



WASHINGTON STATE
DEPARTMENT OF
E C O L O G Y

**Besides the Permit:
A Summary of Air Operating Permit Related Activities**

Prepared by:
Washington State Department of Ecology
Air Quality Program

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Notice

This document is a reference for air operating permit sources, air quality agencies, the general public, and the legislature in the state of Washington. It describes the basis for and requirements of the air operating permit program. It also explains what has been done to evaluate the effectiveness of the program.

Federal and state laws and regulations take precedence over the content of this document. Future changes to the laws and regulations may affect the activities summarized here.

This document is not a complete description of the air operating permit program requirements or the underlying laws and regulations.

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If you need this document in another format, please call Tami Dahlgren of the Air Quality Program at (360) 407-6800. If you are a person with a speech or hearing impairment, call 711 or 1-800-833-6388 for TTY.

General Information

What is an air operating permit?

An [air operating permit](#)¹ is a legally enforceable document that permitting agencies issue to air pollution sources after the source has begun to operate. Most large sources and some smaller sources of air pollution must have these permits. This requirement comes from [Title V](#)² of the [Federal Clean Air Act Amendments of 1990](#)³, and is codified in the [Code of Federal Regulations](#)⁴ (CFR). Air operating permits are also referred to as “title V” or “part 70” permits.

State or local permitting authorities issue most air operating permits. However, the United States Environmental Protection Agency (EPA) issues “[part 71](#)⁵” air operating permits to sources in Indian country and in other situations, as needed.

What is the purpose of an air operating permit?

The purpose of an air operating permit is to reduce violations of air pollution laws and improve enforcement of those laws. Air operating permits do this by:

1. Recording in one document all of the air pollution control requirements that apply to the source. This gives members of the public, regulators, and the source a clear picture of what the source is required to do to keep its air pollution within the legal limits.
2. Requiring the source to make regular reports on how it is tracking its emissions of air pollution and the controls it is using to limit its emissions. These reports are public information, and anyone can get them from the source’s permitting agency.
3. Adding monitoring, testing, or record keeping requirements as needed to assure that the source complies with its emission limits or other pollution control requirements.
4. Requiring the source to certify at least once each year whether or not it has met the air requirements in its permit. These certifications are public information, and anyone can get information about them.
5. Making the terms of the permit federally enforceable. This means that EPA, Ecology or the appropriate local agency, and the general public can enforce the terms of the permit.

¹ Ecology website containing a table of issued Washington operating permits is available online at: http://www.ecy.wa.gov/programs/air/AOP_Permits/AOP_permits.html .

² EPA website containing Title V of the Federal Clean Air Act is available online at: <http://www.epa.gov/air/caa/title5.html> .

³ EPA website containing Federal Clean Air Act as amended in 1990 is available online at: <http://www.epa.gov/air/caa/contents.html> .

⁴ GPO U.S. Government Printing Office website containing the Federal Operating Permit Regulation 40 CFR part 70 is available online at: http://www.access.gpo.gov/nara/cfr/waisidx_04/40cfr70_04.html .

⁵ GPO U.S. Government Printing Office website containing the Federal Operating Permit Regulation 40 CFR part 71 is available online at: http://www.access.gpo.gov/nara/cfr/waisidx_04/40cfr71_04.html .

What air pollution sources need air operating permits?

A source must get an Air Operating Permit if it has the [potential to emit](#)⁶ any of the following:

- more than 100 tons per year of any regulated [pollutant](#)⁷, or
- more than 10 tons per year of any [hazardous air pollutant](#)⁸, or
- more than 25 tons per year of a combination of hazardous air pollutants.

Even if a source does not have the potential to emit the above amounts, it may still need an air operating permit if it is subject to certain federal air quality requirements, including:

- the [Title IV](#)⁹ [Acid Rain Program](#)¹⁰,
- a [New Source Performance Standard](#)¹¹ (NSPS), or
- a [National Emission Standard for Hazardous Air Pollutants](#)¹² (NESHAP).

How can I get a copy of a permit?

All air operating permits, their associated basis statement, and non-confidential parts of their applications are public information. Anyone can get these documents by contacting an [Ecology public disclosure coordinator](#)¹³.

Additionally, most [Washington operating permits](#)¹⁴ and their basis statements are available electronically.

Who can I contact for more information?

Lynnette Haller, Ecology Central Regional Office, (509) 457-7126, lhul461@ecy.wa.gov
Tom Todd, Ecology Headquarters Bldg, (360) 407-7528, ttod461@ecy.wa.gov

⁶ EPA website containing rule and implementation information for potential to emit is available online at: <http://www.epa.gov/ttn/atw/pte/ptepg.html>.

⁷ EPA Policy and Guidance “Definition of a Regulated Air Pollutant for Purposes of Title V” is available online at: <http://www.epa.gov/Region7/programs/artd/air/title5/t5memos/rapdef.pdf>.

⁸ EPA website containing list of 188 hazardous air pollutants is available online at: <http://www.epa.gov/ttn/atw/188polls.html>.

⁹ EPA website containing Title IV of the Federal Clean Air Act is available online at: <http://www.epa.gov/air/caa/title4.html>.

¹⁰ EPA Clean Air Markets website is available online at: <http://www.epa.gov/airmarkets/arp/index.html>.

¹¹ EPA website with table of selected NSPS is available online at: <http://www.epa.gov/ttn/atw/nsps/nspstbl.html>.

¹² EPA website with table listing the NESHAPs: <http://www.epa.gov/ttn/atw/mactfnlalph.html>.

¹³ Ecology website containing a listing of public disclosure coordinators is available online at: <http://www.ecy.wa.gov/services/disclosure/coordinators.html>.

¹⁴ Ecology website containing a table of issued Washington operating permits is available online at: http://www.ecy.wa.gov/programs/air/AOP_Permits/AOP_permits.html.

Regulatory Jurisdiction

How do I determine who has regulatory jurisdiction?

In the state of Washington, either [Ecology](#)¹⁵, one of seven [local air authorities](#)¹⁶, the [State Department of Health](#)¹⁷, the [Energy Facility Site Evaluation Council](#)¹⁸ (EFSEC), or the [EPA](#)¹⁹ has regulatory jurisdiction over air operating permits. Which of these agencies has regulatory jurisdiction for a specific source's permit generally depends on where the source is located. However, it is important to note the following exceptions:

- EFSEC has jurisdiction over any stationary thermal power plant with generating capacity of 350,000 kilowatts or more.
- Ecology's [Industrial Section](#)²⁰ has jurisdiction over aluminum smelters and pulp and paper mills.
- Ecology's [Nuclear Waste Program](#)²¹ has jurisdiction over many activities on the Hanford Reservation.
- The Department of Health has jurisdiction over sources of radionuclide air emissions.
- EPA has jurisdiction on tribal lands and in outer continental shelf waters.

The [Washington State Clean Air Act](#)²² allows counties to form their own local air authorities. Regulations (i.e., the Washington Administrative Code) that fall under the authority of the Washington Clean Air Act generally apply statewide, except where a local authority has adopted its own [federally-approved regulation](#)²³(s). The [Operating Permit Regulation](#)²⁴ is implemented statewide, except on tribal lands and in outer continental shelf waters.

