

RBLC WORKSHOP SUMMARY

EPA Office of Air Quality Planning and Standards
San Francisco, California
January 9, 2002

Background

On January 9, 2002 in San Francisco, California, 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 fifth in a series of public workshops to solicit feedback on the RBLC.

Following welcoming remarks and introductions, Bob Blaszcak (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 Blaszcak 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 unforeseen 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, New Source Review (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 should 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 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 the 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 said 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.

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. 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, EPA 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 said that RBLC users do not get cost data from vendors. There is no way to verify that the data is accurate.
- A participant asked how long the RBLC maintains data. Bob Blaszcak answered that the RBLC keeps all historical data. The default in the database is for the most recent 10 years.
- Several participants noted that their organizations do not use the NAICS codes and suggested keeping SIC codes in the database. Other participants asked why NAICS codes had emerged as a replacement for SIC codes. Rick Copland indicated that the origins of the NAICS could be traced to the North American Free Trade Agreement.
- A participant said that identifying emerging technologies may present a problem because many are not proven. Vendors will take advantage of the marketing opportunity whether their products are proven or not.

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 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 the RBLC database querying options:
 - *RBLC ID Query* is used to dig into the information from a particular facility. The RBLC ID 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 can limit the search criteria to 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 old 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 old 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 old 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 long report.
 - *Generated ASCII Text File* is useful when exporting data for subsequent manipulation using a spreadsheet or database program.

Participant Comments

- A participant commented that including a search to find the most recent entries or entries over the past year would be a useful standard query.
- A participant said that process codes do not match the description of the process.
- A participant suggested adding a “New Query” button to all query pages that would reset the query form at any time.
- A participant asked how long it takes for permit records in the transient database to be promoted to the main database. Bob Blaszcak answered that it should take about 30 days.
- A participant recommended limiting the number of information fields. Fewer information fields will make the database easier to use and improve reporting.
- A participant suggested identifying only those fields that provide basic information. Perhaps the database could be structured around a concept where users can choose more detailed entry or a more focused set of fields.
- A participant suggested simplifying and focusing the database to get through the current backlog of permits.
- A participant suggested analyzing data to determine which fields are being entered most often and structuring data entry around these fields.
- A participant said that the RBLC ID query is confusing and recommended moving it down the list of choices so that it is not the first option.
- A participant recommended separating the query and home buttons from the facility information buttons on the web site.
- A participant recommended eliminating the pollutant information button and combining the link with process information. He noted that the information is mostly redundant and should be combined.
- A participant asked if it is possible to run a query that lists results by most stringent emissions limits.
- A participant suggested adding a feature where queries could be saved for later use using a “cookie” or similar device.

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

- A participant said that there is a divergence in design of the RBLC between what new users and advanced users want and need.
- A participant recommended determining what information is used primarily by permit engineers and what information is used primarily by program personnel. He also suggested that program data either be eliminated or entered by other program staff.
- A participant suggested adding a query to rank determinations according to stringency based on process and pollutant criteria entered by users.
- A participant suggested listing source types in alphabetical order in the standard query or including a feature that allows users to search for a specific industry or source type.
- A participant said that there are too many query fields. Process searches are the most useful.
- A participant stated that EPA and district users have different needs in using the system. Permit engineers need only a few pieces of information to make BACT determinations. The additional information included in the database is not important to permit engineers.
- A participant suggested adding a field identifying the person responsible for making the compliance determination.

What kind of training materials are needed?

- A participant suggested that web-based training makes the most sense because, unlike CD-ROM-based training, it can be continually updated as the system evolves.
- A participant said that web-based training eliminates the need to schedule training

courses or mail CD-ROMs.

Data Fields/Data Structure/Content of the RBLC Database

Bob Blaszczyk 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.

Participant Comments

- A participant said that it is impossible to model a source 250 km from a Class 1 Area. It is impossible to make a determination if a Class 1 Area is affected by a source that far away.
- A participant commented that compliance information is the most meaningful information on a permit. The participant commented that it is important to provide an operation range.
- A participant commented that an updated OAQPS cost manual would be useful.
- A participant suggested restructuring the input forms similar to TurboTax, where the system asks the user specific questions relevant to the user's specific situation. The system then generates the required forms based on the information the user submitted in response to the questions.

Who Should Be Able to Submit/Enter Data?

