

July 6, 1998

Mr. Robert Hodanbosi
STAPPA Chair, Permitting Committee
1800 Watermark Drive
Columbus, OH 43216-1049

Mr. Charles Lagges
ALAPCO President, Permitting Committee
1500 Maybrook Drive
Maywood, IL 60153

Dear Messrs. Hodanbosi and Lagges:

Thank you for your May 15, 1998 letter describing State and local concerns regarding the Environmental Protection Agency's (EPA's) use of its authority to object to proposed permits under the title V operating permits program. I recognize that this was a followup to my request at our Pine Needles meeting, and I appreciate the information. It will help us as we try to identify steps to improve the permit review process.

On a related matter, I would like to share with you information we recently received on permit issuance rates as a result of a similar request I made of our Regional offices. Though not directly linked with your information, it provides a useful overview of what is impacting the issuance of permits. It appears that there are several reasons for the current delays. These fall into two major groupings: issues internal to the permitting authorities and issues related to EPA. The three most frequently mentioned impediments to timely operating permit issuance were: hiring and retaining of permitting staff, diverting resources to competing priorities-- most notably issuing synthetic minor permits and construction permits, and underestimating the amount of time needed to work with sources and write permits. Also cited were EPA's lack of periodic monitoring guidance, delays in finalizing the part 70 revisions, and time spent working with the Regional offices.

Enclosed are three documents summarizing the Regional comments. This information has proven to be very useful in identifying a number of issues related to permit issuance rates.

It is also helping us to develop a list of potential action items that EPA can apply to fine tune its existing procedures and

help ensure an appropriate role for EPA in the issuance process. I look forward to working with you to see what we can do collectively to improve the issuance of permits at our meeting scheduled to occur after the part 70 stakeholders meeting on July 8. In addition, we will be meeting with STAPPA in August to discuss the interface between air toxics standards and title V permits. I trust this information will be helpful. Should you have any questions on the enclosures, please contact Steve Hitte at (919) 541-0886 or Scott Voorhees at (919) 541-5348.

Sincerely,

(original signed)
John S. Seitz
Director
Office of Air Quality Planning
and Standards

Enclosures

cc: B. Becker
T. Curran
B. Higgins
S. Hitte
D. Wallenberg
L. Wegman

Master List of Title V Permits “Roadblocks” and Next Steps

draft 6/11/98

(98 of 116 permitting agencies provided comments — including 10 agencies who said they had no roadblocks)

Permitting Authority	Reasons for Delays	# synthetic minor sources	Actions to lessen delays	Issuance Plan
REGION 1	(Comments from RO) 1. difficulty hiring and keeping staff 2. time spent developing and implementing PTE limiting rules (1500 T5 sources are now down to 800; another 1250 synthetic minors have already gotten, or will get emission caps) 3. underestimate of time needed for application review 4. the need for permit writers to maintain working knowledge of new MACT standards and other new applicable reqs. 5. some MACTs are very complex (e.g., pulp & paper, wood furniture, MWC) 6. difficulty in writing comprehensive permits that are understandable by general public		1. continue developing timely guidance (e.g., periodic monitoring) 2. develop MACTs with T5 in mind 3. give timely and useful comments on permits 4. continue holding biweekly calls 5. increase EPA’s role as a resource in addition to traditional oversight role 6. encourage consistency in permits while also allowing flexibility and innovation	

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Connecticut	<ol style="list-style-type: none"> 1. lack of EPA guidance on complicated MACT applicability and MACT requirements 2. lack of EPA training (by knowledgeable EPA staff) for State 3. lack of clear delineation of extensions and deferrals of T5 applicability 4. lack of periodic monitoring guidance 5. lack of explanation of relationship between extensions of interim approvals and proposed changes to part 70 6. lack of updates on status of part 70 revisions 7. need for additional EPA resources to address add on requirements due to EPA policy outside the context of part 70 revisions 8. need for prompt processing of SIP revisions 	149	<ol style="list-style-type: none"> 1. clear delineation of T5 applicability, including extensions and deferrals of applicability 2. periodic monitoring guidance 3. guidance on the relationship between interim approval extensions and proposed changes to part 70 4. frequent and regular updates concerning status of part 70 5. EPA resources to address add-on requirements from EPA policy outside the scope of part 70 6. prompt processing of SIP packages 7. EPA provide clear and consistent guidance on interface of title I (including SIPs and section 112) and title V 8. EPA should focus on permit issuance, not on correcting 20 year old NSR permit conditions 	
Massachusetts	<ol style="list-style-type: none"> 1. resources, workload, regulations are delaying issuance 2. review of applications 3. permit format development 4. training new staff and staff turnover 5. application format development 6. adoption of additional app. reqs. (e.g., NOx cap reg, NOx RACT) 7. issuing Phase II acid rain permits 8. clean up of existing reg. abnormalities 	480		

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Maine	<ol style="list-style-type: none"> 1. New Source Review -- our integrated T5/NSR program has severely complicated the NSR process and the T5 process 2. MACT -- timing of MACTs means T5 permit may get issued only to be immediately amended (e.g., pulp & paper) 3. resources -- cuts or redistribution of 105 grant fund for PM2.5 monitoring and cyclical nature of T5 fees has prevented filling vacancies 4. new construction -- 8 new nat. gas turbine NSR permits. these are high priority and Federal Land Managers are making unreasonable demands 5. federal enforceability -- little consistency within EPA. EPA needs to tell us which terms and conditions are state vs. federally enforceable 6. periodic monitoring -- EPA reviewers lack basic knowledge of permittee. Site visits are needed by EPA. EPA should rely on DEP expertise. 7. EPA Adding New Requirements -- EPA is imposing new conditions beyond those ID'ed in our interim approval. Unfair. 	276		
New Hampshire	<ol style="list-style-type: none"> 1. significant staff turnover due to marginally competitive salary structure (positions remain vacant up to 20 months) 2. long permit processing time (sources and attorneys are very active in review process; many site visits, calls and meetings) 3. WP's helpful, but streamlining permits to something meaningful to sources, inspectors and public takes time 4. lack of periodic monitoring guidance on gap-filling 	200 (125 permits have been issued)	1. fill all open permitting engineer positions	<p>7/31/98 -- 6 formal drafts, 4 issued</p> <p>11/1/98 -- 8 formal drafts, 10 issued</p> <p>7/31/99 -- 15 formal drafts, 45 issued</p> <p>11/1/99 -- 3 formal drafts, 60 issued</p> <p>2/28/00 -- 63 issued</p>
Rhode Island	<ol style="list-style-type: none"> 1. resources -- 8 month delay in filling 2 positions (very slow administrative process for hiring; FTE cap impeded hiring; FY97 state budget authorized lower fee collection than requested by dept.) 2. resources -- 50% loss of staff 3. workload -- review and drafting process is significantly greater than we thought 4. synthetic minors -- issued emission caps to 100 sources, this was a priority for 2 years 	101	task of processing emission caps for syn minors is largely done. this frees staff resources for T5	begin comment process for 3 permits within next 60 days. complete technical review of 3 applications by June 98.

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Vermont	<ol style="list-style-type: none"> 1. unrealistic time frames in Act and P. 70 2. applications can't be processed due to lack of information prompted by allowances in WP's (e.g., no look-back by source, but State still accountable for NSR applicability) 3. new/different policy issues in each permit (i.e., EPA is making case-by-case determinations and State cannot anticipate problems in advance of EPA review) 4. imposition of new requirements resulting from T5 (e.g., CAM) 5. drafting NSPS and MACT standards into permits. Myriad MRR requirements in Title I and section 112 standards are not permit friendly (e.g., wood furniture) 6. large and complex sources -- permits can become very lengthy for complex sources and internal review takes time 7. industry in no hurry -- once the application's in, source is not penalized for not having a permit. Pressure remains on State to issue NSR permits, so resources get diverted to NSR. 8. Hampered by hiring freezes and resource allocation at State level. 	60	Vermont will continue to work with STAPPA and NESCAUM to help eliminate or reduce the need for case-by-case reviews by the Regions through development of policies. there is little we can do to simplify federal standards or reduce the complexity of T5 facilities.	
REGION 2				
New York	<p>Lagging approval of state regs into SIP (State has different rules on its books than EPA has approved), Difficult to determine the appropriate app. req. Takes time to draft and review. Difficult to catch up.</p>	8500	Continue having meetings with NYSDEC to address concerns during pre-draft phase. EPA working with NY on approving NOx RACT rule and other rules.	NY has 25 "pre-draft" permits that State is reviewing.

