# RBLC WORKSHOP SUMMARY

EPA Office of Air Quality Planning and Standards
Chicago, Illinois
August 22, 2001

## Background

On August 22, 2001 in Chicago, Illinois, the EPA Office of Air Quality Planning and Standards (OAQPS) Reasonably Available Control Technology (RACT)/Best Available Control Technology (BACT)/Lowest Achievable Emission Rate (LAER) Clearinghouse (RBLC) hosted the fourth in a series of public workshops to solicit feedback on the RBLC. The fifth RBLC workshop is scheduled to be held in Sacramento, California, in November 2001.

Following welcoming remarks and introductions, Bob Blaszczak (OAQPS/RBLC) updated participants on the status of the RBLC database system. 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.

## Introduction

Bob Blaszczak 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 the 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 also included 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
  - The RBLC is a screening tool. If users need more detailed information they may have to contact State and local agencies.
  - The 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.
  - The 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, including workshops and 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 they 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.

**RBLC Improvements vs. New Source Review Rulemaking**

Bob Blaszczak presented a brief overview on the New Source Review (NSR) process. He emphasized that the RBLC role in New Source Review is simply to respond to and record the results of changes to the permitting process that are ultimately driven by the rulemaking. 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 the RBLC. For example:

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

- Clean unit test – The biggest regulatory impact on the 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 the 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 encouraged participants to get involved in the rulemaking process.

Participant Comments

- A participant asked if States were to delegate data entry authority to regulated sources, would that create security issues for EPA? Bob Blaszczak answered that

EPA is developing a stand-alone system that would allow States to delegate this role to the sources, while maintaining overall system security.

**Planned Improvements**

Rick Copland (OAQPS/RBLC) led a discussion of planned improvements to the RBLC. He indicated that these involved both on-going initiatives and improvements under consideration.

On-going improvements include:

• Data Acquisition – One of the problems with the RBLC is that it is incomplete. EPA is having a difficult time keeping the 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 to the EPA Regional offices to update the RBLC.

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

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

• Linkage – The 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 the RBLC, as 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 the RBLC to other web sites in order to provide more information. EPA would like to link regulations and permits databases. The 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 the 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.

Participant Comments

- A participant noted that there seems to be detachment between NSR reform and the RBLC regarding industry assessment by sector. Permit writers often see industry settle on compliance rates entered into the RBLC because there is no incentive or requirement to improve. Industry believes that as long as compliance data are entered in the RBLC, they do not have to show improvement. Better coordination between the NSR office and the RBLC is essential on this issue. State agencies find themselves in a tough spot if the EPA Regions do not want to get involved.

- Another participant asked if it was possible to delete outdated data from the RBLC. Bob Blaszczak answered that the RBLC is intended to store historical data and that the default is 10 years.

- Several participants noted that it is essential for the RBLC to include more definitive process codes, especially for gas turbines.

- A State representative stated that the RBLC should include the following: (1) a disclaimer that the RBLC includes data that may not be BACT; (2) a list of

industry-specific feasible control technologies with an appropriate disclaimer; and (3) well-defined cost data that takes into account factors including present value, interest rates, and equipment life, with a disclaimer that cost data may be unreliable because it can be easily manipulated.

**RBLC On-line Demonstration**

Rick Copland conducted an on-line demonstration of the RBLC system.  He said 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 real-time 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 the 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 permitting action.  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

- A number of participants observed that the database screens are hard to read and that there is too much text on the screen, particularly the standard query screen. They also thought the database should provide more information on field conventions. For example, when entering search criteria in date fields, there is no information indicating proper conventions (i.e., number of digits and forward slashes or hyphens).

- Another participant requested that when EPA updates the SIC codes to NAICS codes, it would be helpful to maintain a list of SIC codes in the RBLC.

- Several participants thought it would be helpful to be able to sort the results according to the most recent permit date. Bob Blaszczak indicated that EPA is presently modifying the system to enable sorts by permit date, but such a change has not been fully implemented. He also noted that there are two other dates tracked in the RBLC – the date a permit was entered into the clearinghouse and the last date a record was revised – that could potentially be used as a sorting criteria, should users express an interest in such a modification.

- When asked how the RBLC handles a permit that has been modified, Bob Blaszczak indicated that the RBLC contains permits to construct, not Title V permits. Therefore, if users are not conducting a new BACT review, they can simply go directly to the data entry screen and modify any old records. He noted that data in these modified permits would entirely replace the old permit data.

