Office of Small and Disadvantaged Business Utilization Stakeholder Feedback Ma

Forum
Docket
Docket
Docket
Docket
April 20 Webinar
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Docket
Docket
Docket
Docket

trix: EO 13777 - Enforcing the Regulatory Agenda

Docket Number (If Applicable)	Commenter Name	Organization
EPA-HQ-OA-2017-0190-4465	Anonymous public comment	Anonymous public comment
EPA-HQ-OA-2017-0190-4236	Anonymous public comment	Anonymous public comment
EPA-HQ-OA-2017-0190-1427	Anonymous public comment	Anonymous public comment
EPA-HQ-OA-2017-0190-1498	Anonymous public comment	Anonymous public comment
N/A	Eric S. Miller	Mansfield, OH
EPA-HQ-OA-2017-0190-4476	Eric S. Miller	Mansfield, OH
EPA-HQ-OA-2017-0190-4959	Anonymous public comment	Anonymous public comment
EPA-HQ-OA-2017-0190-5175	Anonymous public comment	Anonymous public comment
EPA-HQ-OA-2017-0190-5884	Anonymous public comment	Anonymous public comment
EPA-HQ-OA-2017-0190-5013	Charles Redell	Public comment

10-May-17

Organization Type	Primary Topic	Regulation Type
General public	EPA regulations create jobs for small businesses	All
General public	Support for EPA regulations	All
General public	Support for the EPA	All
General public	Support for the EPA	All
General public	Role of Clean Water, Air and Stable Climate	All
General public	Role of Clean Water, Air and Stable Climate	All
General public	Support for enforcement of EPA regulations	All
General public	Support for EPA regulations	All
General public	Support for EPA regulations	All
General public	Support for EPA regulations	All

Affected EPA Office	Regulated Industrial Sector
All	Not Specific
All	Not Specific
All	Not Specific
All	Not Specific
All	Not Specific
All	Not Specific
All	Not Specific
All	Not Specific
All	Not Specific
All	Not Specific

Regulation (part, subpart)	Primary Comment
None specified	Argues that EPA regulations create jobs for small businesses.
None specified	Disagrees that EPA regulations eliminate or inhibit jobs, but rather create jobs for small and large businesses
None specified	EPA regulations create jobs
None specified	Supporting the environment provides a stronger economy
None specified	Disagrees with EO 13777 that environmental regulations cost jobs and reduce prosperity, but has the opposite effect.
None specified	Disagrees with EO 13777 that environmental regulations cost jobs and reduce prosperity, but has the opposite effect.
None specified	Small business owner who believes that regulations enforced by the EPA are critical to ensuring that our country retain the resources it has in perpetuity. Recommends that EPA consider actions in terms of their effect of seven generations, not simply their immediate economic impact.
None specified	Believes that EPA regulations are necessary and don't produce significant job losses or have adverse economic impact on the regulated industries, including small businesses.
None specified	Father owned a small business for 40 years that made air pollution control equipment and his business supported his employees and children for decades and protected the environment.
None specified	Small business owner who is opposed to the rollback of regulations designed to protect the environment.

Supporting Details	Nature of Comment
As an example, green completions for oil and gas wells provide an opportunity for small businesses that innovate and improve technology and creates opportunities for consultants who help companies meet the requirements in efficient and cost-effective ways.	Maintain
Jobs include environmental firms, site cleanup specialists, water/air quality engineering and research firms, alternative energy material manufacturers and installers including the entire multi-billion dollar wind and solar industry. Notes that solar and wind jobs are growing at a rate 12 times as fast as the rest of the US economy.	Maintain
Believes the EPA regulations provides jobs to small businesses that assist industry in complying with these regulations.	Maintain
Believes that relaxed regulations will hurt tourism, both large and small businesses, and quality of plant and animal life.	Maintain
Notes that small businesses want clean air and water. Notes Flint, MI as an example of what happens to communities that don't provide clean water to the community.	Maintain
As an example, people that own small businesses and homes in an area find out their water supply is poisoned with lead. Now you can't sell their home or business, because no one wants to live there anymore.	Maintain
Clean air and water regulations protect their health and the longevity of the ecosystems on which the continued prosperity of the country rely.	Maintain
OMB estimates that regulatory benefits exceed regulatory costs by 7 to 1 for significant regulations. The EPA estimates that the regulatory benefits of the CAA exceeds its costs by a ratio of 25 to 1. Similarly, a study of EPA rules issued during the Obama Administration found that their regulatory benefits exceeded costs by a ratio as high as 22 to 1.	Maintain
	Maintain
Believes that the argument that environmental regulations cost this nation money and jobs is false. Also argues that the effects of global warming would kill crops his business needs to survive and the repeal of regulations would allow pollutants that caused the acid rain to be emitted into the atmosphere again.	Maintain