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New Jersey	EPA's objection to two permits stopped production of all permits. Took three months to reach resolution. Working on other issues that were not raised as an objection but must be resolved to ensure consistency.		NJDEP will resume permit issuance once reach agreement with EPA. Minor NSR permitting increased, due to sources in Title V changing permits as well as sources requesting caps to get out of Title V. Resolution on all issues to be completed in March so that permits will begin to be proposed again in April 1998.	NJ will use initial permits as models. About 6 draft permits are currently being prepared.
Puerto Rico	Need to translate permits into Spanish. Work on model pharmaceutical title v permit delayed due to EPA offices' disagreements about the level of detail. 25 other facilities will be modeled after Merck permit.	46	EPA has seen some excellent drafts from PR (7 to date that are being translated into Spanish currently).	Once have draft permit for Merck, the other 25 pharmaceuticals should follow.
Virgin Islands	New employees that work in various media, resulting in other priorities	0	EPA will assist VI on drafting permits. This could include writing the permits.	The small number does make completing issuance of permits doable (according to EPA)

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Reasons expressed by all four states	<ol style="list-style-type: none"> 1. Lateness of EPA guidance (e.g., level of detail for air toxic rules). 2. Incomplete and changing guidance from EPA (e.g., periodic monitoring) 3. Changing permitting program from an emission points permit program to facility wide permitting program. 4. Insufficient time to develop complex permit program (e.g., develop operating permits program, computer systems and SOP's to handle new work.) 5. Too many conflicting federal rules (i.e., many NSPS conditions no longer make sense since BACT is far more stringent). 6. Its more time consuming than expected to write a permit. Since inception of CAA of 1990, there are thousands of pages of new rules (e.g., new air toxic rules). Often new rules conflict with existing rules, especially in monitoring, recordkeeping and reporting. It takes time to develop a compliance template that implements the rules and EPA regional offices are challenging these templates, causing further delays. 			
Add'l Comments From RO2	<ol style="list-style-type: none"> 1. Traditionally, air program had individual experts for various rules. Title V requires state staff and the Region to become experts on all applicable requirements. Various rules are often written in a manner that is difficult to comprehend. 2. Takes RO time to review permits (RO must make sure all provisions in a permit correctly restate the rule). 3. Delays in getting out the Part 70 rule. This has a large effect on deciding how much flexibility should be put in permit to avoid permit revisions when don't know what the permit revisions procedures will be. 4. Delays in and inconsistent responses from HQ offices regarding issues that arise from preparation and review of Title V permits have delayed the issuance of permits (e.g., periodic monitoring). 			<p>Recently, enforcement branch has become more involved in Title V. EPA will work with our two offices on obtaining permit expertise. States tend to have separated out the permitting folks from enforcement.</p> <p>RO plans to review permits mainly during the draft phase in order to ensure delays caused by objections can be avoided in the future. Region is committed to reviewing 50 permits a year as required by the MOA.</p>
REGION 3				

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Delaware	Synthetic minors have been issued first Hiring and training new staff Negotiations with Region (wording for monitoring, testing, record keeping, compliance language)	52	Most staff hired Training continues Have completed negotiations with Region	Issue all title V and synthetic minor permits by 1/3/99
District of Columbia		0	All 33 could be issued by 10/15/98	25 proposed by 5/15/98 8 drafted by 6/30/98 8 proposed by 8/30/98
Maryland	Lack of timely EPA guidance & regulations Much time spent working with industry No guidance on periodic monitoring Amount of time spent on synthetic minor and PTE issues EPA's inability to finalize part 70 means sources want more flexible permits Inability to get timely responses from EPA Lack of guidance from EPA HQ on fugitives Staff turnover			25 draft permits to EPA by 12/31/98 60 draft permits to EPA in '99 remainder of draft permits to EPA in '00
Pennsylvania				
Virginia		190 issued		
West Virginia	Longstanding staffing shortfall Funding for agency didn't happen until mid-'94, despite requests beginning in 1989 Ramp up occurred from early '94 to late '96 Significant increase in NSR activity Diversion of time and resources to NSR Confusion and redirection due to WP#1 Delays due to developing and debugging electronic application submittal process Controversy and turmoil over CAM and need for guidance EPA policy re fugitive emissions, PM/PM10 issues, interface of NSR and T5, IEU definition Absence of any pre-existing operating permit program prior to T5	3	Completion of revisions to permit format and content necessitated by NSR/T5 interface issue Deferral of inclusion of CAM requirements in permits Nearing completion of general permit structure for coal processing facilities/asphalt plants Commitment of more staff	75 (1st 1/3) required by 12/15/96, 0 issued 150 (1st 2/3) required by 12/15/97, 34 issued 232 (100%) required by 12/15/98, 130 projected to be issued 232 projected to be issued by 12/15/99

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REGION 4				
Alabama	<p>(1) Uncertainty in a number of federal programs related directly to the implementation of title V. For example:</p> <ul style="list-style-type: none"> • Numerous evolutions of the Enhanced Monitoring/CAM rules • Delay in finalizing Part 70 revisions • Problems in defining PTE <p>Alabama states that these programs are critical to the development of title V permits and fear that uncertainties or dramatic changes may significantly increase the workload associated with the title V program.</p> <p>(2) Alabama believed it was important to observe the progress of the programs that received early approvals and learn from their experiences ("middle of the pack" theory).</p> <p>(3) Other permitting, inspection and enforcement activities being carried out by the same staff members responsible for reviewing title V permit applications.</p>	43 sources under synthetic minor permits; 142 sources covered under generic permit by rule	<p>(1) Continue dialogue with EPA;</p> <p>(2) Complete review of permit applications in the first two program review cycles and request additional information from sources as needed.</p>	<p>Alabama did not submit a revised issuance plan . Instead Alabama stated its intent to issue all permits by October 15, 2001.</p> <p>Alabama believes that the 10-month extension (and any future extensions) to interim approvals (61 FR 56368) implied a 10-month extension to the permit issuance schedule as well. Region 4 disagrees with this assessment and is preparing a response to Alabama restating the requirement to issue all permits by December 15, 2000. The response will also state the Region's intention to conduct a program audit and fee evaluation if significant progress in permit issuance is not made by December 15, 1998.</p>
Jefferson County, AL	<p>Jefferson County will meet the five-year deadline for permit issuance.</p> <p>Issuance of some draft permits has been delayed for various reasons such as the evaluation of public hearing comments and additional testing; review of EPA comments; compliance issues; and facility changes in progress.</p>	75	The County has specifically identified sources to be permitted during each year of the first 5-year cycle and the permit writers responsible for drafting each permit.	<p>The County has revised it's issuance plan and will meet the original deadline as follows:</p> <p>12/15/97 to 12/15/98 - Issue 12 12/15/98 to 12/15/99 - Issue 10 12/15/97 to 12/15/00 - Issue 9</p> <p>An additional 5 permits have been proposed.</p>

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Huntsville, AL	Huntsville will meet the original three year deadline for permit issuance.	4	N/A	N/A
Florida	<p>(1) Having to make program (rule) changes to resolve interim approval issues and to accommodate for EPA guidance (i.e., White Paper I & II);</p> <p>(2) The time involved in the issuance of synthetic non-title V permits and the rule development associated with the conditional exemptions;</p> <p>(3) Processing of (new) title V sources resulting from the promulgation of various Federal regulations;</p> <p>(4) Permit processing delays due to the amount of comments received from applicants and EPA.</p>	226 (Includes FESOP, conditional exemptions, & construction permits)	The State will track progress towards meeting the deadline on a monthly and quarterly basis. The new issuance plan details issuance rates by District and Local agency office.	<p>The State has submitted a new issuance plan as follows:</p> <p>By 12/98 - Issue 100 By 12/99 - Issue 200 By 10/00 - Issue 99</p> <p>Total = 399 to be issued by 10/25/00.</p>
Georgia	<p>(1) The effort that has been, and is being, made to issue 520 synthetic minor permits (which were delayed because of the court decisions involving federal enforceability) and to process 422 applications for coverage under the State's permit-by-rule provisions;</p> <p>(2) the increased need for issuing state operating permits as industry prepared for title V and reviewed past permitting actions;</p> <p>(3) re-design of the State's title V permit application form following EPA's issuance of the White Paper guidance memoranda; (4) state-wide workshops for industry in 1996 on synthetic minor and title V permitting;</p> <p>(5) the need to provide information and supporting documentation during the period from approximately 1993 through 1996 when industry and some government sectors were pressuring Congress to repeal the title V portion of the 1990 CAA;</p> <p>(6) the mixed signals sent by EPA regarding the directions to be taken in the revisions to 40 CFR part 70; and</p> <p>(7) the need to recruit and train additional permitting staff.</p>	942 (includes synthetic minors & permit-by-rule coverage)	<p>(1) The hiring and training of additional permitting staff;</p> <p>(2) several reorganizations of the permitting program to redistribute the permitting workload;</p> <p>(3) requesting and being granted technical assistance from EPA-Region 4 in the form of a 10-month IPA assignment of a senior Title V staff person;</p> <p>(4) elements of new schedule deadlines have been placed in permit reviewer's performance standards.</p>	<p>The State has submitted a new issuance plan as follows:</p> <p>By 6/30/98 - Issue 81 7/1/98 to 12/30/98 - Issue 100 1/1/99 to 6/30/99 - Issue 99 7/1/99 to 12/30/99 - Issue 102 1/1/00 to 6/30/00 - Issue 87</p> <p>TOTAL = 469 permits to be issued by 6/30/00.</p>

