RBLC WORKSHOP SUMMARY

EPA Office of Air Quality Planning and Standards
Washington, D.C.
June 6, 2001

Background

On June 6, 2001, in Washington, D.C., the EPA Office of Air Quality Planning and Standards (OAQPS) hosted the first in a series of public workshops on the Reasonably Available Control Technology (RACT)/Best Available Control Technology (BACT)/Lowest Achievable Emission Rate (LAER) Clearinghouse (RBLC). Future workshops are planned for Research Triangle Park, NC, Denver, CO, and Chicago, IL, with potentially one additional location to be determined. The workshops are intended to obtain input on the RBLC from current and potential users and to assist new users in understanding system capabilities.

Bob Kellam (Associate Director, Information Transfer and Program Integration Division, OAQPS) welcomed participants to the session by describing the current state of the system. He began with a discussion on the history of RBLC, which began as a paper-based system in 1981, then progressed to a mainframe-based system to a PC-based system and finally to the current web-based application. In FY 2001, OAQPS received the funding necessary to implement major changes to the system and gather missing information. OAQPS is holding the RBLC workshops to demonstrate the direction it is taking the system, but primarily is seeking input from system users on how to improve and update the RBLC so that it better meets user needs.

Participants in the workshop were asked to identify themselves and the organizations they represented and to indicate their expectations for the workshop. Initial responses generally fell into one of the following categories:

- Participants wished to learn how to enter and retrieve data from RBLC and become more proficient with the system;

- Participants wanted to express their concerns that the information in RBLC is outdated and incomplete and learn why the information is not up-to-date;

- Participants wished to learn more about planned changes to RBLC and reporting protocols; and

- Participants wanted to identify areas in which more pollution prevention (P2) technologies might be coordinated with RBLC.

Introduction

Bob Blaszczak (OAQPS/RBLC) provided an introduction that described the goals and format of the workshop, as well as a summary of Clean Air Act Advisory Committee recommendations.

Workshop Goals

- Provide a forum for participants to offer feedback on RBLC and raise issues, and

- Conduct an on-line demonstration of the RBLC data input and querying.

Workshop Format

- Scheduled presentations included: (1) an RBLC on-line demonstration; (2) a discussion of RBLC improvements in relation to the New Source Review Reform Rulemaking; (3) a summary of planned improvements, both on-going and under consideration; (4) a review of RBLC data fields, data structure, and content; and (5) an overview of air pollution technology issues.

- The workshop schedule also included three separate open forums intended to: (1) identify and discuss broad RBLC issues; (2) obtain specific suggestions on improving user-friendliness and system functionality; and (3) address any remaining and/or unforseen issues.

- The workshop was scheduled to conclude with an on-line data entry tutorial designed for participants from state and local permitting agencies.

Clean Air Act Advisory Committee Recommendations

In 1994, the RBLC Subgroup, NSR Advisory Committee, Clean Air Act Advisory Committee made specific recommendations for improvements to the RBLC. The Committee's twenty-three prescriptive suggestions, outlined in more detail in the original documents available at www.epa.gov/ttn/catc, were briefly described during the workshop.

- Function and purpose of the RBLC
    – RBLC is a screening tool. If users need more detailed information they may have to contact State and local agencies.
    – RBLC should comprehensively catalog all RACT/BACT/LAER determinations. Specifically, LAER data must be entered into the RBLC.
    – New and emerging technologies should be examined by permitting authorities.

- Content of the RBLC
    – The RBLC should limit the number of data fields to simplify data entry. Users should tell EPA what is really needed.
    – RBLC should standardize emissions units and generate ranking of most- to least-stringent order of sources.

- Funding of the RBLC
    – Additional funding to be provided to implement improvements.

- Oversight and management of the RBLC
    – Make sure data are real.
    – New and emerging technologies are not always listed. EPA wants to include foreign technologies.
    – Conduct education and outreach: workshops, training (e.g., classroom, CD-ROM).