Bob Blaszczyk 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 participant commented that sources are unlikely to submit data unless it is required.
- Several participants voiced general concern over allowing vendors and sources to enter data.

Air Pollution Technology Issues

Bob Blaszczyk 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. He also noted that EPA is considering a web technology database maintained by a university or qualified organization that is initially supported by EPA and then sustained by a fee schedule. Bob Blaszcak asked for feedback on these issues.

Participant Comments

- The consensus among the participants was that transferring the technology database to a university or organization is worth pursuing.
- A participant suggested including a list of links to industry associations on the RBLC web site.

Attachment A

**Attendees for the RBLC Workshop
San Francisco, California**

Attendees for the RBLC Workshop #5 - San Francisco, California

Name	Organization	City, State	Phone	E-Mail
Aquitania, Manny	U.S. EPA Region 9	San Francisco, CA	(415) 947-4123	aquitania.manny@epa.gov
Blaszczak, Bob	U.S. EPA OAQPS	RTP, NC	(919) 541-5432	blaszczak.bob@epa.gov
Brodnax, Lia	NM Air Quality Bureau	Santa Fe, NM	(505) 955-8031	lia_brodnax@nmenv.nm.us
Chen, Shawnee Yihong	ID Dept of Environmental Quality	Boise, ID	(208) 373-0176	schen@deq.state.id.us
Chin, Grant	CA Air Resources Board	Sacramento, CA	(916) 327-5602	gchin@arb.ca.gov
Chowdhury, Hafizur	CA Air Resources Board	Sacramento, CA	(916) 327-5626	hchowdhu@arb.ca.gov
Copland, Rick	U.S. EPA OAQPS	RTP, NC	(919) 541-5265	copland.rick@epa.gov
Durham, Robert W.	OR Dept of Environmental Quality	Medford, OR	(541) 776-6010	durham.robert.w@deq.state.or.us
Johnson, Dan	WESTAR Council	Lake Oswego, OR	(503) 387-1660	djohnson@westar.org
Kay, Martin L.	S. Coast Air Quality Management District	Diamond Bar, CA	(909) 396-3115	mkay@aqmd.gov
Kohn, Roger	U.S. EPA Region 9	San Francisco, CA	(415) 972-3973	kohn.roger@epa.gov
Marse, Todd	U.S. EPA Region 9	San Francisco, CA	(415) 972-3976	marse.todd@epa.gov
Ralph, Chris	Washoe County Dept of Health - Air Quality	Reno, NV	(775) 784-7204	cralph@mail.co.washoe.nv.us
Rapicavoli, Emmanuelle	U.S. EPA Region 9	San Francisco, CA	(415) 972-3969	rapicavoli.emanuelle@epa.gov
Regan, Mickey	Clark County Department of Air Quality Management	Las Vegas, NV	(702) 455-5942	regan@co.clark.nv.us
Sewell, Mike	MBUAPCD	Monterey, CA	(831) 647-9411	msewell@mbuapcd.org
Steele, Jerry	MBUAPCD	Monterey, CA	(831) 647-9411	jsteele@mbuapcd.org
Tollstrup, Mike	CA Air Resources Board	Sacramento, CA	(916) 322-6026	mtollstr@arb.ca.gov
Yadao, Alfonso	Clark County Department of Air Quality Management	Las Vegas, NV	(702) 455-1676	yadao@co.clark.nv.us
Young, Barry	Bay Area AQMD	San Francisco, CA	(415) 749-4721	byoung@baaqmd.gov

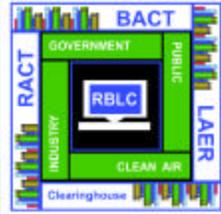
Attachment B

**Presentation Materials for the
RBLC Workshop #5
San Francisco, California**



RACT/BACT/LAER Clearinghouse

Introduction



Introduction



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



Workshop Goals



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



Workshop Format



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



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?



CAAAC Recommendations



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



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)



Content of the RBLC



- ▶ Limit Number of Data Fields, Require Only Needed Information, Simplify Data Entry
- ▶ Standardize Emission Units (to Allow for Comparison/Ranking)



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



Previously Identified Issues



- ▶ Complete/Comprehensive
- ▶ Compliance Verification
- ▶ Cost Information
- ▶ New and Emerging Technologies
- ▶ User-Friendliness

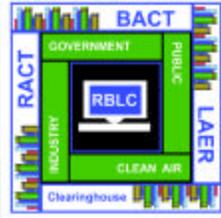


RACT/BACT/LAER Clearinghouse

RBLIC
Improvements

vs.