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Kentucky	<p>Kentucky will meet the original five year deadline for permit issuance; however, several factors have delayed progress:</p> <p>(1) Issuance of first permits was slowed by inexperience;</p> <p>(2) Many of Kentucky's sources had not received a comprehensive permit for quite some time, which required more review time for permit writers;</p> <p>(3) Numerous minor compliance-related and application deficiencies were discovered during the application review process, leading to a delay in permit issuance;</p> <p>(4) Developing permit conditions to meet the periodic monitoring requirements. EPA has not finalized periodic monitoring guidance, and Part 70 is rather vague in addressing this. Striking a balance between industry's desire to not perform more monitoring than they had in the past, and EPA's desire for more periodic monitoring in some cases proved to be difficult and time-consuming;</p> <p>(5) Processing significant numbers of minor source permits and registrations, which is time-consuming;</p> <p>(6) A marked increase in the number of PSD, title V major, synthetic minor, and conditional major permit applications.</p>	46	<p>(1) Staff are becoming more experienced in writing title V permits;</p> <p>(2) Communicating with EPA on periodic monitoring issues and working toward an understanding of periodic monitoring requirements which are nationally consistent with other states.</p>	<p>Kentucky has submitted a revised (SIC based) issuance plan as follows:</p> <p>During 1998 - Issue 83 During 1999 - Issue 65 During 2000 - Issue 59</p> <p>All permits will be issued by the original deadline of December 14, 2000.</p>
Jefferson County, KY	<p>Jefferson County will meet the original three year deadline for permit issuance. Factors that have impacted original schedule include:</p> <p>(1) concentration on issuing FEDOOPs, and has issued all of these permits;</p> <p>(2) negotiation with the Chamber of Commerce about general permit condition language delayed the finalization of title V permits;</p> <p>(3) confusion regarding actions to be taken in the revisions to the implementing regulations of 40 CFR Part 70.</p>	29	<p>Negotiation with the Chamber of Commerce regarding general permit conditions has been completed.</p>	<p>The County intends to issue all 40 title V permits by the original March 1999 deadline.</p>

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Mississippi	<p>(1) The effort that was exerted to issue over 144 synthetic minor permits;</p> <p>(2) EPA's unpreparedness in moving from program development to permit issuance, including an inability to provide guidance, assistance, or example permit content.</p> <p>(3) The timing of the transition policy resulted in the effort expended on 45 facilities being wasted. The timing of the first White Paper caused Mississippi to defer work on the first round of in house applications to determine what effects this would cause, again resulting in delay or wasted effort.</p> <p>(4) Development of permit conditions to meet the periodic monitoring requirements.</p> <p>(5) Unpromulgated revisions to Part 70 have had the greatest impact on slow permit issuance.</p> <p>(6) The need to develop MACT terms and conditions has been found to be onerous and resource intensive as each is slightly different and EPA has changed the affected source definition in at least one case.</p>	206	<p>(1) Remaining sources have been rescheduled for issuance.</p> <p>(2) Elements of new schedule deadlines have been placed in permit reviewer's performance standards.</p>	<p>Mississippi has completed an internal agency detailed issuance schedule; however, that schedule was not provided to EPA. The State did state its intent to issue all remaining final title V permits by January 27, 2000.</p>

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North Carolina	<p>(1) The effort exerted to issue over 1100 synthetic minor permits (which were delayed by the State due to the court decisions involving federal enforceability);</p> <p>(2) the delay in finalization of the revisions to Part 70;</p> <p>(3) twelve PSD projects, including seven currently in-house, have required large amounts of state resources since interim approval of the program;</p> <p>(4) significantly more comments have been received on draft Title V permits by applicants, their attorneys, and their consultants than was originally expected; (5) the need to coordinate permit issuance through trade associations has slowed the drafting process;</p> <p>(6) the need to develop MACT terms and conditions has been found to be onerous and resource intensive;</p> <p>(7) completeness determinations took longer than expected ;</p> <p>(8) the development of standardized periodic monitoring terms and conditions;</p> <p>(9) the training of internal staff, and subsequent seminars held to train industry;</p> <p>(10) the need to issue all 14 Phase II acid rain permits by 1/1/98.</p>	672 (plus 80 under exclusionary rule)	<p>(1) Encouraging pre-review/draft permit conferences with applicants;</p> <p>(2) Formation of implementation teams for development of MACT permit conditions;</p> <p>(3) Limiting time applicants can respond with additional information as requested;</p> <p>(4) All title V engineering time has been dedicated to permit issuance.</p>	North Carolina intends to issue all final title V permits by December 15, 2000. A detailed schedule of issuance (by SIC) was submitted to EPA.
Forsyth County, NC		17	N/A	Forsyth County will meet the original three year deadline for permit issuance. The County will issue all final title V permits by December 31, 1998.
Mecklenburg County, NC		204 (covers 66 sources)	None provided.	Mecklenburg intends to submit all proposed title V permits to EPA by December 15, 1998. Final issuance will occur in 1999.
Western NC		0	None provided.	Western North Carolina intends to submit all 8 draft permits to EPA in 1998. Final issuance will occur by December 2000.
South Carolina		<p>(1) Development of standard permit language and permit templates for title V and conditional major permits;</p> <p>(2) Issuance of conditional major permits;</p> <p>(3) EPA delays in providing guidance on matters such as those covered by White Paper 1, and periodic monitoring.</p>	162 (includes 32 individual syn. minors and 130 general permit coverages)	<p>Will focus on staff prioritization of workload. To date the State has:</p> <p>(1) 201 draft permits under internal state review</p> <p>(2) 154 draft permits under facility for review</p>

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Tennessee	(1) Lack of periodic monitoring guidance from EPA; (2) Issuance of synthetic minor permits to opt out of title V; (3) Discussions with EPA and title V facilities on periodic monitoring and emission factors.	258	(1) Targeted permits sent to EPA well in advance of public notice for early review; (2) Processing of non-targeted permits on a draft/proposed basis (i.e. transmit to EPA at or near the time of public notice); (3) Change from hard copy submittals to e-mail submittals of draft/proposed permits reducing processing time; (4) Grouping of permits issued based on source-category and regulation applicability.	Tennessee intends to meet the original three year deadline for permit issuance, but may find that they need additional time due to unforeseen circumstances.
Chattanooga, TN	Chattanooga will meet the original three year deadline for permit issuance.	83	N/A	N/A
Knoxville, TN	Knoxville will meet the original three year deadline for permit issuance.	1	N/A	N/A
Memphis, TN	Memphis will meet the original three year deadline for permit issuance.	35	Will submit majority of permits on a draft/ proposed basis (i.e. transmit to EPA at or near the time of public notice).	N/A
Nashville, TN	Nashville will meet the original three year deadline for permit issuance.	100	Will submit majority of permits on a draft/ proposed basis (i.e. transmit to EPA at or near the time of public notice).	N/A
REGION 5				

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Illinois	<p>IL's VOC emission trading program, ERMS, is implemented in T5 permits and requires detailed baseline determinations. 135 T5/ERMS permits ready for public comment but awaiting ERMS section.</p> <p>Some of the 642 sources covered by Transition Policy are applying for FESOPs, diverting IL staff attention from T5.</p> <p>1,841 FESOPs issued first, increased T5 startup time.</p> <p>Almost all applications need substantial work on applicable requirements.</p> <p>Sources attempt to claim "confidential business information," as with production limits.</p> <p>T5/NSR timing incongruous.</p> <p>CAM, 112(g), new MACT possible future roadblocks.</p> <p>Smaller T5 source permits take 4-6 mos., larger sources ahead may take longer.</p>	1,841	<p>Reorganized staff on task basis, i.e. T5, FESOP and Utilities, as opposed to prior geographic basis.</p> <p>Increase visibility of transition policy problem (sources under 50% T5 PTE). Encourage extension up to final PTE rulemaking. Lack of extension a critical resource issue.</p> <p>Region 5 to inform States to consider policy extended. For legal purposes HQ should address issue immediately to prevent transfer of State resources from T5 permit issuance to addressing these smaller sources.</p>	<p>31% issued by 4/30/99; balance thereafter. IL has maintained a detailed issuance plan, but it is dynamic and modified per ERMS developments and other adopted rules, e.g. CAM.</p>
Indiana	<p>Finalizing model language.</p> <p>Working with regulated community.</p> <p>Development of Compliance Monitoring Plans.</p> <p>First year focus on Source Specific Operating Agreements (SSOA) and FESOPs to opt-out sources.</p> <p>High staff turnover.</p> <p>Complex source population.</p> <p>Identification and notification of newly subject air toxics sources.</p>	921	<p>Improved guidance, issue resolution, and model permit for staff.</p> <p>Improved management system for permit tracking.</p>	<p>464 T5s issued by 12/13/98, remaining 286 to be issued by 12/15/2000.</p>

