



**Olympic Region Clean Air Agency  
Title V Program Review  
(2<sup>nd</sup> Round)**

**EPA Region 10**  
*Final September 29, 2020*

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## Attachments

- 1 Program Review Kickoff Letter and Information Request, April 29, 2020
- 2 Program Review Information Request Response, May 27, 2020
- 3 Title V Operating Permit System Reported Data Summary

## I. Introduction

This report documents the (2020) second review of the Olympic Region Clean Air Agency's (ORCAA's) Title V permitting program. The first Title V program review for ORCAA was completed in September 2007.

### ORCAA's Title V Program

The Olympic Region Clean Air Agency is a local air pollution control agency with jurisdiction in six counties in western Washington: Clallam, Grays Harbor, Jefferson, Mason, Pacific and Thurston. ORCAA implements the State of Washington operating permit regulations found in Washington Administrative Code 173-401, but has their own fee rules. The U.S. Environmental Protection Agency, Region 10<sup>1</sup> granted ORCAA full approval of its title V program, effective September 12, 2001. 66 FR 42439 (August 13, 2001). A revision to Washington's Title V rules was approved, effective on January 2, 2003. 67 FR 71479 (Dec 2, 2003). We have not approved any revisions to Washington's title V program since 2003. ORCAA has revised their fee rules since 2003; these revisions did not require the EPA approval.

ORCAA currently issues Title V permits to approximately 11 sources. There are four permit writers that are responsible for writing Title V permits as well as processing construction permits, inspecting sources, reviewing source test reports, reviewing emission inventories and other miscellaneous duties. Each permit writer is assigned specific sources for performing all of these responsibilities. There are other staff that provide management, administrative, enforcement, and accounting support to the Title V program.

Each permit is accompanied by a Statement of Basis that explains the technical and legal basis for the permit. ORCAA calls the Statement of Basis the "Technical Support Document."

### Program Review Objective and Overview

The EPA initiated Title V program reviews in response to recommendations in a 2002 Office of Inspector General audit. The objective of broader program reviews (as opposed to individual permit reviews) is to identify good practices that other agencies can learn from, document areas needing improvement and learn how the EPA can help improve state and local Title V programs and expedite permitting.

The EPA set an aggressive initial national goal of reviewing all state and local Title V programs with 10 or more Title V sources. ORCAA was one of ten Title V programs in Region 10 reviewed between 2004 and 2007. Here is the list of agencies in Region 10 reviewed in the first round along with the final report date and an approximate number of Title V sources they regulated when reviewed:

<u>Permitting Authority (first round)</u>	<u>Report Date</u>	<u>Sources</u>
Idaho Department of Environmental Quality	January 2004	59
Oregon Department of Environmental Quality	June 2006	111
Lane Regional Air Protection Agency (OR)	June 2006	19
Spokane Regional Clean Air Agency (WA)	August 2006	10
Puget Sound Clean Air Agency (WA)	September 2006	35

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<sup>1</sup> In this report, the term "EPA" refers to the United States Environmental Protection Agency as a nationwide agency. The term "Region 10" and the first-person plural (we/us/our) refer to the EPA, Region 10.

Washington Department of Ecology	September 2006	27
Northwest Clean Air Agency (WA)	September 2006	21
Alaska Department of Environmental Conservation	September 2006	158
Olympic Regional Clean Air Agency (WA)	September 2007	15
Southwest Clean Air Agency (WA)	September 2007	12

In response to a follow-up review by the Office of Inspector General, the EPA also committed to repeat the reviews of all Title V programs with 20 or more Title V sources every four years beginning in 2007. The original, second-round commitment covered each of the four state programs in Region 10 (Alaska, Idaho, Oregon and Washington) as well as two local agencies in Washington (Puget Sound Clean Air Agency and Northwest Clean Air Agency). In September 2016, we fulfilled that commitment and decided to continue second-round reviews for the remaining agencies that were reviewed in the first round, but not yet reviewed for a second time.

Below is the list of agencies reviewed to date in the second round along with the final report date. All of the program review reports can be found on Region 10's air permitting website.<sup>2</sup>

<b><u>Permitting Authority (second round)</u></b>	<b><u>Report Date</u></b>
Idaho Department of Environmental Quality	September 2007
Puget Sound Clean Air Agency (WA)	September 2008
Northwest Clean Air Agency (WA)	September 2013
Washington Department of Ecology	September 2014
Alaska Department of Environmental Conservation	September 2015
Oregon Department of Environmental Quality	September 2016
Lane Regional Air Protection Agency (OR)	September 2017
Spokane Regional Clean Air Agency (WA)	November 2018
Southwest Clean Air Agency (WA)	November 2019

In the first title V program review, we covered all major elements of a title V program. In the second round of program reviews, we focused on issues specific to each permitting authority's implementation of its permitting program. Of particular interest is how each authority has addressed the concerns identified in the first review. We also considered permit issuance progress, resources, compliance assurance monitoring (CAM), which is required to be added during permit renewal for most sources, and how programs have integrated new requirements and rules into their permits and program.

To prepare for this review, Region 10 sent a letter in April 2020 requesting specific information from ORCAA (Attachment 1). Region 10 reviewed ORCAA's emailed response (compiled as Attachment 2) which included, as requested, a staff list, financial records, and an update regarding each of the concerns raised in 2007.

Region 10 also reviewed past permit issuance data ORCAA reported to TOPS, the Title V Operating Permits System (Attachment 3), and a selection of recently-issued permits. Permits issued more recently were intentionally selected for review to provide a more accurate depiction of how ORCAA's permits have changed since the first program review. The permits reviewed include those listed in the table below, as well as 7 other permits for which only compliance

<sup>2</sup> <https://www.epa.gov/caa-permitting/permit-program-reviews-epa-region-10>

assurance monitoring implementation was reviewed – those 7 permits are generally discussed in the follow-up section for Concern C-3.

<u>Permit No.</u>	<u>Company Name &amp; Location</u>	<u>Date Issued</u>
16AOP1172	Simpson Door Company McCleary, WA	07/20/2018
15AOP1129	Crown Cork & Seal Company Olympia, WA	09/01/2016
12AOP915	Weyerhaeuser NR Company	11/20/2019

An online conference was conducted with ORCAA on July 15-16, 2020, Region 10 staff interviewed permit writing staff, finance staff and the agency management. The purpose of the interviews was to clarify and discuss what was learned from the review of their permits and other information provided by ORCAA. Region 10 staff and ORCAA staff discussed permit issuance progress, program resources (and the fee program), general program implementation topics, and specific issues identified during the previous review of ORCAA’s program including compliance assurance monitoring.

[In the final report, discuss here when the draft report was shared with ORCAA and the follow through that occurred thereafter building up to the issuance of the final report.]