¹⁵ Ecology Air Quality Program homepage is available online at: <http://www.ecy.wa.gov/programs/air/airhome.html>.

¹⁶ Ecology website containing Washington air quality agency contact information is available online at: <http://www.ecy.wa.gov/programs/air/local.html>.

¹⁷ Washington State Department of Health homepage is available online at: <http://www.doh.wa.gov/>.

¹⁸ EFSEC's homepage is available online at: <http://www.efsec.wa.gov/>.

¹⁹ EPA Region 10's homepage is available online at: <http://www.epa.gov/region10/>.

²⁰ Ecology's Industrial Section homepage is available online at: <http://www.ecy.wa.gov/programs/swfa/industrial/>.

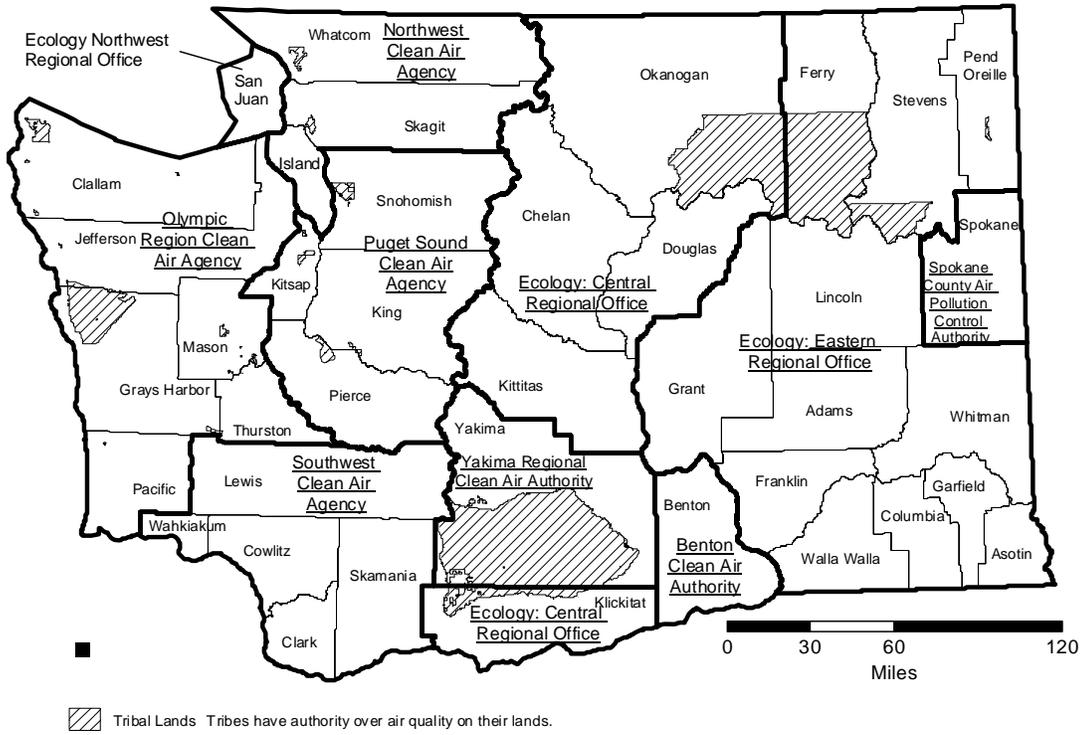
²¹ Ecology's Nuclear Waste Program homepage is available online at: <http://www.ecy.wa.gov/programs/nwp/>.

²² Washington Clean Air Act -- Chapter 70.94 RCW -- is available online at: <http://www.leg.wa.gov/RCW/index.cfm?fuseaction=chapterdigest&chapter=70.94>.

²³ EPA Region 10 SIPs are available online at: <http://yosemite.epa.gov/R10/AIRPAGE.NSF/webpage/SIP+-+General+Page>.

²⁴ Operating Permit Regulation -- chapter 173-401 WAC -- is available online at: <http://www.ecy.wa.gov/biblio/wac173401.html>.

Washington's Clean Air Agencies



Who do I contact for more information?

Tom Todd, Ecology Headquarters Bldg, (360) 407-7528, ttod461@ecy.wa.gov

Program Approval

What is program approval?

Program approval means that EPA has approved a state's proposed program for issuing operating permits, and the state can implement the program.

Title V²⁵ of the Federal Clean Air Act Amendments of 1990²⁶ requires states to develop programs for issuing operating permits. EPA determines whether a state's program meets all of the federal requirements. EPA may give the state authority to implement the program if the state program meets all of the federal requirements. If the program does not meet federal requirements, EPA may implement the federal program.

What program is approved in Washington?

Ecology delegated authority to each of the seven Washington local air authorities to implement their respective operating permit programs if EPA approved them. EPA approved the programs submitted by Ecology, EFSEC, and the seven local air authorities. These programs make up Washington's operating permits program.

EPA first granted interim approval of Washington's operating permits program on November 9, 1994. The program became effective December 9, 1994. The initial complete air operating permit applications were due within one year, no later than December 8, 1995. EPA granted full approval to Washington agencies on August 13, 2001.

Each of the permitting agencies implements the Operating Permit Regulation²⁷, with some differences in the fee structures.

²⁵ EPA website containing Title V of the Federal Clean Air Act is available online at:

<http://www.epa.gov/air/caa/title5.html> .

²⁶ EPA website containing Federal Clean Air Act as amended in 1990 is available online at:

<http://www.epa.gov/air/caa/contents.html> .

²⁷ Operating Permit Regulation – chapter 173-401 WAC – is available online at:

<http://www.ecy.wa.gov/biblio/wac173401.html> .

How do I learn more about the history of program approval?

The history of Washington's program is recorded in the [Federal Register](#)²⁸. To find out more about the approval process for Washington's air operating permit program, you can read the relevant notices online²⁹:

- Clean Air Act Proposed Interim Approval or Disapproval of Operating Permit Programs in the State of Washington, [Federal Register: August 18, 1994]
- Clean Air Act Final Interim Approval of Operating Permits Programs in Washington, [Federal Register: November 9, 1994]
- Clean Air Act Proposed Interim Approval Of Operating Permits Program; Washington, [Federal Register: September 28, 1995 (Volume 60, Number 188)]
- Clean Air Act Final Interim Approval of Operating Permits Program; Washington, [Federal Register: December 8, 1995 (Volume 60, Number 236)]
- Operating Permits Program; Notice of Comment Period on Program Deficiencies, [Federal Register: December 11, 2000 (Volume 65, Number 238)]
- Clean Air Act Full Approval of Operating Permits Program in Washington, [Federal Register: January 2, 2001 (Volume 66, Number 1)]
- Clean Air Act Full Approval of Operating Permits Program in Washington, [Federal Register: April 2, 2001 (Volume 66, Number 63)]
- Clean Air Act Full Approval of Operating Permits Program in Washington, [Federal Register: August 13, 2001 (Volume 66, Number 156)]
- Notice of Deficiency for Clean Air Operating Permits Program in Washington, [Federal Register: January 2, 2002 (Volume 67, Number 1)]

Who do I contact for more information?

Tom Todd, Ecology Headquarters Bldg, (360) 407-7528, ttod461@ecy.wa.gov

²⁸ GPO U.S. Government Printing Office website containing the Federal Register is available online at: <http://www.gpoaccess.gov/fr/index.html>.

