionnaire was submitted during the third round, but no audit was performed. In the fee questionnaire, DENR noted their concern regarding the state's sole coal fired power plant (Big Stone) could be shut down under the Clean Power Plan. This plant pays an annual fee of \$220,000 to the Title V program, which is 40% to 50% of the DENR's revenue from Title V fees. Should this plant close, there could be insufficient funding in the future. The fee review indicates DENR's is currently meeting the fee requirements of Part 70.

## **Conclusion**

In conclusion, DENR implements an effective Title V program that continues to evolve as challenges arise. DENR continues to communicate with EPA staff to address issues in proposed permits. The Title V fee review demonstrates DENR's ability to continue to operate a program that meets the fee requirements of Part 70. DENR has provided all of the necessary information to EPA during these reviews and has discussed issues raised by EPA. DENR's Title V program continues to meet the requirements of the Part 70 regulations. No significant deficiencies were noted during this review.

**Attachment 1**

**Title V Third Round State Program Review Questionnaire and Responses by DENR**

## Title V Third Round State Program Review Questionnaire

### I. General Questions and Responses to First and Second Round Program Reviews

#### A. What has been done in response to EPA recommendations for improvements from the second round program review?

EPA Region VIII conducted the second round of South Dakota's Title V air quality operating permit program review in 2009. DENR received EPA's final report on December 26, 2012. EPA provided five recommendations EPA believes will improve DENR's Title V air quality permit program. The following are EPA's recommendation and what DENR has implemented to improve its Title V air quality operating permit program:

1. *Continue to improve public participation by specifically noting in public notices when the public comment period ends.*

DENR provides the public with several avenues for the public to participate in the public comment period. Those avenues depend on the type of permit.

For an individual permit, the first method is the method DENR has used since DENR took over the Air Quality Program from EPA and involves publishing a public notice in a local newspaper where the facility is located. The public notice identifies the public has 30 days from the date the public notice is published to submit comments on DENR's draft permit. In addition to placing the public notice in the local newspaper, DENR places a copy of the statement of basis (i.e., DENR's review of the facility's application), public notice, and draft permit on its website and solicits comments from the public. Since there is no publication date, the website identifies the date comments need to be submitted. In both cases, the public is given two options. First the public can submit comments electronically or through the mail on the draft permit. In this case, DENR would respond to the comments and change the draft permit if appropriate. If the individual that commented was not satisfied with DENR's response, the individual has the ability to request a contested case hearing in front of the Board of Minerals and Environment. In the second option, the public can simply request a contested case hearing in front of the Board of Minerals and Environment. DENR believes its public participation process provides the public with every opportunity to provide comments on DENR's draft permits.

For a general permit, the public participation process is similar to the individual permit with two exceptions. First, since a general permit covers that industry statewide, state law requires the public notice to be published

in at least three newspapers. DENR exceeds this requirement by publishing the general permits in South Dakota's 11 daily newspapers. Second, DENR is required to submit the public notice to county officials, city officials, and tribal officials on a general permit.

2. *Continue to improve permit format to make the permits more understandable for reviewers, particularly interested citizens.*

DENR continues to strive to make its air quality permits understandable and easy to understand by both the public and the individuals complying with the permits. The most recent change involves the permit conditions related to the federal requirements. Instead of having emission limits, recordkeeping, reporting, etc. located with state emission limits, recordkeeping, reporting, etc., DENR has combined the federal requirements in their separate chapters. Essentially a chapter for each federal rule the facility is applicable to. DENR also writes what is called a "statement of basis" which is a narrative about the facility, what state and federal rules are applicable, how compliance will be determined, etc. DENR believes the statement of basis and recent changes to the air quality permit result in a permit both the facility and public can understand. Even with that DENR is always striving to make its permits better and will make changes when appropriate.

3. *Continue to ensure that all underlying applicable requirements are included in Title V permits that are being used as construction permits*

When EPA conducted this review, DENR's Title V air quality operating permit was both a construction permit and an operating permit. Since then, DENR has developed a separate air quality construction permit for new facilities and existing facilities modifying their operations and not subject to the Prevention of Significant Deterioration preconstruction permit program. Once the facility completes construction, they have one year from initial startup to submit an application for an operating permit. The requirements in the construction permit are then incorporated in the operating permit. This process ensures requirements in the construction permit are incorporated in the operating permit and if not, the statement of basis identifies the reason for not including the requirement. In this case, the construction permit is modified at the same time the operating permit is issued and follows the same permitting process which includes an opportunity for public comment before the permits are issued.

4. *Continue to expand review of modified permits to other parts of the permit that may be indirectly impacted by the modification.*

DENR's statement of basis identifies all applicable changes that need to be made to a permit when a modification is requested by the facility.

5. *Continue to improve the accounting system for demonstration of appropriate use of Title V fees for the Title V program implementation only.*

DENR strives to accurately track the Title V air quality operating permit program fees to ensure the fees collected cover the expenses related to the program.

DENR has several checks and balances in its accounting system. For the collection of fees, the air quality program obtains the operational data from each Title V facility, calculates the annual air emission fee, and submits a bill to the facility. The facility submits the payment to South Dakota's Department of Revenue, which in turn informs both DENR's air quality program and DENR's Division of Financial and Technical Assistance on how much was received and by who. DENR's air quality program reviews to make sure what was billed matches what was received.

For the tracking of expenses, DENR uses a computerized timekeeping system. In the timekeeping system, the air quality program has generic funding sources identified (e.g. Title V fees, air grants). The air quality program identifies the number of hours each days spent on a project covered under one of the funding sources. Twice a month, the supervisor of the program reviews and signs off on information in the time keeping system.