## **Program Review Report Structure**

This program review report is presented in four main sections:

- I. Introduction
- II. Follow-up to 2007 Program Review
- III. Additional Review
- IV. Summary of Concerns and Recommendations

Section I presents background information regarding ORCAA’s Title V program as well as an overview of Region 10’s program review plan. Section II presents Region 10’s evaluation of ORCAA’s progress in resolving concerns identified in the 2007 program review. Section III presents additional observations from Region 10’s review of ORCAA’s individual permits and other information provided. Finally, Section IV summarizes Region 10’s second-round concerns and presents Region 10’s recommendations for resolving any outstanding issues.

## **II. Follow-up to 2007 Program Review**

In the initial Title V program review, finalized in September 2007, Region 10 provided observations delineated into nine separate topic areas labeled A through I. In each section, Region 10 identified good practices, concerns and other observations and asked ORCAA to respond to the concerns identified. In December 2007, ORCAA responded to Region 10 addressing the concerns identified by Region 10.

This section of the second-round program review report presents Region 10’s evaluation of the progress ORCAA has made in addressing the concerns identified in the initial program review. Each of Region 10’s original concerns is listed below, followed by ORCAA’s 2007 responses, ORCAA’s 2020 update, and, finally, Region 10’s second-round (Round 2) evaluation.

## Section A. Title V Permit Preparation and Content

A-1 2007 EPA Concern: In at least one permit, ORCAA has incorporated an NSPS requirement by reference, citing only the subpart and listing none of the specific requirements that apply to the source. To be an effective compliance tool, the permit should be as clear as possible about the requirements that apply and add specific monitoring that assures compliance. Simply referencing at the NSPS subpart level is not an adequate level of detail for Title V. ORCAA should specifically list in each permit the requirements from any NSPS that apply.

2007 ORCAA Response: High Level vs. Low Level Citing. ORCAA's understanding is that both high level and low-level citing of an applicable regulation is available for Title V permitting, provided that all applicable requirements are incorporated into a Title V permit. ORCAA considers citing only the subpart and not specific subsections of an applicable NSPS, NESHAP or MACT standard as the superior approach because the subpart citation includes all applicable subsections, all applicable subsections outside of the subpart that are referenced by the subpart (like subpart "A" requirements), and all applicable appendices referenced by the subpart. If an agency's policy is to cite the specific subsections of an applicable subpart, then all applicable subsections must be specifically cited and any subsection not cited in the permit signifies it is not part of the permit and, therefore, not applicable. Considering the complex nature of most federal standards, applicability of many general requirements from the corresponding "Subpart A" requirements, and applicability of provisions for testing contained in referenced appendices, citing all applicable requirements at the subsection level of a subpart is not practical and incurs a high risk of leaving an applicable requirement out. In addition, citing only the subpart retains all compliance options that were built into the subpart and intended to provide the affected facility flexibility. Most new MACT standards contain multiple compliance options and/or requirements. ORCAA believes flexibility provisions intended in new MACT standards should be retained in the Title V permit. If the policy is to cite at specific subsections, then it becomes necessary to cite all compliance options in order to retain the flexibility provisions built into a MACT. By far the easier, more understandable and less complicated approach is to cite the subpart only. For these reasons, ORCAA will continue with the current policy of high-level citing. Exactly how an NSPS, NESHAP or MACT is incorporated into a permit will largely depend on the complexity of the standard. In some cases it may be valuable to cite referenced subparts or appendices. However, high level citing will be used to capture federal standards completely and thoroughly.

Listing Applicable Requirements. The other concern mentioned is that one of the permits reviewed did not specifically list the applicable requirements. ORCAA agrees that not listing applicable emission limitations and operational requirements is a problem and that the permit would be clearer if it listed the specific emission limitations in addition to citing the applicable subpart. ORCAA will revise this permit and institute a policy to specifically list emission limitations in Title V permit tables in addition to citing the subpart.

2020 ORCAA Update: High Level vs. Low Level Citing of NSPS/NESHAP. ORCAA reconsidered their previous plan of continuing with a policy of incorporating applicable

NSPS, NESHAPS and MACT standards into permits using “high level” incorporation by reference (see ORCAA responses 12/14/2007). Starting in 2011 with the permit renewal for Nippon Paper Industries (now McKinley Paper), ORCAA switched to a policy of incorporating specific requirements from applicable NSPS/NESHAP/MACT standards. Permit renewals issued after this date should reflect detailed requirements from applicable federal standards with the exception of Reference Test Methods, and QA/QC standards and performance specifications for required monitors, which are still incorporated into permits by reference. There remains one permit, the permit for Sierra Pacific Cogeneration, that predates ORCAA’s transition from a policy of incorporating federal requirements by reference to incorporating specific requirements, which started in 2011. This permit is up for renewal and a draft permit is scheduled to be issued sometime in June 2020.

Listing Applicable Requirements. The second concern raised was that one of the permits reviewed in 2007 did not specifically list applicable requirements. ORCAA’s current policy is to incorporate specific limits and operating standards from applicable requirements. All permits except the permit for Sierra Pacific Cogeneration were drafted under ORCAA’s current policy and should reflect specific limits, standards and other requirements from applicable requirements.

Round 2 Evaluation: Though the Sierra Pacific Cogeneration permit has not been issued at the time of this final report, Region 10 is satisfied with ORCAA’s update and does not consider this a concern that warrants follow-up.

- A-2 2007 EPA Concern: In ORCAA’s permits, the standard Terms and Conditions section presents off permit change provisions but did not specify that off-permit changes require notification to the agency. This should be added. ORCAA should also consider adding generic language that addresses the requirements in 40 CFR 52.21(r)(6), which becomes an applicable requirement when sources determine PSD applicability using a specific technique.

2007 ORCAA Response: ORCAA agrees and will both amend the condition covering Changes not Requiring Permit Revision/Off Permit Changes and add an additional condition that covers the requirements in 40 CFR 52.21(r)(6).

2020 ORCAA Update: The permit condition ORCAA currently uses to address changes not requiring permit revision and off permit changes reads as follows:

The Permittee may make the changes described in WAC 173-401-722 and WAC 173-401-724 without revising this permit, provided that the changes satisfy the criteria set forth in those sections, including the requirements to notify ORCAA and the EPA. [Origin: WAC 173-401-722; and WAC 173-401-724] [Authority: WAC 173-401-600(1)(b)]

ORCAA believes this condition adequately addresses the concern raised in 2007.

Round 2 Evaluation: The general permit condition used by ORCAA to address changes not requiring permit revisions and off permit changes is a good one. Each of the permits Region 10 reviewed included the condition referenced by ORCAA. Region 10 is satisfied

with ORCAA's update regarding off-permit changes and does not consider it a concern that warrants follow-up.

Regarding the original suggestion to add 40 CFR 52.21(r)(6) to PSD major source permits, the only PSD major source permit that Region 10 reviewed in 2020 did not contain a provision that captures the monitoring and reporting requirement that could apply if a source concludes under WAC 173-400-720(4)(b)(iii)(D) that a modification to the facility is not subject to PSD. ORCAA should still consider adding such a provision to all Title V permits held by PSD major sources.

