

RBLC WORKSHOP SUMMARY

EPA Office of Air Quality Planning and Standards
Research Triangle Park, N.C.
June 13, 2001

Background

On June 13, 2001, in Research Triangle Park, N.C., the EPA Office of Air Quality Planning and Standards (OAQPS) hosted the second 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 Denver, CO in July 2001 and Chicago, IL in August 2001 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.

Chet Wayland (Group Leader, Information Transfer Group, 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- Participants wanted to express their concerns that the information in RBLC is outdated and incomplete and learn why the information is not up-to-date;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 Blaszcak (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. Bob emphasized that the RBLC improvement process will be an on-going process over the next several months. He urged participants to send comments to EPA over the next several months as they become familiar with the RBLC and discovery areas that could be improved.

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 of 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 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
 - S** RBLC is a screening tool. If users need more detailed information they may have to contact State and local agencies.
 - S** RBLC should comprehensively catalog all RACT/BACT/LAER determinations. Specifically, LAER data must be entered into the RBLC.

- S New and emerging technologies should be examined by permitting authorities.
- Content of the RBLC
 - S The RBLC should limit the number of data fields to simplify data entry. Users should tell EPA what is really needed.
 - S RBLC should standardize emissions units and generate ranking of most- to least-stringent order of sources.
- Funding of the RBLC
 - S Additional funding to be provided to implement improvements.
- Oversight and management of the RBLC
 - S Make sure data are real.
 - S New and emerging technologies are not always listed. EPA wants to include foreign technologies.
 - S 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.

Participant Suggestions

- “Avoidance” Permits - NY Agency representative wanted to know if EPA plans to include this type of permit in the RBLC. Bob discussed it with the person. Basically, any type of permit may be entered in the RBLC so, yes, this type of permit may be entered into the RBLC. (Bob encouraged them to do so.)

RBLC Improvements vs. New Source Review Rulemaking

Bob Blaszcak 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 NSR rulemaking itself. 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 must be recorded in RBLC before it can be effective.

Bob Blaszcak 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.

Participant Suggestions

- Can EPA link to State/local agency permit data bases so that when a “ranking” report is done all data bases are queried and the tightest limit is shown? (Similar to cheapest air fare queries or price queries on the Web.) The question was discussed briefly. The old ranking reports were briefly discussed and the problem of different emission units was raised. RBLC staff pointed out that it is probably not possible to conduct queries that include information outside the RBLC database because there is no consistency among databases.

Planned Improvements

Rick Copland restated that this workshop would not be the participants' only opportunity to comment. Workshop participants and other interested parties are urged to send comments and suggestions to EPA over the next several months.

Rick then 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 to 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, 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 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 reinstating the capability to list 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 Suggestions

- Can EPA do anything about the 3 user (data enterers) per agency limit? The limitations imposed by NTSD were briefly discussed. EPA reminded the user that once the RBLC Standalone was finished, it could be used to enter new data and should help relieve the 3 user limit. Otherwise, EPA is limited to 3 users per State.
- What is the Agency's commitment/future of getting data into the system (with respect to effort to catch up with missing data using State/local/Regional visits)? The future is uncertain and will depend on money and NSR rule disposition, however, agencies will be responsible for entering their data but EPA may be able to make it easier with RBLC updates and/or changes.
- Does the RBLC want State/local agencies to put a link to the RBLC on their Web pages? Agencies should feel free to put a link to the RBLC on their Web pages, but the link should be to the CATC homepage for the time being until the RBLC has a permanent home.

- Can EPA link an RBLC permit directly to the same permit in a State/local Web data base? This type of link is currently under investigation but that State/local agency should be responsible for updating the links.

