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Posted To: Industrial Stormwater Comments
Conversation: Application Certification
Subject: Application Certification

The language in the permit itself is not consistent with the language in the permit application instructions with respect to who must sign the permit application. Section G2 from the permit and Section XI from the application instructions follow.

From my perspective, a chemical plant meeting the general regulatory definition of a large plant, having the responsible official of the facility certify the application makes more sense than having a business VP certify it. The responsible official of the facility clearly has the responsibility to implement the requirements of the permit and is in a better position to understand the day to day operation of the facility relative to all regulatory requirements.

My recent renewal application was certified by our business unit VP, based on the language in the permit. He is based in Philadelphia and visited our facility for the first time two weeks ago in that capacity. His predecessor was based in Paris. She visited the plant once in two years.

I realize that everyone's situation is different but I would appreciate your considerations towards revising the permit to be consistent with the application instructions. I look forward to your reply.

G2. SIGNATORY REQUIREMENTS

A. All permit applications shall be signed:

1. In the case of corporations, by a responsible corporate officer of at least the level of vice president of a corporation.
2. In the case of a partnership, by a general partner of a partnership.
3. In the case of sole proprietorship, by the proprietor.
4. In the case of a municipal, state, or other public facility, by either a principal executive officer or ranking elected official.

SECTION XI. CERTIFICATION OF AN ACCURATE APPLICATION BY THE PERMITTEE

This section should be read closely by the applicant. A responsible official or authorized representative of the operator shall print or type their name for clarity, then sign and date the document on the lines provided.

In the case of corporations, the application must be signed by a responsible corporate officer or a duly authorized representative, if such representative is responsible for the overall operation of the facility from which the discharge originates.

For a partnership, the application must be signed by a general partner.

For a sole proprietorship, the application must be signed by the proprietor.

For a municipal, state or other public agency, the application must be signed by either a principal executive officer, a ranking elected official, or other duly authorized employee.

In the case of co-permittees, both the operator of the facility and the co-permittee representative must sign the application.

Regards,
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