²⁹ The GPO U.S. Government Printing Office website allows for the query of Federal Register notices by date and title.

Public Involvement

How can the public participate in the permit process?

As a member of the public, you can use the air operating permit program to ensure air pollution sources are meeting the requirements that apply to them. You can be involved in the following ways:

1. Comment on and request a public hearing on permits before they are issued, when they are renewed, and when important changes to permits are proposed.
2. Appeal already-issued permits in state court, and petition the EPA Administrator to object to state-issued permits. You can also appeal EPA-issued permits to the Environmental Appeals Board and the federal courts.
3. Keep track of whether sources are complying with their permits by reviewing the reports and certifications they submit to their permitting agency. Air Operating Permits are [publicly discloseable documents](#)³⁰. The public can take action in court against sources that do not comply with their permits.

What is the Permit Register?

Ecology keeps a [Permit Register](#)³¹ to track permit actions, including opportunities for public involvement. All actions that have been taken on a source's permit application are in the Permit Register. This includes completion of the draft and final permit, the scheduling of hearings and public meetings, and changes to the permit. You can view the Register online at http://www.ecy.wa.gov/programs/air/permit_register/register.html. To have your name put on the Permit Register's mailing list, contact Bruce Estus at (360) 407-6827.

Ecology publishes a new Permit Register on the 10th and 25th of each month, or the nearest business date.

³⁰ Ecology's website containing a listing of public disclosure coordinators is available online at: <http://www.ecy.wa.gov/services/disclosure/coordinators.html>.

³¹ Ecology's Air Quality Program maintains the Permit Register online at: http://www.ecy.wa.gov/programs/air/permit_register/register.html.

How can I learn more?

EPA has an [air operating permit policy and guidance database](#)³². The database includes policy and guidance that EPA has issued interpreting [Title V](#)³³ of the [Federal Clean Air Act Amendments of 1990](#)³⁴, and EPA's regulations.

EPA also has a document titled, "[The Proof is in the Permit: How to Make Sure a Facility in Your Community Gets an Effective Title V Air Pollution Permit](#)"³⁵. This document's purpose is to help citizens understand and become involved in the program.

Who do I contact for more information?

Bruce Estus, Ecology Headquarters Bldg, (360) 407-6827, best461@ecy.wa.gov

³² EPA Region 7 maintains a Title V Policy and Guidance Database available online at: <http://www.epa.gov/region07/programs/artd/air/title5/title5pg.htm> .

³³ EPA website containing Title V of the Federal Clean Air Act is available online at: <http://www.epa.gov/air/caa/title5.html> .

³⁴ EPA website containing Federal Clean Air Act as amended in 1990 is available online at: <http://www.epa.gov/air/caa/contents.html> .

³⁵ EPA offers "The Proof is in the Permit" publication online at: <http://www.epa.gov/oar/oaqps/permits/partic/proof.html> .

Permit Processing

When is the application due?

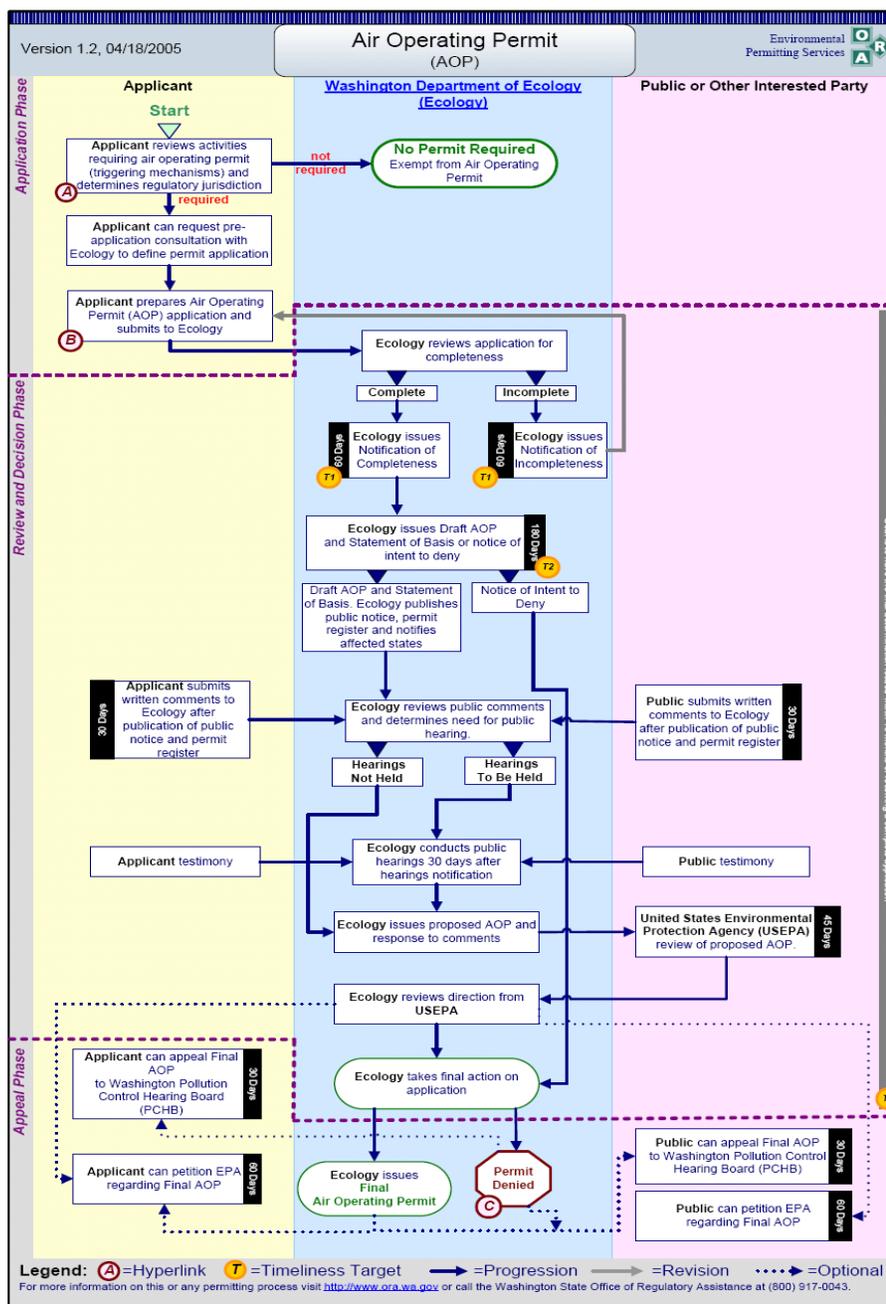
An Air Operating Permit source must submit a complete Operating Permit Application³⁶ within 12 months from the time the source becomes subject to the permit program. Additionally, renewal applications are due six to 18 months before the permit expires.

How long will the process take?

Ecology processes³⁷ Air Operating Permit applications according to the Operating Permit Regulation³⁸ and is committed to meeting the statutory timelines³⁹.

Who do I contact for more information?

Lynnette Haller
Ecology Central
Regional Office
(509) 457-7126
lhul461@ecy.wa.gov



³⁶ Ecology’s standard operating permit application is available online at: <http://www.ecy.wa.gov/biblio/94175.html> .