DENR's Division of Financial and Technical Assistance tracks both fees collected and expenses. This division provides the air quality program with a monthly summary of the air quality programs funding sources, which the air quality program then checks for accuracy.

**B. What key EPA comments on individual Title V permits remain unresolved (EPA to determine this)? What is the State's position on these unresolved comments?**

DENR is not aware of any unresolved issues related to EPA's comments on individual Title V air quality operating permits, except for those Title V air quality operating permits environmental groups submitted petitions on and are unresolved. There are three Title V air quality operating permits that have been petitioned and unresolved. The following is a list of the facilities associated with the petition and DENR's status of the permits that were petitioned:

1. Pacer Corporation – White Bear Mica Plant: DENR revised the Title V air quality operating permit six times without any additional petitions and

renewed the Title V air quality operating permit on February 2, 2010. The renewal went through the appropriate permitting process for a Title V air quality operating permit without another petition. Therefore, DENR recommends EPA close this case.

2. American Colloid Company – Belle Fourche: DENR revised the Title V air quality operating permit eight times without any additional petitions. On February 3, 2011, American Colloid Company reduced its operations and was issued a minor air quality operating permit. Therefore, DENR recommends EPA close this case.
3. Otter Tail Power Company – Big Stone: The petition was related to permit conditions in the Title V air quality operating permit which were related to the Prevention of Significant Deterioration preconstruction permit issued for Big Stone II. Since Otter Tail Power Company elected not to build Big Stone II, the permit conditions in the Title V air quality operating permit are essentially null and void since Otter Tail Power Company is no longer authorized to construct or operate the equipment associated with Big Stone II. DENR is currently in the process of reviewing Otter Tail Power Company's application to renew its Title V air quality operating permit and those permit conditions will be removed. Therefore, DENR recommends EPA close this case.

**C. Have any procedures in Title V changed (e.g., public participation, petitions, communication with EPA) since the second round program review?**

No changes to the procedures related to the Title V air quality operating permit program has changed since the second round program review.

Originally, South Dakota's Title V air quality permitting program was a combined construction and operating permit program. In 2010, South Dakota developed an independent construction permit program. Therefore, the construction permit activities are included into the Title V air quality permit at a later date.

**1. If so, which ones?**

Not applicable.

**D. What does the state think it's doing especially well in the Title V program?**

DENR believes its statement of basis, which is a written narrative review of the facility's application, helps the facility and the public understand what state and federal rules are applicable to the facility, how DENR determined the facility is currently in compliance with the requirements, and how the facility will demonstrate compliance in the future. In addition, the changes to

the permit format will also make it easier for the facility and the public to determine which are state and federal requirements in the permit which will make it easier for both to determine if the facility is in compliance with those permit conditions.

DENR is also developing templates for each federal regulation under the New Source Performance Standards and Maximum Achievable Control Technology Standards. Each template identifies what the criteria are for using the template. This has helped speed up the process in drafting a permit since the permit conditions are already written and all the permit writer has to do is ensure the criteria is met and then cut and paste the permit conditions in the draft permit.

**E. Are there any issues affecting the Title V program in your state right now that you consider particularly important?**

DENR is still concerned with the process EPA developed for finalizing Title V air quality operating permits. EPA allows individuals to submit comments on a Title V air quality operating permit during the state's public comment period and does not require that individual to exhaust the state's permitting process before being allowed to petition EPA on a Title V air quality operating permit. This allows individuals to bypass the state's process which are designed to give the public an opportunity to revise draft Title V air quality operating permits they are concerned about.

For the petitions in South Dakota, the individuals are simply repeating objections made during the comment period in their EPA petitions. In a February 18, 2005 decision, the Environmental Appeals Board for the United States Environmental Protection Agency denied a petition for this same reason by a facility petitioning its Title V air quality operating permit issued by EPA (i.e., Peabody Western Coal Company CAA Appeal No. 04-01). This same logic should hold true for individuals petitioning Title V air quality operating permits.

By requiring the individual to exhaust the state's permitting process before being allowed to petition EPA on a Title V air quality operating permit will reduce the state's and EPA's workload because it would eliminate frivolous petitions.

Another EPA process that can be improved upon is EPA's 45-day review period. EPA does not have the resources to review every Title V air quality operating permit during its 45-day review period and must pick and choose which ones to review. The proposed permits not reviewed are essentially allowed to sit on EPA's desk until the 45-day review period ends. This process can delay economic development in a state. Therefore, DENR recommends that EPA develop a process in which if it decides a proposed

permit will not be reviewed, EPA should notify the state there are no issues and allow the state to issue the Title V air quality operating permit.

**1. Which one would you rate as the most important?**

They are all equally important. Each of these topics requires significant resources for South Dakota's small program and its limited resources.

DENR would like to see EPA initiate a policy in which they notify states that they can issue a Title V air quality permit prior to the end of the 45-day review period if EPA is not going to review it or object to its issuance.

DENR would also like EPA to maintain an open mind and dialogue as DENR reviews and tries to streamline its permitting programs.

**2. Are there any EPA policies or regulatory issues that are causing concern?**

See above.

**3. How can EPA help?**

See above.

**II. Permit Issuance**

**A. Since the second round program review, what percent of Title V initial permits have you issued within the regulatory timeframe specified in 40 CFR 70.7(a)(2)?**

DENR reviewed the time frame from 2010 to 2014 to respond to this question. During that time frame DENR issued three initial Title V air quality operating permits. All three (i.e., 100%) were issued within the regulatory timeframe specified in 40 CFR 70.7(a)(2).