Status of Rule Commented On
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April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

Docket

April 25 Public Meeting

N/A	Jess McCluer	National Grain and Feed Association (NCFA)
N/A	Tim Hunt	American Wood Council (AWC)
N/A	Tim Hunt	American Wood Council (AWC)
N/A	Eric Stuart	Steel Manufacturers Association of America (SMA)
N/A	Joe O'Donnell	International Wood Products Association
N/A	Bill Perdue	American Home Furnishings Alliance (AHFA)
N/A	Theresa Pugh	Theresa Pugh Consulting
N/A	Samantha McDonald	Independent Petroleum Association of America (IPAA)
EPA-HQ-OA-2017-0190-1667	Anonymous public comment	Anonymous public comment
N/A	Jim Doyle	Business Forward

Industry group	NSPS Subpart DD - Standards of Performance for Grain Elevators	Air
Industry group	General	Air
Industry group	General	Air
Industry group	American recycled steel producers	Air
Industry group	Formaldehyde Emission Standards for Composite Wood Products	TSCA
Industry group	Formaldehyde Emissions from Composite Wood Products	TCSA
Consultant	1) New Source Review/PSD and permit streamlining, 2) Clean Power Plant regulation revisiting, 3) Dispersion modeling under CAA, 4) either CSAPR issues and Water rules	Air
Industry group	Independent oil and natural gas production	Air
General public	Support for EPA environmental programs	Air
Industry group	Clean Power Plan	Air

OAR	Grain Elevators
OAR	Wood Products
OAR	Boilers
OAR	Electric Arc Furnaces (EAF)
OCSPP	Composite Wood Products
OCSPP	Composite Wood Products
OAR	Oil and gas industry
Oar	Oil and gas industry
OAR	Oil and gas industry
OAR	Not Specific

40 CFR 60, subpart DD (Grain Elevator NSPS)	Clarification of rule status
40 CFR Part 63 Subpart DDDD (Plywood and Composition Wood Products MACT)	For the upcoming RTR, recommend work practices to regulate small sources of emissions that were not covered by the original rule. Believes the EPA has enough data to develop regulations without an ICR.
40 CFR Part 63 Subpart DDDDD (Boiler MACT)	Request that the EPA complete the rule so there will be certainty in the industry.
40 CFR part 63, subpart YYYYY (EAF Steelmaking Area Source NESHAP)	Industry having problems competing with EAF producers in China and other countries where the EAF industry is not subjected to the same level of regulation.
40 CFR part 770 (Composite Wood Products Formaldehyde Standard)	Concerned with the delays in the effective date and subsequent compliance dates for the standard.
40 CFR part 770 (Composite Wood Products Formaldehyde Standard)	Eliminate the Formaldehyde from Composite Wood Products rule.
40 CFR 60, subpart OOOOa (Oil and Gas Methane NSPS)	Equipment leak repair provisions are unworkable for the pipeline transmission industry
40 CFR 60, subpart OOOOa (Oil and Gas Methane NSPS)	Harmful to small businesses. Re-instate exemption for low producing wells.
40 CFR 60, subpart OOOOa (Oil and Gas Methane NSPS)	Supports the methane regulations for the oil and gas industry
40 CFR 60, subpart UUUU (Clean Power Plan)	Businesses support action on climate change because it will have negative impacts on them.