³⁷ Washington’s Office of Regulatory Assistance maintains an operating permit flow schematic, with imbedded links, online at: http://www.ecy.wa.gov/programs/sea/pac/ppds_info/Air_Operating_Permit_Schematic.pdf .

³⁸ Operating Permit Regulation – chapter 173-401 WAC – is available online at: <http://www.ecy.wa.gov/biblio/wac173401.html> .

³⁹ Ecology’s commitment to meeting regulatory deadlines is available online at: <http://www.ecy.wa.gov/biblio/0301021.html> .

Permit Appeals and Petitions

What if I disagree with a permit's content?

You can appeal any air operating permit to the [Pollution Control Hearing Board](#)⁴⁰. You can also petition EPA to disapprove a permit.

What is the Pollution Control Hearings Board?

The Pollution Control Hearings Board (PCHB) is three people appointed by the Governor and confirmed by the Washington State Senate. They hear appeals on orders and decisions made by Ecology and local air agencies. A permit denial or approval can be appealed to the PCHB.

The PCHB's purpose is to provide a full and complete administrative hearing as promptly as possible, and issue a fair and impartial written decision based on the facts and law. The PCHB is not affiliated with Ecology or any other state agency.

How do I file an appeal?

To file an appeal, you must file a notice of appeal with the PCHB within 30 days of the date of receiving the agency Order or Decision. In the notice of appeal, you must supply the PCHB the following information, in writing:

1. Your name and address (mailing and legal, if different) and, if applicable, the name and address of your representative if you have one.
2. A daytime phone number (and fax number if available) for you and/or your representative.
3. Identification of the parties to the appeal.
4. A copy of the order or decision you are appealing. If the order or decision followed an application, include a copy of the application.
5. A brief statement why you are appealing the order or decision.
6. A clear, concise statement of the facts supporting your appeal.
7. The relief you seek (what you want the Board to do).
8. Statement, signed by you or your representative, that the content of the appeal is true.

Send the notice of appeal to **both** of the addresses below:

The Pollution Control Hearings Board 4224 - 6th Avenue SE, Rowe Six, Bldg. 2 P.O. Box 40903 Lacey, Washington 98504-0903	The Department of Ecology Appeals Coordinator P.O. Box 47608 Olympia, Washington 98504-7608.
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Send one copy to the Ecology [program/office](#)⁴¹ that made the decision you are appealing.

⁴⁰ The Pollution Control Hearings Board homepage is available online at: <http://www.eho.wa.gov/Boards/PCHB.asp>

⁴¹ Ecology maintains an online directory available at: <http://www.ecy.wa.gov/org.html>.

What is a petition?

A petition is a request to reconsider a permit decision. EPA has 45 days to review a proposed permit and determine whether to approve or deny the permit. After this review period, any person who submitted comments during the relevant public comment period can [petition](#)⁴² EPA to reconsider its decision about the permit. You must file a petition within 60 days of the end of EPA’s 45-day review period. You can only petition EPA regarding deficiencies in an air operating permit program or its implementation. Generally, you may only raise issues in the petition that you have already brought up in comments submitted to Ecology during the formal public comments period.

How do I file a petition?

It can be hard to know when to submit a petition, because Ecology is not required to notify the public when it submits a proposed permit to EPA for review, and EPA is not required to announce the end of its review period.

To petition, you must send copies of your petition to:

- the Ecology [program/office](#)⁴³ that made the decision being appealed;
- the permit applicant; and
- USEPA Administrator
401 M Street SW
Washington, DC 20460

Although you are not required to, it is also a good idea to send your petition to both the addresses below:

Regional Administrator EPA Region 10 1200 Sixth Avenue Seattle, Washington 98101	Director, Office of Air, Waste and Toxics Division EPA Region 10 1200 Sixth Avenue Seattle, Washington 98101
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Who do I contact for more information?

Appeals: Maylee Collier, Ecology Headquarters Bldg, (360) 407-6712, mayc461@ecy.wa.gov
 Petitions: Laurie Kral, EPA Region 10, (206) 553-1868, kral.laurie@epa.gov

⁴² Title V Petition Database. <http://www.epa.gov/region07/programs/artd/air/title5/petitiondb/petitiondb.htm> .

⁴³ Ecology maintains an online directory available at: <http://www.ecy.wa.gov/org.html> .

Reporting

What kinds of reports do sources need to submit?

Reporting is important to the air operating permit program. The permits require a variety of reports, including:

- [Deviation reports](#)⁴⁴. A source must promptly report deviations from permit requirements, including those caused by upset conditions. Reports must include the probable cause of the deviations and any corrective actions or preventative measures taken. The permit will define “prompt” in relation to the degree and type of deviation likely to occur. For deviations that are a potential threat to human health or safety, “prompt” reporting means no later than 12 hours after the source discovers the deviation. A source must report other deviations no later than 30 days after the end of the month in which the source discovers the deviation. Sources must maintain records of all deviations.
- [Excess emissions due to emergency](#)⁴⁵. An “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source. Emergencies do not include events caused by improperly designed equipment, lack of maintenance, careless or improper operation, or operator error. An emergency can be considered a defense to enforcement action if the source can demonstrate that:
 - an emergency occurred and the source can identify the cause of the emergency;
 - the source was being properly operated at the time; and
 - the source took all reasonable steps to minimize emissions.

The source must notify the Ecology within two working days, or less if specified in the permit. The notice must contain a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.

- [Unavoidable excess emissions](#)⁴⁶. The source may claim that excess emissions were unavoidable. The source must report excess emissions they believe to be unavoidable to Ecology as soon as possible. Ecology may require a full written report including causes, corrective action, and measures taken to prevent recurrence. If Ecology determines the excess emissions were unavoidable, the emissions will be excused and not subject to penalty.

⁴⁴ The regulatory citation regarding deviation reports -- WAC 173-401-615(3)(b) – is available online at: <http://www.leg.wa.gov/WAC/index.cfm?section=173-401-615&fuseaction=section> .

⁴⁵ The regulatory citation regarding excess emissions due to emergency -- WAC 173-401-645 – is available online at: <http://www.leg.wa.gov/WAC/index.cfm?section=173-401-645&fuseaction=section> .

⁴⁶ The regulatory citation regarding unavoidable excess emissions -- WAC 173-400-107(3) – is available online at: <http://www.leg.wa.gov/WAC/index.cfm?section=173-400-107&fuseaction=section> .

- [Monitoring reports](#)⁴⁷. Each source must submit a report of any monitoring required by its permit at least once every six months. Each source must clearly identify in these reports all instances of deviations from permit requirements.
- [Compliance certifications](#)⁴⁸. At least annually, each source must certify compliance with all terms and conditions of their permit. Each compliance certification must include:
 - The identification of each term or condition of the permit that is the basis of the certification
 - The compliance status
 - Whether compliance was continuous or intermittent
 - The method(s) the source used for determining their compliance status currently and over the reporting period
 - Other information Ecology may require to determine the compliance status

When determining the compliance status, the source must consider [all evidence in their possession](#).⁴⁹

How do I know the reports are accurate?

A responsible official must certify⁵⁰ the truth, accuracy, and completeness of all air operating permit submittals, including applications, reports, and compliance certifications. This certification is based on information and beliefs formed after reasonable inquiry.