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Michigan	<p>Start-up time needed to get legislation and program established since no operating permit program existed previously.</p> <p>Effort expended on opt-out sources.</p> <p>Training of staff on program requirements.</p> <p>Late promulgation of Part 70 and Part 70 Revisions.</p> <p>State program had to be changed to be consistent with white papers.</p> <p>Implementation guidance created in the form of rules or formal operational memos due to industry pressure.</p> <p>Developing data management system to receive and track applications electronically.</p> <p>Difficulty in determining best method and establishing appropriate level of detail for including all MACT and NSPS conditions.</p>	397	<p>Improved guidance memos for staff.</p> <p>Clearer permit procedures.</p>	<p>50% T5 permits issued by 2/99.</p> <p>75% by 2/00.</p> <p>100% by 2/01.</p>
Minnesota	<p>Started on biggest emissions sources and most complex, controversial facilities in State to meet goal of 80% T5 emissions permitted by 12/31/98. MN addressed many public comments and concerns on these sources which involved much staff time and effort.</p> <p>MN T5 issuance strategy slowed issuance in first three years. Some facilities take 2-3 years to go through permitting process.</p> <p>MN permitted synthetic minors so as not to be subject to NESHAP requirements.</p> <p>Developed registration (prohibitory rule-like permits) and general permit to opt-out hundreds of small sources.</p> <p>Installed new computer system (DELTA) which will facilitate reissuance, improve compliance tracking system. Slowed short-term permitting process due to information and data entry required.</p> <p>MN implemented flexibility provisions in several T5 permits.</p> <p>Expanded complexity, time need.</p>	1828	<p>MN increased number of hours permit writers spend writing permits, decreased their involvement in rule, enforcement and compliance activities.</p> <p>MN continues to look for opportunities to create additional general permits and registration permit categories to reduce number of facilities needing T5 permits.</p>	<p>80% T5 emissions permitted by 12/31/98. Number T5s issued to increase significantly once big, complex, controversial facilities permitted.</p>
Ohio	<p>Lost a year getting online permit submission and review up and running.</p> <p>Scrutiny by regulated community.</p> <p>Understaffing.</p>	87		<p>All draft T5 permits by Sept. 1999.</p> <p>All final T5 permits by Dec. 1999.</p>

Permitting Authority	Reasons for Delays	# synthetic minor sources	Actions to lessen delays	Issuance Plan
Wisconsin	<p>25% vacancy rate for permit engineers for past 3 years. Currently 10% vacancy rate due to the DNR reorganization, decentralization. Spending, hiring freeze resulted from reorganization.</p> <p>Lack of comprehensive training program for new permit writers.</p> <p>Computer equipment problems for first two years slowed WI's regional review.</p> <p>Number of hours to write permits was underestimated, so staffing levels also underestimated.</p> <p>Have combined T4/T5 permits.</p> <p>Issued FESOPs and general operating permits (217 of 499 FESOPs and approx 150 GOPs issued).</p>	499	<p>New training system as of December 1997 that should reduce the learning curve time for new engineers.</p> <p>Permits submitted electronically and available on Internet.</p> <p>Sharing of boilerplate language between permit writers.</p> <p>Program priority shift to 55% permits/45% other.</p> <p>Budget requests to fill vacancies and hire new engineers for 99/01 budget cycle.</p>	<p>Sept 2001 completion w/o new hires in July 99.</p> <p>November 2000 completion w/all new hires in July 99.</p>
Other	<p>Lack of guidance. Late promulgation of Part 70. Part 70 Revisions ongoing.</p> <p>The most difficult sources to permit under T5 are ahead, considering "mega," complex sources where HON or NSPS apply. Ambitious schedule too tight. Possibly conflicting goals: number T5s issued, quality programs, % T5 emissions permitted, opt-out sources (FESOPs), high-priority construction permits.</p> <p>Startup of data management and tracking systems.</p> <p>Understaffing.</p>	Region 5 Total 5573	<p>Finalize Part 70 Revisions.</p> <p>Searchable Internet access to guidance.</p> <p>Share model MACT language.</p> <p>Internet access for State permit engineers.</p> <p>T5 fee audit.</p>	---
REGION 6				
New Mexico	<p>Turn over in personnel</p> <p>NM had to invent their proposal from scratch</p> <p>EPA is adding requirements as the program develops that must be accommodated</p> <p>It is a growth and change process</p>	14	Agreed to issuance plan	<p>Revised Permit Insurance Plan:</p> <p>1998 - 38 permits</p> <p>1999 - 51 permits</p> <p>2000 - 44 permits</p>

Permitting Authority	Reasons for Delays	# synthetic minor sources	Actions to lessen delays	Issuance Plan
Albuquerque	hiring permitting staff has been limited by mandates from City Council and Mayor need more title V permit training by EPA the City has a diverse source base, therefore a wide range of applicable requirement	4	have requested additional personnel from City & reorganized to increase title V staff worked with industry in a cooperative effort to develop permit terms	expect approximately 8 draft permits by end of March will not exceed permit time schedule by more than 120 days
Arkansas	focused on issuing synthetic minor permits working out title V comments with EPA	133	have issued most synthetic minor permits & will now concentrate on title V permits	Revised Permit Issuance Plan: 10/98 - 25% 10/99 - 75% 10/00 - 100%
Louisiana	Inadequate number of staff members Issues with Title 3 and Title 5 interface Numerous complex permits One and a half year period to write one permit	do not track	currently in the process of hiring and training additional staff members	
Oklahoma	Loss of trained staff Inability to replace staff who have left Inadequate number of permit evaluators and writers Inadequate Title V operating fee Lack of interest by industry to get operating permits issued, but high interest in construction permits and minor operating permits	183	Complete efficiency study Initiate specialization within engineering staff Additional training to increase efficiency Continue to request additional permits staff	Issue Title V Permits as rapidly as possible given constraints
Texas				
REGION 7				

Permitting Authority	Reasons for Delays	# synthetic minor sources	Actions to lessen delays	Issuance Plan
Iowa	<p><u>Main reason</u> working with facilities so they understand the process, their emission limits, and applicable rules. Requires at least 2 site visits and a number of meetings for each permit.</p> <p>Time to train new staff requires more time than originally estimated.</p> <p>Time to develop standard conditions.</p> <p>EPA's delay on CAM required Iowa to develop own policy.</p>	151 & have applications for about 300 more.	Meeting the deadline is not a concern for Iowa. It is much more important to issue Title V permits that are correct and complete than it is to issue all the permits within three years.	Not revised plan.
Kansas	<p>Resources used to issue FESOP permits. FESOP permits were given a high priority because of EPA's insistence.</p> <p>Unsettled issues including periodic monitoring, enhanced monitoring, Part 70 revisions, 112(r), and 112(g) created confusion regarding the extent these unsettled issues should be addressed in the application, both by the agency and the applicant.</p>	550 [3/5/98] expects to issue more than 600 total		Not revised plan.
Missouri	<p>Applications not required before end of first year.</p> <p>Deluged by construction permit applications from sources that failed to submit proper construction permit applications for approval.</p> <p>Staff vacancies in both the operating and construction permit units that were not approved to be filled, therefore the section had a lack of adequate staff resources to process the additional construction permit applications or the operating permits.</p> <p>EPA rulemaking delays [particularly on CAM]. It did not seem logical to go through the process of issuing initial operating permits, and then reopen them shortly thereafter as EPA revised the Title V rules.</p>	8 with 266 applications under review	The three year time frame was unrealistic from the outset. The National Pollutant Discharge Elimination System (NPDES) operating permit process required about ten years to issue the initial permits.	Not revised plan.
Nebraska	<p>Increase in the number of construction permit applications due to increased awareness by sources as a result of T5.</p> <p>High turnover of staff. Takes time to train inexperienced staff.</p> <p>Finding past construction permit issues that must be resolved, including PSD.</p> <p>Time it takes source to review first draft of permit.</p>	686 with 71 applications to review.	Add staffing, combine construction and operating permits were practical, develop standard policies and procedures, and improve applications.	Has a revised plan and will update the plan again in the near future.

Permitting Authority	Reasons for Delays	# synthetic minor sources	Actions to lessen delays	Issuance Plan
Lincoln-Lancaster	Did not provide any information			
City of Omaha	Did not provide any information			
REGION 8				
Colorado	<ol style="list-style-type: none"> 1. Identification of sources and mailouts to 340 sources 2. Program development - met with industry over 6 month period; worked on model permit 3. Hiring/training of new staff 4. Program implementation, including numerous pre-application meeting w/ sources 5. WP's 1&2 - time spent analyzing and implementing 6. Dev. of State's own periodic monitoring guidance 7. Hiring/training replacement staff 8. NSR-Related Activities-most of 1st 1/3 of sources requested NSR permit revisions; 400 new and modified NSR permits; T5 staff had to work with NSR staff as new NSR terms were created 	180 (includes FESOP, PP, and dropped out)	<ol style="list-style-type: none"> 1. Hiring and training replacement staff 2. Sources are encouraged not to submit requests for mods unless it is business necessity 3. Requests for mods get lower priority than initial issuance 4. Hiring a permit writer who was instrumental in writing CO's regs 5. Will reevaluate issuance rate later in 1998 and provide additional resources if necessary and available. 	Will make every effort to issue remaining permits by 3/1/99
Montana	<ol style="list-style-type: none"> 1. Staffing 2. Reorganization 3. Database system worked on, then dropped 4. Regulatory priority goes to NSR 	25	<p>Working hard to stay fully staffed. Reorganized structure is efficient. Moving forward without a database system. Attempting to streamline preconstruction program. This would free up people to work on T5.</p>	All facilities have been assigned to staff. Goal is to issue half the remaining permits by end of 10/98.
North Dakota	<ol style="list-style-type: none"> 1. No definitive guidance on periodic monitoring 2. Modifications to existing T5 permits 	89	<p>EPA should clearly define periodic monitoring for all types of control equipment. EPA needs to simplify the methods for modifying T5 permits.</p>	We will try to have all permits issued by 08/07/98 but 4 may be delayed because of other issues.