Amendments to this rule were proposed, but never signed and the rule is back at EPA for review. Asks the EPA to clarify the status and what is going to occur with this rule.	Support
Believes that the ICR will cost the industry $10 million, requires more time to complete, should only be required by large manufacturers, and should exclude operating data.	Support
The Boiler MACT has been a 20 year process, and all the stop and starts has resulted in over $200 million of stranded costs.	Support
EPA considering moving to a more expensive and less effective mercury reduction program. Believes best option is to extend the existing mercury switch program. Recommends streamlining the permitting process, reducing the reporting and recordkeeping burdens, and improving the models used to predict environmental impacts.	Support
Rule was finalized on December 12, 2016 with an effective date of March 21, 2017. The EPA extended the effective date until May 22, 2017 to review the rule, but did not extend the compliance dates. Issues with bringing the supply chain into compliance by the compliance dates. Also, the labeling requirements will be very confusing and recommends that voluntary labeling be allowed early to start the process of bringing all the supply chain into compliance.	Support
Formaldehyde already well controlled, most of the industry complies with the CARB rule. Finishers included in definition of fabricated laminated products, which results in $10 million of new compliance costs with no environmental benefit.	Support
Rule requires repairs be made within 30 days of finding a leak. May require a shutdown of the pipeline which will disrupt delivery. Recommends the rule be revised to allow a longer repair period, so that repairs can be made during low demand periods.	Support
Requirements imposed by the NSPS apply over the life of the wells and include leak detection and repair. As the well production declines, the cost effectiveness of this leak program increases and makes it cost prohibitive for small businesses that may wish to purchase these low low-producing wells.	Support
States jobs associated with detecting and repairing methane leaks are performed by small businesses that have experienced up 30 percent business growth in states with methane regulations. This regulation not only promotes health and safety, but also creates jobs for American people.	Maintain
The Clean Power Plan will not increase costs for individual businesses so much that they will have to shut down.	
The impact to businesses from weather-related issues will be greater, in terms of supply chain disruption, loss of foot traffic, travel delays, and other factors.	Support

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April 25 Public Meeting

April 20 Webinar

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 20 Webinar

Docket

N/A	Theresa Pugh	Theresa Pugh Consulting
N/A	Grant Carlisle	Environmental Enterprises (E2)
N/A	Paul Schlegel	American Farm Bureau Foundation
N/A	Michael Mittelholzer	National Association of Home Builders
N/A	Jeffrey Leiter	Bassman, Mitchell, Alfano & Leiter, representing the Independent Lubricant Manufacturers Association
N/A	Paul Schlegel	American Farm Bureau Foundation
N/A	Michael Mittelholzer	National Association of Home Builders
N/A	Paul Schlegel	American Farm Bureau Foundation
N/A	Fern Abrams	Association Connecting Electronics Industries
N/A	Danielle Cioce	Harris County Engineering Department
EPA-HQ-OA-2017-0190-0442	Jeff Sims	Truck Trailer Manufacturers Association

Consultant	1) New Source Review/PSD and permit streamlining, 2) Clean Power Plant regulation revisiting, 3) Dispersion modeling under CAA, 4) either CSAPR issues and Water rules	Air
Consultant	Support for Clean Power Plant regulations	Air
Industry group	Wetlands - Definition of Waters of the United States	Water
Industry group	Wetlands - Definition of Waters of the United States	Water
Industry group	Wetlands - Definition of Waters of the United States	Water
Industry group	Wetlands - prior converted croplands	Water
Industry group	Wetlands - permits	Water
Industry group	Wetlands - normal farming	Water
Industry group	Hazardous Waste Generator Improvements Rule	Waste
County	Water Regulations	Water
Industry group	Trailer manufacturing requirements	Air

OAR	Electric generating units
OAR	EPA
OW	farmers and ranchers
OW	Home builders
OW	Producers of automotive and metalworking lubricants
OW	farmers and ranchers
OW	Home builders
OW	farmers and ranchers
OLEM	printed circuit board and electronics manufacturing service companies
OW	Not Specific
OAR	Medium and heavy duty trucks

40 CFR 60, subpart UUUU (Clean Power Plan)	Believes the Clean Power Plant regulations need to be repealed.
40 CFR 60, subpart UUUU (Clean Power Plan)	Believes that the CPP or similar regulation should be enacted.
Clean Water Rule	Repeal the WOTUS rule and revisit the issue of jurisdiction.
Clean Water Rule	Define WOTUS more clearly.
Clean Water Rule	Revisit the WOTUS rule.
Clean Water Rule	Clarify the status of prior converted croplands.
Clean Water Rule	Facilitate states taking over CWA Section 404 programs.
Clean Water Rule	Respect the exemption in CWA Section 404(f) on normal farming activities.
Clean Water Rule	Revisit the consequences for violations of conditions for exemption as a very small generator.
Clean Water Rule	Regulation is not clear. Believes that ditches and channels along roadways should not be considered tributaries.
40 CFR 1037 (GHG Emissions from Heavy Duty Motor Vehicles)	Rescind the requirements for trailer manufacturers.

