



Permit Section News

During 2001 the permit staff issued 74 Title V permits, 16 PSD permits, and 320 other permits. We also issued 114 synthetic minors during the year. We had 17 PSD applications pending, 22 Title V renewals pending and 10 Title V modifications pending. Our goal this year will be to issue the remaining original Title V applications and prepare for the renewal load that will jump to 80 during 2003. Along those lines, renewal application forms have been developed and can be found on our web site.

The work groups that were discussed in the last Air Quality Update have begun several studies that should improve our permits and streamline our process. The "Test Method for Portable Analyzers used for Compliance Monitoring" document is nearly complete and should be available soon. These groups will continue to address difficult issues that plague both the industry and AQD.

We held our own during the year from a personnel standpoint. We lost three engineers but also managed to hire three good replacements. We continue to get younger in experience and we appreciate the patience of the public while we grow and learn. Applicants may wish to take this into account when planning future permitting and scheduling. Complicated permits may take longer to issue than in the past and it will help if the applications are as complete as possible when submitted.

The Air Quality Division honored several permit writers in a ceremony on February 13, 2002. The awards are all based on the number of Relative Difficulty Index (RDI) points each individual earned in 2001. The award winners:

Javey Dallas-Student Engineer of the Year

Herb Neumann- Permit Writer of the Year in Applicability Determination Category

Eric Milligan and David Schutz-Permit Writers of the Year in Construction Permit Category

David Pollard-Permit Writer of the Year in Operating Permit Category

Eric Milligan-Permit Writer of the Year in Title V Permit Category

Aerie Club (800+RDI Points)

Roya Sharifoltani, David Schutz, Eric Milligan

David Schutz is Permit Writer of the Year with 1249 RDI Points

Air Quality Update is published quarterly and may be accessed from the Air Quality Division (AQD) section of the DEQ Web Page at www.deq.state.ok.us. This publication is issued by the Oklahoma Department of Environmental Quality as authorized by Mark S. Coleman, Executive Director. 400 copies have been produced at a cost of \$0.007 each. Copies have been deposited with the Publications Clearinghouse of the Oklahoma Department of Libraries.

Your opinion is valuable to us! We would like to know what you think of *Air Quality Update* and the types of articles you would like to read. Please send suggestions and comments to randy.ward@deq.state.ok.us.

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MACT Hammer Strikes May 15

Under the 1990 Clean Air Act Amendments, EPA was required to meet certain deadlines in promulgating the Maximum Achievable Control Technology (MACT) standards. The MACT standards were divided into four "bins", each with differing promulgation deadlines. Usually, but with some exceptions, EPA has managed to meet the deadlines to present. The last group (the 10-year bin) had a deadline of 11-15-2000, after which EPA was given 18 months to promulgate all the MACTs in that group. Otherwise the provisions of Section 112(j) of the Act come into play. This section is the so-called MACT Hammer, the equivalent emission limitation by permit provisions.

The MACT hammer provides that for any unpromulgated MACT, sources must apply for a Title V permit to include emission limitations equivalent to those that would have been included in the MACT. The Title V application must be received by the hammer date, in this case May 15, 2002. The state is then required by Section 112(j) to implement these case-by-case MACTs through the Title V permitting process.

DEQ is very concerned about the implementation of these rules, and the resulting burden on Oklahoma resources. States and affected sources will have to use existing resources to implement this program, and face a lot of uncertainty as to which MACTs will or will not be promulgated in time. Other concerns include the obvious problems with standards varying from state to state, and the problems that will occur when the remaining EPA MACT standards are promulgated but conflict with the case-by-case MACTs.

EPA has communicated to the states that they will have all, or perhaps all but one, of the MACT standards proposed by May 15. However, about 30 MACT standards affecting 54 source categories will not be promulgated by the May 15 deadline. Just proposing a standard does not cancel the MACT hammer provisions, but does help with the implementation by providing information on EPA's intent. Assuming that all the MACT standards were proposed by May 15, it would be very likely that most of the standards would be promulgated sometime in 2002. This would negate the need for most of the case-by-case MACT determinations, but would still leave a substantial paperwork burden on states and affected sources.

To help with the implementation, EPA has proposed new rules to break the Title V application process into two steps. Phase I would allow sources to submit a one-page initial application, due by May 15, 2002. Phase II applications would contain much more information and be due in six months (November 2002), although this

might be extended in the final version. These new rules are expected to be promulgated in late February, probably using the direct final rule approach.

The DEQ is trying to collect and disseminate the latest information about the impending MACT hammer date and its effects on our programs and companies in Oklahoma. If you have questions or concerns about the MACT hammer, please contact Randy Ward at 405-702-4100. As we get information we will try to pass it on through our DEQ web page, monthly *Air Toxic Updates*, and all other appropriate means.