Previously Identified Issues

- The RBLC is currently missing approximately 60 percent of permits that have been issued. The data is not comprehensive in scope and permit-related information is incomplete.

- The RBLC does not confirm that a source was constructed and that compliance with emission limits indicated in the database has been demonstrated. Although data fields are provided, agencies rarely report whether or not a source has passed a compliance verification test.

- Cost information is not included in the system. The Agency must decide what constitutes "reasonable cost information." Some states have expressed reservations because the do not verify this information. They want real numbers and not estimates, if possible. Other states indicated that they regularly verified cost information as part of the permitting process.

- Questions have been raised concerning the presentation of new and emerging air pollution control technologies.

- EPA is seeking input on user-friendliness.

Participant Comments

- Several participants agreed with the need to consider incorporating new and emerging technologies into the system.

- Participants were concerned about confidential business information (CBI) issues.

RBLC On-line Demonstration

Rick Copland (OAQPS/RBLC) conducted an on-line demonstration of the RBLC system. He indicated that his demonstration would be limited to navigation and querying of the RBLC. He also noted that the final session of the workshop would provide a hands-on demonstration of data entry protocols. The demonstration covered the following topics:

- Accessing the RBLC database – the CATC home page address is www.epa.gov/ttn/catc.

- RBLC home page structure, including:
  - *Welcome* link provides background and instructions on how to use the RBLC.
  - *What's New* is self explanatory.
  - *Data Entry* will be shown this afternoon.
  - *Links to S/L Air Pollution Control Agencies* contains links to state agency web sites and contact information for both state agencies and EPA Regional Offices.
  - *On-Line Reference Library* contains links to web sites within and outside of EPA where you might find additional data and technology information.
  - *Tool Box* contains links to software tools that will allow you to estimate emissions, evaluate technologies, or identify less polluting materials.

- Employing RBLC database querying options:
  - *RBLC ID query* is used to dig into the information from a particular facility. The RBLC is composed of a two-letter state abbreviation followed by a 4-digit number. Each RBLC ID represents one facility. You can type in up to 3 specific IDs.
  - *Process type query* employs broad categories from a drop-down list.
  - *Standard query* employs a potentially long list of criteria to narrow the search – the more criteria, the more focused the results.
  - *Advanced query* is faster than the standard query if you only need to limit two criteria and you already know what those criteria are.

- Selecting report options:
  - *Process Summary by Facility Name* report corresponds to Appendix F of the RBLC Annual Report and includes facility name, company name, RBLC ID, Permit Date, Process Type, and Process Description.
  - *Contact Summary by Process Code* report corresponds to Appendix G of the RBLC Annual Report, and presents information first by process type code, then by facility name and gives some summary information.

- *Detailed Listing By Identifier* report corresponds to Appendix H of the RBLC Annual Report, and presents information by RBLC ID and contains virtually all information from the selected facilities in a table format. Notice that the report is much longer than either of the previous summary reports.
- *Freeform Report* provides the data in order by RBLC ID and includes all information. It is a very long report.
- *Generated ASCII text file* is useful when exporting data for subsequent manipulation using a spreadsheet or database program.

Participant Comments

- One participant suggested that the system should enable users to sort by date of permit. RBLC staff noted that the current system allows for queries that narrow the results using a date range, but it cannot sort by a specific date. The RBLC staff indicated that they would consider adding such a capability.

RBLC Improvements vs. New Source Review Rulemaking

Bob Blaszczak presented a brief overview on the New Source Review process. He emphasized that the RBLC role in New Source Review (NSR) is simply to respond to and record the results of changes to the permitting process that are ultimately driven by the rulemaking agencies. He noted that the RBLC facilitates the NSR permitting process, but that neither the RBLC nor the workshop is a part of the rulemaking process. However, he observed that the rulemaking does impact RBLC. For example:

- Early notification for Federal land managers – EPA has indicated that it will post permit applications on RBLC as they are received.

- Clean unit test – the biggest regulatory impact on RBLC will be to require complete information to facilitate the permit process.