RBLC On-line Demonstration

Rick Copland (OAQPS/RBLC) conducted an on-line demonstration of the RBLC data query system. He indicated that his demonstration would be limited to navigation and querying of the RBLC. He also noted that a hands-on demonstration of data entry protocols would take place in the afternoon. The query 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:
 - S** *Welcome* link provides background and instructions on how to use the RBLC.
 - S** *What's New* is self explanatory.
 - S** *Data Entry* will be shown this afternoon.
 - S** *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.
 - S** *On-Line Reference Library* contains links to web sites within and outside of EPA where additional data and technology information might be found.
 - S** *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:
 - S** *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.
 - S** *Process type query* employs broad categories from a drop-down list.
 - S** *Standard query* employs a potentially long list of criteria to narrow the search – the more criteria, the more focused the results.
 - S** *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:
 - S *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.
 - S *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.
 - S *Detailed Listing By Identifier* report corresponds to Appendix H of the RBLC Annual Report, 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.
 - S *Freeform Report* provides the data in order by RBLC ID and includes all information. It is a very long report.
 - S *Generated ASCII text file* is useful when exporting data for subsequent manipulation using a spreadsheet or database program.

User-Friendliness/Functionality

Bob Blaszcak 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)? What level of data do users typically want to access first when conducting a search? Do users want to see any permit information? Bob encouraged participants to contact OAQPS with ideas and suggestions for improving user-friendliness and functionality.

Participant Suggestions

- The Appendix H format report is very hard to import into a spreadsheet program (and ASCII format doesn't always work). The Appendix H report format is not intended to be imported. The ASCII report should be used for importing into spreadsheets and databases. The RBLC has to accommodate all users and the ASCII Delineated report is the lowest common denominator among report formats.
- Codes and drop-down list are cumbersome. Can the system allow users to just type in a word and search? The RBLC search system uses the codes and drop-downs because of the complexity of the data. EPA has tried to make it as simple as possible, but is open to suggestions.

- Can EPA develop data bases on-line and software for users to query the data off-line on their PC's? The request had numerous technical problems. The primary ones were briefly discussed.

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 Suggestions

- EPA should eliminate RACT altogether and focus the RBLC on BACT and LAER.
- Queries should be able to reach out to other databases on the web.
- EPA should develop a list of tasks from the workshops and post them on the web.
- EPA should develop a CD Tutorial and Web-based tutorial. The web tutorial should be very detailed but allow the option to skip steps. Add video clips and audio clips, but be careful about bogging down local servers with audio and video files.

Data Fields/Data Structure/Content of RBLC Data Base

Bob Blaszcak 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 next session of the workshop would involve a hands-on data entry tutorial for interested participants.

Participant Suggestions

- There is confusion about the definition of "modification" (e.g., new boiler at existing facility)
- EPA should indicate on page 1 that this is all plant-wide information, not process information.
- There was general confusion about RBLC definition of "source" vs PSD/NSR and NSPS

- If a new permit is really a modification of an existing permit, the new permit should refer back to the original permit
- EPA should clarify what is meant by emission increase (actual or potential?)
- Compliance verification should be at the pollutant level rather than at the process level.
- Rather than ask simply for the number of options considered and which one was selected, EPA should either ask for more detail or eliminate the question altogether
- Everyone agreed EPA should add the following fields to emission limits: averaging time, oxygen concentration, and test method.

On-Line Data Entry Tutorial

Brenda Best conducted an on-line demonstration of the RBLC data entry system.

Who Should be Able to Submit Data?

Participant Suggestions

- Anybody should be able to enter data as long as there is QA (EPA/State reviewers)
- Applicants may not want to enter data
- Reviewing someone else's work is harder than entering the data yourself. Therefore, let States enter data and no one else
- Let Regional Offices review the data

Air Pollution Technology Issues

Bob Blaszcak 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 Blaszcak asked if this is something EPA should pursue.

Participant Suggestions

- Air pollution technology database/Industry Sector analysis are good ideas, there were no objections
- Utility sector could be a good candidate, or coal combustion

Open Forum

There was no discussion during the open forum.

