

# Title V Program Evaluation

## Questionnaire

February 27, 2003

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## A. Title V Permit Preparation and Content

1. What % of your initial applications contained sufficient information so the permit could be drafted without seeking additional information? What efforts were taken to improve quality of applications if this % was low?

Y  N  2. For those title V sources with an application on file, do you require the sources to update their applications in a timely fashion if a significant amount of time has passed between application submittal and the time you draft the permit?

Y  N  a. Do you require a new compliance certification?

Y  N  3. Do you verify that the source is in compliance before a permit is issued and if so, how?

Y  N  a. In cases where the facility is out of compliance, are specific milestones and dates for returning to compliance included in the permit, or do you delay issuance until compliance is attained?

Y  N  4. What have you done over the years to improve your permit writing and processing time?

Y  N  5. Do you have a process for quality assuring your permits before issuance? Please explain.

6. Do you utilize any streamlining strategies in preparing the permit such as:

Y  N  a. Incorporating test methods, major and minor New Source Review permits, MACT's, other Federal requirements into the Title V permit by referencing the permit number, FR citation, or rule? Explain.

Y  N  b. Streamlining multiple applicable requirements on the same emission unit(s) (i.e., grouping similar units, listing the

requirements of the most stringent applicable requirements)? Describe.

c. Describe any other streamlining efforts.

7. What do you believe are the strengths and weaknesses of the format of the permits (i.e. length, readability, facilitates compliance certifications, etc.)? Why?

8. How do you fulfill the requirement for a statement of basis? Please provide examples.

9. Does the statement of basis<sup>1</sup> explain:

Y  N  a. the rationale for monitoring (whether based on the underlying standard or monitoring added in the permit)?

Y  N  b. applicability and exemptions, if any?

Y  N  c. streamlining (if applicable)?

Y  N  10. Do you provide training and/or guidance to your permit writers on the content of the statement of basis?

11. Do any of the following affect your ability to issue timely initial title V permits:

Y  N  a. SIP backlog (i.e., EPA approval still awaited for proposed

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<sup>1</sup> The Statement of Basis sets forth the legal and factual basis for the permit as required by 70.7(a)(5). The permitting authority might use another name for this document such as Technical Support Document, Determination of Compliance, Fact Sheet.

SIP revisions)

- Y  N  b. Pending revisions to underlying NSR permits
- Y  N  c. Compliance/enforcement issues
- Y  N  d. EPA rule promulgation awaited (MACT, NSPS, etc.)
- Y  N  e. Issues with EPA on interpretation of underlying applicable requirements
- Y  N  f. Permit renewals and permit modification (i.e., competing priorities)
- Y  N  g. Awaiting EPA guidance
  - i. If yes, what type of guidance?
  - ii. If yes, have you communicated this to EPA?
    - A. If yes, how did you request the guidance?

If yes, please specify what type of EPA guidance, and how you requested the guidance

Note: If yes to any of the above, please explain.

12. Any additional comments on permit preparation or content?

B. General Permits (GP)

Y  N  1. Do you issue general permits?

a. If no, go to next section

b. If yes, list the source categories and/or emission units covered by general permits.

Y  N  2. In your agency, can a title V source be subject to multiple general permits and/or a general permit and a standard "site-specific" Title V permit?

a. What percentage of your title V sources have one or more general permits have more than one general permit?  
\_\_\_\_\_%

Y  N  3. Do the general permits receive public notice in accordance with 70.7(h)?

a. How does the public or regulated community know what general permits have been written? (E.g., are the general permits posted on a website, available upon request, published somewhere?)

4. Is the 5 year permit expiration date based :

Y  N  a. on the date the general permit is issued?

Y  N  b. on the date you issue the authorization for the source to operate under the general permit?

5. Any additional comments on general permits?

## C. Monitoring

1. How do you ensure that your operating permits contain adequate monitoring (i.e., the monitoring required in §§ 70.6(a)(3) and 70.6(c)(1)) if monitoring is not specified in the underlying standard or CAM?

Y  N

a. Have you developed criteria or guidance regarding how monitoring is selected for permits? If yes, please provide the guidance.