It is a criminal offense to knowingly make any false statement, representation or certification in any form, notice or report required by the air operating permit. It is also a criminal offense to [knowingly cause any required monitoring device or method](#) to be inaccurate.⁵¹

Who do I contact for more information?

Lynnette Haller, Ecology Central Regional Office, (509) 457-7126, lhul461@ecy.wa.gov
 Dave Wendland, Ecology Eastern Regional Office, (509) 329-3594, dwen461@ecy.wa.gov

⁴⁷ The regulatory citation regarding monitoring reports -- WAC 173-401-615(3)(a) – is available online at: <http://www.leg.wa.gov/WAC/index.cfm?section=173-401-615&fuseaction=section>.

⁴⁸ The regulatory citation regarding compliance certifications -- WAC 173-401-630(5) – is available online at: <http://www.leg.wa.gov/WAC/index.cfm?section=173-401-630&fuseaction=section>.

⁴⁹ The regulatory citation regarding credible evidence -- 40 CFR 60.11(g) – is available online at: <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=bf1d9317e90401e96960cd6aa5164432&rgn=div8&view=text&node=40:6.0.1.1.1.1.68.11&idno=40>

⁵⁰ The regulatory citation regarding certification -- WAC 173-401-520 – is available online at: <http://www.leg.wa.gov/WAC/index.cfm?section=173-401-520&fuseaction=section>

⁵¹ The regulatory citation regarding enforcement authority -- 40 CFR 70.11(a)(3)(iii) – is available online at: <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=b12bdbfa27f033e2801761a23d0e215b&rgn=div8&view=text&node=40:15.0.1.1.7.0.1.11&idno=40>.

Emissions Inventories

What is an emissions inventory?

An emissions inventory is an account of the actual air emissions from a specific source, industry, or geographic region.

Who uses emissions inventories, and how?

Ecology uses emission and source information to:

- show industrial emissions trends;
- show regional cumulative impacts of industry;
- show effectiveness of industrial air regulation and permit limits;
- provide detail necessary for air quality modeling; and
- calculate sources' annual air operating permit fees.

EPA collects state data to:

- analyze air emissions at the national level, and
- compile the National Emission Inventory (NEI), National Air Toxics Risk Assessment (NATA), and the Toxics Release Inventory (TRI).

What is the regulatory authority?

Under the [Consolidated Emission Reporting Rule](#)⁵², EPA requires states to report a statewide inventory every three years. Industrial sources are included in the inventory. [State regulation](#)⁵³ requires industrial sources to submit an annual inventory of their air emissions. Air operating permits require the permit holder to submit an inventory of emissions from the source for each calendar year. Most permits specify that the inventory shall be submitted for each calendar year, no later than April 15 of the following year.

How does Ecology collect emissions inventories?

Every year, each air operating permit source submits an emission inventory report to Ecology. The receiving regional office or program reviews the inventories, and then forwards them to Ecology Headquarters Air Quality Program staff.

⁵² GPO U.S. Government Printing Office website containing the CERR -- Title 40 CFR Part 51, Subpart A, Appendix A -- is available online at: <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr;sid=83b34c708891127f439ce06604c9bcc2;rgn=div6;view=text;node=40%3A2.0.1.1.2.1;idno=40;cc=ecfr>.

⁵³ The regulatory citation for emission inventories -- WAC 173-400-105(1) -- is available online at: <http://www.leg.wa.gov/WAC/index.cfm?section=173-400-105&fuseaction=section>.

What information does Ecology collect?

Ecology collects emissions data for four criteria air pollutants:

- [Carbon monoxide](#)⁵⁴ (CO)
- [Sulfur dioxide](#)⁵⁵ (SO₂)
- [Particulate matter](#)⁵⁶ (TSP, PM₁₀ and PM_{2.5})⁵⁷
- [Lead](#)⁵⁸

and three precursors/promoters of criteria air pollutants:

- Volatile organic compounds (VOCs)⁵⁹
- [Oxides of nitrogen](#)⁶⁰ (NO_x)⁶¹
- Ammonia (NH₃)⁶²

Ecology also asks sources to quantify their emissions of [toxic air pollutants](#)⁶³.

Every three years, Ecology submits an [expanded emission inventory report](#)⁶⁴ to EPA. The most recent expanded inventory reports were for 1996, 1999, and [2002](#)⁶⁵. Ecology is currently preparing for the 2005 National Emission Inventory.

It is important that the data states provide to EPA is as accurate as possible. When data from an existing point source is not included, EPA will project conservative annual emissions values for that source based on national average emissions for the industry type and size.

How are emissions inventories compiled?

[Forms](#)⁶⁶ and a guide to assist in reporting are available on-line. Ecology forms are tailored to capture state and federal point source reporting requirements.

⁵⁴ EPA offers a summary of carbon monoxide, available online at: <http://www.epa.gov/air/urbanair/co/index.html>.

⁵⁵ EPA offers a summary of sulfur dioxide, available online at: <http://www.epa.gov/air/urbanair/so2/index.html>.

⁵⁶ EPA offers a summary of particulate matter, available online at: <http://www.epa.gov/air/urbanair/pm/index.html>.

⁵⁷ PM₁₀ and PM_{2.5} are acronyms for particulate matter consisting of particles smaller than 10 and 2.5 micrometers, respectively.

⁵⁸ EPA offers a summary of lead, available online at: <http://www.epa.gov/air/urbanair/lead/index.html>.

⁵⁹ Ozone, a criteria pollutant, is not emitted directly; it forms by chemical reactions of organic compounds with nitrogen oxides in the air, mediated by sunlight.

⁶⁰ EPA offers a summary of oxides of nitrogen, available online at: <http://www.epa.gov/air/urbanair/nox/index.html>.

⁶¹ Ozone, a criteria pollutant, forms by chemical reactions of organic compounds with nitrogen oxides in the air, mediated by sunlight.

⁶² Ammonia reacts with nitric and sulfuric acids in the atmosphere to form fine particulate matter.

⁶³ Washington toxic air pollutants are listed in WAC 173-460-150 & -160 and are available online at:

<http://www.leg.wa.gov/wac/index.cfm?fuseaction=chapterdigest&chapter=173-460>.

⁶⁴ GPO U.S. Government Printing Office website containing the CERR -- Title 40 CFR Part 51, Subpart A, Appendix A -- is available online at: <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&rgn=div6&view=text&node=40:2.0.1.1.2.1&idno=40>.

⁶⁵ EPA offers the 2002 NEI online at: <http://www.epa.gov/ttn/chief/net/2002inventory.html>.

⁶⁶ Ecology offers standardized emission inventory forms, available online at:

<http://www.ecy.wa.gov/programs/air/EmissionInventory/emisinv.htm>.

Where can I find emissions inventory data?

Emissions inventory data are publicly accessible through the [NEI](#)⁶⁷, [NATA](#)⁶⁸ and [TRI](#)⁶⁹, databases.

Who do I contact with questions?

Sally Otterson, Ecology Headquarters Bldg, (360) 407-6806, sott461@ecy.wa.gov
Bill Puckett, EPA Region 10, (206) 553-1702, puckett.william@epa.gov

⁶⁷ EPA offers NEI information online at: <http://www.epa.gov/air/data/neidb.html> .