- A State representative suggested that EPA move the navigation buttons down below the EPA logo on data display screens so the buttons do not appear to be part of the EPA logo. He also suggested that the navigation button color be changed to gray to distinguish them from the EPA logo.

- When asked how sensitive searches are to certain fields, Rick Copland answered that in the advanced query users can enter partial information in some fields. For example, in the standard query, users can enter "starts with" and "ends with" criteria. In addition, Bob Blaszczak noted that the search criteria are not case sensitive.

- Another State official suggested EPA establish a link between the RBLC and State agencies for converting and transferring permits and technical support documents in a consistent format (e.g., PDF files).

- A participant suggested that EPA add a "check none" button along with the "check all" button on the results page.


**User-Friendliness/Functionality and Identification and Discussion of RBLC Issues**

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

Participant Comments

- One participant commented that the RBLC is "permit-centric" and that he would prefer access that is more "data-centric." He asked if there was any way he could identify permits based on a set or a range of emissions for various processes? That way, if he identified a process in that range, he could view potentially applicable permits. Bob Blaszczak indicated that if users knew a technology that fell within a particular emission range, they could search under the acronym or name as it was entered, but that there currently is no way of querying on emissions data first.

- Another participant suggested the database should include more instructions or recommendations on what is appropriate to include in the various "notes" fields. Permit writers/reviewers need a lot of specific information that does not fall under other data elements. This information could be included in the notes field. Rick Copland answered that the notes field is generic and not required. Any type of information can be entered in the notes field.

- A participant observed that facility size information is important to permitting agencies. Bob Blaszczak answered that there is a field in the RBLC for

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throughput, although it might create potential CBI issues.

- Another participant observed that searching on a process to find a LAER determination is complicated, because it is difficult to distinguish between PSD-BACT or LAER. Bob Blaszczak answered that the standard query option allows the user to search on the basis of emission limit (e.g., LAER). However, it may be more important to search on the most stringent emission limit for a particular source (i.e., rank emissions from most to least stringent).

- A participant noted that having consistent units in the database is important. Bob Blaszczak answered that the RBLC standard units are based on EPA emission standard units, and, most likely, match the permit standard units. If the units are not consistent, the tools menu could provide a converter (now under consideration).

Bob Blaszczak then asked participants for their input on the types of RBLC training materials that might prove useful. Most participants agreed that a web-based tutorial that makes use of help buttons is the best approach. Other training and/or help-related recommendations included:

- Adding a mouse-over feature or compressing the text within the standard query to reduce its size.

- Incorporating a feature to the query screens that indicates a mistake may have been made and where. One participant suggested an "error" report might include a summary of inputs so as to highlight where the error in query logic might have occurred.

**Data Fields/Data Structure/Content of the 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.

- During the presentation and the comment session that followed, participants asked a number of targeted questions and made numerous specific suggestions on improving the content of the RBLC. These included:

  – If the RBLC is a screening tool, why do users need to input whether a public hearing was held? Bob Blaszczak indicated that collection of such data met programmatic needs.

- The RBLC should include data fields indicating whether hearing transcripts are available and where they are available.

- The input form should specifically ask whether new information relates to a major modification or a green field site rather than using the terms "new" and "modified" because the latter terms are unclear.

- The term "Plantwide Emissions/Increase Information" on the data collection form is unclear. Bob Blaszczak indicated that EPA will attempt to clarify what "increase" means in this context.

- What is the purpose of tracking "Emissions Increase?" Bob Blaszczak answered that it is intended to address a portion of the proposed rule.

- The input form should include check boxes to indicate a range of distances for class one areas within 250 km of the source.

- The input form should ask if a fuel is a back-up fuel. Bob Blaszczak suggested that check boxes would be appropriate in this case.

- Is it important to list all processes relevant to a particular source? Bob Blaszczak answered that only the major processes are critical.

- The data form should be different for different stages in the process, otherwise a data entry person does not know when the form is complete.

- Who completes the plant information section of the form? Bob Blaszczak answered that State agencies are responsible for inputting these data.

- Pollutant-specific permit conditions should require information on the method used to assess compliance. Another participant indicated that including a checkbox to indicate that an approved test method was used is sufficient. Asking for more information is overkill.