Y  N

2. Do you provide training to your permit writers on monitoring? (e.g., periodic and/or sufficiency monitoring; CAM; monitoring QA/QC procedures including for CEMS; test methods; establishing parameter ranges)

Y  N

3. How often do you “add” monitoring not required by underlying requirements? Have you seen any effects of the monitoring in your permits such as better source compliance?

Y  N

4. Are you incorporating CAM monitoring into your permits?

## D. Public Participation and Affected State Review

### Public Notification Process

- Y  N  1. Do you publish notices on proposed title V permits in a newspaper of general circulation?
- Y  N  2. Do you use a state publication designed to give general public notice?
3. On average, how much does it cost to publish a public notice in the newspaper (or state publication)?
- \$\_\_\_\_\_ (per publication)
- Y  N  4. Have you published a notice for one permit in more than one paper?
- a. If so, how many times have you used multiple notices for a permit?
- b. How do you determine which publications to use?
- c. What cost-effective approaches have you utilized for public publication?
- Y  N  5. Have you developed a mailing list of people you think might be interested in title V permits you propose? [e.g., public officials, concerned environmentalists, citizens]



a. How does a person get on the list?

b. How does the list get updated?

c. How long is the list maintained for a particular source?

d. What do you send to those on the mailing list?

Y  N  6. Aside from publications described above, do you use other means of public notification?

If yes, what are they (e.g., post notices on your webpage, e-mail)?

Y  N  7. Do you reach out to specific communities (e.g., environmental justice communities) beyond the standard public notification processes?

Y  N  8. Do your public notices clearly state when the public comment period begins and ends?

9. What is your opinion on the most effective avenues for public notice?

Y  N  a. Are the approaches you use for public notice effective?

Y  N  10. Do you provide notices in languages besides English? Please list.

#### Public Comments

Y  N  11. Have you ever been asked by the public to extend a public comment period?

Y  N  a. If yes, did you normally grant them?

b. If not, what would be the reason(s)?

Y  N  12. Has the public ever suggested improvements to the contents of your public notice, improvements to your public participation process, or other ways to notify them of draft permits? Describe.

Y  N  13. Do you provide the public a copy of the statement of basis if they request it? If no, explain.

14. What percentage of your permits have received public comments?

Y  N  15. Over the years, has there been an increase in the number of public comments you receive on title V permits? Is there any pattern to types of sources getting comments?

Y  N  16. Have you noticed any trends in the type of comments you have received? Please explain.

a. What percentage of your permits change due to public comments?

Y  N  17. Have specific communities (e.g., environmental justice communities) been active in commenting on permits?

Y  N  18. Do your rules require that any change to the draft permit be re-proposed for public comment?

a. If not, what type of changes would require you to re-propose (and re-notice) a permit for comment?

#### EPA 45-day Review

Y  N  19. Do you have an arrangement with the EPA region for its 45-day review to start at the same time the 30-day public review starts? What could cause the EPA 45-day review period to restart (i.e., if public comments received, etc)?

a. How does the public know if EPA's review is concurrent?

Y  N  20. Is this concurrent review process memorialized in your rules, a MOA or some other arrangement?

### Permittee Comments

- Y  N  21. Do you work with the permittees prior to public notice?
- Y  N  22. Do permittees provide comments/corrections on the permit during the public comment period? Any trends in the type of comments? How do these types of comments or other permittee requests, such as changes to underlying NSR permits, affect your ability to issue a timely permit?

### Public Hearings

23. What triggers a public hearing on a title V permit?
- Y  N  c. Do you ever plan the public hearing yourself, in anticipation of public interest?

### Availability of Public Information

- Y  N  24. Do you charge the public for copies of permit-related documents?
- If yes, what is the cost per page?
- Y  N  a. Are there exceptions to this cost (e.g., the draft permit requested during the public comment period, or for non-profit organizations)?
- Y  N  b. Do your title V permit fees cover this cost? If not, why not?
25. What is your process for the public to obtain permit-related information (such as permit applications, draft permits, deviation reports, 6-month monitoring reports, compliance certifications, statement of basis) especially during the public comment period?

Y  N

a. Are any of the documents available locally (e.g., public libraries, field offices) during the public comment period? Explain.