Attachment A

**Attendees for the RBLC Workshop
Research Triangle Park, N.C.**

**RBLC Workshop
U.S. EPA Environmental Research Center
Research Triangle Park, NC**

June 13, 2001

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Attachment B

**Presentation Materials for the
RBLC Workshop #2
Research Triangle Park, N.C.**

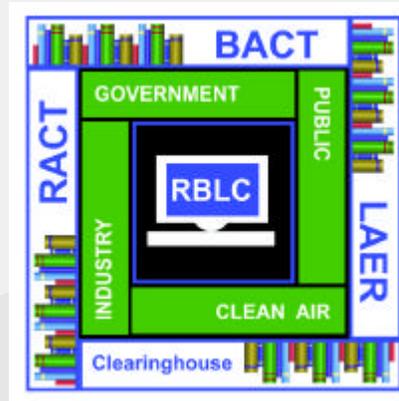


RACT/BACT/LAER Clearinghouse

RBLC Workshop #2

Research Triangle Park,
North Carolina

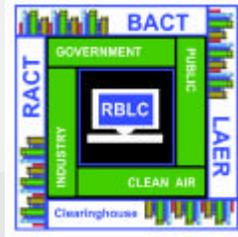
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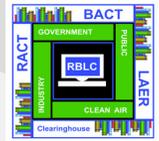


RACT/BACT/LAER Clearinghouse

Introduction



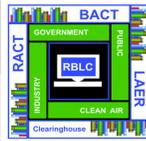
Introduction



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



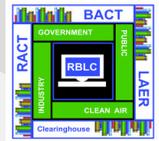
Workshop Goals



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



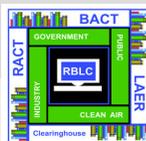
Workshop Format



- ▶ Demonstrate RBLC Web
- ▶ Known Issues & Planned Improvements
- ▶ Get Your Input
- ▶ Open Forum
- ▶ Data Entry Tutorial



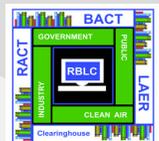
Get Your Input



- ▶ 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?



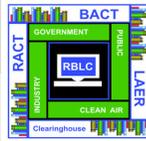
CAAAC Recommendations



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



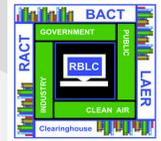
Function & Purpose of the RBLC



- ▶ Screening Tool to ID Technologies & Emission Limits
- ▶ Comprehensive & Accurate Information for All Newly Issued Permits
- ▶ Industry Technology Profile (Experimental Basis)



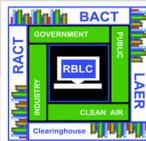
Content of the RBLC



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



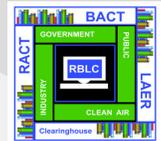
Oversight & Management of the RBLC



- ▶ 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

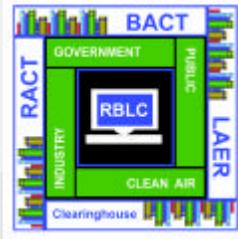


RACT/BACT/LAER Clearinghouse

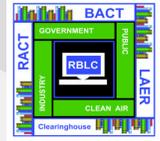
RBLC
Improvements

vs.

NSR Reform
Rulemaking



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

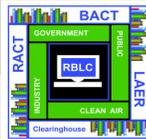


RBLC's Role in NSR Permitting

▶ What Is NSR Reform Rulemaking?

▶ How Does it Impact the RBLC?

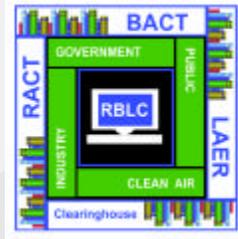
- Early Notification for FLM's & Complete Application
- Clean Unit Test
- Effective Permit to Construct



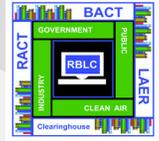


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Planned Improvements



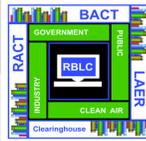
On-going Initiatives



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



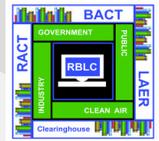
On-going Initiatives



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



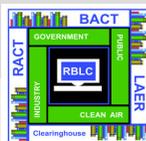
Under Consideration



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



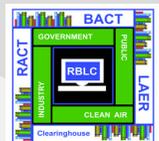
Under Consideration



- ▶ 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

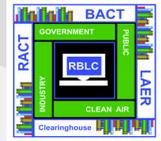
▶ Do Current Query Options Meet Your Needs?

▶ 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?

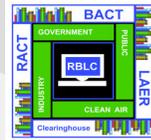
▶ What Kind of Training Material is Needed?