NSR Reform
Rulemaking



RBLIC'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



RBLIC's Role in NSR Permitting

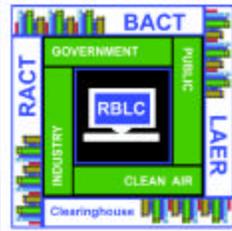


- ▶ What Is NSR Reform Rulemaking?
- ▶ How Does it Impact the RBLIC?
 - Early Notification for FLM's & Complete Application
 - Clean Unit Test
 - Effective Permit to Construct

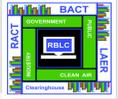


RACT/BACT/LAER Clearinghouse

Planned
Improvements



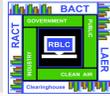
On-going Initiatives



- ▶ Data acquisition / QA
 - Regional coordination
 - RBLC data review
 - Site visits
- ▶ Outreach
 - Workshops
 - User manual
 - New annual report



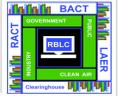
On-going Initiatives



- ▶ Data Entry
 - Standalone editor
 - On-line QA utilities
- ▶ Linkage
 - Related technical sites
 - Software tools
 - Agency sites/contacts



Under Consideration



- ▶ Customized retrievals / output reports
- ▶ Cost data
- ▶ More definitive process identification
- ▶ Links



Under Consideration



- ▶ Update SIC to NAICS
- ▶ Training
- ▶ Restore ranking capability
- ▶ New clean air technology database



Under Consideration



- ▶ Industry sector technology assessments
- ▶ Emerging technology technical bulletins
- ▶ Graphical display of RBLC sources & Class I areas



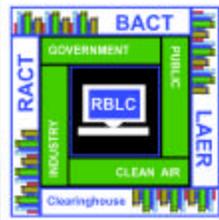
RACT/BACT/LAER Clearinghouse

User-Friendliness

&

System

Functionality



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?