## **Section C. Monitoring**

C-1 2007 EPA Concern: Permits often required monitoring of several parameters, but not all of the parameters were always referenced as monitoring for a related applicable requirement. Where several monitored parameters can indicate how an emission unit is performing, there is no reason to not rely on all of them in some way. ORCAA should consider more cross-referencing between applicable requirements and monitoring in their requirements tables.

2007 ORCAA Response: ORCAA would like to know the specific conditions the EPA is concerned about. Without knowing the specific condition that triggered the EPA's concern, it is difficult to respond. However, if the EPA's concern is a general concern, then ORCAA disagrees with the stated conclusion. In accordance with WAC 173-401 permit content requirements, any and all monitoring included in ORCAA's permits have a basis and are related to an underlying applicable requirement that references the monitoring condition. Most monitoring required in ORCAA permits is "periodic monitoring" and for the purpose of assuring compliance with the requirement to properly operate and maintain pollution control devices. The related or underlying applicable requirement in most cases is the requirement to properly maintain and operate pollution control devices. The cross reference from this applicable requirement to the monitoring condition with the table containing the periodic monitoring requirements for control devices was intact in the permit reviewed by the EPA. Therefore, ORCAA requests further clarification of this concern.

2020 ORCAA Update: Every operating parameter required to be monitored in a permit is linked to a specific applicable emissions limit or work practice standard.

Round 2 Evaluation: Region 10 still believes it is important to recognize opportunities to assign multiple periodic monitoring requirements to multiple applicable requirements. Take, for instance, a grain loading standard applicable to a baghouse. ORCAA should consider referencing both pressure drop monitoring (though bag leak detection monitoring is preferable) and visible emissions monitoring (commonly M1 through M3) as periodic monitoring to assure compliance with that emission limit. For visible emissions limitations, ORCAA should consider referencing both visible emissions monitoring and pressure drop monitoring. When a control device is used to reduce emissions to comply with multiple emission limitations, the control device monitoring should always be referenced as periodic monitoring to assure compliance with all emission limitations.

C-2 2007 EPA Concern: Some permits listed the option to require testing as the monitoring technique for assuring compliance for certain generally applicable emission limits. In some cases, there was no explanation why no testing (or other monitoring) was being required or what circumstances could lead to a requirement to test. In other cases, periodic testing was required without any explanation as to why that frequency adequately assured compliance. ORCAA should assure the permit includes monitoring that assures compliance or clearly explain why no monitoring is necessary in the Technical Support Document.

2007 ORCAA Response: ORCAA does assure that permits include monitoring sufficient to assure compliance and will strive to better explain the basis for monitoring in the associated Technical Support Documents to permits.

2020 ORCAA Update: ORCAA past and current policy is to include monitoring sufficient to assure continuous compliance.

Round 2 Evaluation: ORCAA continues to issue permits with a “monitoring” condition stating that ORCAA may require that a test be conducted to assure compliance with generally applicable emission limits. While periodic testing can serve as periodic monitoring, this condition does not require testing and, therefore, does constitute monitoring. In the absence of additional periodic monitoring requirements, a permit relying on this condition to establish periodic monitoring would have no monitoring at all. All permits must contain monitoring that assures compliance or explain why there is no need for monitoring. In this case, a decision that no monitoring or testing is necessary to assure compliance at the time of permit issuance must be explained in the Technical Support Document.

C-3 2007 EPA Concern: While ORCAA appears to thoroughly document their CAM-related decisions, in at least one application of CAM, ORCAA required monitoring a parameter to indicate compliance with a PM standard without establishing the relationship between the parameter level and PM compliance. In general, surrogate parameter levels, whether for CAM or not, should be established relative to compliance with the standard in question. Without that, monitoring that parameter does not assure compliance.

2007 ORCAA Response: ORCAA’s policy is that surrogate parameters should be established based on the best available data at the time of permitting. Typically, monitoring that occurred during the last stack test that demonstrates compliance with the applicable requirement is used as the basis for establishing the level of surrogate parameters. In some cases, target operating ranges recommended by the control device manufacturer are used. In either case, this information should be documented in the Technical Support Document. ORCAA will strive to do a better job of this in the future.

2020 ORCAA Update: ORCAA has continued with the policy that surrogate parameters should be established based on the best available data at the time of permitting. Typically, acceptable operating ranges for surrogate parameters are based on operating data from stack testing used to determine compliance and are incorporated into permits as “indicators” of compliance. Operating outside an acceptable operating range for a

parameter triggers the requirement for Reference Method Testing. ORCAA understands this to be an acceptable CAM approach for Title V permits.

Round 2 Evaluation: Not explaining in the Technical Support Document how CAM indicator ranges were established warrants follow-up. A permit Region 10 reviewed for a PSD major source contained pressure drop indicator ranges for three baghouses subject to CAM. The Technical Support Document did not explain how the ranges were established and how they assure compliance with emission limits. ORCAA must explain monitoring decisions, including CAM decisions, in the Technical Support Document.

Region 10 reviewed the CAM analyses in three permits reviewed as part of this program review as well as 7 other permits, to evaluate ORCAA's implementation of the CAM program. Region 10 is still very concerned about ORCAA's approach to CAM applicability determinations and documentation. One common mistake is the application of the exception of rules promulgated after 1990. CAM applies to emission units that use a control device to comply with an emission limitation that is not exempt from CAM. If the control device is used to comply with non-exempt applicable emission limitations, CAM still applies. For instance, if an emission unit is subject to a (post 1990) MACT standard and a SIP limitation and has a control device needed to meet both requirements, ORCAA should apply CAM to the emission unit for the SIP limitation, but not the MACT standard. While the MACT monitoring is presumptively acceptable monitoring to satisfy CAM requirements for the SIP limitation pursuant to 40 CFR 64.4(b)(4), the assumption can be rebutted through presentation of new information (e.g., MACT test reports). It is ORCAA's responsibility to review MACT test reports at time of Title V permit renewal to assess the strength of the relationship between the MACT indicator (e.g., Boiler MACT – opacity) and the emission limit (e.g., Boiler MACT – RM5 PM). If the relationship between the indicator and pollutant is not sufficient to assure compliance with the SIP limit, the presumption is rebutted and the MACT monitoring is not CAM for the SIP limit.

Opacity limits should also be factored into the CAM analysis. If a COMS is required under authority other than CAM, then the permittee is required to use the COMS to satisfy CAM for all visible emissions limits pursuant to 40 CFR 64.3(d). The COMS may also be required to assure compliance with PM emission limits.

Emission units that use continuous compliance determination monitors for a specific pollutant are exempt from CAM. When an emission unit has a continuous emission monitoring system that is not the compliance determination method (a reference method test is the compliance determination method), but rather just an indicator of compliance, the pollutant-specific emission unit is still subject to CAM. ORCAA's permits should clarify when a required continuous monitoring system is the compliance determination method.

Permits should include applicable CAM requirements from 40 CFR 64.7 through 64.9. The Technical Support Document (where the CAM applicability analysis should be) should present pre- and post-control potential emissions (for applicability and monitoring frequency decisions, respectively) as part of the CAM applicability analysis. ORCAA

should re-evaluate CAM applicability in their permits at time of permit renewal to assure CAM has been applied correctly.