- Does the RBLC consider any emissions reduction approach that is not an add-on control/abatement device to be pollution prevention?

- EPA should delete the checkboxes for NSPS and NESHAPS from the pollutant information section of the data form. RACT, BACT, and LAER should be the only choices.

- The data form should include a checkbox to indicate when a BACT

determination is affected by other factors (i.e., to indicate that an emission limit went beyond BACT for reasons outside the usual BACT parameters).

– Change "compliance verified" to "compliance method required in permit," adding checkboxes for "CEMS" and "EPA Test Method."

– A participant questioned how CAS numbers are relevant to these types of compliance decisions and why the data form includes a field for collecting such data.

– Keep the cost effectiveness field, but eliminate all other cost fields. Cost contact information would be helpful.

– Add a "notes" section to cost where CBI information can be included and cost data can be explained in greater detail.

– Is cost analysis data available anywhere else? If not, it should be included in the RBLC.

– Without complete information, how can permitting staff make a determination regarding the accuracy of cost information? Moreover, there is no way to determine how cost data for different applications relate to one another.

**Air Pollution Technology Issues**

Bob Blaszczak asked how the 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

• One participant stated that if EPA planned to incorporate information on emerging technologies in the RBLC, the Agency should limit it to technologies that are commercially available.

• Another participant suggested that if EPA prepared industry sector profiles, it should start with industries on the BART list because the BART list provides a

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national perspective.

## Who Should Be Able to Submit/Enter Data?

Bob Blaszczak asked the participants for input on who should be allowed to enter data into the RBLC. He also asked participants to consider whether the RBLC should contain a list of vendors or a link to a list of vendors.

Participant Comments

- A State representative suggested that only regulatory agency personnel should be allowed to enter data, or at least provide extensive oversight so as to eliminate any unfair advantages gained by allowing industry to submit the data directly.

- Another participant thought that RBLC data entry is too complex and burdensome for State agencies. He observed that if EPA wanted the data, they should expend the resources to input it. He also suggested that RBLC reporting will be poor because it is burdensome for State agencies to enter data.

- One participant suggested that EPA explicitly define which RBLC fields are required and which are optional. He noted that as the number of data elements increased, particularly program evaluation data, the RBLC becomes less valuable as a clearinghouse that benefits the State agencies and more a tool that benefits program analysts.

- Several participants expressed strong feelings that the current data entry form contains too many fields. Too much information is asked for. The form should focus on information useful to States in making BACT determinations and eliminate fields that are only used by EPA for statistical purposes. Asking for less would improve the response from States and improve the percentage of permits in the RBLC.

- Lastly, a participant asked if EPA had considered making the RBLC form part of the facility application that is submitted to the States? Including the form as part of the application process would remove some of the burden from the State agencies to enter these data.