- Effective permit to construct – EPA is unsure how this provision will be implemented. It may require that a permit be recorded in RBLC before it can be effective.

Bob Blaszczak indicated that EPA will not delay permits after the NSR Final Rule is issued and that the RBLC will have to react quickly. He also encouraged participants to get involved in the rulemaking process.

Planned Improvements

Rick Copland led a discussion of planned improvements to the RBLC. He indicated that these involved both on-going initiatives and improvements under consideration. Key elements of the on-going improvements include:

- Data Acquisition – One of the problems with RBLC is that it is incomplete. EPA is having a difficult time keeping RBLC data current. EPA is coordinating with regional offices to identify permits that have been issued but not entered. With its budget for data review increased, OAQPS will send teams the EPA regional offices to update RBLC.

- Outreach – Outreach initiatives assist in the process to improve RBLC. These initiatives include the RBLC annual report, workshops, and an RBLC user manual.

- Data Entry – EPA will develop a standalone editor system for RBLC so users do not have to be on-line to enter data. EPA also plans to develop on-line quality assurance (QA) utilities.

- Linkage – RBLC will include links to technical web sites and to relevant State and local web sites.

Improvements under consideration include:

- Customized Retrieval/Output Reports – EPA is exploring ways to customize reports and queries based on user input.

- Cost Data – Cost data are rarely entered into the RBLC. EPA is considering ways to include more cost data in RBLC, a well as the implications of these expanded data collection efforts.

- More Definitive Process Identification – EPA is considering changes to the process type codes to better reflect processes regulated by various EPA regulations (NSPS, NESHAP, MACT, etc.).

- Links – The Agency intends to include more links in RBLC to other web sites in order to provide more information. EPA would like to link regulations and permits databases. RBLC may include links to permitting information on State and local web sites.

- Update SIC to NAICS – EPA plans to update the SIC codes currently used in the RBLC to the North American Industrial Classification System (NAICS).

- Training/Training Material and Methods – EPA is considering developing classroom and CD-ROM training courses for RBLC.

- Restore Ranking Capability – EPA is considering listing most stringent to least stringent emission limits and technologies for processes and pollutants.

- New Clean Air Technology Database – Subject to disclaimers regarding endorsements of specific technologies, the Agency is considering including information on specific technology vendors.

- Industry Sector Technology Assessments and Emerging Technology Technical Bulletins – EPA is exploring the feasibility of providing direct access and/or links to these reference materials as they are finalized.

- Graphical Displays of RBLC Sources and Class I Areas – In anticipation of NSR reform, EPA is considering including this information to assist Federal land managers with early notification requirements.

Identification and Discussion of RBLC Issues

The RBLC staff and workshop participants engaged in a discussion to identify RBLC issues and answer questions about RBLC.

Participant Comments

- Katie Hornbarger (AFPA) asked to explain more about the industry sector and technology assessments. Bob Blaszczak responded that RBLC is intended to be a comprehensive database and that the system could enable users to review relevant information to see what is happening within a particular industry and to pull other available literature on the topic. He noted that inclusion of the industry sector and technology assessments remains conceptual at this point.

- Another participant commented that, while putting information into RBLC is voluntary, many EPA grant programs to States make RBLC reporting mandatory under the terms of the grants. Bob Blaszczak replied that withholding grant money is not common and enforcing agreements is difficult. Agreements are not legal requirements and there is no regulation or statute requiring that information be entered in RBLC.

- Leslie Sue Ritts (Counsel, NEDA/CARP) commented that if industry were to accept a presumptive BACT/LAER, it would significantly expedite the permitting

process. Bob Blaszczak responded that while OAQPS/RBLC received a significant budget increase for FY 2001, maintaining this level of funding is not certain. Therefore, the resources necessary to maintain and update presumptive BACT/LAER determinations might not be there in the future.