**B. Since the second round program review, what percent of Title V significant permit modifications have you issued within the regulatory timeframe specified in 40 CFR 70.7(a)(2) and (e)(4)(ii)?**

DENR reviewed the time frame from 2010 to 2014 to respond to this question. During that time frame DENR issued 26 significant permit modifications (i.e., modification) for Title V air quality operating permits. Twenty-four of the 26 or 92% were issued within 9 months of a complete application as specified in 40 CFR 70.7(e)(4)(ii). Therefore, a majority were issued within 9 months of a complete application. Of the remaining two, both were issued with 18 months of a complete application which is in compliance with 40 CFR 70.7(a)(2).



**C. What percent of Title V permits expire before they can be renewed?**

DENR does not understand the relevance of this question. The federal rule along with the state requires a Title V facility to submit its renewal application at least 6 months prior to its expiration, and gives DENR 18 months to renew the application. Based on this timeline, DENR prioritizes its application to ensure new facilities and modifications to existing facilities have the highest priority since the facility that is renewing its operating permit already has an permit in place to ensure South Dakota is able to maintain its attainment status for all National Ambient Air Quality Standards.

From 2010 through 2014, there were 85 Title V air quality operating permits up for renewal. Of those 85, 76 or 89% were renewed within the time frame specified in 40 CFR 70.7(a)(2).

**1. For those permits that could not be renewed before they expired, what are the reasons they could not be renewed prior to their expiration?**

Of the nine facilities that DENR has not met the deadline, 2 have been issued and one is in EPA's hands under its 45-day review period. The other six are being worked on but again, the highest priority for DENR is working on new facilities and modifications to existing facilities because facilities with expired operating permits still have permits they need to comply with provided the applications were submitted in a timely manner. As demonstrated in subsection "A" and "B" of this section, DENR is getting these application processed in a timely manner.

Probably the biggest reason for not processing these applications in a timely manner relates to turnover. DENR in the last three years has replaced four permit engineers, one of which has already resigned and DENR is in the process of replacing. The fact that the permit engineers they replaced were not here that long either compounds the problem because it takes time to get them trained and able to review facilities with Title V air quality operating permits.

**D. Have unresolved violations created any delay in issuing Title V renewals?**

No

**E. Have permittees requested a hold in renewal for any reason?**

No

**F. CAM**

**1. Are CAM plan requirements slowing the renewal process?**

No

**a. If so, what is it about CAM that's problematic?**

Not applicable

**2. Where CAM plans have been inadequate, what have been the main types of inadequacies that have caused difficulties or delays in permit issuance?**

DENR has not observed any issues with inadequate Compliance Assurance Monitoring plans.

**3. What difficulties have you had in getting better plans to be submitted?**

DENR has not had any issues with Compliance Assurance Monitoring plans.

**4. Have you had to supplement the CAM technical guidance document (TGD) with state-issued guidance?**

No

**5. Is CAM training adequate?**

Yes

**6. Are CAM applicability determinations resource-intensive or difficult?**

DENR has not had any issues with Compliance Assurance Monitoring plans because very few sources require Compliance Assurance Monitoring plans and the majority that do are subject to a New Source Performance Plan or Maximum Achievable Control Technology Standard that already has the Compliance Assurance Monitoring plan requirements in the federal rule.

**G. What improvements does the State believe it has made to the management of the Title V permit program, since the second round program review, that could be described as best practices and could be of interest to other States?**

When a facility is subject to a federal rule, DENR does not reference the federal rule in the Title V air quality operating permit because it makes it difficult for inspectors and the facility to determine compliance since the federal rules are complicated with a variety of options for demonstrating compliance.

DENR has implemented a process of developing templates for each federal rule to speed up the permitting process. The difficulty with this is the federal rules are complicated with multiple scenarios in which the permit conditions related to the rule can be written. In addition, some of the federal rules are changed frequently which requires the template to be revised. Even though these are issues, the templates are helping speed up the process for several reasons. First the permit writer does not have to write permit conditions; the permit writer just has to cut and paste the correct template in the draft permit. Second, DENR always has another more experienced individual review the draft permit and if the template has already been approved, all the individual has to do is make sure the correct template is used. Using the templates has also resulted in the permit engineers being consistent with the permit requirements.

**H. What improvements does the state plan to make, if any, in the management of the Title V permit program within the next five years?**

DENR is not anticipating any changes but is always looking for ways to improve the Title V air quality operating permit program.

**1. Does the state have a set period of time for planning cycles?**

No

**III. Public Participation**

**A. What forms of news media do you use to maximize public participation, for implementation of 40 CFR 70.7(h)?**

DENR uses both the normal form of public notice which is a local newspaper in the county seat in which the facility is located and each public notice is posted on DENR's website. In fact, all environmental public notices have been centralized to provide the public one location to find all public notices dealing with all environmental media.

**1. How is the form of media chosen?**

DENR uses both forms no matter the situation.

**2. How do you believe public participation should be improved?**

DENR believes the federal process for public participating should be improved by requiring those that wish to petition EPA on the issuance of a Title V air quality operating permit to first exhaust all of the state's options for public participation (i.e., comment during the public notice period and contest the draft permit in front of the Board of Minerals in Environment or whatever process each state has for providing public participation) before they are allowed to petition EPA to not issue the Title V air quality operating permit.

DENR goes through a lot of work with the public and the facility to come up with creative solutions that work for both parties and are within the boundaries of the state and federal regulations. However, in some cases there are individuals that are not satisfied with the results and the state has a process in which they can take it in front of the Board of Minerals and Environment to get their issues heard and possibly resolved. These individuals should be required to go through this process before being allowed to petition EPA.