**Attachment A**

**Attendees for RBLC Workshop #4**
**Chicago, Illinois**

# Attendees for the RBLC Workshop #4 - Chicago, IL

| Name | Organization | City, State | Phone | E-Mail |
|------|-------------|-------------|-------|--------|
| Aldrich, Mary | Pharmacia | Kalamazoo, MI | (616) 833-9157 | mary.a.aldrich@pharmacia.com |
| Angelbeck, Richard | U.S. EPA - ARD | Chicago, IL | (312) 886-9698 | angelbeck.richard@epa.gov |
| Barsley, Thomas | Philadelphia Air Management Services | Philadelphia, PA | (215) 685-9428 | thomas.barsley@phila.gov |
| Blaszczak, Bob | U.S. EPA, OAQPS | RTP, NC | (919) 541-5432 | blaszczak.bob@epa.gov |
| Bolfing, Rick | KS Dept of Health and Environment | Topeka, KS | (785) 296-1576 | rbolfing@kdhe.state.ks.us |
| Capasso, Julie Anne | U.S. EPA | Chicago, IL | (312) 886-1426 | capasso.julie@epa.gov |
| Chou, Jeffrey | ENSR International | Warrenville, IL | (630) 839-5327 | jchou@ensr.com |
| Copland, Rick | U.S. EPA, OAQPS | RTP, NC | (919) 541-5265 | copland.rick@epa.gov |
| Cottrell, Kimberly | IDEM - Office of Air Quality | Indianapolis, IN | (317) 233-0870 | kcottrel@dem.state.in.us |
| Coughanour, Bob | NOVA Chemical | Hilton Head, SC | (843) 842-6002 | rcougha888@aol.com |
| David, Laura L. | U.S. EPA | Chicago, IL | (312) 886-0661 | david.laura@epa.gov |
| Franek, William | Cook County Environmental Control | Chicago, IL | (312) 603-8241 | wfranek@cookcountygov.com |
| Hanson, Jeff | Wisconsin DNR | Madison, WI | (608) 266-6876 | hansojc@dnr.state.wi.us |
| Hughes, Jeffrey | Ecology and Environment, Inc. | Chicago, IL | (312) 578-9243 | jhughes@ene.com |
| Judge, Hardip S. | Air Resources Board, CA EPA | Sacramento, CA | (916) 324-9512 | hjudge@arb.ca.gov |
| Killie, Charlie | Citizens Organized Watch | Columbia City, IN | (219) 625-5414 | cgkille@acninc.net |
| Marmer, Daniel | Sargent and Lundy | Chicago, IL | (312) 269-6014 | daniel.l.marmer@sargentlundy.com |
| Marse, Jennifer S. | Regional Air Pollution Control Agency | Dayton, OH | (937) 225-4435 | marseejs@rapca.org |
| Mason, Jerry | AGEISS Environmental, Inc. | Dugway, UT | (435) 831-4207 | jerrym@ageiss.com |
| Mason, Rebecca | IDEM - Office of Air Quality | Indianapolis, IN | (317) 233-9664 | rmason@dem.state.in.us |
| Miller, Bradley | Department of Environmental Services | Cincinnati, OH | (513) 946-7731 | bradley.miller@does.hamilton-co.org |
| Mount, Bernard F. | Sargent & Lundy, LLC | Chicago, IL | (312) 269-2734 | bernard.f.mount@sargentlundy.com |
| Nowac, Laura | Ohio EPA | Columbus, OH | (614) 644-3697 | laura.nowac@epa.state.oh.us |
| Olson, Karen | TX Natural Resource Conservation Commission | Austin, TX | (512) 239-1294 | kolson@tnrcc.state.tx.us |
| Ostling, Kristi | Pharmacia | Kalamazoo, MI | (616) 833-9342 | kristi.a.ostling@pharmacia.com |
| Owen, Verena | Lake County Conservation Alliance | Winthrop Harbor, IL | (847) 872-1707 | baumling@aol.com |
| Patterson, Fern | Trinity Consultants | Itasca, IL | (630) 467-9100 | fpaterso@trinityconsultants.com |
| Rao, Maya | MS DEQ | Jackson, MS | (601) 961-5242 | maya_rao@deq.state.ms.us |
| Saini, Gurinder | IDEM - Office of Air Quality | Indianapolis, IN | (317) 233-0203 | gsaini@dem.state.in.us |
| Schnepp, Jason | Illinois EPA | Springfield, IL | (217) 782-2113 | Jason.Schnepp@epa.state.il.us |
| Smet, Bob | Illinois EPA | Springfield, IL | (217) 782-2113 | Robert.Smet@epa.state.il.us |
| Trimmer, Dan | Citizens Organized Watch | Columbia City, IN | | |
| Watson, Wanda | AR Dept of Environmental Quality | Little Rock, AR | (501) 682-0083 | watson@adeq.state.ar.us |
| Wehner, Chris | Air Quality Services, LLC | Evansville, IN | (812) 452-4785 | cwehner@aqsllc.net |
| Zayudis, Pete | IA Dept of Natural Resources - Air Quality Bureau | Urbandale, IA | (515) 281-8035 | peter.zayudis@dnr.state.ia.us |

**Attachment B**

**Presentation Materials for
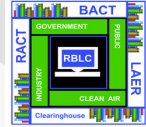RBLC Workshop #4
Chicago, Illinois**

## RACT/BACT/LAER Clearinghouse
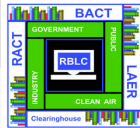
**EPA**

Introduction

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## Introduction

**EPA**

- ▶ Workshop Goals
- ▶ Workshop Format
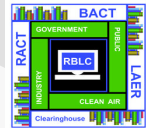- ▶ Clean Air Act Advisory Committee Recommendations
- ▶ Previously Identified Issues

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## Workshop Goals

**EPA**

- ▶ Get User Input
- ▶ Answer Questions & Discuss Issues
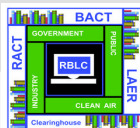- ▶ RBLC Web Capabilities and Demonstration

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## Workshop Format

**EPA**

- ▶ Known Issues & Planned Improvements
- ▶ Demonstrate RBLC Web
- ▶ Data Structure & Data Entry Tutorial
- ▶ Air Pollution Technology Issues
- ▶ Get Your Input

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## Get Your Input

**EPA**

- ▶ 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?