26. How long does it take to respond to requests for information for permits in the public comment period?

Y  N

27. Have you ever extended your public comment period as a result of information requests?

a. Where is this information stored?

Y  N

b. Do information requests, either during or outside of the public comment period, affect your ability to issue timely permits?

Y  N

c. Have you ever extended the public comment period because of a request for a public hearing?

Y  N

28. Do you have a website for the public to get permit-related documents?

a. What is available online?

b. How often is the website updated? Is there information on how the public can be involved?

Y  N  29. Have other ideas for improved public notification, process, and/or access to information been considered? If yes, please describe.

Y  N  30. Do you have a process for notifying the public as to when the 60-day citizen petition period starts? If yes, please describe.

Y  N  31. Do you have any resources available to the public on public participation (booklets, pamphlets, webpages) ?

Y  N  32. Do you provide training to citizens on public participation or on title V?

Y  N  33. Do you have staff dedicated to public participation, relations, or liaison?

a. Where are they in the organization?

b. What is their primary function?

34. How do you notify affected States of draft permits?

a. How do you determine what States qualify as "affected States" for your draft permits?

35. How do you notify tribes of draft permits?

36. What percentage of your permits get comments from affected States? from Tribes?

37. Is there any pattern to the type of draft permit that gets affected State / Tribal comment? Are there common themes in comments from affected States or Tribes?

38. Suggestions to improve your notification process?

Any additional comments and public notification?

## E. Permit Issuance / Revision / Renewal

### Initial Permit Issuance

- Y  N  1. If not all initial permits have been issued, do you have a plan to ensure your permits are issued in a reasonable timeframe? If not, what can EPA do to help?

### Permit Revisions

2. Did you follow your regulations on how to process permit modifications based on a list or description of what changes can qualify for:

- Y  N  a. Administrative amendment? (See § 70.7(d)(vi))
- Y  N  b. §502(b)(10) changes? (See §70.4(b)(12))
- Y  N  c. Significant and/or minor permit modification? (See §70.7(e))
- Y  N  d. Group processing of minor modifications?
- Y  N  3. If the EPA Regional office has formally asked you to re-open a permit, were you able to provide EPA with a proposed determination within 90 days? (40 CFR 70.7(g)(2))

If not, why not?

4. For those permits that have been issued, and where the permitted facility has undergone a change, how many changes to the title V permit have you processed?

- a. What percentage of changes at the facilities are



processed as:

i. Significant

ii. Minor

iii. Administrative

b. Of all changes that you have, how many (or what percentages) were:

i. Off-permit

ii. 502(b)(10)

5. How many days, on average, does it take to process (from application receipt to final permit amendment):

a. a significant permit revision?

b. a minor revision?

c. an administrative revision?

Y  N

6. Have you taken longer than the part 70 timeframes of 18 months for significant revision, 90 days for minor permit revisions and 60 days for administrative? Explain.

7. What have you done to streamline the issuance of revisions?

8. What process do you use to track permit revision applications moving through your system?

Y  N  9. Have you developed guidance to assist permit writers and sources in evaluating whether a proposed revision qualifies as an administrative amendment, off-permit change, significant or minor revision, or requires that the permit be reopened? If so, provide a copy.

Y  N  10. Do you require that source applications for minor and significant permit modifications include the source's proposed changes to the permit?

Y  N  a. For minor modifications, do you require sources to explain their change and how it affects their applicable requirements?

Y  N  11. Do you require applications for minor permit modifications to contain a certification by a responsible official, consistent with 70.5(d), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used?

12. When public noticing proposed permit revisions, how do you identify which portions of the permit are being revised? (e.g., narrative description of change, highlighting, different fonts).

13. When public noticing proposed permit revisions, how do you clarify that only the proposed permit revisions are open to comment?

#### Permit Renewal Or Reopening

Y  N  14. Have you begun to issue permit renewals?

15. What are your plans for timely issuance of the renewals?

Y  N  16. Do you have a different application form for a permit renewal compared to that for an original application? (e.g., are your application renewal forms different from the forms for initial permits)

a. If yes, what are the differences? Are 1st time requirements (like CAM, off permit changes, etc.) in a renewal application being included in the renewal?

Y  N  17. Has issuance of renewal permits been "easier" than the original permits? Explain.

