

Procedures for Handling Nebraska EQC

- What:** The Nebraska Environmental Quality Council (EQC) is a body which meets quarterly. One of their duties is to approve any changes to Nebraska state regulations governing delegated environmental programs. Well in advance of the meetings (4-5 weeks), EPA receives notice of the time and place of the meeting with a copy of the agenda and proposed rule changes.
- Who:** Carla Felix Carla.felix@nebraska.gov is the point of contact at the state. Her office manager will send the material to the RA, the Legislative Liaison (Currently Ben Washburn, OPA) and Dick Sumpter (Nebraska Administrative Project Officer for the PPG).
- When:** According to an agreement in the PPA, we will return our comments at least seven calendar days before the meeting.
- How:** Upon receipt of the material, the Administrative PO will analyze the proposed rule changes for determining which EPA programs will be affected. The PO then forwards the material to the Division Deputies whose programs are involved. In the transmittal, stress the point that only substantive comments are requested. Give a suspense date that will allow time to compile the comments into an email for the DRA's signature and still get the response to NDEQ at least one week before the meeting. A couple of days earlier than that is better. Also, send a copy to Regional Counsel with the same suspense date, offering them an opportunity to comment. Request negative responses from all parties, should they have "no comment."

Here is a sample note:

Diane, John,

I'm forwarding this announcement from the Nebraska Environmental Quality Council (EQC). I will compile any comments for Ed's response.

I'm not sure who in your respective Divisions would handle this, so I ask that you forward to the appropriate persons. There are two Water related rule changes and one Air related. As usual, we are only interested in substantive comments that would relate to the legality of the rule changes, program integrity or to the delegation agreement. I will also copy Regional Counsel on this so that there is no time lost in getting a response together, should they feel the need to weigh in.

I would ask that you send me any comments by COB June 2. A negative response is also requested, should you have no comments. Thanks for your cooperation.

Dick Sumpter
FOIS/PLMG
X7661