	Support
States that the CPP saves money and resources, reduces the effects of climate change, has health benefits and is supported by the majority of Americans.	Support
Supports the agency's review of the rule.	Support
Supports EPA's review of the WOTUS rule. The definition of WOTUS should be clarified. Required permits under CWA Section 404 are costly and time consuming to obtain. The average cost for a permit to dredge and fill a wetland under Section 404 is $270,000 and takes 850 days. Nationwide Permits, which streamline the process for certain activities, cost $30,000 and take an average of 313 days to obtain. These costs do not include fees for mitigation projects.	Support
The WOTUS rule would expand the number of facilities subject to SPCC regulations.	Support
Prior converted croplands are wetlands converted to agricultural lands before 1985. The preamble of the 1993 EPA and U.S. Army Corps of Engineers (Corps) rule states that once land has been converted to cropland, it is exempt from CWA Section 404, which protects wetlands. However, EPA has not followed this in practice, holding that such lands are only exempt as long as they remain farmland.	Support
Congress prefers states to regulate, instead of the federal government, and Section 404(g) allows for states to administer their own permit programs. However, only two states have been delegated the Section 404 program. EPA should continue the former administration's progress in examining barriers to states taking on the program.	Support
Although the CWA includes an exemption for "normal farming" activities, EPA continually promulgates regulations to restrain or restrict this exemption. EPA should not infringe on these exemptions given by Congress.	Support
The rule made it such that any violations of the conditions for exemption as a very small generator – even minor – would cause the facility to be treated at the same level as the largest generator.	Support
Without clarity may cause cost and time implications to infrastructure projects.	Support
Small businesses will incur substantial expenditures for parts inventory and for reconfiguring manufacturing plants and assembly lines to enable installation of the required devices.	Support

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April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

Docket

N/A	Paul Schlegel	American Farm Bureau Foundation
N/A	Jeffrey Leiter	Bassman, Mitchell, Alfano & Leiter, representing the Independent Lubricant Manufacturers Association
N/A	Jeffrey Leiter	Bassman, Mitchell, Alfano & Leiter, representing the Independent Lubricant Manufacturers Association
N/A	Marcia Kinter	Specialty Graphic Imaging Association, also representing the Graphic Arts Coalition
N/A	Michael Mittelholzer	National Association of Home Builders
N/A	Paul Schlegel	American Farm Bureau Foundation
N/A	James W. Conrad, Jr.	Conrad Law and Policy Counsel, representing the Society of Chemical Manufacturers and Affiliates
EPA-HQ-OA-2017-0178-0017	Tyrel Stevenson	Coeur d'Alene Tribe

Industry group	Spill Prevention, Control, and Countermeasure (SPCC) rule	Water
Industry group	Spill Prevention, Control, and Countermeasure (SPCC) rule	Water
Industry group	Spill Prevention, Control, and Countermeasure (SPCC) rule	Water
Industry group	Spill Prevention, Control, and Countermeasure (SPCC) rule	Water
Industry group	Wetlands - Construction General Permits	Water
Industry group	Agricultural Worker Protection Standard (pesticides)	Chemicals and Toxics
Industry group	Hazardous Waste Generator Improvements Rule	Waste
Tribe	Environmental Site Assessments	Air

OLEM	farmers and ranchers
OLEM	Producers of automotive and metalworking lubricants
OLEM	Producers of automotive and metalworking lubricants
OLEM	screen and digital printers
OW	Home builders
OCSPP	farmers and ranchers
OLEM	Specialty chemicals
OAR	Landowners

40 CFR 112 (SPCC)	Give farms greater flexibility under the SPCC rule.
40 CFR 112 (SPCC)	Reconsider the need to expand the SPCC program beyond oil to other non-water substances.
40 CFR 112 (SPCC)	Relax rules for periodic integrity testing of tanks.
40 CFR 112 (SPCC)	Revise the definition of "oil" and its interpretation.
40 CFR 122 (NPDES)	Allow compliance with stormwater pollution prevention plan requirements by using a template for projects within a subdivision.
40 CFR 170 (Worker Protection Standard)	Revisit the provisions in the Agricultural Worker Protection Standard requiring farmers to surrender proprietary records.
40 CFR 260-265, 268, 270, and 279 (Hazardous Waste Regulations)	Revisit the distinction between waste generators and storage facilities, in terms of small generators.
40 CFR 312 (Superfund Innocent Landowners Standards for Conducting Inquiries)	Recommends extending the expiration period for Environmental Site Assessments (ESA) in the interest of streamlining the fee-to-trust process.