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## CAAAC Recommendations

**EPA**
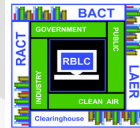
- ▶ Function & Purpose of the RBLC
- ▶ Content of the RBLC
- ▶ Funding of the RBLC
- ▶ Oversight & Management

**♻EPA**

## Function & Purpose of the RBLC
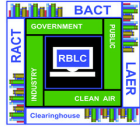


► Screening Tool to ID Technologies & Emission Limits

► Comprehensive & Accurate Information for All Newly Issued Permits

► Industry Technology Profile (Experimental Basis)

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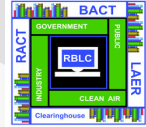
## Content of the RBLC



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

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

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**♻EPA**

## Oversight & Management of the RBLC
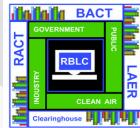


► Annually ID Most Stringent Permits & Verify & Correct As Appropriate

► Include Foreign Technology & Provide Technical Support to Permitting Agency

► Conduct Education & Outreach

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## Previously Identified Issues
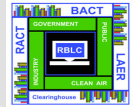


► Complete/Comprehensive

► Compliance Verification

► Cost Information

► New and Emerging Technologies

► User-Friendliness

## RACT/BACT/LAER Clearinghouse

RBLC
Improvements

vs.

NSR Reform
Rulemaking

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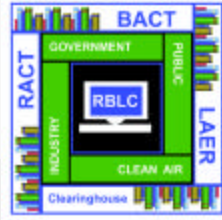
## RBLC's Role in NSR Permitting
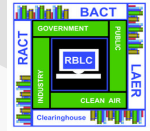
► Tool to Facilitate NSR Permitting

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

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## RBLC's Role in NSR Permitting
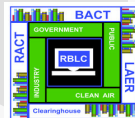
► What Is NSR Reform Rulemaking?

► How Does it Impact the RBLC?

- Early Notification for FLM's & Complete Application

- Clean Unit Test

- Effective Permit to Construct

## RACT/BACT/LAER Clearinghouse

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Planned Improvements



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## On-going Initiatives
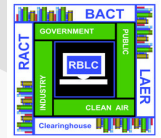


► Data acquisition / QA
- Regional coordination
- RBLC data review
- Site visits

► Outreach
- Workshops
- User manual
- New annual report

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## On-going Initiatives
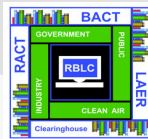


► Data Entry
- Standalone editor
- On-line QA utilities

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

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## Under Consideration
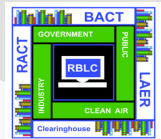


► Customized retrievals / output reports

► Cost data

► More definitive process identification

► Links

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## Under Consideration



► Update SIC to NAICS

► Training

► Restore ranking capability

► New clean air technology database

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## Under Consideration
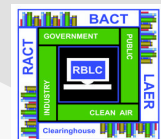


► Industry sector technology assessments

► Emerging technology technical bulletins

► Graphical display of RBLC sources & Class I areas

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# RACT/BACT/LAER Clearinghouse
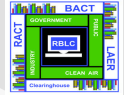
User-Friendliness

&

System

Functionality

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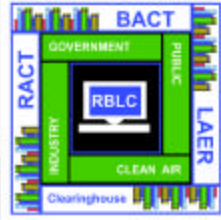
### User-Friendliness & System Functionality