- A participant asked if the Agency had any hard data on exactly who is using RBLC and how they were using it. Bob Blaszczak indicated that based on information collected during the "bulletin board days" of RBLC, industry makes up approximately 65 percent of RBLC users and they are primarily interested in NSR permits. Approximately 25 percent of users are State and local agencies. The remaining 10 percent fall in the "other" category. He noted that it was unlikely that this mix had changed much as the system had evolved. He also noted that OAQPS was somewhat reluctant to refine these numbers by using a formal survey because such information collection is subject to formal Office of Management and Budget review. He added that most users employ RBLC as a screening tool.

- A participant asked if the Agency plans to post permits on-line. EPA responded that they hope to post permits on-line, but resource and maintenance problems limit options in this area.

- Dr. Iclal Atay (NJ Department of Environmental Protection) commented that the State of New Jersey has used presumptive BACT/LAER determinations, in the form of technology manuals, for major and minor sources. The down-side of this program is keeping the manuals up-to-date. She emphasized that it is important to keep this information up-to-date so as not to suppress the development of new technologies. The State is required to give manuals to industry when they submit permit applications, but it is difficult to keep up with technologies.

- A participant asked if EPA will aggregate RBLC data with other databases. Bob Kellam responded that the Central Data Exchange, currently under development by the Office of Environmental Information, will be a one-stop resource that allows States to submit to and search one database rather than several.

- A participant asked if there is a schedule for listing new technologies. Bob Blaszczak said that EPA is focusing on getting the web-based RBLC system running smoothly. EPA will then consider technology listing after feedback is received on what the listing should contain and what costs the listing is expected to incur. The registry of technologies is designed for specific industries and pollutants. This process will require a substantial amount coordination with stakeholders. Bob Kellam noted that EPA needs to be careful about appearing to endorse technologies.

- Dr. Atay noted that the University of California at Riverside has web site listing of available technologies along with a disclaimer. She said that the site is well-designed and may be a considered as a model or possible link for the RBLC.

- Katie Hornbarger asked when a practical display of sources is expected to be available using Geographical Information System technology. Bob Blaszczak estimated that EPA can get the database running in approximately 3 to 6 months. He noted that the agency needs feedback on this issue.

- Bruce Augustine (EPA Region 2) asked when ranking reports will be available. Bob Blaszczak responded that report ranking was an output function on the PC-based RBLC and when the RBLC became a web-based system it lost ranking capability. For a time, EPA was able to generate those reports off-line and post them on its web site; however, that is no longer possible. EPA is seeking feedback from users on how they would like to see report ranking on the RBLC web site. This feature will probably be available in FY 2002.

- Dr. Atay commented that the RBLC should function as a major source permitting tool and include technology information for permitting. Bob Blaszczak responded that EPA is attempting to be more efficient in using RBLC as an early notification system so that users will know that permits are in the process and EPA is aware of permit applicants to facilitate follow-up.

- Another participant asked if RBLC will list new technologies? Bob Blaszczak said that EPA is exploring whether to include a technology database as part of RBLC.

- Dr. Atay asked if EPA-issued technology permitting memoranda will be listed on the RBLC. Bob Blaszczak replied that memoranda probably should be listed on the web site. A link to the NSR web site is also an option.

At the conclusion of the open forum, Rick Copland listed issues raised during one-on-one conversations at the morning break:

Participant Comments

- A participant commented that it would be useful to be able to sort records in a query by date.

- Query results yielding more than 150 records currently must be broken into separate reports for each set of 150 records. The participant indicated that they would like to see one report regardless of the number of records.

- A participant commented that it would be useful for the RBLC to allow users the options to generate an ASCII file with all information and select specific fields to manipulate data as their needs require. A free form report provides all data. ASCII reports do not yield all data as in a free form report. The participant would also like to be able to select fields to be included in the ASCII ouput.

Data Fields/Data Structure/Content of RBLC Database

Bob Blaszczak provided an in-depth discussion of each data element in the RBLC input form and addressed comments from the workshop participants. He provided an overview of RBLC data structures, discussed the rationale underlying each included data element, and provided instructions on completing the form. He also noted that the final session of the workshop would involve a hands-on data entry tutorial for interested participants.