**B. Do you have a mailing list for Title V public participation for implementation of 40 CFR 70.7(h)(1)? If so, please provide it.**

DENR has not received much interest in individuals wanting to be on a list to receive all public notices. They are occasionally specific requests for certain type of facility in a certain area. Probably one of the main reasons for the lack of interest is more individuals are using internet to view public notices. DENR has established the capability for individuals to be alerted to public notices posted on DENR's webpage.

**C. Is there a policy which outlines the response to comments procedure or process, such as which comments are responded to, the time-frame for responding, how the permitting authority will respond, to whom, etc.?**

DENR's procedures for responding to comments are outlined in DENR's regulations at ARSD 74:36:05:18 through 74:36:05:20.01.

**1. If written, can you provide a copy? If not written, could you describe the policy?**

EPA has a copy of this already since DENR submitted as part of the package for EPA's approval of DENR's Title V air quality operating

permit program. However, if EPA cannot find the rules they are out on our webpage at: <http://legis.sd.gov/rules/DisplayRule.aspx?Rule=74:36:05>

#### **IV. Petitions**

##### **A. Since the second round program review, to what extent have Title V petitions:**

###### **1. Changed how permits are written;**

DENR has not had a petition in the 2010 through 2014 timeframe.

###### **2. Resulted in re-openings of other permits;**

DENR has not had a petition in the 2010 through 2014 timeframe.

###### **3. Resulted in an amended permitting process, to address any issues settled through petitions granted in full or in part?**

DENR has not had a petition in the 2010 through 2014 timeframe.

#### **V. EPA Relationship**

##### **A. Is there any EPA policy, on Title V, that is causing problems or confusion?**

**NOTE:** Answer may or may not be the same as I.E.2.

The only issue DENR has with EPA's policies is when EPA considers them equivalent to federal regulations.

##### **B. Has the state developed any tools, strategies, or best practices that have assisted in the inclusion of MACT subparts in Title V permits?**

As stated earlier, DENR is developing templates for MACT subparts and in some cases there are several templates for a subpart. This has helped speed up the process and provided consistent permit conditions throughout the state.

##### **C. Is the issue of startup-shutdown-malfunction (SSM) emissions causing problems or confusion in Title V permit writing?**

No, South Dakota has not had issues with startup-shutdown-malfunction emissions in its Title V air quality permits. The only issue related to startup-shutdown-malfunction is in the development of the emission limit for a certain unit. As noted in DENR's comments on EPA's SIP call on South Dakota's opacity exceptions for the startup, shutdown, and malfunctions, the state

emission limits were based on the unit operating during normal operations; not during startup-shutdown-malfunctions. Therefore, EPA cannot just arbitrarily assume that a unit may comply with the limit during these periods and should not try to resolve these issues through the Title V permitting program. Granted, there are certain units in which startup and shutdown do not impact the emission rate and the unit should be able to meet the emissions limit during this type of operation. But it is unrealistic to assume a unit can meet the emission limit during a malfunction.

When EPA develops emission limits under the New Source Performance Standards and Maximum Achievable Control Technology Standards, EPA needs to start taking this into account and have emission limits for normal operations and emission limits for startup and shutdown and need be malfunctions and develop testing methods that can provide accurate information during these types of operations for determining compliance. These startup, shutdown, and malfunction issues should be brought up during the development or revision of these rules and not during periods when the rules are being incorporated into a Title V air quality permit program.

**1. Has the state developed any tools, strategies, or best practices that have alleviated problems or confusion if either exist?**

No, South Dakota includes the regulations as they currently exist into the Title V air quality permit.

**D. Do you have any unaddressed training needs? What can EPA do to help?**

No. Continue to provide funding to organizations like WESTAR for training purposes.

**Attachment 2**  
**State/local Title V Program Fiscal Tracking Evaluation Questionnaire and DENR**  
**Responses**

Possible Resources Available	More Detailed Questions – Factors to Support a Permitting Authority’s Answer to the Basic Questions (Note: these are not all-inclusive, and some ideas will not apply in all cases)
<p>Req’s/Auth.: State/local Title V program legislation &amp; regulations</p> <p>Permit ref s: Permits state has written/submitted to EPA</p> <p>Fee Rate(s): State/local Title V program submittal, and then verify w/ Permitting Authority that info is up-to-date</p> <p>Billing/Payments: Permitting Authority records. Emission data may be in AIRS. If some fees are hourly, there should be some direct labor tracking mechanism (see accounting system, below).</p>	<p><b>1. Title V Fee Revenue</b></p> <p>Can the Permitting Authority show that sources are being billed in accordance with its fee requirement(s), and that sources are paying fees as required?</p> <p>Where are the fee collection authority and the fee rate(s) specified? Is the Permitting Authority including reference to these fee requirements in its Title V permits?</p> <p>Statutory authority is provided in South Dakota Codified Laws: §34A-1-58 (<a href="http://legis.sd.gov/Statutes/Codified_Laws/DisplayStatute.aspx?Type=Statute&amp;Statute=34A-1-58">http://legis.sd.gov/Statutes/Codified_Laws/DisplayStatute.aspx?Type=Statute&amp;Statute=34A-1-58</a>) and §34A-1-58.1 (<a href="http://legis.sd.gov/Statutes/Codified_Laws/DisplayStatute.aspx?Type=Statute&amp;Statute=34A-1-58.1">http://legis.sd.gov/Statutes/Codified_Laws/DisplayStatute.aspx?Type=Statute&amp;Statute=34A-1-58.1</a>).</p> <p>Administrative authority is provided in ARSD Chapter 74:37:01 – Air Emission Fees (<a href="http://legis.sd.gov/rules/DisplayRule.aspx?Rule=74:37:01">http://legis.sd.gov/rules/DisplayRule.aspx?Rule=74:37:01</a>).</p> <p>Each Title V air quality operating permit has the following requirements as general permit conditions:</p> <p><b>2.0 Permit Fees</b></p> <p><b>2.1 Annual air fee required</b> In accordance with ARSD 74:36:05:06.01, the owner or operator shall submit an annual administrative fee and an annual fee. The fee is based on actual emissions in accordance with ARSD 74:37.</p> <p>If this is for an ethanol plant, use this language instead: In accordance with ARSD 74:36:05:06.01, the owner or operator shall submit an annual administrative fee and an annual fee. The fee is based on actual emissions in accordance with SDCL 34A-1-58.1.</p> <p><b>2.2 Annual operational report</b> In accordance with ARSD 74:37:01:06, the Secretary will supply the owner or operator with an annual operational report in January of each year. The owner or operator shall complete and submit the operational report to the Secretary by March 1 of each year. The responsible</p>



