

2022 Certificate of Exemption (COE) Renewal  
Supplemental Questions and Comments 3

County: Shelby

1. Responses to questions 1.e. in the previous set of follow-up questions (Supplemental Questions and Comments 2) indicate that the Technical Manager is planning to retire in November of this year.

- a. Please provide any details on the succession plan for the Technical Manager position known at this time.

Succession Planning began November of 2021. In house training was slated to start February 17, 2022, but with the uptick in COVID positive cases and the start of the Alternative Work Schedule, training was paused. Work is currently being done so that the Succession Planning will start this summer.

- b. How soon do you anticipate the position to be filled?

The current position cannot be filled until it is actually vacant. Plans to begin advertising for the position will start once a definite date for the current managers departure is known. Interviews will follow soon after.

- c. Having faced challenges filling positions in the monitoring program, how will this position be filled without an interruption in leadership or technical capacity?

Plans are to start the search and hiring process before the current manager leaves as well as continue with the succession plan training with current staff.

- d. Will this vacancy create issues with fulfilling any of the local program's statutory or regulatory functions in a timely manner?

It is not anticipated to have any effect. The Title V program is currently in the process of planning how any delinquent or overdue inspections and related work will be brought current and in compliance.

2. In your previous responses to the second set of follow-up questions, you indicated that Title V fees need to be increased to retain staff and potentially fill a soon to be created position.

- a. How many, if any, Title V permits, permit renewals, administrative amendments, minor modifications, and significant modifications are

beyond their regulatory deadline? Over the past two years and the current year (calendar or fiscal, whichever is most convenient for you to report) how many of the above permits, amendments, and modifications were issued past the regulatory deadline?

There are approximately 30 current projects with applications beyond the 18-month period. In the past two years and year to date, approximately 75 projects were completed that had applications beyond the 18-month period.

- b. Have all your applicable sources identified in your Compliance Monitoring Strategy Plan been inspected during the last two years? If not, how many inspections were not completed?

All sources, except one out of approximately 127, have been inspected during the last two years. The one source mentioned is scheduled for inspection the second quarter of this year.

- c. Are there any other Title V activities as specified in 40 CFR 70.9(b)(1) that are required to be funded by Title V fees that are not being met as required by federal law?

All activities are being carried out. Our current fee schedule does not cover costs for these activities and needs to be changed immediately. Our branch will again approach the County Commission to get approval for the proposed increased fee schedule.

3. In the COE Petition, you indicated that there are some overdue air monitoring related SOPs that require updating. Since it has been a few months since this information was provided:

- a. Have those SOPs been updated?

Air Monitoring has not finished updating the SOPs. This task will be completed when additional staff has been hired. The three (3) vacant positions remain, the jobs are posted and interviews are conducted when applications are received. The EPA is aware of the ongoing situation and requested we continue to ensure the data is of good quality.

- b. If not, what is the current status of those SOPs?

The SOP's require rewriting, all are in the *Draft* format.