Participant Comments

- Dr. Atay commented that the RBLC should include actual emissions to process information. Also, if there has been stack testing, users should indicate the method used. Bob Blaszczak responded that information on methods used should be entered in the "additional information" field.

- A participant stated that they would have reservations about inputting actual emissions data because it may be inaccurate. Jennifer Bryan (Vermont Air Pollution Control) commented that emissions data out should be excluded because the RBLC is primarily a screening tool. She suggested contacting the relevant State if specific emissions data are required. Dr. Atay stated that the test method should be removed. Dr. Atay wanted the RBLC to indicate information on test methods and test results (actual values). Others were concerned about the use of that data and the added burden of entering it.

- A participant asked if three different control options were considered and the decision was to use two of the three what would be the ranking of the selected option. Bob Blaszczak responded that control options represent a combination of one and two. EPA used the highest ranking option for on-line data entry.

- Bob Blaszczak registered his concern that the RBLC might be requiring too much cost information. He noted that O&M, annual, capital cost information might be considered CBI. EPA is considering eliminating those data elements and, as an alternative, asking for cost effectiveness and incremental cost effectiveness data.

- A participant asked for a clarification of the relationship between process level and pollutant level. What if there are multiple operating scenarios and multiple

fuel scenarios? Bob Blaszczak responded that EPA is deciding how to present fuels information. One option is to display the information in a table. EPA welcomes ideas on how to provide this information. A participant suggested asking "Is there another scenario?" after entering the first scenario.

- Dr. Atay commented that she has cost information concerns. Specifically, cost data must have a basis in order to be valid. Cost effectiveness may be meaningless from agency to agency, corporation to corporation, or office to office. She said that there should be a qualifier as to what cost effectiveness means. She suggested devising a common methodology to calculate cost effectiveness or posting a disclaimer in the RBLC data entry screen (e.g., "Please don't take cost data seriously").

- Representatives from the Pennsylvania Department of Environmental Protection indicated that cost data is needed in the database. A component of the Pennsylvania Technical Review is a cost analysis. They actually contact vendors and regulatory offices to see if they are "in the ballpark."

User-Friendliness/Functionality

Bob Blaszczak asked the participants if the current query options meet user needs. Are there options users do not like? Are there simpler query options (e.g, similar to a web search engine where a user enters a word or phrase to look for specific results)?

Participant Comments

- Jennifer Bryan asked if it is possible to search by process. Bob Blaszczak responded that users can search by process codes which are provided in drop down lists that include the process name/description.

- Hallie Comer (Philadelphia Air Management Services) asked if it possible to search by capacity. Bob Blaszczak responded that the current version of RBLC did not have this capability.

- Bob Blaszczak asked what level of data do users typically want to access first when conducting a search. Would it be helpful to jump to process level data instead of wading through facility data? Most participants agreed with this idea. Do users want to see any permit information? A participant noted that permit dates are useful.

- Bob Blaszczak encouraged participants to contact OAQPS with ideas and suggestions for improving user-friendliness and functionality.

Air Pollution Technology Issues

Bob Blaszczak asked how RBLC should provide information on new and emerging technologies and foreign technologies. Current plans under consideration by EPA call for including basic information, operating parameters, cost, successful applications, links to developer/vendor web sites, and existing technologies. EPA is wary of appearing to endorse vendors and products by establishing links on EPA web sites. Bob Blaszczak asked if this is something EPA should pursue.

Participant Comments

- Jennifer Bryan suggested providing examples of sites that could serve as models. Dr. Atay commented that States have technology verification programs where vendor technologies have been accepted by the states. Andy Bray (Northeast Waste Management Officials' Association) said that the information on the Waste Reduction Resource Center out of Region 4 is often not maintained and not updated by vendors. Bob Blaszczak noted the need to build into the system reminders to vendors to update information.

- Bob Blaszczak asked if RBLC should be involved in writing reports and technical bulletins. Jennifer Bryan commented that without regular updates, technical reports and bulletins are not effective.

