

Technical Subcommittee

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National SBEAP/SBO
Conference
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Mission of Technical Subcommittee

- Evaluate policy issues and rulemakings that may impact small businesses
- Develop and maintain relationships with EPA staff in OECA, OAQPS, etc. that develop rules and policy
- Make recommendations to National Steering Committee on issues that warrant action on their part

Activities

- Provide comments on proposed rules, or before they are proposed if able to gain access to rule writer workgroups
- Provide input on guidance documents in development
- Draft letters or summary of comments for
 - Signature of NSC chair, or
 - Use as talking points by individual members

Activities

- Representation with other groups
 - 1 or more members attend annual Air Toxics workshop to bring attention to small business issues
 - Members participate on monthly calls for NACAA Permit and Toxics committees to learn about rule issues
 - Those with approval from official NACAA members in their state
 - Committees are good resources to hear EPA presenters summarizing current rule/policy issues

Previous Projects

- Members provided input on the following:
 - Boiler MACT rule development (stakeholders group)
 - Secondary Aluminum MACT guidance document
 - Fiberglass Reinforced Plastics MACT guidance documents
 - Early PTE guidance
 - Small business enforcement policy
- Compile technical information on Small Biz Enviroweb
 - Pollution control page
 - New rule summary page

Current Projects

- 50+ Area Source NESHAPs
 - Working on getting input to rule writers before proposed
 - Short comment time frames will make changes difficult after proposed
- Once-in-Always-in policy changes
 - Drafted comment letter on proposed rule for NSC Chair signature
- Dry Cleaner Rule changes
 - Worked together to provide summary of changes on website
 - Identified problems in rule to EPA rule writer and OECA