#### **Section D. Public Participation and Affected State Review**

D-1 2007 EPA Concern: Like many of the permitting authorities across the country, ORCAA provides the permittee with a pre-draft permit for review and comment before the draft permit goes out for public comment. Soliciting the permittee's input on the factual aspects of the permit can help to reduce errors in the permit and help educate the permittee on its obligations under the permit. Working with the permittee on developing the substantive requirements of the permit, however, can create the impression that the permit issuance process is not an open process. ORCAA should carefully balance these interests as it works with permittees during the development and issuance of Title V permits.

2007 ORCAA Response: ORCAA understands the EPA's concerns and will be careful to consider only factual input from regulated sources regarding their pre-draft permits. Frequently, we need technical input from sources for gap-filling purposes, but these interactions never involve loosening of requirements.

2020 ORCAA Update: ORCAA continues to provide permittees an opportunity to review their preliminary draft permits and Technical Support Documents. However, changes resulting from such reviews are limited to correcting misinformation only. ORCAA does not collaborate with permittees on substantive requirements at any time during the permit process. Permittees are allowed to submit their comments on draft permits the same as the general public and ORCAA addresses all comments publicly.

Round 2 Evaluation: This is generally not an issue when the agency documents the basis for all of the requirements in the permit and assures that all comments received during the public comment period are documented and addressed before the permit is issued. ORCAA understands and implements their program this way. Region 10 is satisfied with ORCAA's approach for ensuring transparency and no longer considers this a concern that warrants follow-up.

#### **Section E. Permit Issuance / Revision / Renewal**

E-1 2007 EPA Concern: ORCAA's fee structure bases part of the fee on the number of emission units to account for permit complexity. The emission unit concept in Title V generally allows useful flexibility in grouping or non-grouping of plant site activities based on a number of factors such as similar applicable requirements or operations. This can make implementation of the permit requirements more practical. Placing a price (by basing the fee) on the number of emission units can put these intentions at odds with each other. To deal with that, ORCAA defines the number of emission units for fee purposes differently than the emission units identified by the permit. While this may work, ORCAA should clarify this distinction some place, possibly including the statement of basis.

2007 ORCAA Response: ORCAA’s Rule 1.4 includes definitions for the terms “Fee Eligible Generating Equipment” and “Fee Eligible Stack.” ORCAA believes this sufficiently covers the EPA’s stated concern but will consider incorporating this distinction in Technical Support Documents of future permits.

2020 ORCAA Update: The number of pieces of equipment used to determine annual fees is included in ORCAA’s annual budget process and available for public review. This happens every year. Therefore, including the same information in the permit or Technical Support Documents, which are subject to review every five years, would be problematic in that it would need to be revised if changed during an annual budget cycle.

Round 2 Evaluation: Region 10 is satisfied with ORCAA’s update and does not consider this a concern that warrants follow-up.

### **Section G. Resources and Internal Management Support**

G-1 2007 EPA Concern: ORCAA generally distributes non-labor Title V costs based upon FTE spent in each separately funded program. This is an efficient way to account for costs which are otherwise very difficult to track separately. Expenses, such as travel to Title V training, might be an exception to this approach that could be easily attributed to only Title V.

2007 ORCAA Response: ORCAA’s accounting system is capable of tracking direct, non-labor, Title V expenses. ORCAA’s current policy is that expenses like the cost for lodging and meals associated with a Title V conference be directly accounted for as a Title V expense. Travel costs such as the cost of airfare or gas can also be accounted for in this way directly to Title V. However the cost of gas for a round trip to Seattle in a hybrid vehicle to participate in a Title V conference has been accounted for on an FTE basis. ORCAA believes this is sufficient cost accounting for Title V.

2020 ORCAA Update: There are very few non-labor Title V costs that are not general in nature and attributable to all ORCAA programs. However, ORCAA’s accounting system is capable of tracking direct, non-labor, Title V expenses for things like Title V training.

Round 2 Evaluation: Region 10 is satisfied with ORCAA’s update and does not consider this a concern that warrants follow-up.

### **III. Additional Review**

In addition to reviewing concerns identified in the first review, Region 10 requested an update about program resources and permit issuance progress and reviewed three permits that were issued by ORCAA within the last few years. As explained in Section I of this report, the following permits were reviewed by Region 10 as part of this program review:

<u>Permit No.</u>	<u>Company Name &amp; Location</u>	<u>Date Issued</u>
16AOP1172	Simpson Door Company McCleary, WA	07/20/2018
15AOP1129	Crown Cork & Seal Company Olympia, WA	09/01/2016
12AOP915	Weyerhaeuser NR Company	11/20/2019

The focus of the permit reviews was generally on previously identified concerns and specifically on compliance assurance monitoring requirements and incorporation of new requirements. In the process of reviewing a selection of ORCAA's permits, we also gain a perspective of ORCAA's general permit quality. CAM has been a recent focus for Region 10's oversight work for several reasons. CAM is required to be applied in the initial permit for sources with "large" pollutant-specific emission units and in the first renewal for all other emission units. Most pollutant-specific emission units are not large, so CAM has been primarily implemented during the renewal phase of the Title V program. Region 10 had a rigorous permit oversight program in the early years of Title V. By the time state and local agencies were issuing renewal permits, Region 10 had scaled back its oversight program substantially and, in fact, reviewed very few permits that addressed CAM. Beginning in fiscal year 2013, Region 10 began to review a small percentage of state/local renewal permits to see how CAM was being addressed. A consistent lack of documentation regarding CAM applicability and monitoring decisions in Technical Support Documents was discovered. Logically, Region 10 decided to specifically review how CAM was being addressed in permits as part of the second-round program reviews. Region 10's review of ORCAA's CAM implementation is addressed in previous Concern C-3. ORCAA's incorporation of new applicable requirements is covered in the New Concerns section of the report below. Other new concerns about ORCAA's permits are also in that section of the report. In reviewing the agency's permit issuance progress and resources, including their fee program and staffing, we learn how the Title V program is being managed. Permit issuance problems, namely large backlogs of unissued permits, are often linked to a lack of resources. ORCAA reports their permit issuance progress semiannually. That data indicates ORCAA's backlog includes four renewals which have been extended past the permit expiration dates. Three of those permits have been drafted and one may become a minor source.

ORCAA provided Region 10 with recent budget data. ORCAA uses the same fee structure as the Washington Department of Ecology and other local agencies in Washington. Total Title V fees needs are divided into three equal assessments each year: complexity (based on the number of emission units), emissions (emitted by each Title V source) and a flat fee assessed to each Title V source. The annual program budget is set by multiplying the number of Title V sources by the fee basis. If collected fees are projected to be overspent, a supplemental billing is assessed. Collected fees left over at the end of the year are carried into the next year where it reduces the fees collected for that year. This is a good system that allows the agency a lot of flexibility. ORCAA is fully staffed with a healthy range of experienced and new staff. Training is provided primarily internally with some outside training courses. The biennial Region 10 Title V workshop plays a role in training staff. Engineers are assigned to specific sources and can be responsible for permit writing (construction permits as well), inspections, public hearings and emission inventories. Compliance staff also perform inspections and handle enforcement cases. Staff retention seems good at the agency.