Y  N  18. How are you implementing the permit renewal process (ie., guidance, checklist to provide to permit applicants)?

19. What % of renewal applications have you found to be timely and complete?

20. How many complete applications for renewals do you presently have in-house ready to process?

Y  N  21. Have you been able to or plan to process these renewals within the part 70 timeframe of 18 months? If not, what can EPA do to help?

Y  N  22. Have you ever determined that an issued permit must be revised or revoked to assure compliance with the applicable requirements?

## F. Compliance

### 1. Deviation reporting:

a. Which deviations do you require be reported prior to the semi-annual monitoring report? Describe.

Y  N

b. Do you require that some deviations be reported by telephone?

Y  N

c. If yes, do you require a followup written report? If yes, within what timeframe?

Y  N

d. Do you require that all deviation reports be certified by a responsible official? (If no, describe which deviation reports are not certified).

Y  N

i. Do you require all certifications at the time of submittal?

Y  N

ii. If not, do you allow the responsible official to "back certify" deviation reports? If you allow the responsible official to "back certify" deviation reports, what timeframe do you allow for the followup certifications (e.g., within 30 days; at the time of the semi-annual deviation reporting)?

### 2. How does your program define deviation?

Y  N

a. Do you require only violations of permit terms to be reported as deviations?

b. Which of the following do you require to be reported as a deviation (Check all that apply):

- Y  N  i. excess emissions excused due to emergencies (pursuant to 70.6(g))
- Y  N  ii. excess emissions excused due to SIP provisions (cite the specific state rule)
- Y  N  iii. excess emissions allowed under NSPS or MACT SSM provisions?
- Y  N  iv. excursions from specified parameter ranges where such excursions are not a monitoring violation (as defined in CAM)
- Y  N  v. excursions from specified parameter ranges where such excursions are credible evidence of an emission violation
- Y  N  vi. failure to collect data/conduct monitoring where such failure is "excused":
- Y  N  A. during scheduled routine maintenance or calibration checks
- Y  N  B. where less than 100% data collection is allowed by the permit
- Y  N  C. due to an emergency
- Y  N  vii. Other? Describe.

3. Do your deviation reports include:

- Y  N  a. the probable cause of the deviation?
- Y  N  b. any corrective actions taken?
- Y  N  c. the magnitude and duration of the deviation?

Y  N  4. Do you define "prompt" reporting of deviations as more frequent than semi-annual?

Y  N  5. Do you require a written report for deviations?

Y  N  6. Do you require that a responsible official certify all deviation reports?

7. What is your procedure for reviewing and following up on:

a. deviation reports?

b. semi-annual monitoring reports?

c. annual compliance certifications?

8. What percentage of the following reports do you review?

a. deviation reports

b. semi-annual monitoring reports

c. annual compliance certification

9. Compliance certifications

Y  N  a. Have you developed a compliance certification form? If no, go to question 7.

Y  N  i. Is the certification form consistent with your rules?

ii. Is compliance based on whether compliance is continuous or intermittent or whether the compliance

monitoring method is continuous or intermittent?

Y  N

iii. Do you require sources to use the form? What percentage do?

Y  N   
evidence?

iv. Does the form account for the use of credible

Y  N

v. Does the form require the source to specify the monitoring method used to determine compliance where there are options for monitoring, including which method was used where more than one method exists?

10. Excess emissions provisions:

Y  N

a. Does your program include an emergency defense provision as provided in 70.6(g)? If yes, does it:

Y  N

i. Provide relief from penalties?

Y  N

ii. Provide injunctive relief?

Y  N

iii. Excuse noncompliance?

Y  N

b. Does your program include a SIP excess emissions provision? If no, go to 6.c. If yes does it:

Y  N

i. Provide relief from penalties?

Y  N

ii. Provide injunctive relief?

Y  N

iii. Excuse noncompliance?

c. Do you require the source to obtain a written concurrence from the PA before the source can qualify for:



Y  N

i. the emergency defense provision?

Y  N

ii. the SIP excess emissions provision?

Y  N

iii. NSPS/NESHAP SSM excess emissions provisions?