**1. Title V Fee Revenue - Continued**

official shall sign the operational report in the presence of a notary public.

If this is for an ethanol plant, use this language instead:

In accordance with SDCL 34A-1-58.1, the Secretary will supply the owner or operator with an annual operational report in January of each year. The owner or operator shall complete and submit the operational report to the Secretary by March 1 of each year. The responsible official shall sign the operational report in the presence of a notary public.

**2.3 Annual air fee**

In accordance with ARSD 74:37:01:08, the Secretary will notify the owner or operator of the required annual air emission fee and administrative fee by June 1 of each year. The fees shall accrue on July 1 and are payable to the Department of Revenue by July 31 of each year.

If this is for an ethanol plant, use this language instead:

In accordance with SDCL 34A-1-58.1, the Secretary will notify the owner or operator of the required annual air emission fee and administrative fee by June 1 of each year. The fees shall accrue on July 1 and are payable to the Department of Revenue by July 31 of each year.

List the fee rate(s) formulae applicable for the time period being reviewed. (Include emission based fees, application fees, hourly processing fees, etc.)

Ethanol facilities pay the following:

- One-time \$1,000 application fee for new ethanol facilities; and
- Annual fee of \$1,000 administrative fee plus \$40 per ton of actual air emissions from the previous year.

Coal-fired power plants (Big Stone):

- Flat fee of \$220,000.

Other Title V air quality facilities pay the following:

- Application fee for new sources, modifications and renewals pay an application fee of \$125;
- Annual administrative and \$ per ton fee based on actual emissions from the previous year.
  1. Administrative fee consists of \$125 for actual emission less than 50 tons per year, \$600 for actual emission between 50 and less than 100 tons per year, and \$1,000 for actual emission 100 tons per year or more;
  2. \$7.50 per ton of actual emissions; and
  3. Minimum annual fee of \$250.

1. Title V Fee Revenue - Continued

- Rock crushers are permitted separately and pay a flat fee of \$400
- Asphalt plants are permitted separately and pay a flat fee of \$300

Does the Permitting Authority anticipate any significant changes to its fee structure?

Only if EPA's Clean Power Plan shuts down South Dakota's one coal-fired power plant.

What is the current status in States/locals with requirements to balance income & expenditures of the Title V program annually (i.e., must rebate any overage of fees, etc.)?

Not an issue.

Examine documentation of how the annual fees for sources are determined. Audit several sources' bills for accuracy.

- Are appropriate (actual or potential) emission records used for \$/ton based fees? How are the Permitting Authority and its sources determining actual emissions for fee purposes?

As stated in permit condition 2.2 of every Title V air quality operating permit, the permit holder is required to submit an annual operational report which contains all of the information DENR needs to calculate actual air emissions.

- Are records kept (and used) for any hourly based fees?

The operational reports and spreadsheets DENR produces for calculating air emissions are maintained electronically.

- Review similar documentation for other types of fee mechanisms.

Not applicable

Billing...

- How is the Permitting Authority notifying sources of the fees owed and due dates for payment?

Around May of each year, the amount of air fees (billing) is sent to each facility and the billing notifies them they have to pay the air fee by July 31 of each year.

**1. Title V Fee Revenue - Continued**

- Discuss how incoming payments are recorded to the appropriate accounts (receiving tracking).

The air fee is payable to the Department of Revenue which sends a notice of payment to DENR on a weekly basis. In some cases, the air fee payment is made directly to DENR in which case the funds are deposited into the air fee account. Both the fiscal personnel and Air Quality program within DENR tracks the payments to ensure all Title V air quality permittee's pay the appropriate air fee each year.

Payments...

- Are the sources paying the total fees charged each year?

Yes

- Are they paying on time?

A majority pay on time, but in some cases there are Title V air quality permittee's that do not.

- If there's a collection problem, how is the Permitting Authority addressing it?

If a Title V air quality permittee has not paid the air fee on time, DENR sends the permittee several notices to pay the fee and if that does not work, a collection agency is used to collect the fee.

- Are late fees being assessed? If so, are the late fees being credited to the Title V accounts?

No

**2. Title V Expenditures**

Is the Permitting Authority identifying division of expenses between Title V and non-Title V programs?

What matrix is the Permitting Authority using to differentiate Title V activities from non-Title V activities?

Direct labor:

- If used by State/local program, review time sheets and instructions given to employees as to how to code information into the time sheet. If time sheets are not used, investigate method that State/local program uses to differentiate Title V and non-Title V direct labor.