ORCAA appears to manage their fees and expenses very well. Combined with their reasonable permit backlog, Region 10 has no concerns about ORCAA's management of their resources.

### **New Suggestions**

1. Regarding ORCAA's incorporation of new requirements, Region 10 thinks it is a good practice to add a section to the Technical Support Document that describes the new

applicable requirements that are being added to a renewal permit. Including a broader-scoped section that describes all changes to the permit (in this renewal) would also be good and could encompass the new applicable requirements. ORCAA's Technical Support Document did not have a section that described the changes or even the new applicable requirements. ORCAA should consider adding one.

2. Each Technical Support Document reviewed presented both actual and potential emissions. The emission inventory, however, was not available. Region 10 thinks that documentation of emissions estimations in the Technical Support Document is important, because they support applicability decisions and reflect important details about the operations (at the emission estimation level).
3. Region 10 reorganized, changing our office and unit structure into a division, branch and section structure. This changed our mailing addresses. Where ORCAA includes the address in permits for mailing copies of certain documents to Region 10, the permits should be revised accordingly. Region 10 can supply the new addresses if needed.

### **New Concerns**

1. The incorporation of the boiler MACT into one permit reviewed could have been better. Errors were made incorporating applicable requirements. Obsolete boiler MACT requirements included in the renewal could have been omitted. Some compliance options that are clearly not options for that particular source also could have been omitted. In those cases where the compliance option chosen by the source is clear, the Technical Support Document can explain that. If the other options are no longer possible, the permit can also be cleaned up by removing the compliance options not used. Permit language could have been added to address (1) updating operating limits to reflect values measured during testing, and (2) alternate compliance options. This should be applied to all the permits that ORCAA issues.
2. The "Regulatory Basis" section of permits includes these statements: "Conditions identified as "state/local only" are enforceable only by ORCAA and the State of Washington. Conditions identified as "local only", "state only", or "state/local only" are not federally enforceable." ORCAA should clarify the difference between "state only" and "state/local only." If a state requirement is being added to the permit, ORCAA should have the authority to enforce it, so there may be no need for a "state only" label.
3. It appears that ORCAA is not adding older SIP-approved rules that are still applicable to the permit. Applicable SIP-approved rules must be in the permit. This can be done by adding those specific requirements as permit conditions, adding those additional citations to already existing conditions that are identical, streamlining with similar conditions or including a cross referencing table to connect old SIP citations to new state or local requirements.
4. In one plant-wide permit condition, ORCAA is limiting RM5/2002 PM emissions from process units to no more than 0.1 gr/dscf. But the two underlying regulations are numerically different (one is more stringent than the limit in the permit) with different reference methods for measuring PM. WAC 173-400-060's limit is 0.1 gr/dscf with PM measured using RM5. ORCAA 8.3(a)'s limit is 0.10 gr/dscf with PM measured using methods on file at ORCAA to measure RM5 front & back half. Unless ORCAA intends to streamline these emission limits,

ORCAA needs to incorporate them into the permit as separate conditions. In addition, ORCAA 8.3(a) does not explicitly reference RM5 and 202. Instead, the regulations reference, “particulate test procedures, on file at the Authority... The Authority includes the Method 5 back-half condensable particulate matter.” RM5 does not specify a methodology for measuring back-half PM. ORCAA should consider updating ORCAA 8.3(a) (and (b)) to explicitly reference EPA RM5 and 202 so that its authority to reference those test methods in the permit is clear.

5. Certain state or local visible emission limitations restrict the number of 15-second readings that can be greater than a threshold value over a standard period of time. See Ecology Method 9A. When ORCAA prescribes a COMS (satisfying NSPS or NESHAP performance specifications) as periodic monitoring for these Ecology Method 9A limitations, ORCAA should explicitly require in the permit that the monitoring system (required by federal standards to generate 6-minute average VE readings) also generate data in a format to enable a compliance determination for the Ecology Method 9A limitations. Alternatively, ORCAA may be able to streamline the requirements, though this is not always easy for these types of opacity limits.
6. On the occasion that an emission unit is subject to more than one PM emission limit (e.g., NSPS Db and Boiler MACT), and the underlying testing methodology for determining PM emissions is different (e.g., significantly different probe temperatures), it is critical that ORCAA understand the difference between the two methodologies and prescribe appropriate compliance demonstrations in the permit. The more stringent Boiler MACT PM limit is associated with a test method more likely to quantify more filterable PM emissions due to the lower probe temperature. But the permit specified the NSPS Db test method with a higher probe temperature likely to under report filterable PM emissions as defined by Boiler MACT. ORCAA should explain the issue and its decision making in the Technical Support Document, especially if it decides to streamline the testing requirements.
7. The state citation for sufficiency monitoring [70.6(c)(1)] is 173-401-630(1). The permits we reviewed do not include this citation. Where ORCAA is enhancing the testing, monitoring, recordkeeping or reporting requirements required outside the permit, the sufficiency monitoring citation is more appropriate than the gap filling monitoring citation [173-401-615(1)(b)] that is more commonly used in the permits we reviewed. Gap filling authority is only appropriate when there is no testing, monitoring, recordkeeping or reporting in the underlying applicable requirement. When information exists to assess the degree to which MACT monitoring does (or does not) assure compliance with the emission limit, ORCAA should review that information at time of Title V permit renewal, and if necessary, supplement the monitoring through its sufficiency monitoring authority.
8. The Technical Support Document should explain each condition in the permit. Even if ORCAA does not go that far, the Technical Support Document must explain all decisions regarding testing, monitoring, recordkeeping and reporting. Once all of the requirements that apply to the source have been compiled, deciding whether the testing, monitoring, recordkeeping and reporting requirements are adequate is probably the most important aspect of permit writing. To that end, there are several facts that should be considered when making these decisions (and there is guidance available). Past test results are some of the facts that should be considered. When there are past test results, ORCAA should present that data in

the Technical Support Document, consider it in the permit decisions and explain it in the Technical Support Document.

9. Section 3.0 of one reviewed Technical Support Document includes this statement regarding insignificant emission units (IEUs): Company X includes many emissions units that qualify as Insignificant Emissions Units (IEUs) under the provisions for IEUs in WAC 173-401-530. Chapter 173-401 WAC exempts IEUs from Title V monitoring, record keeping and reporting requirements.” However, Chapter 173-401 does not exempt IEUs from Title V monitoring. Section 173-401-530(1) states that “designation as an IEU does not exempt it from any applicable requirement.” Section 173-401-530(2)(a) states that “notwithstanding any other provision of this chapter, no emission unit subject to a federally enforceable applicable requirement (other than generally applicable requirements of the SIP) shall qualify as an IEU” and “Generally applicable requirements of the SIP are those federally enforceable requirements that apply universally to all emission units without reference to specific types of emission units.” So, ORCAA should revise the general statement about IEU exemptions and decide whether it is appropriate to add monitoring to assure that IEUs are in compliance with the requirements that apply.
10. The TSD should include an applicability statement regarding 40 CFR Part 68. Determining applicability requires knowing, among other things, whether the source stores certain quantities of regulated materials onsite. If ORCAA cannot confirm whether Part 68 applies, it can simply include a statement in the permit that states something to the effect “if the source stores quantities of regulated materials that make it subject to Part 68, then the source must comply with those provisions.” If ORCAA is going to claim that Part 68 does not apply, it will need to more comprehensively confirm the amounts of materials stored at the source.