11. Is your compliance certification rule based on:

Y  N

a. the '97 revisions to part 70 - i.e., is the compliance certification rule based on whether the compliance monitoring method is continuous or intermittent; or:

Y  N

b. the '92 part 70 rule - i.e., is the compliance certification rule based on whether compliance was continuous or intermittent?

12. Any additional comments on compliance?

## G. Resources & Internal Management Support

Y  N  1. Are there any competing resource priorities for your "title V" staff in issuing Title V permits?

a. If so, what are they?

2. Are there any initiatives instituted by your management that recognize/reward your permit staff for getting past barriers in implementing the title V program that you would care to share?

3. How is management kept up to date on permit issuance?

Y  N  4. Do you meet on a regular basis to address issues and problems related to permit writing?

Y  N  5. Do you charge Title V fees based on emission volume?

a. If not, what is the basis for your fees?

b. What is your Title V fee?

6. How do you track title V expenses?

7. How do you track title V fee revenue?

8. How many Title V permit writers does the agency have on staff (number of FTE's)?

Y  N

9. Do the permit writers work full time on Title V?

a. If not, describe their main activities and percentage of time on title V permits.

b. How do you track the time allocated to Title V activities versus other non-title V activities?

Y  N

10. Are you currently fully staffed?

11. What is the ratio of permits to permit writers?

12. Describe staff turnover.

a. How does this impact permit issuance?

b. How does the permitting authority minimize turnover?

Y  N  13. Do you have a career ladder for permit writers?

a. If so, please describe.

Y  N  14. Do you have the flexibility to offer competitive salaries?

Y  N  15. Can you hire experienced people with commensurate salaries?

16. Describe the type of training given to your new and existing permit writers.

17. Does your training cover:

Y  N  a. how to develop periodic and/or sufficiency monitoring in

permits?

Y  N

b. how to ensure that permit terms and conditions are enforceable as a practical matter?

Y  N

c. how to write a Statement of Basis?

Y  N

18. Is there anything that EPA can do to assist/improve your training? Please describe.

19. How has the PA organized itself to address Title V permit issuance?

19. How has the PA organized itself to address Title V permit issuance?

20. Overall, what is the biggest internal roadblock to permit issuance from the prospective of Resources and Internal Management Support?

### Environmental Justice Resources

Y  N

21. Do you have Environmental Justice (EJ) legislation, policy or general guidance which helps to direct permitting efforts?

If so, may EPA obtain copies of appropriate documentation?

Y  N

22. Do you have an in-house EJ office or coordinator, charged with oversight of EJ related activities?

Y  N

23. Have you provided EJ training / guidance to your permit

writers?

- Y  N  24. Do the permit writers have access to demographic information necessary for EJ assessments? (e.g., soci-economic status, minority populations, etc.)
- Y  N  25. When reviewing an initial or renewal application, is any screening for potential EJ issues performed? If so, please describe the process and/or attach guidance.

## H. Title V Benefits

1. Compared to the period before you began implementing the Title V program, does the Title V staff generally have a better understanding of:

- Y  N  a. NSPS requirements?
- Y  N  b. The stationary source requirements in the SIP?
- Y  N  c. The minor NSR program?
- Y  N  d. The major NSR/PSD program?
- Y  N  e. How to design monitoring terms to assure compliance?
- Y  N  f. How to write enforceable permit terms?

2. Compared to the period before you began implementing the Title V program, do you have better/more complete information about:

- Y  N  a. Your source universe including additional sources previously unknown to you?
- Y  N  b. Your source operations (e.g., better technical understanding of source operations; more complete information about emission units and/or control devices; etc.)?
- Y  N  c. Your stationary source emissions inventory?
- Y  N  d. Applicability and more enforceable (clearer) permits?

3. In issuing the Title V permits:

- Y  N  a. Have you noted inconsistencies in how sources had previously been regulated (e.g., different emission limits or frequency of testing for similar units)? If yes, describe.
- Y  N  b. Have you taken (or are you taking) steps to assure better regulatory consistency within source categories and/or between sources? If yes, describe.