- Web-based Tutorial?

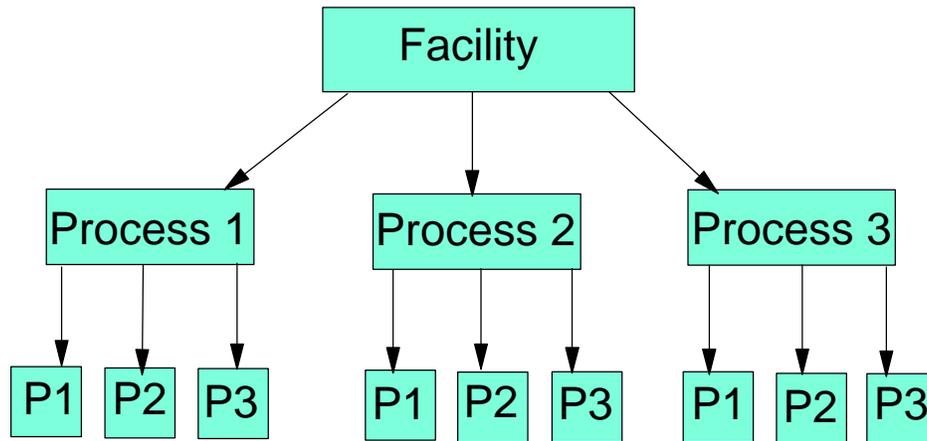
- CD Tutorial?

- Conventional Training Courses?

- Other Training Possibilities?



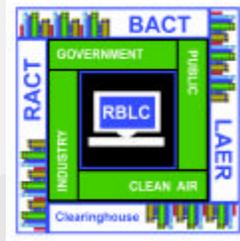
RBLC Data Base Structure



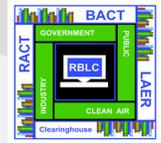


RACT/BACT/LAER Clearinghouse

Air Pollution
Technology
Issues



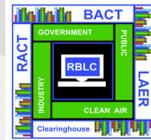
Air Pollution Technology Issues



- ▶ How Can the RBLG 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 RBLG Prescribed Format)



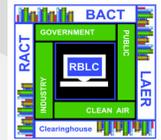
Air Pollution Technology Issues



- ▶ 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?

Attachment C

Written Comments from Participants



NATIONAL COUNCIL FOR AIR AND STREAM IMPROVEMENT, INC.
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Phone (919) 558-1999 Fax (919) 558-1998

June 15, 2001

Mr. Bob Blaszczak (MD-12)
RACT/BACT/LAER Clearinghouse
U.S. Environmental Protection Agency
Research Triangle Park, NC 27711

Dear Bob:

As EPA moves forward with its effort to improve the usefulness of the Clearinghouse to various stakeholders, I would like to reemphasize a few of the suggestions made during the June 13 RBLC Workshop here in Research Triangle Park, and offer some further thoughts on the RBLC.

In my opinion, EPA should devote its additional resources to upgrading the content of RBLC database as opposed to developing more sophisticated tools to search and summarize the contents of the database. Unless the information in the database is comprehensive, accurate, and current, having elaborate search capabilities seems rather pointless. As mentioned by several attendees at the June 13 workshop, there are some serious concerns with the current database with respect to the following:

1. **Completeness** – You stated the current database might have between 30 and 50% of all New Source Review permits issued by state and local agencies. Obviously the database would be much more useful if the coverage could be increased to near 100%. State and local agencies should be encouraged to enter all permits they have issued for new/modified sources, not just ones they believe represent particularly stringent emission limits. When determining the most appropriate limit for a particular type of emission unit, it is important to know the full spectrum of limits that have been determined to be BACT or LAER by various permitting agencies. For example, if 9 out of 10 sources have been permitted at the NSPS level, and one at a small fraction of the NSPS level, this information should be available to RBLC users so it can be factored into permitting decisions.
2. **Accuracy** – More attention needs to be given to reviewing and checking information entered into the database, particularly with respect to plant information, process data and numerical limits. Inaccurate or incomplete entries for plant and emission source descriptions, process descriptions, SCC codes, sizes, and fuels create confusion. When primary and alternative emission limits are provided, they should be checked against each other for consistency. If an entry is made for the RBLC “standard emission limit” also, this should be checked. If any of the limits are inconsistent with each other, explanatory notes should be provided to explain why (for example, different averaging times or limits apply to different fuels).
3. **Up-to-date** – Permits in the database should be reviewed periodically to identify those that have lapsed (source not built), been modified, or been rescinded. There should also be some entry to note if a permit modification application has been submitted and is undergoing review, since the review process often takes several months.