Open Forum

The discussion portion of the workshop concluded with an open forum for general questions and ideas related to RBLC.

Participant Comments

- Jennifer Bryan asked what happens to the data when it is entered into RBLC because it is not always available. Bob Blaszczak responded that there is currently an extensive backlog in the transient database. The RBLC support contractor has committed to cleaning up the transient database by then end of August 2001. The data are in the system, but not in the main database.

- Andy Bray asked about a quality assurance review. Bob Blaszczak responded that EPA conducts a logical QA review of required and recommended fields for consistency to determine if the data are valid. EPA does not second guess the permitting agencies about their determinations.

The workshop concluded with a hands-on demonstration of data entry procedures and then adjourned.

Attachment A

Attendees for the RBLC Workshop
Washington, D.C.

Attendees for the RBLC Workshop #1 - Washington, DC

| Name	Organization	City, State	Phone	E-Mail
Atay, Dr. Iclal	New Jersey Dept. of Environmental Protection	Trenton, NJ	(609) 984-0491	iatay@dep.state.nj.us
Augustine, Bruce	U.S. EPA Region 2	New York, NY	(212) 637-4064	augustine.bruce@epa.gov
Bankoff, Barbara A.	Jiemens Westinghouse	Washington, DC	(202) 434-4810	babankof@erols.com
Best, Brenda	U.S. EPA, OAQPS	RTP, NC	(919) 541-5438	best.brenda@epa.gov
Blaszczak, Bob	Information Transfer Group (ITG), OAQPS, EPA	RTP, NC	(919) 541-5432	blaszczak.bob@epa.gov
Bray, Andy	Northeast Waste Management Officials' Association	Boston, MA	(617) 367-8558	abray@new moa.org
Bryan, Jennifer	Vermont Air Pollution Control	Waterbury, VT	(802) 241-3846	jennb@dec.anr.state.vt.us
Carter, Tom	American Portland Cement Alliance	Washington, DC	(202) 408-9494	tcarter@apca.org
Comer, Hallie	Philadelphia Air Management Services	Philadelphia, PA	(215) 685-9427	hallie.comer@phila.gov
Copland, Rick	U.S. EPA, OAQPS	RTP, NC	(919) 541-5265	copland.rick@epa.gov
Dufficy, Craig A.	PA Dept of Environmental Protection	Harrisburg, PA	(717) 787-4325	cdufficy@state.pa.us
Faini, Glenn	Naval Surface Warfare Center	Indian Head, MD	(301) 744-2257	fainigd@ih.navy.mil
Fey, Roger M.	City of Phila., Dept. of Public Health, Air Management Services	Philadelphia, PA	(215) 685-9428	roger.fey@phila.gov
Hornbarger, Katie	American Forest and Paper Association	Washington, DC	(202) 463-2780	katie_hornbarger@afandpa.org
Kellam, Bob	Information Transfer & Program Integration Division, OAQPS, EPA	RTP, NC	(919) 541-5647	kellam.bob@epa.gov
Kinter, Marci	SGIA International	Fairfax, VA	(703) 359-1313	marcik@sgia.org
Ours, Stephen S.	Delaware - DNREC	New Castle, DE	(302) 323-4542	sours@state.de.us
Paul, William	MD Dept of the Environment	Baltimore, MD	(410) 631-3230	bpaul@mde.state.md.us
Pinto, James	Naval Surface Warfare Center, Indian Head Division	Indian Head, MD	(301) 744-2266	pintojr@ih.navy.mil
Ritts, Leslie Sue	Counsel, NEDA/CARP	Washington, DC	(202) 637-6573	LSRitts@HHLAW.COM
Shontz, John T.	PA Dept of Environmental Protection	Harrisburg, PA	(717) 787-4325	jshontz@state.pa.us
Smith, Jeff	Institute of Clean Air Companies	Washington, DC	(202) 457-0911	jsmith@icac.com
Svendsgaard, David	OAQPS	RTP, NC	(919) 541-2380	svendsgaard.dave@epa.gov
Wyman, Robert A.	Latham & Watkins	Los Angeles, CA	(213) 891-8346	robert.w yman@lw .com