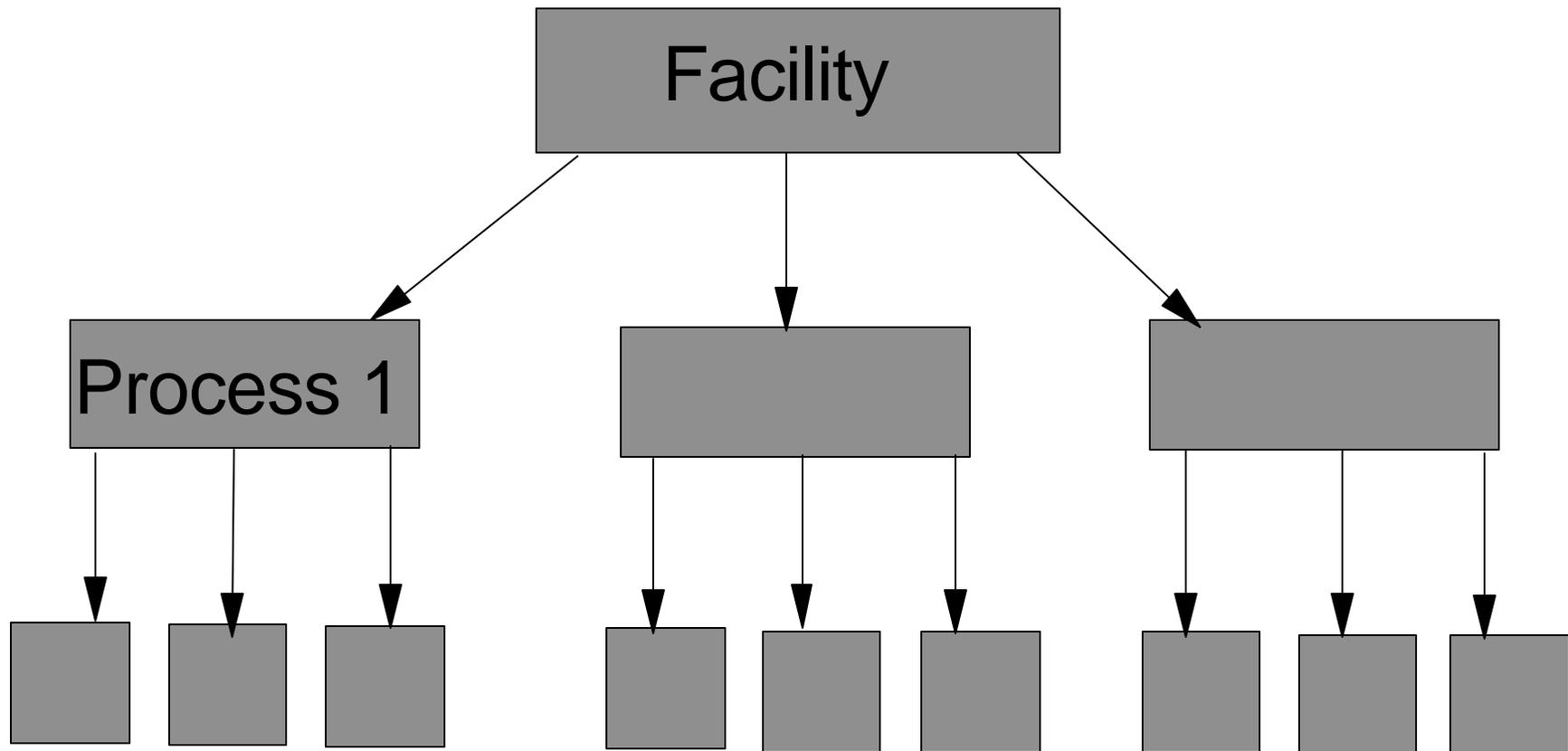


User-friendliness & System Functionality



- ▶ Do We Need to Provide Training?
- ▶ What Kind of Training Material is Needed?
 - Web-based Tutorial?
 - CD Tutorial?
 - Conventional Training Courses?
 - Other Training Possibilities?

RBLC Data Base Structure



RACT/BACT/LAER CLEARINGHOUSE
INPUT FORM

Date Submitted _____

Company/Plant Name: _____

Plant/Facility Contact Information:		Mailing Address: _____	
Plant Contact Name: _____		_____	
Telephone Number: _____	Fax: _____	_____	
E-Mail Address: _____	City: _____	State: _____	Zip Code: _____

Physical Plant Location Information: UTM Coordinates: X: _____ Y: _____ Zone: _____

Public Hearing Held? Y N (circle one)

The Source is: New Modified (circle one)

Permit Number: _____

AIRS Facility Number: _____

EPA ID Number: _____

SIC Code: _____

Scheduling Information:

Date _____ (circle one)

Received Application: _____ / _____ / _____

Estimated/Actual

Final Permit Issued: _____ / _____ / _____

Estimated/Actual

Start Up Operation: _____ / _____ / _____

Estimated/Actual

Compliance Verification: _____ / _____ / _____

Estimated/Actual

Company/Plant Location:
State _____
County _____

Permitting Agency Contact Information:

Permitting Agency: _____ Address: _____

Agency Contact: _____

Telephone Number: _____ Fax: _____

E-Mail Address: _____ County: _____ State: _____ Zip Code: _____

Class One Areas Affected within 250km of source:

Class One Area Name	Distance (km)	Class One Area Name	Distance (km)
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Source Name: _____

Permit Number: _____

PLANTWIDE INFORMATION

Facility Notes: _____

Plant Information - Please include the following information on the facility being permitted:

Brief Plant Description/Narrative (for example - Chemical Plant, Steel Mill, Paint Manufacturing, etc.): _____

Brief Emission Source(s) Description (for example - boiler, paint spray booth, furnace, etc.): _____

Type(s) of Fuel Used at this Facility: _____

Description of the Pollution Abatement Strategy (for example - fabric filter, ESP, carbon adsorbers, powder coatings, etc.): _____

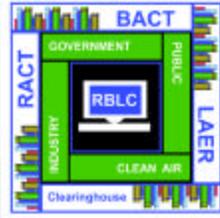
Plantwide Emissions/Emissions Increase Information (Rate After Control):

Pollutant:	Emissions (T/YR):	Pollutant:	Emissions (T/YR):	Pollutant:	Emissions (T/YR):
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
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RACT/BACT/LAER Clearinghouse

Air Pollution
Technology
Issues



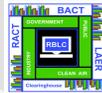
Air Pollution Technology Issues



- ▶ 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)



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?



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?