▶ 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?
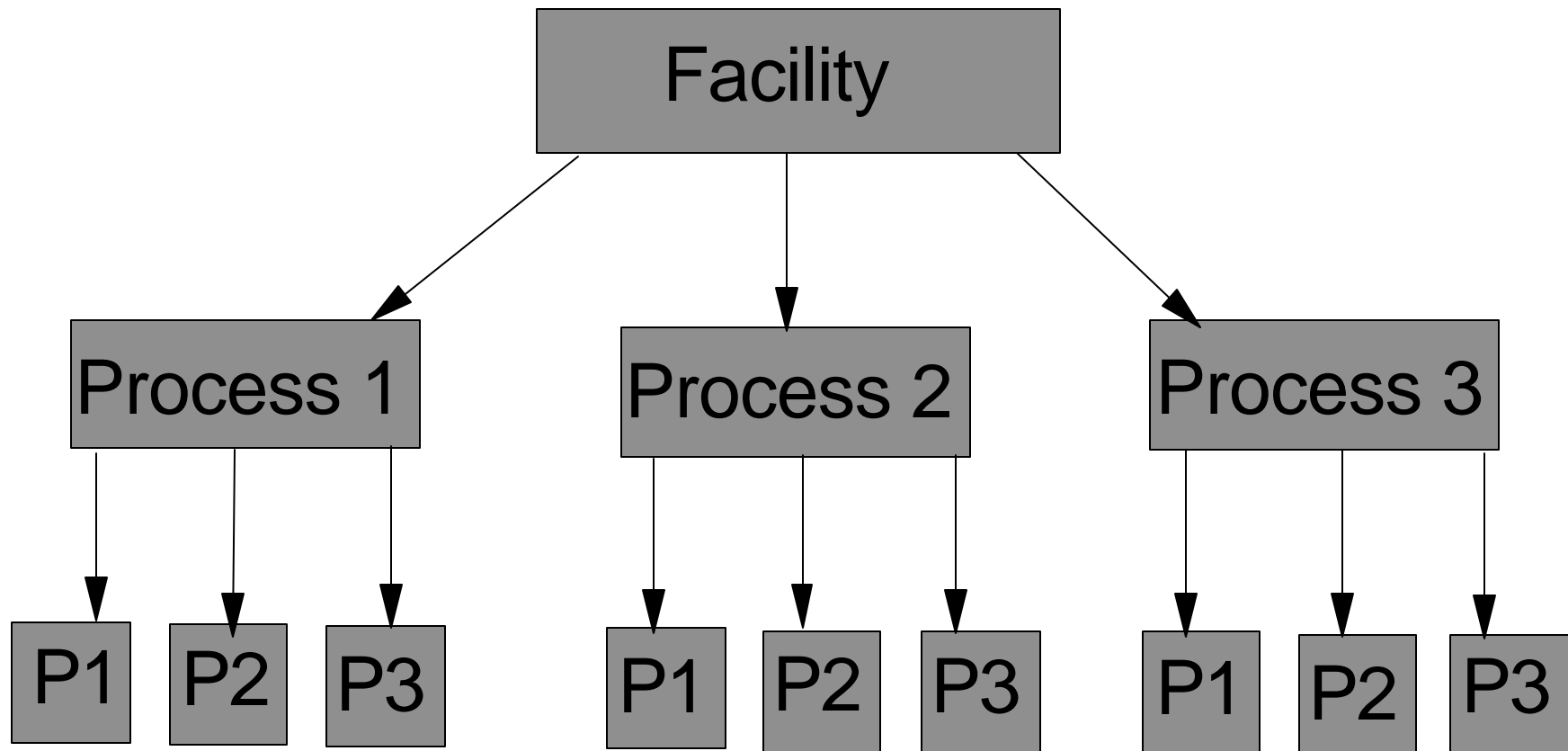
▶ How Can We Simplify Site Navigation?

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### User-friendliness & System Functionality
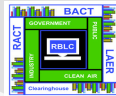
▶ Do We Need to Provide Training?

▶ What Kind of Training Material is Needed?

- Web-based Tutorial?

- CD Tutorial?

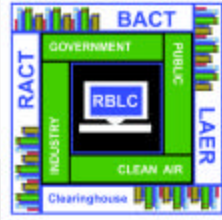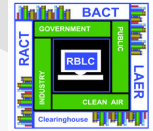- Conventional Training Courses?

- Other Training Possibilities?

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# RACT/BACT/LAER Clearinghouse
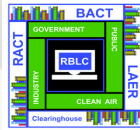
Air Pollution

Technology

Issues

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## 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?
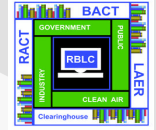(Venders Supply Info on Their Technology for Uploading in RBLC Prescribed Format )

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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?