Attendees: 24

Attachment B

Presentation Materials for the
RBLC Workshop #1
Washington, D.C.
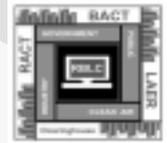
♻EPA

RACT/BACT/LAER Clearinghouse

RBLC Workshop #1

Washington, DC
June 6, 2001

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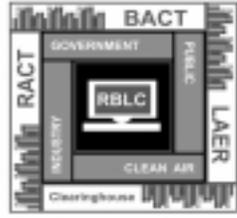
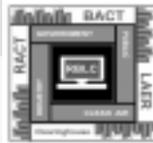## Introduction

► Workshop Goals

► Workshop Format

► Clean Air Act Advisory Committee Recommendations

► Previously Identified Issues

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Workshop Goals

► Get User Input

► Answer Questions & Discuss Issues

► RBLC Web Capabilities and Demonstration

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Workshop Format

► Demonstrate RBLC Web

► Known Issues & Planned Improvements

► Get Your Input

► Open Forum

► Data Entry Tutorial

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Get Your Input

► Are There Other Issues?

► Are There Data Issues?
  - Do We Have the Right Data?
  - Do We Have Too Much Data?
  - Do We Need More Data?

► System Issues?
  - How Can We Be More User-Friendly?

► Air Pollution Technology Issues?
  - How About Emerging & Foreign Technologies?

♻EPA

CAAAC Recommendatio

► Function & Purpose of the RBLC

► Content of the RBLC

► Funding of the RBLC

► Oversight & Management

EPA
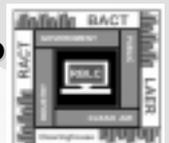
Function & Purpose of the RBLC
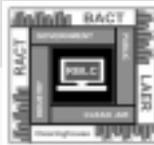
► Screening Tool to ID Technologies
& Emission Limits

► Comprehensive & Accurate Information
for All Newly Issued Permits

► Industry Technology Profile
(Experimental Basis)

EPA
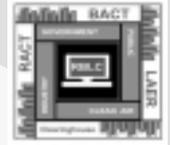
Content of the RBLC

► Limit Number of Data Fields,
Require Only Needed Information,
Simplify Data Entry

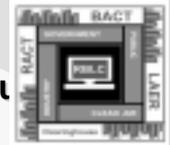► Standardize Emission Units
(to Allow for Comparison/Ranking)

EPA

Oversight & Management of the RBLC
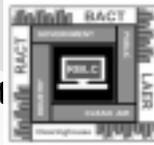
► Annually ID Most Stringent Permits &
Verify & Correct As Appropriate

► Include Foreign Technology & Provide
Technical Support to Permitting Agency

► Conduct Education & Outreach

EPA

Previously Identified Issues

► Complete/Comprehensive

► Compliance Verification

► Cost Information

► New and Emerging Technologies

► User-Friendliness

⊕EPA

RACT/BACT/LAER Clearinghouse

RBLC
Improvements
vs.
NSR Reform
Rulemaking

⊕EPA
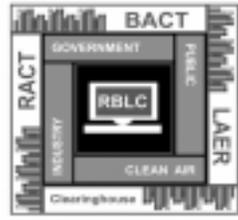
RBLC's Role in NSR Permitting
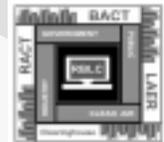
► Tool to Facilitate NSR Permitting

► Provide for the Sharing of Information on the Application of Technologies and Permitted Emission Limits
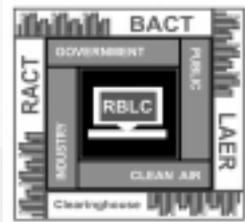

⊕EPA

RBLC's Role in NSR Permitting

► What Is NSR Reform Rulemaking?

► How Does it Impact the RBLC?

