

## Technical Sub-Committee Report Out

### Issues

1. Continue PTE and Once in Always in Policy Changes.
2. Research and Actions
  - a. Research rules for exemptions for coating rules similar to Wood Surface Coating MACT .
  - b. Industrial Boiler MACT for applicability of small boilers and space heaters used for human comfort.
  - c. Establish a research forum – mechanism to accomplish rule review.
  - d. Status of Composite Manufacturing MACT.
  - e. Research mobile source impacts, small egu's, and non-point air sources for small business relief from categorical regulatory impacts. In other words get the reductions from mobile sources.
3. TRI lead needs a deminimus level...leads to discussion of media parameters for the technical committee.
4. Strategic goals and implementation, eg goal l# 5
5. SIC Code listings:
  - For materials development
  - Rule Applicability
  - Word search capabilities for CFR
  - CFR pdf rule extraction. Give to Technology.
6. Timing of tools and publications, guidelines and compliance guides to coincide with rule proposal at a minimum.
7. Develop **generic** operation and maintenance guides for control equipment . Approach and partner with trade associations to research equipment manufacturers and vendors.
8. SBREFA Look back ...mandated every 10 years. Is this functioning? Is it happening? What impact can we have?
9. EPA Responsibility to periodically review rule effectiveness.
10. Increase state program awareness of state initiated regulatory trends e.g. perc ban in CA. for potential national trends and state implications.
11. Simple direct, concise CA materials ...guide books often way too long.

### Function:

1. \*\*\*Proactively participate in administrative and policy discussions. Upon decision of Tech Committee elevate discussion through the Steering Committee to Karen's Office and appropriate AA's.
  - Include small businesses in administrative and policy discussions (perhaps utilize CAPs.)

2. Identify ways to establish and build creditable relationships with Air Program and Hq Program offices, cooperative relationships with trade associations and small business representatives to collaborate on technical issue and rule review..
3. Develop work groups as needed to address issues but always include stakeholders.
  - Need larger representation on tech sub-committee.
4. Continue making recommendations: Select the most effective avenue Associations; State Programs; Steering Committee; direct comments..
5. Regulations Review:
  - Utilize CAP Attorneys for review of Small Business Impact.
  - Obtain Semi-annual Review and Certified list of rules with small business impact. Provide to state.
  - Create review panel by use of impact list.; population /geographical location (BID) and beg states with high-test impact to serve as a review authority.
  - Technical committee should provide regulation impact synopsis to Steering committee
    - Cogent.
    - CAP Attorneys
    - Continue and strengthen dialogue with the rule writers to have a proactive impact on rule development by asking for:
      - the intent of the rule;
      - what are the exit strategies or exemptions.