#### **IV. Summary of Concerns**

Some of the concerns identified in the first-round program review have been resolved to Region 10’s satisfaction, but some still require attention. Region 10 is satisfied with ORCAA’s progress on four of the eight concerns identified in the 2007 program review. Region 10 thinks ORCAA can still improve on the other four remaining original concerns. Region 10 has identified ten new concerns and three new suggestions.

ORCAA has made improvements to their permits and Technical Support Documents, but more improvements can be realized.

ORCAA can improve their permits:

- By creating a condition to address 52.21(r)(6) (Concern A-2);
- By more completely linking testing, monitoring, recordkeeping and reporting to applicable emission limits (Concern C-1);
- By revising the EPA’s mailing address (New Suggestion 3);
- By improving the incorporation of new federal requirements such as the boiler MACT (New Concern 1);
- By clarifying or removing the state-only citation label (New Concern 2);
- By including all applicable SIP citations (New Concern 3);
- By clarifying PM and visible emission testing (New Concerns 4, 5 and 6); and
- By citing the sufficiency monitoring authority (New Concern 7).

ORCAA can improve their Technical Support Documents:

- By documenting their testing decisions (Concern C-2);
- By improving their CAM applicability determinations and documentation (Concern C-3);
- By including a section that includes new requirements (New Suggestion 1);
- By including a detailed emission inventory (New Suggestion 2);
- By using and documenting the use of past test data to set monitoring and testing requirements in permits (New Concern 8);
- By clarifying how IEUs are addressed in the permit (New Concern 9); and
- By addressing Part 68 applicability (New Concern 10).

## **V. Recommendations**

ORCAA should provide to Region 10 a response that explains what they plan to do to address these concerns and suggestions: Concerns A-2, C-1, C-2 and C-3; New Concerns 1 thru 10; and New Suggestions 1-3. If SRCAA prefers to discuss any of the concerns before responding, Region 10 will gladly accommodate that.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 155  
Seattle, WA 98101-3123

AIR & RADIATION  
DIVISION

April 29, 2020

Ms. Fran McNair  
Executive Director  
Olympic Regional Clean Air Agency  
2940 Limited Lane NW  
Olympia, Washington 98502

Dear Ms. McNair:

The purpose of this letter is to notify you that the U.S. Environmental Protection Agency, Region 10 plans to perform a second evaluation of the Olympic Regional Clean Air Agency's Title V Operating Permit Program. This letter kicks off the effort by describing the evaluation process and our proposed schedule. We are also requesting information that will assist us in our program evaluation. Your agency will be the tenth and final of the second-round program evaluations that Region 10 will undertake.

This program evaluation will focus primarily on the following four areas:

- (1) follow-up on concerns identified during our 2007 evaluation of your program;
- (2) permit issuance progress and resources;
- (3) compliance assurance monitoring; and
- (4) new applicable requirements and rules. We will review a selection of your permits, focusing on those issued more recently. This program review will require involvement of staff and managers from your permitting, technical, finance and compliance groups. We appreciate your cooperation and assistance.

Our tentative schedule is as follows:

<b>Task</b>	<b>Tentative Date</b>
Region 10 sends kickoff letter	Today
ORCAA sends requested information	May 29, 2020
Region 10 meets with ORCAA	June 15 & 16, 2020
Region 10 sends draft report	August 1, 2020
ORCAA sends comments to Region 10	August 16, 2020
Region 10 sends final report	September 15, 2020

The enclosure describes the information we would like to receive in advance, so we can be efficient during the interviews. Please return the information in electronic form as early as possible, but no later than the date in the table above, to Christopher Familiare at [familiare.christopher@epa.gov](mailto:familiare.christopher@epa.gov) who will be leading the evaluation. We will contact you if we need any additional information.

We look forward to working with you and your staff. If you have any questions about the program evaluation, please do not hesitate to call me at (206) 553-1679 or Chris at (206) 553-1250.

Sincerely,

/s/ April 29, 2020

Kelly McFadden, Chief  
Air Permits and Toxics Branch

Enclosure

cc: Mr. Mark Goodin  
Professional Engineer, ORCAA

**Title V Program Evaluation  
Olympic Regional Clean Air Agency**

**Information Request**

Please send the following information in electronic form as soon as possible, but no later than May 29, 2020, to Christopher Familiare at [familiare.christopher@epa.gov](mailto:familiare.christopher@epa.gov).

1. A list of Olympic Regional Clean Air Agency staff that work in the Title V program, noting their responsibilities (e.g. permit writer, rule writer, inspector, etc.).
2. Identification of any Title V permits, renewals, or revisions that are recent enough that they are not represented on the Olympic Regional Clean Air Agency website.
3. A list and description of any rule changes that have been made to Olympic Regional Clean Air Agency's Title V regulations (e.g. those that affect applicability, implementation, or fees) since the last revision approved in September of 2001. If any of the rule changes have been submitted to Region 10 for review, note the date of submittal.
4. An update regarding each of the concerns raised in the 2007 Title V program evaluation, noting whether the plan to address the concern was completed and whether Olympic Regional Clean Air Agency is approaching any of the concerns differently than previously communicated to Region 10 in December 2007. Provide a narrative explaining the different approach, if applicable.
5. Any issues or requests that Olympic Regional Clean Air Agency would like to raise to Region 10 regarding any aspect of the Title V program.

# **2020 Status Update for ORCAA Progress Towards Resolving Concerns from 2007 Title V Program Review**

May 27, 2020

## **A. Title V Permit Preparation and Content**

**A-1.** “In at least one permit, ORCAA has incorporated an NSPS requirement by reference, citing only the subpart and listing none of the specific requirements that apply to the source. To be an effective compliance tool, permit should be as clear as possible about the requirements that apply and add specific monitoring that assures compliance. Simply referencing at the NSPS subpart level is not an adequate level of detail for Title V. ORCAA should specifically list in each permit the requirements from any NSPS that apply.”

### **2020 Status Update:**

#### **High Level vs. Low Level Citing of NSPS/NESHAP**

ORCAA reconsidered their previous plan of continuing with a policy of incorporating applicable NSPS, NESHAPS and MACT standards into permits using “high level” incorporation by reference (see ORCAA responses 12/14/2007). Starting in 2011 with the permit renewal for Nippon Paper Industries (now McKinley Paper), ORCAA switched to a policy of incorporating specific requirements from applicable NSPS/NESHAP/MACT standards. Permit renewals issued after this date should reflect detailed requirements from applicable federal standards with the exception of Reference Test Methods, and QA/QC standards and performance specifications for required monitors, which are still incorporated into permits by reference.