 - Early Notification for FLM's
   & Complete Application

 - Clean Unit Test

 - Effective Permit to Construct

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RBLC Workshop #1

Washington, DC
June 6, 2001

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Planned Improvements

► On-going Initiatives

► Under Consideration

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On-going Initiatives

► Data acquisition / QA
  - Regional coordination
  - RBLC data review
  - Site visits

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On-going Initiatives

► Data acquisition / QA
  - Regional coordination
  - RBLC data review
  - Site visits

► Outreach
  - Workshops
  - User manual
  - New annual report

⊕EPA On-going Initiatives *(continued)*

► Data Entry
  - Standalone editor
  - On-line QA utilities

⊕EPA On-going Initiatives *(continued)*

► Data Entry
  - Standalone editor
  - On-line QA utilities

► Linkage
  - Related technical sites
  - Software tools
  - Agency sites/contacts

Under Consideration

► Customized retrievals / output reports

Under Consideration

► Customized retrievals / output reports

► Cost data

Under Consideration

► Customized retrievals / output reports

► Cost data

► More definitive process identification

Under Consideration

► Customized retrievals / output reports

► Cost data

► More definitive process identification

► Links

Under Consideration (continued)

► Update SIC to NAICS

Under Consideration (continued)

► Update SIC to NAICS

► Training

Under Consideration *(continued)*

► Update SIC to NAICS

► Training

► Restore ranking capability

Under Consideration *(continued)*

► Update SIC to NAICS

► Training

► Restore ranking capability

► New clean air technology database

Under Consideration *(continued)*

► Industry sector technology assessments

Under Consideration *(continued)*

► Industry sector technology assessments

► Emerging technology technical bulletins

Under Consideration *(continued)*

► Industry sector technology assessments

► Emerging technology technical bulletins

► Graphical display of RBLC sources & Class I areas

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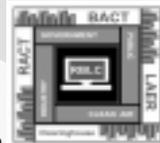
Air Pollution

Technology
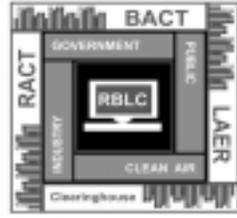
Issues

EPA
Air Pollution Technology Issues
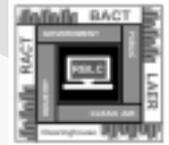
► How Can the RBLC Provide Information on New & Emerging Technologies? Foreign Technologies?

► How About a Web Database Supported Directly by Technology Developers & Venders?
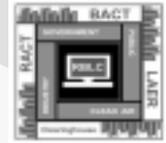(Venders Supply Info on Their Technology for Uploading in RBLC Prescribed Format)

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Air Pollution Technology Issues

► Include Basic Information on Operational Parameters, Cost, & Successful Applications

► Possible Links to Developer / Vender Web Site or E-mail

► Could Include Existing Technology, Too

► Other Possibilities?

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Air Pollution Technology Issues

► Technical Bulletins on New & Emerging Technologies

► Periodic Industry Profiles Indicating the State of Technology and Achievable Emission Limits Demonstrated for All Processes Associated with That Industry
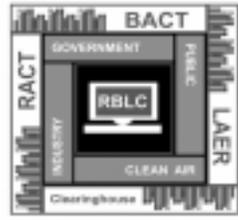
► Is There a Need for Other types of Reports?
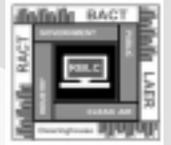
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User-Friendliness

&

System

Functionality

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User-Friendliness & System Functionality

► Do Current Query Options Meet Your Needs?

► Are the Right Fields Available for Query?

► What Level of Data Do you Want to Access First? Facility? Process? Pollutant?

► How Should Query results be Displayed?

► How Can We Simplify Site Navigation?

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User-friendliness & System Functionality
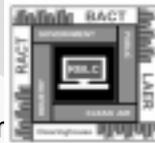
► Do We Need to Provide Trainir

► What Kind of Training Material iIs Needed?

  - Web-based Tutorial?

  - CD Tutorial?

  - Conventional Training Courses?

  - Other Training Possibilities?