If used by State/local program, sample time sheets and instructions given to employees; equivalent records for alternate direct labor differentiation methods.

## 2. Title V Expenditures - Continued

- Ensure that accounting system is set up to utilize the various coding information.

- Analyze time sheets/instructions (and/or other direct labor differentiation method) for conformance with the matrix of acceptable Title V activities

South Dakota uses direct labor and a time sheet system. Each time sheet has several line items an individual can charge to. One of those line items is "Air Fees - Air Fees" which represents Title V air quality fees. All Air Quality Program personnel are instructed to charge any activities involving a Title V air quality operating permit to the "Air Fees - Air Fees" line item.

### Direct non-labor:

- Does the Permitting Authority utilize an allocation system that separates travel and equipment costs for Title V and non-Title V functions?
- If so, are the allocations in accordance with the Permitting Authority's Title V/ non-Title V activity separation?
- If not, are these included as part of indirect costs? (Direct non-labor needs to be addressed somewhere.)

For travel, the traveler identifies what percentage of the trip involves a Title V air quality operating permit. The percentage is used to charge the vehicle, room and board, etc. to Title V air quality fees. The rest is charged accordingly.

### Indirect labor & non-labor:

- How are indirect labor & non-labor costs apportioned between Title V vs. non-Title V accounts? (Indirect costs include parts of secretarial & managerial overhead, paper & supplies, space, utilities, generalized computers, etc., that is not addressed as direct labor/non-labor)

A set percentage of indirect labor and a percentage of non-labor cost is charged to Title V air quality fees.

Accounting system records showing that administrative/ clerical personnel costs are accounted for in the Title V program

Accounting system records showing that non-labor costs (travel, equipment, office space costs, etc.) are accounted for in some fashion and a portion is billed to Title V.

EPA Guidance includes: "Matrix of Title V-Related and Air Grant-Eligible Activities, Information Document," Office of Air & Radiation, May 31, 1994

3. Accounting System (i.e., the system that provides for analysis of the Title V program revenue and expenditure information gathered above)	
<p>Has the Permitting Authority integrated features into its accounting/financial management system which will:</p> <ul style="list-style-type: none"> <li>• identify Title V fee revenues separate from other funding?</li> <li>• identify Title V expenditures separate from other expenses?</li> <li>• produce management reports, periodically and as requested, which the Permitting Authority will be able use to certify as to the disposition of Title V funds?</li> </ul>	<p>Describe the accounting structure that the Permitting Authority uses to differentiate Title V \$ from other funds. [i.e., govt. fund, enterprise fund, etc. -- for more detail on options, see the U of MD report.]</p> <p>Does the accounting system have separate categorization for Title V and non-Title V funding and expenses?</p> <p>If yes, are these features being used to track Title V monies separate from non-Title V monies?</p> <p>If no, does the Permitting Authority keep any separate records that identify Title V monies separate from non-Title V monies? Could such information potentially be integrated into an accounting/financial management system?</p>
	<p>Review sample reports/specific reports for the time period being reviewed.</p> <p>For background:  <u>Overview of CLEAN AIR Title V Financial Management and Reporting, A Handbook for Financial Officers and Program Managers, Environmental Finance Center, Maryland Sea Grant College, University of Maryland, 0112 Skinner Hall, College Park, MD 20742, January 1997, [Publication Number UM-SG-CEPP-97-02]</u></p>

<p><b>4. Separation of Title V from §105 grant and grant match funding</b></p> <p>Can the Permitting Authority confirm that the Title V fees collected from sources are used to pay for the entire Title V program, and that no Title V fees are used as match to the CAA section 105 Air Program grant?</p>	<p>Determine the federal §105 grant award received, and the amount of state/local funds used during the time period being reviewed.</p> <p>Determine the Title V fees collected (and Title V funds available, if carryover of Title V fees is allowed by state/local regulations) during the time period being reviewed.</p> <p>Determine Title V expenditures during the time period being reviewed.</p> <p>Ensure that adequate non-Title V state/local funds were available to provide required match to the federal grant.</p> <p>Ensure that sufficient Title V funds were available to pay for the Title V program (i.e.-- Title V program is self supporting)</p> <p>Title V air quality fees are separate from the 105 Air Program grant.</p>	<p>Grant files -- FSR's for applicable years. (See appropriate EPA Region grant &amp; project manager staff)</p> <p>Permitting Authority accounting system reports showing revenue and expenditure summaries for Title V, grant, and other activities</p>
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Please make check or money order payable to:

BLACK HILLS POWER  
 PO BOX 1440  
 RAPID CITY, SD 57709-1440

Check if changes to mailing address, email or phone number entered on back of form

Current amount due 05/04/09:	\$76.56
Account balance:	\$76.56

DEPT OF ENV NAT RES  
 SCHULTZ BRAD  
 523 E CAPITOL AVE  
 PIERRE SD 57501-3182

**AMOUNT ENCLOSED:**  
 Web ID: 311507  
 Account Number: 08 01 070085 01

Please return top portion with payment. If paying in person please bring entire bill.