There remains one permit, the permit for Sierra Pacific Cogeneration, that predates ORCAA’s transition from a policy of incorporating federal requirements by reference to incorporating specific requirements, which started in 2011. This permit is up for renewal and a draft permit is scheduled to be issued sometime in June 2020.

#### **Listing Applicable Requirements**

The second concern raised was that one of the permits reviewed in 2007 did not specifically list applicable requirements. ORCAA’s current policy is to incorporate specific limits and operating standards from applicable requirements. All permits except the permit for Sierra Pacific Cogeneration were drafted under ORCAA’s current policy and should reflect specific limits, standards and other requirements from applicable requirements.

**A-2.** “In ORCAA’s permits, the standard Terms and Conditions section presents off permit change provisions but did not specify that off-permit changes require notification to the agency. This should be added. ORCAA should also consider adding generic language that addresses the requirements in 40 CFR 52.21(r)(6), which becomes an applicable requirement when sources determine PSD applicability using a specific technique.”

**2020 Status Update:**

The permit condition ORCAA currently uses to address changes not requiring permit revision and off permit changes reads as follows:

*The Permittee may make the changes described in WAC 173-401-722 and WAC 173-401-724 without revising this permit, provided that the changes satisfy the criteria set forth in those sections, including the requirements to notify ORCAA and EPA.*

*[Origin: WAC 173-401-722; and WAC 173-401-724]*

*[Authority: WAC 173-401-600(1)(b)]*

ORCAA believes this condition adequately addresses the concern raised in 2007.

**B. General Permits** – No concerns stated in 2007 Title V Program review Final Report.

**C. Monitoring**

**C-1.** “Permits often require monitoring of several parameters, but not all of the parameters were always referenced as monitoring for a related applicable requirement. Where several monitored parameters can indicate how an emission unit is performing, there is no reason to not rely on all of them in some way. ORCAA should consider more cross-referencing between applicable requirements and monitoring in their requirements tables.”

**2020 Status Update:**

Every operating parameter required to be monitored in a permit is linked to a specific applicable emissions limit or work practice standard.

**C-2.** “Some permits listed the option to require testing as the monitoring technique for assuring compliance for certain generally applicable emission limits. In some cases, there was no explanation why no testing (or other monitoring) was being required or what circumstances could lead to a requirement to test. In other cases, periodic testing was required without any explanation as to why that frequency adequately assured compliance. ORCAA should assure the permit includes monitoring that assures compliance or clearly explain why no monitoring is necessary in the Statement of Basis.”

### **2020 Status Update:**

ORCAA past and current policy is to include monitoring sufficient to assure continuous compliance.

**C-3.** “While ORCAA appears to thoroughly document their CAM-related decisions, in at least one application of CAM, ORCAA required monitoring a parameter to indicate compliance with a PM standard without establishing the relationship between the parameter level and PM compliance. In general, surrogate parameter levels, whether for CAM or not, should be established relative to compliance with the standard in question. Without that, monitoring that parameter does not assure compliance.”

### **2020 Status Update:**

ORCAA has continued with the policy that surrogate parameters should be established based on the best available data at the time of permitting. Typically, acceptable operating ranges for surrogate parameters are based on operating data from stack testing used to determine compliance and are incorporated into permits as “indicators” of compliance. Operating outside an acceptable operating range for a parameter triggers the requirement for Reference Method Testing. ORCAA understands this to be an acceptable CAM approach for Title V permits.

## **D. Public Participation and Affected State Review**

**D-1.** “Like many of the permitting authorities across the country, ORCAA provides the permittee with a pre-draft permit for review and comment before the draft permit goes out for public comment. Soliciting the permittee’s input on the factual aspects of the permit can help to reduce errors in the permit and help educate the permittee on its obligations under the permit. Working with the permittee on developing the substantive requirements of the permit, however, can create the impression that the permit issuance process is not an open process. ORCAA should carefully balance these interests as it works with permittees during the development and issuance of Title V permits.

### **2020 Status Update:**

ORCAA continues to provide permittees an opportunity to review their preliminary draft permits and Technical Support Documents. However, changes resulting from such reviews are limited to correcting misinformation only. ORCAA does not collaborate with permittees on substantive requirements at any time during the permit process. Permittees are allowed to submit their comments on draft permits the same as the general public and ORCAA addresses all comments publicly.

## **E. Permit Issuance/Revision/Renewal**

**E-1.** ORCAA's fee structure bases part of the fee on the number of emission units to account for permit complexity. The emission unit concept in Title V generally allows useful flexibility in grouping or non-grouping of plant site activities based on a number of factors such as similar applicable requirements or operations. This can make implementation of the permit requirements more practical. Placing a price (by basing the fee) on the number of emission units can put these intentions at odds with each other. To deal with that, ORCAA defines the number of emission units for fee purposes differently than the emission units identified by the permit. While this may work, ORCAA should clarify this distinction some place, possibly including the statement of basis.

### **2020 Status Update:**

The number of pieces of equipment used to determine annual fees is included in ORCAA's annual budget process and available for public review. This happens every year. Therefore, including the same information in the permit or Technical Support Documents, which are subject to review every five years, would be problematic in that it would need to be revised if changed during an annual budget cycle.

## **F. Compliance**

**F-1.** The focus of this Title V program review was on ORCAA's implementation of its Title V program. Accordingly, in conducting this Title V, EPA reviewed ORCAA's compliance certification and semiannual monitoring report forms but did not review completed forms submitted by Title V facilities to determine the extent of compliance with Title V requirements in ORCAA's jurisdiction and whether ORCAA is taking appropriate enforcement actions in response to noncompliance. EPA also conducts periodic reviews of state and local clean Air Act enforcement programs which look at, among other things, source compliance and enforcement actions.

### **2020 Status Update:**

ORCAA's compliance inspections and enforcement actions are well documented.

## **G. Resources and Integral Management Support**

**G-1.** ORCAA generally distributes non-labor Title V cost based upon FTE spent in each separately funded program. This is an efficient way to account for costs which are otherwise very difficult to track separately. Expenses, such as travel to Title V training, might be an exception to this approach that could easily be attributed to only Title V.

**2020 Status Update:**

There are very few non-labor Title V costs that are not general in nature and attributable to all ORCAA programs. However, ORCAA's accounting system is capable of tracking direct, non-labor, Title V expenses for things like Title V training.