Permitting Authority	Reasons for Delays	# synthetic minor sources	Actions to lessen delays	Issuance Plan
South Dakota	<ol style="list-style-type: none"> 1. Change in particulate ambient standard - unsure how to proceed with the Rapid City sources until SD knew how the new ambient standard would be implemented. 2. Number of sources requesting synthetic minor permits. 	68 (48 issued)		State has issued 81% of its initial permits and has an additional 5% in public comment or EPA review. State has committed to have all remaining permits drafted and in public and/or EPA review by 3-yr. anniversary date.
Utah	<ol style="list-style-type: none"> 1. Identified 100 "issues" that needed resolving 2. Permits go through individual and group peer review 3. Involving sources in all aspects of process 4. Focused on permitting sources with more significant environmental benefit 5. Combined Title V and Title IV permits 6. No EPA guidance on periodic monitoring 7. Difficulty of actually writing periodic monitoring conditions into permits 8. Extremely diverse and complex nature of sources in UT 9. Issuing approx. 50 syn minor permits. 10. Making determinations that sources weren't even subject to T5. 11. Developing data management system 12. Developing policies and procedures to implement large number of new requirements (CAM, 112(r), part 70 revisions) 	approx. 56	<ol style="list-style-type: none"> 1. Writing permits for same industrial group during same time frame 2. Developed most sophisticated date management system in U.S. 3. Involving sources in all aspects of process 	As of 3/20/98, final action on 32 of 104 (31%). Permits issued for 20 of 104 (19%). Final action on 60% expected in very near future. A few of most complex sources will require work into 1999. Pace has increased dramatically now that program is developed.
Wyoming	<ol style="list-style-type: none"> 1. Issuing 1/3 of permits in 1st year unrealistic 2. Lack of EPA guidance (no model application, treatment of IEUs, p.m.) 3. Late EPA guidance (WP#1, WP#2) 4. Time spent explaining impact of WP's to industry. 5. Staff turnover 	approx. 63	Continue to write and issue permits as rapidly as possible. Hire and train additional new staff.	Believe we can finish the initial round of permits within one year. We are finding additional work in producing admin. amendments for existing permits, plus major and minor mods.
REGION 9				
California				

Permitting Authority	Reasons for Delays	# synthetic minor sources	Actions to lessen delays	Issuance Plan
Amador County	Only two staff members. Limited budget.			1-2nd quarter FY'98 1-3rd quarter FY'98 1-1st quarter FY'99
Bay Area				11-1st quarter FY'98
Butte County	Need clear consistent definition of program. Change in requirements creates drain on district staff.			3-2nd quarter FY'98 2-3rd quarter FY'98
Calaveras County				
Colusa County	Unresolved EPA/State issues (i.e., concerns re District-only permit conditions.)			1-2nd quarter FY'98 3 when EPA/State issues resolved.
El Dorado County	Need response from EPA on questions re Tier II report.			Unable to determine.
Feather River County	Finances (fees). Staff.			3-3rd quarter FY'98 1-4th quarter FY'98
Glenn County				
Great Basin				
Imperial				
Kern County	Limited resources. Waiting for resolution of issues re contested T5 before sending draft PTOs.			Currently preparing draft PTO's.
Lake County	Clear guidance on 112(r) constituents, CH4 and NH3, in determining PTE.			Addressing synthetic minors first.
Lassen County	N/A			5-3rd quarter FY'98

Permitting Authority	Reasons for Delays	# synthetic minor sources	Actions to lessen delays	Issuance Plan
Mariposa County				
Mendocino County	Short staffed.			3-3rd quarter FY'98
Modoc County	Time, negotiation of terms.			In process.
Monterey Bay	None.			13 by 1st quarter FY'99 (2 or 3 per quarter)
Mojave Desert	Resources.			17-2nd quarter FY'98 thru 2nd quarter FY'99 16-2nd quarter FY'99 thru 2nd quarter FY'00
N. Coast				1-1st quarter FY'98 2-2nd quarter FY'98 2-3rd quarter FY'98
N. Sierra County				1-2nd quarter FY'98 2-3rd quarter FY'98
N. Sonoma County	All permits are for geothermal plants. After first approval expect others to follow quickly.			1 by 1st quarter FY'98 1 to 2 per subsequent quarter until completed.
Placer County	Need to amend T5 rule for "White Paper II" revisions. Staff resources needed.			None established.
Sacramento Metropolitan	Changes in EPA policy. Inconsistent interpretation. Too much attention to insignificant units. Anticipated changes in facilities.			2 per quarter

Permitting Authority	Reasons for Delays	# synthetic minor sources	Actions to lessen delays	Issuance Plan
San Diego County	California variance issue. Outdated SIP esp. re NSR. Periodic monitoring. Issues re federal enforcement of state preconstruction permit requirements.			All by 3/6/99. No interim schedule.
San Joaquin Valley	Demonstrating compliance w/ outdated SIP rules. Negotiating MRR requirements. Incorporating rule and facility changes after initial application. Determining basis for requirements added to permits prior to notification.			18-1st quarter FY'98 20-2nd quarter FY'98 20-3rd quarter FY'98 20-4th quarter FY'98 20-1st quarter FY'99 20-2nd quarter FY'99 24-3rd quarter FY'99
Santa Barbara	Reduction in staff.			2-1st quarter FY'98 3-2nd quarter FY'98 2-3rd quarter FY'98 3-4th quarter FY'98 5-1st quarter FY'99 1-3rd quarter FY'99
San Luis Obispo County	No problem.			2-1st quarter FY'98 2-2nd quarter FY'98
Shasta County	District workload & resources. EPA policy on federally enforceable conditions.			2 to 3 per quarter.
Siskiyou County				
South Coast				96-1st quarter FY'98 255-2nd quarter FY'98
Tehama County				1-4th quarter FY'98
Tuolumne County	Out of date SIP (grain loading rule)			1-calendar YR'97 1-calendar YR'98

Permitting Authority	Reasons for Delays	# synthetic minor sources	Actions to lessen delays	Issuance Plan
Ventura County	Delays in EPA approval due to periodic monitoring requirements.			7-2nd quarter FY'98 7-3rd quarter FY'98 4-4th quarter FY'98 5-1st quarter FY'99
Yolo-Solano County	Limited staff. Review of toxic emissions. SIP rules and providing information to public.			3-1st quarter FY'98 5-2nd quarter FY'98 2-4th quarter FY'98
Arizona	Outdated SIP.			18-1st quarter FY'98 16-2nd quarter FY'98 13-1st quarter FY'99
Maricopa County	Limited resources.			6-2nd quarter FY'98 3 per quarter beginning 4/1/98
Pima County	Conformance with ADEQ procedures and process for developing permits.			14-calendar YR'98 7-calendar YR'99
Pinal County	None.			4-1st quarter FY'98 3-2nd quarter FY'98 3-3rd quarter FY'98
Nevada				9-1st quarter FY'98 8-2nd quarter FY'98 7-3rd quarter FY'98 7-4th quarter FY'98 5-1st quarter FY'99 1-2nd quarter FY'99
Clark County	Low staff. Applications not processible. Applicable requirements not established. Sources undergoing major modification and have not been issued NSR permits.			8-4th quarter FY'98 3-1st quarter FY'99 Remainder require amendment.

Permitting Authority	Reasons for Delays	# synthetic minor sources	Actions to lessen delays	Issuance Plan
Washoe County	EPA regs not promulgated. Staff shortages.			1-2nd quarter FY'98 1-3rd quarter FY'98 1-2nd quarter FY'99
Hawaii	Economic slump, delays in hiring.			All by 3rd quarter FY'98
Comments from RO	<ol style="list-style-type: none"> 1. limited resources (15 PA's) 2. outdated SIPs (5 PA's) 3. need clear/consistent interpretation/definition of program (4 PA's) 4. periodic monitoring requirements (3 PA's) 5. waiting for resolution of issues (district-only permit conditions; Tier II report; before sending draft PTO's (3 PA's) 6. change in rule (3 PA's) 7. change in facilities (2 PA's) 			
REGION 10				
Washington DOE	<ol style="list-style-type: none"> 1. no pre-existing operating permit program. 2. Processed a large number of synthetic minor permits 3. Lack of consistent periodic monitoring guidance 4. Guidance on applications (WP #1) was received after all of our applications were received 5. Streamlining in WP#2 so cumbersome that no permits in Washington used the procedure. 6. Extensive Minor New Source Review program created many applicable requirements on many units of all sizes and must be incorporated into the permit. Determining periodic monitoring for small units at a large source is a difficult task. 7. Unexpected lengthy consultations and negotiations with sources and EPA Region X over the terms of the permits. 8. Compliance issues were uncovered as permit was being negotiated. Sometimes source wanted underlying regulatory orders updated before finalizing permit. 			
WA - ERO	None	14	None	None

