

**Summary of Changes to SRF Round 3 Clean Air Act Plain Language Guide  
Based on State Comments  
September 2013**

General:

- Comment noted metrics refer to “major facilities” and “Title V facilities” and it might be more clear to refer to Title V facilities throughout the document - if it is referring to all Title V facilities and not just the major Title V facilities.
  - o Response: The CAA PLG is not just referring to major title V facilities
- Comment suggested the PLG may need to be revised when the FRV Policy is complete.
  - o Response: SRF will be modified to incorporate changes in FRV policy at that time.

Element 1:

- A number of comments were made regarding the data count metrics under element 1 of the 12 element structure. Those data counts have been removed from the SRF, but will remain part of the data verification process and will be used to populate some of the numbers used in the Round 3 metrics under the 5 element structure.
- Comment recommended moving metric 3b2 from element 3. Metric 3b2 has been moved to element 1.
- Comment suggested that in metric 7b3 term "active major facilities" should be replaced by "active Title V facilities" and noted that all Title V facilities are major so these terms are not interchangeable.
  - o Response: The metric is looking at the facilities' classification and not the applicable air programs, so facilities that are classified as synthetic minor or other are not included.
- Comment asked for clarification under metric 7b1 on reporting formal enforcement action at Tier II facilities and suggested that the reporting of "formal enforcement actions" at Tier II facilities is optional and depends on whether state/local have the resources available to report actions at minor facilities.
  - o Response: Per the current AFS ICR, the reporting of formal enforcement actions at minor sources is required. However, current the FRV policy recognizes resource constraints and allows the states flexibility to report these actions.

Element 2:

- Comment suggested that for metric 5c & 5d, a CMS plan in many states does not include SM sources. To maintain national consistency and ensure the review is focused upon significant issues either categorize this data metric type as “informational only” or remove this from the metrics as a data measurement goal.

- Response: If a state does not have a CMS that includes SM sources, then 5c and 5d may not need to be utilized.

Element 3:

- Comment suggested metric 8b was duplicative of 1i2. Metric 8b was deleted.
- Comment suggested changing the denominator for metric 8c. The denominator has been changed to “total number of violations in the files reviewed that should be identified as HPVs.”

Element 4:

- Comment suggested allowing more flexibility under metric 10a to account for state-specific laws.
  - Response: SRF reviewers can recognize in the explanation section of each element finding where state agencies have difficulties meeting timeliness standards because of state specific issues.

Element 5:

- Comment suggested deleting metric 12a. Metric 12a has been changed to look at only penalties where the final value is lower than the initial value calculated.