**ORCAA Staff Title V Responsibilities**  
**May 27, 2020**

Dept.	Staff/Title	Title V Responsibilities
Administration	Fran McNair, Executive Director	<ul style="list-style-type: none"> <li>• Agency management</li> <li>• Final permit review and stamping (Title V &amp; NSR)</li> <li>• Hearings Officer for public hearings</li> </ul>
	Debbie Moody, Office Mgr/Public Records Officer	<ul style="list-style-type: none"> <li>• Administrative processing for all permits</li> <li>• Public hearing administration</li> <li>• Title V fee billing</li> </ul>
	Dan Nelson, Public Information Officer	<ul style="list-style-type: none"> <li>• ORCAA's website administrator</li> <li>• Public hearings</li> </ul>
	Lynn Harding, Administrative Services Manager	<ul style="list-style-type: none"> <li>• Responsible for overall agency budget</li> <li>• Assists with developing Title V budget</li> </ul>
	Jackie Wallner, Customer Service/Records Clerk	No direct Title V responsibilities
Engineering	Mark Goodin, P.E. Engineering Manager	<ul style="list-style-type: none"> <li>• Title V program manager</li> <li>• Permit review and PE sign-off (Title V and NSR)</li> <li>• Workload forecasting and Title V budget</li> <li>• Permit writer (Title V &amp; NSR)</li> <li>• Inspections and testing observation</li> <li>• Public hearings</li> </ul>
	Jennifer DeMay, P.E. Engineering Supervisor	<ul style="list-style-type: none"> <li>• Permit writer (Title V &amp; NSR)</li> <li>• Inspections &amp; testing observation</li> <li>• Public hearings</li> <li>• Emissions Inventory/Title V fee calculation</li> </ul>
	Aaron Manley, P.E. Engineer II	<ul style="list-style-type: none"> <li>• Permit writer (Title V &amp; NSR)</li> <li>• Inspections &amp; testing observation</li> <li>• Public hearings</li> </ul>
	Lauren Whybrew, Engineer I	<ul style="list-style-type: none"> <li>• Permit writer in training (Title V &amp; NSR)</li> <li>• Emissions Inventory training</li> </ul>
Compliance	Robert Moody, Compliance Manager	<ul style="list-style-type: none"> <li>• Compliance manager</li> <li>• Inspections, Report Reviews &amp; testing observation</li> <li>• Complaint response</li> <li>• Enforcement</li> </ul>
	Mike Shults, Compliance Supervisor	<ul style="list-style-type: none"> <li>• Inspections, Report Reviews &amp; testing observation</li> <li>• Complaint response</li> <li>• Enforcement</li> </ul>
	Tony Gibson, Air Quality Specialist II	<ul style="list-style-type: none"> <li>• Inspections, Report Reviews &amp; testing observation</li> <li>• Complaint response</li> <li>• Enforcement</li> </ul>
	Allie Feidt, Air Quality Specialist I	No current Title V responsibilities
	Seamus Shevlino, Air Quality Specialist I	No current Title V responsibilities
Monitoring IT	Nick Grant, Network Administrator/Monitoring Specialist	No direct Title V responsibilities
	Odelle Hadley, Senior Monitoring Specialist	No direct Title V responsibilities

**Staff Direct Responsibilities in Title V**

Staff	Title	Title V Permitting	NSR Permitting	Administration	Public Noticing	Public Hearings	Inspections	Emissions Inventory	Test Observation	SAMR Review	ACC Review	Complaints	Fee Determination	Ambient Monitoring	IT	Financial Audits	Budgeting
Fran McNair	Executive Director			ORCAA Director		Hearings Examiner											
Debbie Moody	Office Manager/Public Records Officer			Permit administration													
Dan Nelson	Public Information Officer				Website posting & press releases	Public Information Officer											
Lynn Harding	Administrative Services Manager																Title V budget development
Jackie Wallner	Office Assistant Secretary			Receptionist													
Mark Goodin	Engineering Manager	Renewals, Mods, other	New Source Permitting	Program Development	Notices & mail lists	Staff report & response to comments	Full Compliance Evaluations	EI Manager	Test Plan/Report review and test observation		ACC review and response		Workload analysis and projections				Title V budget development
Jennifer DeMay	Engineering Supervisor	Renewals, Mods, other	New Source Permitting	Program Development	Notices & mail lists	Staff report & response to comments	Full Compliance Evaluations		Test Plan/Report review and test observation		ACC review and response		Fee Calculation				
Aaron Manley	Engineer II w/PE	Renewals, Mods, other	New Source Permitting		Notices & mail lists	Staff report & response to comments	Full Compliance Evaluations		Test Plan/Report review and test observation		ACC review and response						
Lauren Whybrew	Engineer I	Renewals, Mods, other	New Source Permitting		Notices & mail lists	Staff report & response to comments	Full Compliance Evaluations	EI assistance	Test Plan/Report review and test observation		ACC review and response						
Robert Moody	Compliance Manager						Full Compliance Evaluations		Test Plan/Report review and test observation	SAMR review and response		Complaint response					
Mike Shults	Compliance Supervisor						Full Compliance Evaluations		Test Plan/Report review and test observation	SAMR review and response		Complaint response					
Tony Gibson	Air Quality Specialist II						Full Compliance Evaluations		Test Plan/Report review and test observation	SAMR review and response		Complaint response					
Allie Feidt	Air Quality Specialist I																
Seamus Shevino	Air Quality Specialist I																
Nick Grant	Network Admin./Monitoring Specialist																
Odelle Hadley	Senior Monitoring Specialist													Manages monitoring network			

**Major Source Assignments**

Active Title V Sources:	Inspector	Engineer
Aquatic Co		
Formerly LASCO	MS	MG
Ascensus Specialty Chemicals LLC		
Formerly Vertellus Performance Chemicals	MS	JD
Crown	MS	JD
Paneltech, LLC		
Formerly Little Green	MS	JD
McKinley Paper Company		
Formerly Nippon Paper Industries USA	MS	MG
Sierra Pacific Industries Cogen	RM	AM
Sierra Pacific Industries - Lumber	RM	AM
Sierra Pacific Lumber - Shelton		
Simpson Lumber Company	RM	MG
Simpson Door Co	MS	MG
Westport LLC	MS	JD & LW
Weyerhaeuser - Raymond	MS & TG	AM

ORCAA TOPS History												
Half-year	Total Sources (2.c)	Active Permits (3)	Initial Permits issued (4.a)	Initial issued < 18 mo. (4.b)	Outstanding initial App. (5)	Expired Permits (6.a)	Extended Permits (6.b)	Sig. Mod issued (7.a)	Sig. Mod issued < 18 mo. (7.b)	Outstanding Sig. Mod. > 18 mo (8)	% extended in (H)	% outstanding (F) + extended (H)
2016-1	12	12	0	0	0	0	5	0	0	0	42%	42%
2016-2	15	13	0	0	1	0	8	1	1	0	62%	60%
2017-1	11	11	0	0	0	0	6	0	0	0	55%	55%
2017-2	11	11	0	0	0	0	6	0	0	0	55%	55%
2018-1	11	11	0	0	0	0	5	0	0	0	45%	45%
2018-2	11	11	0	0	0	0	4	0	0	0	36%	36%
2019-1	11	11	0	0	0	0	4	0	0	0	36%	36%
2019-2	11	11	0	0	0	0	4	0	0	0	36%	36%
2020-1	11	11	0	0	0	0	4	0	0	0	36%	36%