Maximum
Achievable
Control
Technology

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What's New on the Air Quality Web

New Look – Old Address

After months of anticipation, the Agency's website has a new look. The website address remains the same, www.deq.state.ok.us, but most of the page names have changed. This will render any "favorites", "bookmarks" and/or "short-cuts" extinct. Please start at the main DEQ page and maneuver through the site to re-establish your links to pages of interest. We are sure you will find that the new layout and design is faster and more user friendly. Although the site appearance and function will vary depending on your browser and display settings, we hope they meet your needs. It remains a work in progress and should continue to improve. We appreciate everyone's continued patience during our change-over phase.

Air Quality Council News

The Air Quality Council met on Wednesday, December 19, 2001 in Oklahoma City and approved all rules put before them for hearing by the Environmental Quality Board. Subchapters 23 and 24, which control emissions from cotton gins and grain, feed or seed operations, were presented for permanent adoption of their presently effective emergency rules. Changes to Subchapter 5 proposed an increase of annual operating fees to \$22.28 per ton of regulated pollutant for both major and minor sources. Presentations for the fee increase were made at the June, August, and October meetings, as well as at a special public finance committee forum held December 6th at the Agency. These rules will be presented to the Environmental Quality Board on March 1, 2002 in Oklahoma City.

The Council met again in Oklahoma City in January and heard proposed changes to subchapters 11 and 39. Subchapter 11 covers alternative emissions reduction authorizations. The changes tighten the definition of net emission reduction and rework notice requirements to incorporate the current requirements contained in OAC:252 Chapter 4. Changes to subchapter 39 are proposed to replace existing ARACT (Alternate Reasonable Available Control Technology) for control of VOC emissions from aerospace sources in Tulsa County with the requirements contained in the EPA Guideline Series: Control of Volatile Organic Compound Emissions from Coating Operations at Aerospace Manufacturing and Rework Operations. The changes include Appendix N. Both subchapters were continued to the April meeting for further discussion.

The next Council meeting will be held at 9a.m. April 17, 2002 at OSU @ Tulsa, 700 North Greenwood, Room 150.

As always, the public is welcome and accomodation is available for the disabled.



Myrna Bruce DEQ Employee of the Quarter

Myrna Bruce of the DEQ Air Quality Division was presented the DEQ Employee of the Quarter award at the Air Quality Council meeting on January 16, 2002.

Myrna spent most of 2001 balancing her responsibilities between the AQD Rules unit, her secretary to the Council position, and many new Division responsibilities. She worked long hours and provided valuable organization and negotiation skills.

Congratulations Myrna!!

Tulsa Office is Moving

In March the DEQ Regional Office at Tulsa (DEQROAT) is moving to 3105 E. Skelly, Suite 215, Tulsa, 74105. The new phone number will be 918-745-0702. We don't have a fax number yet, but we'll post it on the web page when it becomes available along with exact dates, downtimes, etc. We will also have information as it becomes available at our central office, 405-702-4100.



The Lead-Based Paint Corner

It is time once again for DEQ certified Lead-based Paint (LBP) contractors to renew their certification.

The 2001-2002 certification year will end March 31, 2002. To renew a LBP certification, contractors must submit a complete LBP renewal application, including documentation of refresher training and fees, to DEQ by March 31, 2002. Refresher training has already begun and will continue through February 2002. Please contact the University of Oklahoma-Institute for Environmental Management at 405-271-2070 for registration forms.

According to the LBP Rules, the certification exam is required of all initial applicants for LBP inspector, risk assessor, or supervisor certification and is required at least every third year for all renewal LBP inspector, risk assessor or supervisor certification applicants. If you obtained your initial certification in one of these disciplines, you may be required to pass a certification exam in order to renew your LBP certification. Please submit your renewal application promptly to allow time for application processing and examination by March 31, 2002.

Please note that the web address for the Oklahoma LBP Program has changed, the new address is <http://www.deq.state.ok.us/AQDnew/lbp/lbp.htm>. Please check this site for new developments in the LBP Program.

Electronic Submittal of Emissions Inventory

The Air Quality Division is pleased to announce that facilities may now submit their annual emissions inventory data in electronic format. In the past, each facility had to enter data by hand on hardcopy forms that AQD personnel would then re-enter into DEQ computers. This was a very slow, labor intensive activity that used too much paper and had many possibilities for errors. To eliminate problems and speed up the inventory process, AQD staff designed a new computerized system that allows facility personnel to submit their inventory data to AQD via the Internet. This year, in addition to the traditional hard copy, inventory forms were sent to each facility on a compact disk. The facility personnel need only install that disk into their computer, make changes as needed and then send that changed information back to the Air Quality password-secured FTP site.