IndianaChamber

The Voice of Indiana Business.™

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IDEM Office of Air Quality
100 North Senate Avenue,
MC 61-53, IGC-N 1003
Indianapolis, IN 46205

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By JL 9/10/08

RE: Proposed revisions to Non-Rule Policy Document Air-007-NPD-R2

The Indiana Chamber of Commerce appreciates the opportunity to comment on the proposed revisions to IDEM's non-rule policy document on Title V and FESOP annual compliance certifications [Air-007-NPD-R2]. The Indiana Chamber of Commerce is the state's largest broad-based business advocacy organization, representing more than 23,000 members and customers in all 92 counties. The Chamber has served the business community since 1922.

The proposed rule will meet the Title V operating permit program requirements and provide IDEM and the public with the most useful information regarding a source's compliance status.

The use of the "short form" will create efficiencies on both the part of the permittee and IDEM by concentrating on the more important compliance related information. To require the submittal of every single requirement in the Title V permit or FESOP is not necessary and is costly and time consuming by all parties while realizing no real value. Additionally, this is consistent with a recent recommendation by EPA.

While we support the proposal, there is always room for improvement. Specifically, the annual compliance certification form should not be used to require information about individual deviations that may have occurred during the reporting period. As currently written, the form includes two columns relating to information about individual deviation events. That kind of information is reported in quarterly deviation reports or other compliance reports, not in an annual compliance certification. For the compliance certification, a source is required to identify its compliance status during the reporting period as it relates to the permit terms. The certification should not be used to collect information about individual deviation events. It would seem to be more appropriate for the permittee to provide the necessary information on a quarterly deviation reporting form or a form that meets the content requirements of deviation reports.

The Chamber appreciates the opportunity to work with the agency toward continuous improvement that benefits the agency, business and our environment.

Sincerely,

Vincent L. Griffin
Vice President, Environmental and Energy Policy

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