June 13 workshop attendees made suggestions for revising several of the entries on the Clearinghouse Input Form. From an industry perspective, the following items require attention:

1. **Compliance verification** – If this is meant to refer to the results of the initial performance test, it should be explicitly stated. Recent permits also have ongoing compliance requirements. On page 1, the single compliance verification date entry should be removed since performance tests must be conducted for each pollutant emission limit and these tests may occur at different dates. The compliance verification section under “Process Information” should be removed and placed in each “Pollutant Information” section, since compliance must be established for each pollutant and it may be

- demonstrated by different methods for each pollutant. Perhaps the date of the initial performance test should be entered for each pollutant as well.
2. Class I areas – The term “affected” is ambiguous – does this mean if the source has no significant impact on a Class I area within 250 km, it should not be listed here?
 3. Plantwide Emissions/Emissions Increase Information – The discussion on June 13 indicated there is confusion over what should be entered here. While some advocated the increase for a modified source should be the “current actual to future potential” calculation specified by PSD regulations, there was no consensus. Furthermore, it was not clear what should be entered in the case of RACT and LAER determinations, or what to enter for emission decreases. Unless the instructions clearly specify what entries should be made, this item should be dropped.
 4. Emission Limits - Under pollutant information, it is absolutely necessary to have additional information for emission limits. The averaging time is essential, and the compliance test method should be stated, especially for VOC, particulate, and individual hazardous air pollutant limits. If the limit is given as a concentration, e.g. 0.04 gr/dscf or 100 ppm, the oxygen or carbon dioxide correction concentration must be included. If only a mass limit is given, e.g. 100 lb/hr, some associated process rate must be included such as 10^6 Btu/hr heat input or tons/hr of material processed, otherwise the mass limit cannot be meaningfully compared to other limits for similar emission units. State and local agency personnel should be strongly encouraged to enter primary emission limits in the same units as the applicable standard, e.g. lb/ 10^6 Btu heat input for boilers subject to NSPS Subpart Db NO_x limits.
 5. Control Costs – Costs are highly project-specific and assigning control costs to a particular pollutant requires many subjective decisions, especially when a control system reduces emissions of more than one pollutant. Without a detailed explanation of how costs and cost-effectiveness were calculated, this section is of no value. Furthermore, since many companies consider capital and operating cost information as confidential, this section would frequently contain no entries. Given these concerns, and considering there are no written EPA thresholds for “acceptable” pollutant removal cost-effectiveness, this section should be eliminated.

Because the RBLC is widely used by industry in the preparation of permit applications for new and modified sources, there is a definite need to ensure the permitting information in the database is accurate and up-to-date. The individuals in the best position to make this happen are those at the facilities that obtained the permits. Thus, EPA should consider asking these personnel to periodically review their permitting information as contained in the RBLC database. This would be especially advantageous to facilities that have permit conditions that appear to have very low limits compared to other similar facilities. Currently, potential permit applicants often contact such facilities to verify that the RBLC entries for that facility's permit are accurate and to discuss the reasons for the low limits. Increasing the veracity of the RBLC entries and including narrative explaining the basis for the low limits would likely reduce the number of such inquiries. If EPA is reluctant to directly contact all facilities with permits in the RBLC database, an alternative might be to ask industry trade associations to screen the RBLC entries of permits for facilities in their industry and identify those with suspect information. This would minimize the number of facilities EPA would have to contact for verification purposes.

We hope you will find these comments and suggestions helpful in your efforts to upgrade the RBLC. Please contact me if you would like to further discuss them.

Sincerely,



John E. Pinkerton

cc: R. Copeland, MD-12
K. Hornbarger, AF&PA
T. Wyles, Georgia-Pacific