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FW: comments on proposed regulations

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From: John Sugrue

Sent: Wednesday, June 5, 2019 1:29:32 PM (UTC-06:00) Central Time (US & Canada)

To: envcomments

Subject: comments on proposed regulations

I had two comments to the new rules that I think need clarification in the rules:

1. Section 3 – do the permit application requirements apply to an existing facility where it already has a permit and only needs to renew it. For New, Expanding, and Modifying Facilities it clearly states must “receive a permit” whereas the Existing Facility must “renew its permit”. It would lead the reader to believe there is a difference between receiving a new permit and renewing an existing permit. Section 5 clarifies that any renewal application required within a year of passing the new rules would be subject to the same requirements as a new application (Section 3 permit requirements). It would be easily clarified if the next paragraph started “*All New and Renewal* Permit applications shall contain) This would encourage existing facilities to keep reading the ordinance so they were prepared for what was coming.
2. Section 6 – In the first paragraph, it seems like it is calling for a further explanation on what to do with requests for extensions of time on the subsections listed. It is like it is missing a verb. You could change “except that requests” to “except *for* requests” if you meant there would be no requests granted for time extensions with the subsections listed in the paragraph

I see some items in the new rules that require daily documentation and reporting. Is DOE staffed up to handle that increased workload? Current applications require the identity of the owner and manager of the facility. You might want to consider adding “Environmental Compliance Manager” to the list of names so administration and inspectors have a known, single-point contact to check on compliance with the reporting rules.

Good luck with the new ordinance.

John

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