Permitting Authority	Reasons for Delays	# synthetic minor sources	Actions to lessen delays	Issuance Plan
WA - CRO	<ol style="list-style-type: none"> 1. Staffing 2. public hearings more time-consuming than anticipated 	4	Engineer position is filled	Most permits are drafted, and we anticipate proposing about one permit per month between spring and early summer.
WA - Industrial Section	<ol style="list-style-type: none"> 1. Complex sources 2. Staff time competition with NPDES permits 3. Unclear direction from EPA-HQ regarding parametric monitoring 	0	Staff has been assigned to drop work on NPDES permits until AOP permits have been issued.	We are using the first Draft permit in each source category as a "model" for the others in the category. The Aluminum Permits (8 sources) are waiting for the first draft to be issued in April 1998. After that permit is farther along the others will follow. The Pulp and Paper Permits (9 permits) are being drafted between 3/98 and 6/98.)
WA - Nuclear Waste Program	The USDOE Hanford Nuclear Reservation is an extremely complex source with radioactive and non-radioactive emissions	0	Draft permit issued on 3/16/98. Public Hearing will be 3/31/98.	None

Permitting Authority	Reasons for Delays	# synthetic minor sources	Actions to lessen delays	Issuance Plan
Olympic	<p>1.OAPCA's first permit (K Ply) was issued at a time when there was much uncertainty about compliance assurance monitoring. As a result, OAPCA had to issue the K Ply permit a second time to rectify shortcomings of the first permit issued. To make a long story short, the K Ply permit was a learning experience and took a long time to issue.</p> <p>2. OAPCA's public noticing of draft permits has gone beyond the requirements of WAC 173-401. This is good in that OAPCA can be assured of reaching concerned citizens, but this assurance comes with a price. OAPCA's enhanced public outreach efforts result in substantial workload associated with meetings, responsiveness summaries and hearing which adds to the overall permit issuance time.</p> <p>3. OAPCA's participation in the Pollution Prevention in Permitting Project associated with the LASCO permit was quite time intensive. The P4 project was worthwhile and we are now realizing the benefits of flexibility measures incorporated into the LASCO permit by the P4 project. However, the P4 project workload was substantial and is part of the reason why our initial round of permits are behind schedule.</p>	10	<ol style="list-style-type: none"> 1. Standard and proven permit format. 2. More experience with CAM mechanisms. 3. More experience at writing permit conditions. 	OAPCA is committed to issuing the remaining 7 permits by October of 1998.
Puget Sound	<p>Inconsistent guidance from EPA and changes in EPA rules such as CAM</p> <p>Much of EPA guidance has been after the fact. For example, White Paper #1 came after we received all the applications.</p> <p>Concentrated on Synthetic Minors</p> <p>Helping the sources understand the permit process and the terms and obligations of the permit</p> <p>Very new program requiring development of new procedures and approaches.</p> <p>Late EPA comments on draft permit</p>	50 All issued	<p>Will schedule a meeting with EPA during the 30-day comment period on most permits.</p> <p>Working better with sources and inspectors</p>	All will be issued in 1998
Benton County	The remaining source is undergoing a review to determine what new controls will be required and then that new requirement will be incorporated into the AOP.	4	The process to determine the appropriate new controls is being expedited.	Permit is expected to be in draft form by mid-summer 1998.

Permitting Authority	Reasons for Delays	# synthetic minor sources	Actions to lessen delays	Issuance Plan
Yakima Regional	Unexpected lengthy consultations and negotiations with sources and EPA Region X over the terms of the permits.		One source (a new major source) has been asked for additional information and 2 permits are currently at Region X for the 45 day review period	Once EPA finishes the 45 day review the permits will be issued soon.
Spokane	<ol style="list-style-type: none"> 1. Addressing outstanding issues. 2. Processing synthetic minor requests 3. Waiting for imminent new applicable regulations 4. Manpower 	23	<p>Working to address outstanding issues on a timely basis. Drafting permits ahead of time so that when new applicable requirements are promulgated they can be quickly added to the permit and the permitting process can move along.</p> <p>Working with sources before issuing drafts to minimize changes needed as a result of the comment period.</p>	23 synthetic minors have opted out of the program using WAC 173-400-091. Others have opted out during new source review, but we do not track the number of sources that do this.
Southwest	<ol style="list-style-type: none"> 1. Cleaning up old NSR issues so outdated requirements do not get incorporated into Title 5 as compliance issues 2. Resolving toxic air pollutant (TAP) issues under WA NSR program prior to issuing Title 5 permit 3. Incorporating revised PM emission factors for grain terminals into WA NSR permit prior to issuing Title 5 permit 4. Recent major RACT analysis completed which is now in litigation. Title 5 was delayed in anticipation of having RACT completed. 5. One new source which is not yet required to have an application submitted. 	21 SM permits issued	Title 5 permitting is proceeding or will be proceeding once WA NSR issues are resolved. Anticipate having all first round permits issued no later than July 1, 1998.	<p>Title 5 permits will be issued to all outstanding sources upon resolution of NSR issues, or other issues as appropriate. All first round Title 5 permits will be issued no later than July 1, 1998.</p> <p>1 pending (T5 applicant) (3 of 21 were T5 applications) (3/16/98)</p>

Permitting Authority	Reasons for Delays	# synthetic minor sources	Actions to lessen delays	Issuance Plan
Northwest	<ol style="list-style-type: none"> 1. There was no state operating permit program in the State of Washington prior to the Title V Air operating Permit program. It has taken us longer to become familiar with concepts and procedures unique to a renewable operating permit program. Four new positions were added to work on Title V issues. The training and program familiarization caused added delays. 2. We have not received consistent guidance from EPA on compliance monitoring issues. We have revised draft permits on several occasions in response to new interpretations. 3. The advent of Title V has caused us to revisit many minor Notice of Construction approvals and state PSD permits to clean them up and make them compatible with the goals of a title V permit. 4. The State of Washington has a minor new source review program. Many of our older T5 sources have generated many minor permits. This adds greatly to the complexity in a title V permit. Many of the permitting strategies developed for T5 have been incorporated in our minor new source permits adding review time. 5. State law (RCW 70.94.152(3)) has a defined time period to process new source review applications. It has also been our internal policy to comply with state rule WAC 173-401-700(5). This provision ranks new source review as a higher priority than T5 permits. 6. Recent promulgations of MACT, NSPS, NSR and emission guidelines standards has added another level of complexity to processing some of our more complex T5 permit applications. Training time has increased in response to these new requirements. 7. In an effort to maintain internal workforce stability we have resisted the temptation to add additional full time staff. Personnel with the necessary training and experience are not readily available. It is difficult to justify investment for what likely would be temporary positions. 8. EPA Region 10 has experienced several reorganizations which has shifted experienced T5 people around. The time taken to “get up to speed” has delayed reviews of some of our draft permits and responses to technical questions. 9. We have also stepped up our enforcement at T5 sources in 	9	<p>Investigate Intergovernmental Personnel Act with Region 10.</p> <p>Review personnel needs, hire part time employees Evaluating need for additional full time permit engineers Considering temporary assignment to outside consulting firm We would welcome more EPA guidance on compliance monitoring procedures and streamlining to simplify permits EPA should train and retain qualified Title V and NSR experts to help resolve regulatory interpretation issues.</p>	<p>We have three permits that are close to issuance. There have been delays because of EPA objections. We are striving to correct these "deficiencies".</p> <p>We have and will be participating in training on Refinery MACT which will help us incorporate the MACT provisions in the refinery permits.</p> <p>We have no specific time table to issue Title V permits. We are continuing to proceed as time and resources allow.</p> <p>We, as the permitting Authority, would like to issue permits with compliance monitoring plans as originally proposed. These plans were developed from our</p>

Permitting Authority	Reasons for Delays	# synthetic minor sources	Actions to lessen delays	Issuance Plan
Oregon	<p>Working with sources to clarify application information and requests for additional information (this is partly due to the level of detail required by the Title V program).</p> <p>Legal determinations such as colocated source evaluations, enforcement actions, applicable requirements, and source applicability.</p> <p>Transferring elements of a prior permitting program that focused on the environmentally significant activities at a facility to a more comprehensive and detailed Title V operating permit program has resulted in more work than expected to re-evaluate plant site emission limits, address fugitive and insignificant emission sources, and, in some cases, further PSD analysis.</p> <p>Development of periodic monitoring without guidance from EPA.</p> <p>Receiving and processing permit modifications before all of the permits have been issued.</p> <p>The higher level of public visibility and criminal liability caused the applicants to involve more legal, technical, and political advisors.</p> <p>Oregon was ahead of the nation in developing and implementing a Title V program and in many cases there was no national guidance. Once guidance was developed, it was sometimes necessary to revisit past decisions.</p>	98	<p>Part 70 revisions and additional EPA guidance will help.</p> <p>Identifying periodic monitoring is a learning process and will improve with time and experience. Once guidance is provided by EPA and based on our initial experience, we will upgrade and improve the monitoring in future permits.</p> <p>As the permits get better at addressing operational flexibility and the Part 70 revisions are finalized, there will be less need for permit modifications.</p> <p>Design permits to assure compliance and provide technical assistance. Department and the regulated community can focus on writing better permits.</p> <p>The program includes several opportunities to improve the permits in the future through reopenings or at renewal. The Department believes that there is an environmental benefit to issuing permits that include increased compliance assurance monitoring as expeditiously as possible.</p>	<p>The remaining permits are either being reviewed by EPA, in the public comment period, or nearly ready for public comment so the Department expects that the permits will be issued in the near future (3 to 6 months)</p>