Energy Usage Billed 04/13/09  
 Service From: 03/11/09 TO 04/13/09  
 Service Address: 5627 PEACEFUL PINES RD  
 BLDG 1/2 BLACK HAWK SD  
 Service For: AIR QUALITY PROGRAM

Statement Date: April 14, 2009  
 Billing Period: 33 days  
 Web ID: 311507  
 Account Number: 08 01 070085 01

Meter Number	Rate Code	Present Reading	Previous Reading	Difference	Multiplier	Usage	Units
98344	20	47726	47037	689	1	689	kWh

**Account Billing Information**

Previous Billing	\$35.29
Credits Payment---March 26, 2009	35.29-
Balance Forward	.00
Charges	
Energy Charge---kWh	74.28
Energy Cost Adjustment	2.28

**ACCOUNT BALANCE** **\$76.56**

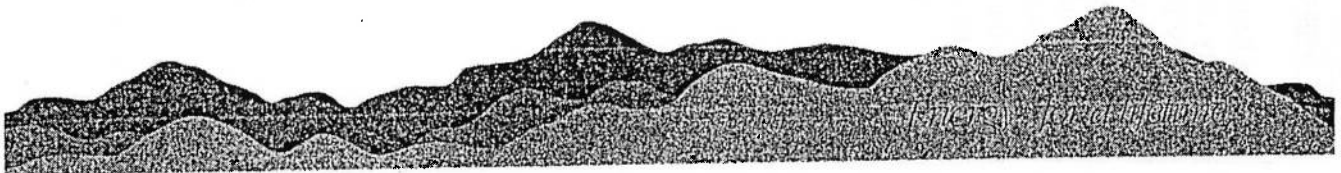
Pay account balance before May 09, 2009 to avoid a late payment charge.

Customers are responsible for payment of their electric bill. Please call us at (605) 721-2660, or visit your local BHP office when you have questions or concerns.

**Thank You For Being Our Customer!**

*70% Air Grant  
 30% Air Fee  
 Brad Schultz 4/15/2009*

RECEIVED  
 APR 15 2009  
 AIR QUALITY PROGRAM



**Employee Information**

Name: Rombough, Kyrk N Emp#: [REDACTED] Pos: [REDACTED] Vac [REDACTED] Personal [REDACTED]  
 Title: Mtrl Resources Engng Dir Timestudy: Timestudy Rules Sick [REDACTED] Military [REDACTED]

**Unofficial Leave Balances for 08/23/2009**

Description	08/09/09 08/10/09 08/11/09 08/12/09 08/13/09 08/14/09 08/15/09 08/16/09							Sun	Mon	Tue	Wed	Thu	Fri	Sat	Su	Pay Period Total	Work Period 1 Total	Work Period 2 Total	Work Period 3 Total
	Sun	Mon	Tue	Wed	Thu	Fri	Sat												
Hours Worked	0.0	8.0	8.5	8.5	8.5	8.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	33.5	33.5	0.0	0.0	
Admin	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
<b>Admin Daily Totals:</b>	<b>0.0</b>	<b>8.0</b>	<b>8.5</b>	<b>8.5</b>	<b>8.5</b>	<b>8.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>33.5</b>	<b>33.5</b>	<b>0.0</b>	<b>0.0</b>	
AIR FEES - AIR FEES	0.0	3.0	2.0	4.5	3.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	12.5	12.5	0.0	0.0	
AIRGR09 - AIR GRANT PPG 09	0.0	5.0	6.5	4.0	5.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	21.0	21.0	0.0	0.0	
<b>Timestudy Daily Totals:</b>	<b>0.0</b>	<b>8.0</b>	<b>8.5</b>	<b>8.5</b>	<b>8.5</b>	<b>8.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>33.5</b>	<b>33.5</b>	<b>0.0</b>	<b>0.0</b>	
<b>Admin Daily Totals:</b>	<b>0.0</b>	<b>8.0</b>	<b>9.5</b>	<b>8.5</b>	<b>8.5</b>	<b>8.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>33.5</b>	<b>33.5</b>	<b>0.0</b>	<b>0.0</b>	

Employee [REDACTED] Manager [REDACTED] Administrative [REDACTED] PrevWk Period: 0.0

Retrieve Leave Print Save Sign Close





**Kyril N Rombough: Multi-select tasks for period ending 08/23/2009**

PayCode	DistRule	Task Name	Start Date	End Date
ALL	ADMINBLZ	ADMIN BLIZZARD	11/08/2005	06/30/2020
ALL	ADMINFLD	ADMIN FLOOD	05/08/2007	06/30/2020
ALL	AIR QUAL	AIR QUALITY	01/25/2002	06/30/2020
ALL	AMBAIR08	AMBIENT AIR 08	03/24/2008	06/30/2020
ALL	CDSTIMUL	CLEAN DIESEL STIMULUS	06/30/1998	06/30/2020
ALL	CLDIESEL	CLEAN DIESEL GRANT	06/30/1998	06/30/2020
ALL	IND COST	FEDERAL INDIRECT COST	11/08/2005	06/30/2020
ALL	M & M	MINERALS & MINING	12/16/2006	06/30/2020
ALL	RADON 09	RADON PPG 09	10/16/2008	06/30/2020

Total Tasks: 9

Cancel OK

<b>SOUTH DAKOTA TRAVEL REQUEST</b> BOA FLEET & TRAVEL MANAGEMENT SFN 01239-0002		Bureau or Department <i>DEUR</i>	Program <i>AQ</i>
		Division <i>ES</i>	Circle One: <input checked="" type="radio"/> In-State <input type="radio"/> Out-of-State
Billing Center Code (Last Two Digits Optional)	Method of Travel <i>State Vehicle</i>		Est. Miles (Personal Vehicle)
Traveler's Name (Last, First, MI) <i>Rombough Kyrik N</i>		Office Phone <i>605-773-5708</i>	Home Phone <i>605-224-7625</i>
Purpose of Travel <i>Big Stone Public Hearing</i>		License Number	

