

Feb. 15, 2005

(AR-18J)

Robert Hodanbosi, Chief  
Division of Air Pollution Control  
Ohio Environmental Protection Agency  
122 South Front Street  
P. O. Box 1049  
Columbus, Ohio 43266-1049

Dear Mr. Hodanbosi:

The purpose of this letter is to inform you that members of my staff will visit your office on May 23 and May 24, 2005, to perform a review of the Ohio Environmental Protection Agency (OEPA) Title V operating permit program, and new source review (NSR) permit program. This review is part of the United States Environmental Protection Agency's (USEPA's) initiative to evaluate States' permit program implementation, note practices that could be helpful to other permitting authorities, document areas needing improvement, and learn how USEPA can help to attain these improvements.

We have already begun working with your staff to prepare for the program evaluations. Our review will be based on USEPA's Title V and NSR Program Evaluation Questionnaires, which were previously e-mailed to your staff. The questionnaires' instructions provide additional information regarding the scope of the program reviews. We have provided the questionnaires electronically to help OEPA prepare for the discussions and ensure that the appropriate staff are involved.

Please note that both the Title V and NSR program evaluations include a file review component. To help us prepare for the file review, we ask that you recommend six Title V permits (issued within the last five years), meeting the following conditions:

- 1) a source subject to either a New Source Performance Standard or a Maximum Achievable Control Technology regulation and that was required to install Best Available Control Technology;

- 2) a source with a permit containing Compliance Assurance Monitoring;
- 3) a source that applied netting in the permitting process;
- 4) a source with a general permit;
- 5) a source whose draft permit generated public comment;
- 6) a synthetic minor source.

We also ask that you recommend five NSR permits for the file review, issued within the last five years, in each of the following categories:

- 1) a prevention of significant deterioration permit with a best available control technology analysis;
- 2) a non-attainment NSR permit with a lowest achievable emission rate analysis;
- 3) a synthetic minor permit;
- 4) a netting permit;
- 5) a permit with significant public interest.

Please provide the source names and permit numbers to Genevieve Damico, of my staff, by May 9, 2005. Do not send any permit documentation regarding these sources at that time. We will work with your staff to ensure that we have access to these files during our visit to your office.

If you have questions or concerns about the review process please contact Genevieve at (312)353-4761. We look forward to the program evaluation meeting, and believe this opportunity will improve our understanding of Ohio's permit programs.

Sincerely yours,

/s/

Jay Bortzer, Chief  
Air Programs Branch