

To: Jackson, Ryan[jackson.ryan@epa.gov]; Dravis, Samantha[dravis.samantha@epa.gov]; Brown, Byron[brown.byron@epa.gov]; Bolen, Brittany[bolen.brittany@epa.gov]
Cc: sean.alteri@ky.gov[sean.alteri@ky.gov]
From: Clint Woods
Sent: Wed 7/19/2017 12:48:55 PM
Subject: AAPCA Releases New Report on Clean Air Act Regulatory Reform

Members of the U.S. EPA Regulatory Reform Task Force,

Today, the Association of Air Pollution Control Agencies (AAPCA) released a new report, *The State of Regulatory Reform: Navigating State Perspective on Clean Air Act Regulations Under Executive Order 13777*. Following the issuance of Executive Order 13777 on Enforcing the Regulatory Reform Agenda and a public comment period from the U.S. Environmental Protection Agency (EPA) on regulations that may be appropriate for repeal, replacement, or modification under the order, AAPCA compiled state and local environmental agency and association comments on [our website](#) and today releases *an accompanying report*, entitled *The State of Regulatory Reform*, to help navigate intergovernmental priorities for regulatory reform on Clean Air Act and cross-media issues at U.S. EPA. In particular, Clean Air Act regulations and themes discussed by at least three state environmental agencies are included, accompanied by links to illustrative comments and excerpts from state and local agencies and associations.

These air quality regulations and themes include: “Once In, Always In” Policy for Major Source Maximum Available Control Technology Standards (pg. 3); Treatment of Data Influenced by Exceptional Events (pg. 4); Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (pg. 4 -5); Standards for Stationary Compression Ignition Internal Combustion Engines, Stationary Spark Ignition Internal Combustion Engines, and Reciprocating Internal Combustion Engines (pg. 5); Startup, Shutdown, and Malfunction State Implementation Plan Call (pg. 6); Title V Permitting Requirements for Air Curtain Incinerators/Destructors (pg. 7); Regional Haze (pg. 7 - 8); Nitrogen Oxides State Implementation Plan Call (NOx SIP Call)(pg. 8); Interstate Ozone Transport (pg. 9); Clean Power Plan and Standards of Performance for Greenhouse Gas Emissions From New, Modified, and Reconstructed Stationary Sources: Electric Generating Units (pg. 10); Modeling Issues & Appendix W (pg. 10 -11); Implementation of the 2015 NAAQS for Ozone: Nonattainment Area Classifications and State Implementation Plan Requirements (pg. 11); 2015 National Ambient Air Quality Standards for Ground-Level Ozone (pg. 12); Cross-Media Electronic Reporting Rule and Other Electronic Reporting Requirements (pg. 13 – 14); Monitoring Requirements (pg. 14); Other Title V Permit Review/Petition Issues (pg. 15); Guidance as De Facto Rulemaking (pg. 15); and General National Ambient Air Quality Standards & State Implementation Plan Process Improvements (pg. 16).

You can find a copy of *The State of Regulatory Reform: Navigating State Perspective on Clean Air Act Regulations Under Executive Order 13777* [here](#).

AAPCA and its members look forward to working with U.S. EPA and the Regulatory Reform Task Force as you continue to carry out Executive Order 13777 and related initiatives. Please let us know if there is any additional information that would be helpful.

Thanks!

Clint Woods

Executive Director

Association of Air Pollution Control Agencies

1776 Avenue of the States

Lexington, KY 40511

859.244.8040 – office

cwoods@csq.org

<http://www.cleanairact.org>

 **ASSOCIATION OF AIR POLLUTION CONTROL AGENCIES**
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