**JOURNEY INFORMATION**

Journey Number	Origin	Odometer Reading	Departure Date	Departure Time	Circle One:
	<i>Pierre</i>		<i>July 16, 2008</i>	<i>3:00</i>	AM <input checked="" type="radio"/> PM
Segment	Destination				
1.	<i>Milbank</i>		<i>July 17, 2008</i>	<i>5:00</i>	AM <input checked="" type="radio"/> PM
2.					AM / PM
3.					AM / PM
4.					AM / PM
5.					AM / PM
6.					AM / PM
7.					AM / PM
8.					AM / PM
<b>REQUIRED: Return to Origin</b>		Final Odometer Reading	Return Date and Time		AM <input checked="" type="radio"/> PM
			<i>July 17, 2008 9:00</i>		

Comments/Vehicle Problems/Repairs *Brian Gustafson 7/14/08* *Lita Magedanz 7/14/08*  
*Change to Air Grant - 100%* White - Fleet and Travel Management; Yellow - Agency  
 Brian Gustafson Date Lita Magedanz Date

**COST ESTIMATES FOR OUT OF STATE TRAVEL**

Transportation \$	Meals \$	Lodging \$	Misc. Fees \$	Total \$
General Funds \$	Federal Funds \$	Other Funds \$	Non-State Funds \$	

**SIGNATURES**

**NOTE: Driver MUST sign to certify he/she holds a valid driver license**

Traveler Signature <i>[Signature]</i>	Date <i>7-14-08</i>	Driver License Number <i>106105</i>	Employee #	Expiration Date
Approving Officer <i>[Signature]</i>	Date <i>7/15/08</i>	Approving Officer		Date

**AGENCY TRAVEL COORDINATOR USE**

Coordinator Name	Date of Entry	Mode
Comments		
Ride Share Contact	Office Phone	Home Phone

**FLEET AND TRAVEL MANAGEMENT USE - FOR HIGH MILEAGE REQUEST ONLY**

Approval Signatures	Date	Comments
Authorization Number		

<b>SOUTH DAKOTA TRAVEL REQUEST</b> BOA FLEET & TRAVEL MANAGEMENT SFN 01239-0002		Bureau or Department <b>DENR</b>	Program <b>AQ - 50% Fees 50% Grant</b>
Billing Center Code (Last Two Digits Optional) <b>2020-9</b>		Division <b>DES</b>	Circle One: <input checked="" type="radio"/> In-State <input type="radio"/> Out-of-State Est. Vehicle (Personal Vehicle)
Method of Travel <b>State Car</b>		Office Phone <b>7734209</b>	Home Phone <b>334 8452</b>
Traveler's Name (Last, First, MI) <b>FROELICH STACY A</b>		License Number <b>AG-570</b>	
Purpose of Travel <b>air quality inspections</b>			

**JOURNEY INFORMATION**

Journey Number	Origin	Odometer Reading	Departure Date	Departure Time	Circle One:
<b>09017367</b>	<b>Pierre</b>		<b>7/28/09</b>	<b>6</b>	<input checked="" type="radio"/> AM <input type="radio"/> PM
1.	<b>Lake Preston</b>		<b>7/28</b>	<b>10</b>	<input checked="" type="radio"/> AM <input type="radio"/> PM
2.	<b>Brookings</b>		<b>7/28</b>	<b>1</b>	<input checked="" type="radio"/> AM <input type="radio"/> PM
3.	<b>Watertown</b>		<b>7/29</b>	<b>8</b>	<input checked="" type="radio"/> AM <input type="radio"/> PM
4.	<b>Big Stone City</b>		<b>7/29</b>	<b>4</b>	<input checked="" type="radio"/> AM <input type="radio"/> PM
5.	<b>Watertown</b>		<b>7/30</b>	<b>8</b>	<input checked="" type="radio"/> AM <input type="radio"/> PM
6.	<b>Big Stone City</b>		<b>7/30</b>	<b>3</b>	<input checked="" type="radio"/> AM <input type="radio"/> PM
7.	<del>Watertown</del>				<input type="radio"/> AM <input type="radio"/> PM
8.					<input type="radio"/> AM <input type="radio"/> PM
<b>REQUIRED: Return to Origin</b>		Final Odometer Reading	<b>7/30/09</b>	Return Date and Time	<b>10</b>

Comments/Vehicle Problems/Repairs

White - Fleet and Travel Management    Yellow - Agency

**COST ESTIMATES FOR OUT OF STATE TRAVEL**

Transportation \$	Meals \$	Lodging \$	Misc. Fees \$	Total \$
General Funds \$	Federal Funds \$	Other Funds \$	Non-State Funds \$	

**SIGNATURES**    NOTE: Driver MUST sign to certify he/she holds a valid driver license

Traveler Signature <i>Stacy A. Froelich</i>	Date <b>7/14/09</b>	Driver License Number <b>001696190</b>	Expiration Date <b>3/2/13</b>
Approving Officer <i>Mr. Kalf</i>	Date <b>7/14/09</b>	Approving Officer	Date

**AGENCY TRAVEL COORDINATOR USE**

Coordinator Name <i>[Signature]</i>	Date of Entry <b>7-20-09</b>	Mode <b>FSMP</b>
Comments		
Ride Share Contact	Office Phone	Home Phone

**FLEET AND TRAVEL MANAGEMENT USE - FOR HIGH MILEAGE REQUEST ONLY**

Approval Signatures	Date	Comments
Authorization Number		

**Attachment 3**  
**South Dakota Air Permitting Section Organization Chart**

DEPARTMENT OF ENVIRONMENT &  
NATURAL RESOURCES  
DIVISION OF ENVIRONMENTAL  
SERVICES  
AIR PROGRAM