Permitting Authority	Reasons for Delays	# synthetic minor sources	Actions to lessen delays	Issuance Plan
Lane Regional	<p>EPA TV guidance late & unstable Changing EPA policies means many state and local rule and policy rewrites and extra meetings with the regulated community Unrealistic time frame in CAA Resolution of historical PSD issues time consuming Management and permit writer turn over Steep learning curve for new staff Industry hires permit writers from agency Under-staffing for work load High burnout rate among permit writers Difficulty recruiting & retaining permit writers Priority on NSR and SM permits first A few large, controversial and complex sources took much longer than anticipated Agency turmoil unique to LRAPA (Legislative effort to disband the agency) resulted in survival focus rather than comprehensive efforts to develop sophisticated and efficient permitting process Much time spent coordinating issues with state and EPA (important but time consuming) Many policy issues to resolve in integrating existing program elements into TV and sorting out complex TV elements consumes time Earlier permitting rules did not integrate smoothly and seamlessly LRAPA did not dedicate permit writer(s) to TV, all permit writers write all types of permits TV program more complex than expected</p>	23 (20 issued)	<p>Recruit operations manager (expected to start May 1, 1998) Recruit environmental engineer (TV experience high priority skill) EPA TV IPA would help Hire extra engineering staff Aggressive TV and general permitting training for new staff Shelter permit writers from lower priority demands for their time and attention Templates/boiler plates Generic permits being considered Refine permitting tracking system and database to make the process more efficient Pre-meetings with sources to avoid later delays Division of labor/specialization Use inspectors to write permits for less complex sources Overtime (though makes burnout worse) Improve SBAP</p>	<p>High potential health harm TV involving new sources SM high priority Rest first in/first out</p>

Permitting Authority	Reasons for Delays	# synthetic minor sources	Actions to lessen delays	Issuance Plan
Idaho	<p>After receiving interim approval of Idaho's Title V permitting project, Idaho instigated a pilot permitting program consisting of four industry source types. Idaho and industry representatives have had several meetings to negotiate the Title V Operating Permit general conditions and facility wide conditions. Concurrently with this process Idaho and the four pilot facilities began a negotiated permit process on the pilot permits. These processes have taken a significant amount of time due to the number of issues being negotiated. The pilot group agreed that no Title V permits would be issued until the general conditions and facility wide conditions have been agreed upon by industry and DEQ. In addition, the group agreed that no Title V permits would go to public comment prior to at least one pilot facility operating permit going to public comment.</p> <p>At this time the general conditions and facility wide conditions are complete. Negotiations on the pilot permits continues, but are nearing completion. The first permits should go to public comment within two to three months.</p>	<p>~ 34 OP ~ 78 PTC ~ 112 Total</p>	<p>Staff has continued to process Title V permits for facilities other than the pilot facilities. DEQ plans to send drafts to EPA for pre public comment review. DEQ believes this will save time by shortening turn around on issues that may have to be renegotiated. When the first pilot facility permits are drafted, they, along with all additional permits that are ready, will be put out to public comment. In addition, Idaho has compressed the schedule to issue all Title V permits.</p>	<p>Idaho's estimated issuance schedule is attached.</p>
Alaska	<ol style="list-style-type: none"> 1. Some facilities unaware of need to apply. 2. General permits preparation delayed due to focus on interim approval revisions. 3. Waited for EPA approval of some permit language in General Permits before starting to issue permits. 4. Significant time lost due to reorganizations. 5. Critical vacancies at DEC and EPA 	<p>157 issued, 37 pending</p>	<ol style="list-style-type: none"> 1. Coordinated public comment periods. 2. Streamlined applications, closer working relationship with EPA. 3. Many applications not received until last possible day, but all got completeness reviews. Developed spreadsheet of app. reqs. which can target individual facility reqs. quickly, summarizing them for permit writing. 	<p>Last of the syn minor permits to be issued within 30 days. All General Permits approved in 60 days, complete issuance by 10/98.</p> <p>Original issuance plan from 1994 was: year 1--accept applications and issue syn minor limits; year 2--issue all General Permits and 1/3 of operating permits; year 3--issue remaining operating permits.</p>

Permitting Authority	Reasons for Delays	# synthetic minor sources	Actions to lessen delays	Issuance Plan
Regional Office Comments	<p>Ranked in order of significance from most to least</p> <ol style="list-style-type: none"> 1. Need to address issues prior to permit issuance (e.g., applicability determinations, cleaning up old NSR, revising emission factors, waiting for new app reqs.) 2. Higher priority to issuing syn minor and NSR permits 3. Inconsistent, late or absent EPA guidance or rules 4. Sources, PAs and EPA on a steep learning curve (e.g., underestimated time needed to work with sources on applications, several agencies never had an operating permit program before) 5. Unanticipated resource drains in other program areas (e.g., small staffs, lawsuit, staff turnover) 		<ol style="list-style-type: none"> 1. EPA issue timely and consistent guidance 2. More EPA resources devoted to technical assistance 3. Train EPA staff to provide appropriate level of tech support to States 4. When guidance is late, make sure it doesn't undermine decisions already made by PAs 	<p>PAs are confident that permits will be no more than 1 year late.</p>

Title V Permits Issuance Chart

draft 6/11/98

Permitting Authority	Program Effective Date	Number of Sources Expected to Get a Permit	Number of Applications Received	Number of Sources Issued a Permit	Date of Survey	“Meeting” Permits Issuance Schedule (Y/N)	Number of Synthetic Minor Sources	Comments
REGION 1								
Connecticut	04/23/97	336	69	0	2/27/98	No	149	
Massachusetts	05/15/96	231	251	6	2/27/98	No	480	20 sources who had applied withdrew their applications and instead became syn minors. 25 permits now in comment period. By 6/30/98, additional 16 permits will be final, and 13 more will be in comment period.

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Maine	03/24/97	70	52	0	2/27/98	No	276	10 draft permits have been completed, and 2 of those are being reviewed informally by EPA
New Hampshire	11/01/96	63	63	0	2/27/98	No	200	EPA has provided comments on 2 draft permits, one of which is now in public review. Additional 10 permits are actively under development.
Rhode Island	07/05/96	64	59	0	3/25/98	No	101	
Vermont	11/01/96	24	24	3	2/27/98	No	60	1 proposed permit currently awaiting EPA comments
REGION 2								
New York	12/9/96	804	552	0		No	8500	

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New Jersey	6/17/96	300	268	3	3/9/96	No		300 under source category interim approved program (additional 200 permits will be issued in years 4 and 5 for a total of 500 sources)
Puerto Rico	3/27/96	60	60	0		No	46	
Virgin Islands	8/31/96	8	7	0		No	0	
REGION 3								
Delaware	1/3/96	93	87	0	3/15/98	No	52	
District of Columbia	9/6/95	40	33	0	3/15/98	No	0	40 includes 6 small sources < 4 TPY and 1 hospital with shut down boiler
Maryland	8/2/96	181	184	0	3/4/98	No		3 facilities shut down after submitting T5 application
Pennsylvania	8/29/96	≈ 800	≈ 800	> 125	4/98	See comment	≈ 400	State indicates it is meeting issuance schedule. Numerous permits are at proposal stage.

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Virginia	TBD	347	223	0	3/19/98	TBD	190	TBD = to be determined. VA’s final approval wasn’t sent to Congress, therefore the T5 program hasn’t yet been officially approved; 114 applications are complete
West Virginia	12/15/95	225	232	52	3/24/98	No	3	225 majors, 174 deferred nonmajors; 7 landfill applications received over and above the 225; 17 permits in draft stage
REGION 4								
Alabama	12/15/95	328	328	0	2/9/98	No	185	Source Category-Limited Interim Approval
Jefferson County	12/15/95	47	47	12	1/23/98	Yes	75	Source Category-Limited Interim Approval
Huntsville	12/15/95	11	11	8	3/16/98	Yes	4	

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Florida	10/25/95	466	503	36	11/31/97	No	226	plus 1,321 title V area sources expected to get permits plus 1,278 title V area source applications received plus 1,247 area sources issued a final permit
Georgia	12/22/95	469	469	5	03/31/98	No	942	
Kentucky	12/14/95	276	276	12	03/10/98	Yes	46	Source Category-Limited Interim Approval
Jefferson County	04/21/96	40	40	0	12/15/97	Yes	29	
Mississippi	01/27/95	418	418	144	02/02/98	No	206	
North Carolina	12/15/95	460	453	14	03/31/98	No	752	

