

1 MR. VOGEL: No further questions? Thank
2 you Alexandra for spending some time today with us.

3 MS. GORMAN: Thanks very much. I really
4 appreciate the opportunity.

5 MR. VOGEL: You're welcome. Is there
6 anyone else who is on the line? We will now take a
7 break until our next speaker is scheduled at 3:20.

8 (Recess taken)

9 MR. VOGEL: Kathy, what we have been
10 doing is allotting for questions -- I mean ten minutes
11 for presentation and then ten minutes for questions and
12 answers from the Task Force. We are taping this for
13 audio transcripts and preparing a written transcript as
14 well. So whenever you're ready, you can go ahead.

15 MS. VAN DAME: My name is Kathy Van Dame.
16 I'm from Salt Lake City, Utah. I'm with the Wasatch
17 Clean Air Coalition and I have been reviewing Title V
18 permits in Utah. I took some of the trainings that's
19 offered by EPA and I think that they were very helpful.

20 I don't really have a lot to say except
21 for really to support the Title V program. I really
22 appreciate the increased amount of -- or the formality
23 of the requirements for public notification. I also
24 think that the increased monitoring record keeping and
25 reporting requirements are an asset to the environment,

1 and I believe that the whole process raises the level
2 of all of the permits in the state, even the ones that
3 aren't Title V permits. The engineers that are
4 reviewing the permits even the -- for the minor sources
5 have gotten more careful, I believe, about the way that
6 it is that they do their permitting.

7 I also think that there's a benefit to
8 the environment in the fact that more sources are
9 encouraged -- or in order to avoid the Title V program,
10 they try and figure out ways to remain minor sources or
11 synthetic minors. I believe that that does reduce the
12 amount of emissions into the environment.

13 One of the things that I personally find
14 a little bit difficult is that there is just an
15 incredible maze of rules to navigate as individuals,
16 particularly a citizen without legal training, is
17 trying to figure out for their own to verify exactly
18 what requirements do apply to various categories of
19 sources. That's it.

20 MR. VOGEL: Thank you. We'll see if
21 there are questions from the Task Force.

22 MR. VOGEL: Kelly Haragan.

23 MS. HARAGAN: Hi Kathy. This is Kelly
24 Haragan.

25 MS. VAN DAME: Hello Kelly. Your name is

1 familiar. Do I know you?

2 MS. HARAGAN: You do know me, at least
3 through e-mail.

4 MS. VAN DAME: Okay.

5 MS. HARAGAN: I had a question about you
6 said it was still difficult to work through the maze of
7 regulations and figure out what applies to the
8 facility. Is that because of the way the permits are
9 written; and if so, can you think of a way that would
10 be more helpful for the permits to be written?

11 MS. VAN DAME: It's not the way that the
12 permits are written, as long as the permits actually
13 reference specific rules in a way that I can find them.
14 But, for instance, 40 CFR 60 and 40 CFR 61 and 40 CFR
15 63 really present, you know, a maze of really
16 interlocking things. And you may find several
17 different sizes of, for instance, electric generating
18 units, and so then you're going through trying to
19 apply, you know, that matrix to whatever it is that you
20 perceive simply as a matter to verify whether or not
21 the work that's been done by the engineers is that you
22 agree with.

23 Another difficulty that I have is that I
24 can download easily off the Internet many of the
25 sections out of 60, except for like DC and DB and the

1 ones with the -- anyway, some of them I have a great
2 deal of difficulty downloading. Sometimes I can find
3 somebody in EPA that can send me a federal register
4 reference or something like that so that I can get
5 access to something that I don't have, but it
6 just -- just navigating that is, for me, personally
7 difficult.

8 MS. HARAGAN: So do the Utah permits
9 reference the specific sections like the federal rules?

10 MS. VAN DAME: Yes, they do. Not always
11 are the references accurate. It happens occasionally
12 that there's a transposition or something like that.
13 And one of the things that I frequently do, not all the
14 time do I take the time, is to track down all the
15 references, and I find some in error, but sometimes it
16 really is quite difficult to track down a subpart that
17 I don't happen to have on file right now.

18 And so, you know, it may take a fair
19 amount of fishing around and asking folks that I've
20 made contacts with to help me locate whatever part it
21 is. And because of the complexity of the way that they
22 are, it really isn't necessarily that if someone misses
23 something that they're subject to that I'm going to
24 find it, because it -- I asked one of the folks in Utah
25 that is in charge of the MACT standards and asked if

1 there are some sort of index that I can -- like a book
2 has an index that I can go through and look at a
3 specific type of industry or, you know, some section.
4 And there just isn't even really an alphabetical index
5 even if I could figure out what is the exact correct
6 name to call that process.

7 MS. HARAGAN: Thanks.

8 MR. VOGEL: Other questions? Thank you,
9 Kathy, for taking the time to testify for us today.

10 MS. VAN DAME: You're welcome. I hope
11 that whoever it is is next is lined up so they can get
12 started and not let you guys sit down without anything
13 to do.

14 MR. VOGEL: Thank you very much.

15 Do we have anyone else on the line?
16 We'll wait for our next people to show up at 3:40.

17 (Recess taken)

18 MR. VOGEL: This is Ray Vogel.

19 MS. SCANLAN: This is Melissa Scanlan.

20 MR. VOGEL: Thank you for joining us
21 today, Melissa. We are allowing ten minutes for your
22 presentation, if you want to go that long, and ten
23 minutes for questions at the end. We're also recording
24 this for audio transcripts and written transcripts. So
25 go ahead, please.