⁶⁸ EPA offers NATA information online at: <http://www.epa.gov/ttn/atw/nata/> .

⁶⁹ EPA offers TRI information, available online at: <http://www.epa.gov/tri/> .

Annual Fees

Why do sources have to pay fees?

Title V⁷⁰ of the Federal Clean Air Act Amendments of 1990⁷¹ requires that the operating permit program be funded entirely by fees paid by the operating permit sources. Air operating permit sources pay an annual fee covering all reasonable costs required to develop and administer the air operating permit program requirements.

How are fees used?

Ecology determines the total amount of fees through an operating permit budget based on a biennial workload analysis⁷². Ecology's air operating permit budget must cover the costs of administering the statewide operating permit program and the costs to issue and oversee permits for sources under Ecology's jurisdiction. With the exception of operating permit program development and oversight costs, which are spread among all Washington operating permit sources, the fee covers the cost of Ecology performing the following operating permit activities at sources under Ecology's jurisdiction:

- Reviewing and acting upon any operating permit application,
- Implementing and enforcing the terms and conditions of any operating permit (not including any court costs or other costs associated with any enforcement action),
- Monitoring emissions and ambient air,
- Preparing generally applicable regulations, or guidance,
- Modeling, analyses, and demonstrations, and
- Preparing inventories and tracking emissions.

What time period do the fees cover?

In general, the fee is based on the actual air emissions from the previous calendar year. The fee is for operation during the current state fiscal year, and is used to support Ecology activities during the upcoming state fiscal year.

This means that the fees due March 1, 2006, are based on actual air emissions from calendar year 2004, and are for source operation during the period of July 1, 2005 through June 30, 2006. These fees fund Ecology's air operating permit fee eligible activities for the period of July 1, 2006 through June 30, 2007.

⁷⁰ EPA website containing Title V of the Federal Clean Air Act is available online at: <http://www.epa.gov/air/caa/title5.html> .

⁷¹ EPA website containing Federal Clean Air Act as amended in 1990 is available online at: <http://www.epa.gov/air/caa/contents.html> .

⁷² Ecology Fiscal Year 2006 and 2007 Workload model, as of November 2005, is available online at: http://www.ecy.wa.gov/programs/air/AOP_Permits/CRO_Permit/FY06-07WorkloadModel11-05.xls .

How does Ecology calculate fees?

Ecology uses the fee process in the [state regulation](#)⁷³. Each source's fee is unique and is based upon a three-tiered structure. The three-tiered structure is based on: (1) the number of AOP sources in Ecology's jurisdiction, (2) the complexity of the source, and (3) the size of the source, as measured by actual air emissions.

For example:

- One third of the total 2005 state fiscal year fee amount was assessed under tier 1. Each of the 30 sources under Ecology's jurisdiction paid a base fee of \$16,331.51.
- One third of the amount was assessed under tier 2. Tier 2 is determined by a system that ranks sources by three levels of complexity. Each source in complexity level 1 paid \$9,205.03. Sources in complexity levels 2 and 3 paid \$18,410.07, and \$27,615.10, respectively.
- The final third of the fee amount was assessed under tier 3. Each source paid \$17.77, for each ton of particulate matter (PM₁₀), sulfur dioxide (SO₂), oxides of nitrogen (NO_x), volatile organic compounds (VOC), and carbon monoxide (CO), they emitted in calendar year 2003.

How much money is collected?

During the 2005 [state fiscal year](#)⁷⁴ (i.e., July 1, 2004 through June 30, 2005), individual source fees ranged between \$23,813.87, and \$128,532.24. Combined fees paid to Ecology totaled \$1,400,947.02, after rebates were calculated.

When are fees due?

Fees are due each March 1st. Ecology sends out preliminary fee billing notices each November. Ecology sends out final bills in January.

Who do I contact with questions?

Leigh Fiedler, Ecology Headquarter Bldg, (360) 407-7530, lfie461@ecy.wa.gov

⁷³ The regulatory citation regarding operating permit fees -- WAC 173-401-900 -- is available online at: <http://www.leg.wa.gov/WAC/index.cfm?section=173-401-900&fuseaction=section> .

⁷⁴ Ecology Fiscal Year 2006 fees calculations are available online at: http://www.ecy.wa.gov/programs/air/AOP_Permits/CRO_Permit/FY06AOPFeeCalculation11-05.xls .

Compliance & Enforcement

How does Ecology determine compliance?

Ecology uses several different approaches to improve and ensure compliance with air quality laws. Some methods include on-site inspections, compliance monitoring, warnings, orders and notices of violation and penalties. Ecology also puts significant efforts into non-regulatory technical assistance, permitting assistance and public outreach.

What is enforcement?

Enforcement is a formal process to gain compliance with regulations. If Ecology determines a source is out of compliance, Ecology works to resolve the problem quickly. If the source does not voluntarily comply within a reasonable timeframe, Ecology will begin a formal process to gain compliance.

What are Ecology's enforcement trends?⁷⁵

Ecology enforcement for commercial and industrial sources has mainly focused on sources that have the potential for large air emissions and are generally aware of the laws and rules.

What happens during an enforcement proceeding?

Ecology conducts enforcement proceedings according to the Compliance Assurance Manual⁷⁶ and the Washington Compliance Assurance Agreement⁷⁷. Ecology takes specific enforcement action in response to high priority violations.

Who do I contact for more information?

Lynnette Haller, Ecology Central Regional Office, (509) 457-7126, lhul461@ecy.wa.gov
Dave Wendlend, Ecology Eastern Regional Office, (509) 329-3594, dwen461@ecy.wa.gov

⁷⁵ Ecology provides the publication "Enforcement Report on Policy and Trends," November 2004, publication number 04-01-009, online at: <http://www.ecy.wa.gov/pubs/0401009.html> .

⁷⁶ Ecology maintains a "Compliance Assurance Manual," July 2003, which is discloseable upon request by contacting an Ecology public records coordinator, online through: <http://www.ecy.wa.gov/services/disclosure/coordinators.html> .

⁷⁷ EPA maintains the Washington Compliance Assurance Agreement online at: <http://yosemite.epa.gov/r10/airpage.nsf/webpage/Compliance+Assurance+Agreements> .

High Priority Violations

What is a high priority violator?

A high priority violator⁷⁸ (HPV) is a source that:

1. has caused humans or the environment to be exposed or to likely be exposed to hazardous waste or hazardous elements,
2. is a chronic or recalcitrant violator of permit conditions, or
3. substantially deviates from the conditions of a permit, order, agreement, or hazardous waste statutory or regulatory requirement.

What are the criteria defining a high priority violator?

EPA's [Timely and Appropriate Enforcement Guidance](#)⁷⁹ defines the criteria for a high priority violation. The regulatory agency will determine what frequency of violation is "high priority" on a case-by-case basis.

What happens once a source is determined to be a high priority violator?

