

# U.S. Environmental Protection Agency Evaluation of Existing Regulations: Association of Air Pollution Control Agencies May 15th Comments



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The Association of Air Pollution Control Agencies (“AAPCA”) submitted a May 15th letter to the United States Environmental Protection Agency (“EPA”) responding to the agency’s request that the regulated community evaluate existing regulations. See Docket ID: EPA-HQ-OA-2017-0190; Evaluation of Existing Regulations (“Evaluation”).

AAPCA states that its letter is intended to provide:

- Consensus comments
- Compilations of air agency feedback on recent EPA regulatory actions
- Member-generated list of regulations that may be appropriate for repeal, replacement or modification (pursuant to Executive Order (EO) 13777

AAPCA describes itself as a consensus-driven organization focused on assisting air quality agencies and personnel with implementation and technical issues associated with the federal Clean Air Act. The organization state that its members work collaboratively on behalf of states and the communities they protect to act as a conduit for and provide feedback to federal regulators on air quality rules that have significant impacts across the entire nation.

Arkansas Department of Environmental Quality Associate Director (Office of Air Quality) Stuart Spencer serves as Vice President of the AAPCA.

AAPCA notes by way of introduction that it has previously compiled feedback on EPA regulations and topics such as:

- Ozone and interstate transport
- Regional haze
- Exceptional events
- EPA’s start up, shut down, and malfunction state implementation call
- Permitting

In responding to EPA’s request for evaluation of existing regulations AAPCA sought member agency feedback via an electronic survey conducted from April 19 to April 28.

The organization’s May 15th letter provides what it characterizes as a “short description of key issues, each of which was provided by at least one of AAPCA’s state and local air agency members.” The letter

does not contain suggestions for any specific action (repeal, replacement, or modification) but instead references comments submitted by an individual member agency. Further, the list is stated to not necessarily imply endorsement from all members.

The May 15th letter includes a chart with 31 referenced regulations or policies. It has the following headings:

- Name/Title of Regulations/Policy
- Key Issues

[A copy of the May 15th letter can be downloaded here.](#)