4. Based on your experience, estimate the frequency with which potential compliance problems were identified through the permit issuance process:

Never Occasionally Frequently Often

- |                                       |                          |                          |                          |                          |
|---------------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| a. prior to submitting an application | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. prior to issuing a draft permit    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. after issuing a final permit       | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

5. Based on your experience with sources addressing compliance problems identified through the Title V permitting process, estimate the general rate of compliance with the following requirements prior to implementing Title V:

- |  |                          |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|--------------------------|
| a. NSPS requirements (including failure to identify an NSPS as applicable)   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. SIP requirements  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Minor NSR requirements (including the requirement to obtain a permit)     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Major NSR/PSD requirements (including the requirement to obtain a permit) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

6. What changes in compliance behavior on the part of sources have you seen in response to Title V? (Check all that apply.)

- |   |   |
|---|---|
| Y <input type="checkbox"/> N <input type="checkbox"/> | a. increased use of self-audits?  |
| Y <input type="checkbox"/> N <input type="checkbox"/> | b. increased use of environmental management systems?   |
| Y <input type="checkbox"/> N <input type="checkbox"/> | c. increased staff devoted to environmental management?   |
| Y <input type="checkbox"/> N <input type="checkbox"/> | d. increased resources devoted to environmental control systems (e.g., maintenance of control equipment; installation of improved control devices; etc.)? |
| Y <input type="checkbox"/> N <input type="checkbox"/> | e. increased resources devoted to compliance monitoring?  |



Y  N  f. better awareness of compliance obligations?

Y  N  h. other? Describe.

Y  N  7. Have you noted a reduction in emissions due to the Title V program?

Y  N  a. Did that lead to a change in the total fees collected either due to sources getting out of title V or improving their compliance?

Y  N  b. Did that lead to a change in the fee rate (dollars/ton rate)?

8. Has title V resulted in improved implementation of your air program in any of the following areas due to Title V:

Y  N  a. netting actions

Y  N  b. emission inventories

Y  N  c. past records management (e.g., lost permits)

Y  N  d. enforceability of PTE limits (e.g., consistent with guidance on enforceability of PTE limits such as the June 13, 1989 guidance)

Y  N  e. identifying source categories or types of emission units with pervasive or persistent compliance problems; etc.

Y  N  f. clarity and enforceability of NSR permit terms

Y  N  g. better documentation of the basis for applicable requirements (e.g., emission limit in NSR permit taken to avoid PSD; throughput limit taken to stay under MACT threshold)

Y  N  h. emissions trading programs

Y  N  i. emission caps

Y  N  j. other (describe)

Y  N  9. If yes to any of the above, would you care to share how this

improvement came about? (E.g., increased training; outreach; targeted enforcement)?

Y  N

10. Has Title V changed the way you conduct business?

Y  N

a. Are there aspects of the Title V program that you have extended to other program areas (e.g., require certification of accuracy and completeness for pre-construction permit applications and reports; increased records retention; inspection entry requirement language in NSR permits). If yes, describe.

Y  N

b. Have you made changes in how NSR permits are written and documented as a result of lessons learned in Title V (e.g., permit terms more clearly written; use of a statement of basis to document decision making)? If yes, describe.

Y  N

c. Do you work more closely with the sources? If yes, describe.

Y  N

d. Do you devote more resources to public involvement? If yes, describe.

Y  N

e. Do you use information from Title V to target inspections

and/or enforcement?

Y  N

f. Other ways? If yes, describe.

Y  N

11. Has the Title V fee money been helpful in running the program?  
Have you been able to provide:

Y  N

a. better training?

Y  N

b. more resources for your staff such as CFRs and computers?

Y  N

c. better funding for travel to sources?

Y  N

d. stable funding despite fluctuations in funding for other state programs?

Y  N

e. incentives to hire and retain good staff?

Y  N

f. are there other benefits of the fee program? Describe.

Y  N

12. Have you received positive feedback from citizens?

Y  N

13. Has industry expressed a benefit of Title V? If so, describe.

Y  N

14. Do you perceive other benefits as a result of the Title V program? If so, describe.

Y  N

15. Other comments on benefits of title V?

Good Practices not addressed elsewhere in this questionnaire

Are any of the practices employed that improve the quality of the permits, or other aspects of title V program that are not addressed elsewhere in this questionnaire?

EPA assistance not addressed elsewhere in this questionnaire

Is there anything else EPA can do to help your title V program?