Under the [Washington Compliance Assurance Agreement](#)⁸⁰, agencies will take the following actions in response to a high priority violation:

1. The regulatory agency compares the source's characteristics with the definition of HPV. If the violation fits one or more of the elements of the definition, the source is designated an "HPV" and is subject to the Timely and Appropriate guidance.
2. Within sixty (60) days after a violation is designated as HPV, a Notice of Violation is issued to each source with an HPV, regardless of which agency has the lead.
3. The delegated state or local agency and the EPA Regional Office jointly decide which agency has the necessary resources and will take the lead in resolving the HPV.
4. The lead agency routinely addresses each HPV as it is identified. Once the agency initiates any type of enforcement activity related to an HPV, it cannot interrupt this activity.
5. EPA (or delegated state or local agency) shall add the source to its HPV list for agency tracking and reporting.
6. The HPV remains an HPV (tracked in AFS) until the HPV and lead agency resolve all the related violations.

Who do I contact for more information?

Lynnette Haller, Ecology Central Regional Office, (509) 457-7126, lhul461@ecy.wa.gov
John Keenan, EPA Region 10, (206) 553-1817, Keenan.John@epamail.epa.gov

⁷⁸ EPA sometimes refers to significant non compliance (SNC) status as "High-Priority Violator" (HPV).

⁷⁹ EPA maintains a webpage on Timely and Appropriate Enforcement Guidance online at: http://www.epa.gov/reg3airtd/enforce/mainenf/hpv_guidance2.htm .

⁸⁰ EPA maintains the Washington Compliance Assurance Agreement online at: <http://yosemite.epa.gov/r10/airpage.nsf/webpage/Compliance+Assurance+Agreements> .

Agency Agreements

What agreements exist?

Ecology and EPA have two agreements:

- an Environmental Performance Partnership Agreement (PPA) and
- the Washington Compliance Assurance Agreement for Air Programs (CAAag).

These agreements clearly state relationships, expectations, and commitments between the two agencies.

What is the PPA⁸¹?

Each state biennium, Ecology's Director and EPA's Acting Regional Administrator enter into an agreement on protecting Washington's air and water quality, and managing hazardous waste. The agreement reflects the agencies' mutual goals and priorities.

What is the CAAag⁸²?

The CAAag applies to EPA, Ecology, Washington State's seven local air agencies, and EFSEC. The CAAag's main purpose is to define the roles and responsibilities of each agency. The CAAag focuses on operating permit and synthetic minor sources subject to the EPA policy on "Clean Air Act Stationary Source Compliance Monitoring Strategy, April 25, 2001." The CAAag is updated as needed.

The CAAag documents each agency's commitment to abide by specific policies, including:

- [Clean Air Act Stationary Source Compliance Monitoring Strategy](#)⁸³, April 2001
- EPA/State Agency Agreement on Compliance Assurance Principles, May 1997
- [Policy on Timely and Appropriate Enforcement Response to High Priority Violations](#)⁸⁴, December 1998
- [EPA Supplemental Environmental Projects Policy](#),⁸⁵ May 1998
- Minimum Data Requirements for Stationary Source Compliance, December 1993
- [Oversight of State and Local Penalty Assessments: Revisions to the Policy Framework for State/EPA Enforcement Agreements](#)⁸⁶,
- [Compliance Assurance Program Evaluation Principles](#)⁸⁷,

⁸¹ Ecology maintains an online copy of the PPA, available at: <http://www.ecy.wa.gov/biblio/0501001.html> .

⁸² EPA maintains the Washington CAAag and its appendices online at: <http://yosemite.epa.gov/r10/airpage.nsf/webpage/Compliance+Assurance+Agreements> .

⁸³ EPA maintains their Clean Air Act Stationary Source Compliance Monitoring Strategy online at: <http://www.epa.gov/Region7/programs/artd/air/title5/t5memos/2001cms.pdf> .

⁸⁴ EPA maintains their Policy on Timely and Appropriate Enforcement Response to High Priority Violations online at: <http://www.epa.gov/compliance/resources/policies/civil/caa/stationary/issue-ta-rpt.pdf> .

⁸⁵ EPA maintains their Supplemental Environmental Projects Policy online at: <http://www.epa.gov/compliance/resources/policies/civil/seps/fnlsup-hermn-mem.pdf> .

⁸⁶ EPA maintains their Oversight of State and Local Penalty Assessments online at: <http://www.epa.gov/Compliance/resources/policies/state/oversgt-penal-mem.pdf> .

What do these agreements cover?

These agreements outline each agency's commitments on activities including emission inventory, database management, air operating permit administration, and compliance programs.

Who do I contact for more information?

Sarah Rees, Ecology Headquarters Office, (360) 407-6823, sare461@ecy.wa.gov
John Keenan, EPA Region 10, (206) 553-1817, Keenan.John@epamail.epa.gov

⁸⁷ EPA maintains their Compliance Assurance Program Evaluation Principles online at:
<http://yosemite.epa.gov/r10/enforce.nsf/8eef287ed236c2bf88256b58006166ef/c32dec93963ec4ef882569260054816f!OpenDocument>.

Facility Databases

What databases are available?

Ecology and EPA each maintain electronic databases that contain information on air operating permit sources. Each agency inputs information to a number of databases, but has one main database containing source information. The public can access this database. Specifically, the public can access the Ecology maintained Facility / Site Identification System and the EPA maintained Enforcement and Compliance History Online (ECHO) database.

What is Facility / Site⁸⁸?

Ecology's Facility/Site system is an electronic database that contains key information about each facility or site that is currently, or has been, of interest to Ecology. Most air quality information gets into the facility/site system through Ecology's Document Management System⁸⁹.

Information on this system includes data about the physical location of a facility or site, the type(s) of business or activity the facility conducts, and reason(s) for Ecology's interest in the facility. The Facility / Site system on the web makes a subset of this information available to everyone. Users can query and display data on sources regulated by Ecology's Air Quality, Dam Safety, Hazardous Waste, Toxics Cleanup, and Water Quality programs.

The system also has an Atlas function that provides interactive mapping of Ecology's regulated sources and the Department of Health's regulated public water systems. This application gives the public access to information showing the proximity of public drinking water sources to regulated pollution sources.

What is ECHO⁹⁰?

ECHO is an online database for both public and government users. Most air quality information gets into ECHO through EPA's Air Facility System⁹¹ and Online Tracking Information System⁹² data management systems.

ECHO contains information on permits, inspections, violations, enforcement actions, and penalties over the past three years. Sources with information on this site are those regulated as

⁸⁸ Ecology maintains a Facility / Site homepage with a link to the database, online at: <http://www.ecy.wa.gov/services/as/iss/fsweb/fshome.html>.

⁸⁹ DMS is Ecology's database system for assigning, managing, tracking and reporting unique docket numbers associated with formal enforcement actions and select permit actions.

⁹⁰ EPA maintains an ECHO homepage with a link to the database, online at: <http://www.epa.gov/echo/>.

⁹¹ AFS contains compliance and permit data for stationary sources regulated by EPA, state and local air pollution agencies.

⁹² OTIS was developed by the Office of Enforcement and Compliance Assurance (OECA) for use by federal, state, tribal, and local government agencies. It is a web application that reads into the Integrated Data for Enforcement Analysis (IDEA) system⁹². IDEA copies many EPA and non-EPA databases monthly, and organizes the information to facilitate cross-database analysis.

Clean Air Act stationary sources, Clean Water Act direct dischargers, and Resource Conservation and Recovery Act hazardous waste generators/ handlers. ECHO reports also contain demographic information from the National Census.

