

TITLE V OPERATION PERMIT PROGRAM  
OEPA/USEPA WORKING DOCUMENT

I. Introduction

- A. This working document serves to supplement the implementation agreement (Agreement) currently in effect between the Ohio Environmental Protection Agency (OEPA) and the United States Environmental Protection Agency (USEPA). This working document defines procedures by which Ohio's Title V operating permit program will be administered. This working document further defines program activities that require coordination between USEPA and OEPA.

II. Document Availability

- A. To the extent practicable, OEPA and USEPA agree to make permit documents available to one another through electronic means, such as the Internet.
- B. OEPA agrees to make available through STARS the permit documentation listed in section V.C.1. of the Agreement. To the extent practicable, OEPA agrees to also make available via the Internet the permit documentation listed in section V.C.2. of the Agreement.

OEPA agree to make the following documents available through STARS: non-confidential operating permit applications or application summaries; preliminary determination documents; draft permits; response to comments of both the public and affected states, and any written refusal to accept an affected State's recommendations on a draft permit; proposed permits; final permits; any equivalent documentation generated by permit revision procedures; and other specific information agreed to by USEPA and OEPA. OEPA agrees to update permit documents available on the designated STARS database as milestones are achieved. If the document has a limited review time such as a draft permit, OEPA will update the activity log in STARS to notify USEPA of its availability prior to the beginning of the comment period.

All documents which require signature approval will include an indicator which contains, at a minimum, the initials of the individual signing the document and the date of the signature.

- C. As referenced in section IV.C.2.a. of the Agreement, OEPA agrees to also make available through STARS, source-specific permit tracking information. This information shall include information regarding the individual sources and their permitting status.
- D. OEPA agrees to update the information available in STARS, on or before each milestone occurs. OEPA agrees that the permit tracking information shall be updated to include all relevant tracking milestones at the same time that draft and proposed permits are copied to a database designated by OEPA.
- E. OEPA and USEPA agree to work together to further automate and continuously improve data transmittal procedures between the two agencies.

### III. Permit Review

- A. OEPA and USEPA agree to work together during the permit application review process to ensure that OEPA's Title V program issues permits that meet all requirements of Title V of the Clean Air Act. USEPA agrees to review draft and proposed permits in accordance with its differential oversight model, and also agrees to review additional draft permits as requested by OEPA.
- B. OEPA and USEPA agree to participate in monthly telephone conferences to discuss permit program implementation. The monthly calls will generally be scheduled for the second Thursday morning (9:00am - 10:00am CST) of each month. The monthly calls will serve as a forum for discussions between OEPA and USEPA on general permit policy issues.
- C. USEPA permit review staff agree to work directly and informally with OEPA permit review engineers regarding clarification of specific permit conditions or questions regarding any portion of a specific permit review file.

USEPA agrees to formally notify OEPA (Mike Ahern, Supervisor of the Permit Management Unit) of any objection to any proposed permit. The Permit and Grants section chief will serve as the primary contact person for resolving any objections by USEPA.

- D. OEPA and USEPA agree to notify one another of any issues as early as possible in the permit application

review process. Because USEPA will have the opportunity to be involved early, USEPA will provide guidance during the preliminary determination and draft permit stage, when possible. OEPA and USEPA agree to work together during the draft permit stage with the intention of resolving any issues prior to USEPA's formal 45 day review period.

- E. OEPA and USEPA agree that USEPA's 45 day review period on a proposed permit will not begin until all the following documents are available and OEPA updates the activity log in STARS to notify USEPA of the availability documents: the permit application or application summary form, the proposed permit, the public comments, and any written refusal to accept an affected State's recommendations.
- F. If requested by OEPA, for a limited number of specific individual permits, USEPA will, if the proposed permit is approvable, notify OEPA prior to the end of the 45 day review period that USEPA has no objection to the immediate issuance of that particular operation permit.
- G. Revisions to the acid rain portions of Title V permits:

Applications for revision to Phase I federal acid rain permits will be received, reviewed, and issued or denied by USEPA. Following issuance of a revised Phase I federal acid rain permit, EPA shall notify the OEPA, (Mike Ahern, Supervisor of the Permit Management Unit) of the permit revision. Such notification shall start the 60 day period for OEPA to revise the acid rain portion of Ohio's Title V permit. Ohio shall issue the acid rain permit exactly as it is worded by USEPA.

IV. Signatures

\_\_\_\_\_ Date: \_\_\_\_\_  
Robert Hodanbosi, Chief  
Division of Air Pollution Control  
Ohio Environmental Protection Agency

\_\_\_\_\_ Date: \_\_\_\_\_  
Cheryl L. Newton, Chief  
Permits and Grants Section  
Air Programs Branch  
Air and Radiation Division  
United States Environmental Protection Agency