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Forsyth County	12/15/95	16	16	0	02/06/98	Yes	17	
Mecklenburg County	12/15/95	15	15	0	02/06/98	No	204	
Western NC	12/15/95	7	7	0	02/06/98	No	0	
South Carolina	7/26/95	356	351	0	1/29/98	No	162	
Tennessee	8/28/96	354	354	17	3/23/98	Yes	258	
Chattanooga	4/24/96	23	23	8	3/31/98	Yes	83	
Knoxville	5/30/96	11	11	0	3/10/98	Yes	1	
Memphis	8/28/96	42	42	0	1/9/98	No	35	
Nashville	3/15/96	15	15	6	3/31/98	Yes	100	
REGION 5								
Illinois	3/07/95	774	761	27	3/01/98	No	1841	
Indiana	12/14/95	750	757	11	3/01/98	No	921	

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Michigan	2/10/97	580	575	24	3/01/98	No	397	
Minnesota	7/17/95	300	339	71	3/01/98	No	1828	
Ohio	10/01/95	694	694	26	3/01/98	No	87	
Wisconsin	4/05/95	780	745	113	3/01/98	No	499	
REGION 6								
New Mexico	12/19/94	166	175	36	3/1/98	No	14	
Albuquerque	3/13/95	22	25	8	3/1/98	No	4	
Arkansas	10/10/95	285	239	46	3/1/98	No	133	
Louisiana	10/12/95	1200	1028	334	3/1/98	No		
Oklahoma	3/6/96	290	290	32	3/1/98	No	183	Source Category-Limited Interim Approval
Texas	7/25/96	950	950	580	3/1/98	Yes		Source Category-Limited Interim Approval
REGION 7								

Permitting Authority	Program Effective Date	Number of Sources Expected to Get a Permit	Number of Applications Received	Number of Sources Issued a Permit	Date of Survey	“Meeting” Permits Issuance Schedule (Y/N)	Number of Synthetic Minor Sources	Comments
Iowa	10/2/95	285	285	11	2/20/98	No	451	
Kansas	2/29/96	330	330	126	3/10/98	No	>600	125 sources covered by 2 general permits and 1 source-specific permit
Missouri	5/13/96	335	335	5	3/27/98	No	274	26 permits have completed objection period
Nebraska	11/17/95	122	110	3	3/24/98	No	757	
Lincoln-Lancaster	11/17/95	17	17	2	3/24/98	No		
City of Omaha	11/17/95	17	17	8	3/24/98	No		
REGION 8								
Colorado	2/23/95	153	153	32	2/23/98	No	180	
Montana	6/12/95	67	62	8	3/1/98	No	25	

Permitting Authority	Program Effective Date	Number of Sources Expected to Get a Permit	Number of Applications Received	Number of Sources Issued a Permit	Date of Survey	“Meeting” Permits Issuance Schedule (Y/N)	Number of Synthetic Minor Sources	Comments
North Dakota	8/7/95	53	67	30	2/25/98	No	89	In addition to 67, 2 applications have come from landfills and 1 from a new source
South Dakota	4/21/95	202	284	163	3/6/98	No	68	the 202 sources actually cover 208 source applications, but some of the 208 were co-located and will be permitting together. 120 sources to get one general permit.
Utah	7/10/95	92	104	20	3/20/98	No	56	Final action completed on 32 of 104 (31%). Permits have been issued for 20 of 104 (19%). 2 permits are under review and 28 more are being written. Expect 60% completion soon. A few sources will be worked on in '99.
Wyoming	2/21/95	161	229	103	2/5/98	No	63	103 plus 3 modifications

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REGION 9								
California								
Amador County	6/2/95	3	2	0	4/98	No		3 applications were due in the first year
Bay Area	7/24/95	90	90	10	4/98	No		84 applications were due in the first year
Butte County	6/2/95	4	4	0	4/98	No		5 applications were due in the first year
Calaveras County								
Colusa County	6/2/95	4	4	0	4/98	No		4 applications were due in the first year
El Dorado County	6/2/95	2	0	0	4/98	No		2 applications were due in the first year
Feather River County	6/2/95	4	4	0	4/98	No		3 applications were due in the first year

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Glenn County	8/13/95	2		0	4/98	No		2 applications were due in the first year
Great Basin	6/2/95	7	7	3	4/98	No		7 applications were due in the first year
Imperial	6/2/95	7	7	0	4/98	No		7 applications were due in the first year
Kern County	6/2/95	7	7	0	4/98	No		7 applications were due in the first year
Lake County	8/14/95	5	5	0	4/98	No		5 applications were due in the first year
Lassen County	6/2/95	5	5	0	4/98	No		5 applications were due in the first year
Mariposa County								
Mendocino County	6/2/95	3	3	0	4/98	No		

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Modoc County	6/2/95	1	1	0	4/98	No		1 applications were due in the first year
Monterey Bay	11/6/95	16	13	8	4/98	No		13 applications were due in the first year
Mojave Desert	3/6/97	33	33	0	4/98	No		33 applications were due in the first year
N. Coast	6/2/95	7	7	4	4/98	No		7 applications were due in the first year
N. Sierra County	6/2/95	3	3	0	4/98	No		3 applications were due in the first year
N. Sonoma County	6/2/95	10	10	0	4/98	No		10 applications were due in the first year
Placer County	6/2/95	8	8	0	4/98	No		8 applications were due in the first year
Sacramento Metropolitan	9/5/95	12	12	2	4/98	No		12 applications were due in the first year

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San Diego County	3/6/96	27	24	0	4/98	No		24 applications were due in the first year
San Joaquin Valley	4/97	142	130	67	4/98	Yes		142 applications were due in the first year
Santa Barbara	12/95	16	15	2	4/98	No		
San Luis Obispo County	12/1/95	4	4	0	4/98	No		4 applications were due in the first year
Shasta County	8/14/95	11	11	1	4/98	No		11 applications were due in the first year
Siskiyou County	6/3/95	0	1	0	4/98	No		0 applications were due in the first year
South Coast	3/31/97	900		0	4/98	No		900 applications were due in the first year
Tehama County	8/14/95	1	1	0	4/98	No		1 applications were due in the first year
Tuolumne County	6/2/95	4	2	0	4/98	No		4 applications were due in the first year

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Ventura County	12/1/95	23	23	4	4/98	No		23 applications were due in the first year
Yolo-Solano County	6/2/95	17	17	0	4/98	No		17 applications were due in the first year 3 of the 17 are no longer subject
Arizona	11/29/96	40	40	0	4/98	No		40 applications were due in the first year
Maricopa County	11/29/96	43	31	0	4/98	No		43 applications were due in the first year
Pima County	11/29/96	21	20	0	4/98	No		22 applications were due in the first year
Pinal County	11/29/96	10	6	0	4/98	No		10 applications were due in the first year
Nevada	1/12/96	77		0	4/98	No		77 applications were due in the first year

Permitting Authority	Program Effective Date	Number of Sources Expected to Get a Permit	Number of Applications Received	Number of Sources Issued a Permit	Date of Survey	“Meeting” Permits Issuance Schedule (Y/N)	Number of Synthetic Minor Sources	Comments
Clark County	8/14/95	50	30	1	4/98	No		30 applications were due in the first year
Washoe County	2/5/95	3	3	0	4/98	No		3 applications were due in the first year
Hawaii	12/1/94	92	137	33	4/98	No		112 - 117 applications were due in the first year
REGION 10								
Washington								
Eastern Regional Office	12/09/94	9	9	9	12/97	Yes	14	Expected 23 sources. 14 got synthetic minor permits, leaving 9 T5 sources
Central Regional Office	12/09/94	5		1		No		
Industrial Section	12/09/94	17	17	0		No	0	These sources are most complex in WA, including primary aluminum smelters and paper mills.

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Nuclear Waste Program	12/09/94	1	1	0		No	0	Plan to address public comments by 5/15/98, then submit to EPA for 45-day review. Permit delayed purposefully to synchronize reporting periods under the AOP and requirements of WA Dept. of Health
Olympic	12/09/94	12	11	3	3/98	No	10	OAPCA is committed to issuing the remaining 7 permits by 10/98. One source has been issued a NOV and is on a compliance schedule to submit a T5 application.
Puget Sound	12/09/94	50	50	2		No	50	
Benton County	12/09/94	2	2	1	03/13/98	No	4	

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Yakima Regional	12/09/94	5	6 and 2 more on Yakima Reservation	2	03/13/98	No		Received 8 applications, including 2 sources on a reservation; one source went out of business, one new source; 2 permits are at RO for 45-day review and 2 permits have been issued
Spokane	12/9/94	13	14	3	3/20/98	No	23	
Southwest	12/08/94	11	14	5	3/16/98	No	21	3 applications were from sources that have become synthetic minors. (1 additional application due on 8/9/98)
Northwest	12/09/94	14	14	1	3/13/98	No	9	

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Oregon	01/03/95	122	135	87	4/01/98	No	98	122 is actual number to get a permit. It doesn't include syn minors or non-T5 sources. 135 is actual # of applications received. 5 sources later shut down, 6 later became syn minors. 2 of the applications were later combined with other applications because the sources were single sources.
Lane Regional	01/03/95	28	23	4	3/20/98	No	23	
Idaho	1/6/97	64	64	0	3/98	No	112	
Alaska	12/16/96	214	167	40	3/15/98	No	194	40 sources were covered by 2 general permits.