EPA, state and local environmental agencies, and the sources collect and report the data that are submitted to EPA databases.

How do I view these databases?

Anyone with access to the Internet can use ECHO.

How recent is the data?

Facility / Site data is posted as soon as it becomes available. The data in ECHO is updated monthly⁹³. However, it may take up to six weeks from its posted date for data to become viewable. The most recent update date is viewable at the end of each summary.

Who do I contact for help or more information?

Facility Site- Rachel Erickson, Ecology Headquarters Bldg, (360) 407-6423,
rcl461@ecy.wa.gov

ECHO- Laurie Kral, EPA Region 10, 206-553-1868, kral.laurie@epa.gov

⁹³ Data imputed into AFS from agencies is picked up the EPA's Legacy System on the 2nd Friday of every month at 8:59pm PST. The data is then made available at the earliest 2 weeks later on the public viewable system ECHO.

State Audits

What are AOP audits?

AOP audits are annual audits of the approved state operating permit regulatory authorities for each jurisdiction. Ecology contracts with a third party to perform these audits. They include routine performance audits and annual random individual permit reviews in accordance with [state regulation](#)⁹⁴.

Why are audits performed?

The law requires Ecology to conduct periodic audits of its air [operating permit program](#)⁹⁵. This requirement covers the four Ecology regions and seven delegated local agencies that manage the air operating permit program throughout the state.

What is included in an audit?

The audits focus on how each agency implemented the air operating permit program during each calendar year.

What did the most recent audit show?

The audit for [calendar year 2004](#)⁹⁶ showed the following:

- The different agencies issue high quality permits that are very consistent statewide.
- The air operating permit program is effective in protecting air quality in the state of Washington.
- State and local agencies work hard to meet and enforce the air operating permit program requirements. They employ competent staff and information management systems.
- Some agencies are understaffed relative to their current workloads. This typically affects timeliness of permits these agencies issue, and the level of compliance and enforcement activities the agencies undertake.
- Washington's air operating permit program is functioning well and there are many dedicated people ensuring its success on a daily basis.
- The air operating permit program has matured to a "steady-state" condition. This means most of its activities are standard practice across the various agencies, and the system is not prone to upsets.

⁹⁴ The referenced regulation – WAC 173-401-920(3)(b) & (c) ii is available online at: <http://www.leg.wa.gov/WAC/index.cfm?section=173-401-920&fuseaction=section> .

⁹⁵ The operating permit regulation – chapter 173-401 WAC – is available online at: <http://www.ecy.wa.gov/biblio/wac173401.html> .

⁹⁶ The calendar year 2004 Washington State air operating permit program audit is available online at: http://www.ecy.wa.gov/programs/air/AOP_Permits/CRO_Permit/WAAirAuditReportCY2004Final.pdf .

Who do I contact for more information?

Leigh Fiedler, Ecology Headquarter Bldg, (360) 407-7530, lfie461@ecy.wa.gov

EPA Program Reviews

What is the purpose of a program review?

Program reviews identify and document how each of the regions implements the EPA-approved Title V Program. In response to a 2002 Inspector General audit of EPA's Title V program, EPA will review all state and local operating permit programs by the end of federal fiscal year 2006 (i.e., September 30, 2006). The objective of the reviews is to:

- identify good practices as examples for permitting agencies,
- document areas needing improvement, and
- identify ways EPA can help improve state and local air operating permit programs and expedite permitting.

How does EPA do the audits?

EPA collects information through a questionnaire and interviews, by reviewing issued operating permits, and by reviewing the permit application form, reporting forms, and relevant guidance.

What is the status of the reviews?

Initially, EPA Region 10 planned to review programs for each agency that issued more than ten permits. EPA completed reviews of [Idaho's Department of Environmental Quality](#),⁹⁷ Oregon Department of Environmental Quality, Lane County, Northwest Clean Air Agency, and Spokane County Air Pollution Control Authority. More recently, EPA decided they will annually review 25 percent of the programs with more than 20 permits. EPA Region 10 plans to review Puget Sound Clean Air Agency in fall 2005, Ecology in spring 2006, and Alaska Department of Environmental Quality in summer 2006. Then they plan to review one state program and one local program each year.

How will EPA share the results?

EPA Region 10 is posting their review reports on their [website](#)⁹⁸. EPA workshops to share the results may be available by the fall of 2006.

Who do I contact for more information?

Doug Hardesty, EPA Region 10, 208-378-5759, Hardesty.Doug@epamail.epa.gov

⁹⁷ EPA provides the complete Idaho DEQ Title V review online at: <http://yosemite.epa.gov/R10/AIRPAGE.NSF/3796c2095070ee7888256d80006f6a04/ce026867b0c0a26088256e35006ab815!OpenDocument> .

⁹⁸ EPA will be posting review results, as they are completed on their website: <http://yosemite.epa.gov/R10/AIRPAGE.NSF/Permits/Permits> .

Customer Feedback

Why does Ecology want feedback?

Ecology wants feedback to help provide better service to you and other customers. Ecology is committed to streamlining permitting procedures and maintaining a high level of staff responsiveness and assistance to permit applicants.

How does Ecology seek feedback?

During the summer of 2004, Ecology administered a “[Customer Satisfaction Survey](#) to seek feedback from regulated sources.”⁹⁹ Ecology gave this survey to applicants of 12 Ecology environmental permit processes, including AOP.

In August 2005, Central and Eastern Regional Offices of Ecology’s Air Quality Program began sending a postage paid feedback card to each facility at the time they issued a final permit. Facilities may submit feedback on this card, which goes to Ecology’s director.

What kind of feedback does Ecology collect?

Ecology uses both the surveys and the feedback cards to gauge customers’ satisfaction with permitting processes. The surveys use a five-point scoring method with a series of questions. The card’s questions are similar to those on the survey so that Ecology can track improvements following the survey.

 <h3 style="text-align: center;">Your Opinion of our Permitting Service Is Important to Us</h3> <p style="text-align: center;">Please tell us how we did on permit _____</p>			
Service Being Rated	Rating	Rating Score	
Ecology staff were helpful.		1= Strongly disagree 2= Disagree 3= Agree 4= Strongly Agree 5= Does Not Apply	
Ecology staff were courteous.			
Ecology staff worked with me to find innovative ways to solve problems.			
Ecology staff informed me about what was needed to submit a complete application.			
Ecology staff informed me about how long it would take to get a permit decision.			
The permit forms were easy to use.			
The permit application guidance was clear.			
The permit decision was timely.			
Comments/How can we improve?			
Date:	Would you like us to contact you about your comments?		
Name (optional):	Phone:		
<i>Thank You! Jay Manning, Director, Department of Ecology</i>			

⁹⁹ The summary of the whole 2004 Permit Applicant Survey is available online at: <http://www.ecy.wa.gov/biblio/0401010.html> .

How can I provide feedback?

If you receive a permit feedback card, please take the time to complete and mail it.

Additionally, both source representatives and citizens are welcome to contact Ecology at any time with questions, comments, or suggestions. If you have thoughts to share on how Ecology can better serve you, we encourage you to call or email us at your convenience.

Who do I contact for more information?

Dee Peace Ragsdale, Ecology Headquarters Bldg, (360) 407-6986, drag461@ecy.wa.gov