EPA has discretion to determine the threshold for farms under the SPCC rule and has chosen to take the strictest interpretation for farms. Farms have never posed an issue in this area and as such should have greater flexibility.	Support
EPA's SPCC program is burdensome. EPA is under a requirement from a court settlement to expand the program beyond oil to other substances, besides water, stored in a tank. Tank farms store many such substances and would face costs of more than $100 million as a result. Requests that EPA reopen the matter with the court.	Support
SPCC requires periodic integrity testing of tanks. This requires hiring specialized contractors at a high cost per tank. These requirements could be relaxed in cases where issues with spills have not occurred. The rule allows facilities the flexibility to determine the qualifications of the personnel performing the tests and inspections, and the frequency and type of testing and inspections, but EPA inspectors do not always recognize such equivalency	Support
The SPCC program requirements for products that are "oil" should not be extended to "oil in any product." Instead, products that are not oil are regulated as such. For example, inks that contain oil but have the consistency of peanut butter, and as such do not spread, require spill control measures to be taken, although they are not needed.	Support
If a state administers Section 402 programs, then the same parcel of land is regulated twice. The requirements for a Stormwater Pollution Prevention Plan apply to both the major developer and also to those working on individual lots. Compliance costs could be reduced if builders within a subdivision use a voluntary compliance template that NAHB worked on with EPA ("Small Residential Lot Stormwater Pollution Prevention Plan Template"). EPA should move beyond considering such a tool as guidance only so that it can count for compliance	Support
Under the standard, farmers are obligated to surrender proprietary records to a third party. The third party would have the ability to disseminate these proprietary records. They could be used, for example, to organize protests of a farm using a registered pesticide.	Support
EPA equates waste generators and storage facilities and therefore does not make small generators exempt from requirements as they are intended to be.	Support
The 25 C.F.R. 151 regulations governing the acquisition of properties in trust for tribes or individuals require an ESA and the current 180 day expiration date in 40 CFR 312 is often unreasonably short for the fee-to-trust process.	Support

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April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 20 Webinar

April 20 Webinar

April 25 Public Meeting

April 20 Webinar

April 20 Webinar

April 20 Webinar

N/A		Fern Abrams	Association Connecting Electronics Industries
N/A		Fern Abrams	Association Connecting Electronics Industries
N/A		Jennifer Gibson	National Association of Chemical Distributors
N/A		Nick Goldstein	American Road and Transportation Building Association (ARTBA)
	N/A	Stephen Pavel	Public comment
	N/A	Heidi McAuliffe	American Coatings Association
N/A		Steven Smith	Hoosier Energy
	N/A	Heidi McAuliffe	American Coatings Association
	N/A	Heidi McAuliffe	American Coatings Association
	N/A	Tony Pendola	NC DEQ

Industry group	TRI reporting	Chemicals and Toxics
Industry group	TRI reporting	Chemicals and Toxics
Industry group	TRI reporting	Air
Industry group	Clean Air Act Reforms (NAAQS and Transportation Conformity)	Air
General public	National Ambient Air Quality Standards	Air
Industry group	Ozone standards	Air
Industry	Regional Haze	Air
Industry group	Aerosol coating regulations	Air
Industry group	Aerosol coating regulations	Air
State	NSPS Petroleum Drycleaning	Air

OCSPP	printed circuit board and electronics manufacturing service companies
OCSPP	printed circuit board and electronics manufacturing service companies
OAR	Chemical manufacturers
OAR	Transportation
OAR	Not Specific
OAR	Coatings Manufacturing Industry
OAR	All
OAR	Coatings Manufacturing Industry
OAR	Coatings Manufacturing Industry
OAR	Drycleaning

40 CFR 372 (TRI)	Raise the small business exemption.
40 CFR 372 (TRI)	Reconsider the lowered threshold for lead reporting and use the Metals Assessment Framework.
40 CFR 372 (TRI)	Chemical distributors should be distinguished from chemical producers.
40 CFR 50 (NAAQS)	The constant review and revision of NAAQS, and the subsequent development of new implementation plan requirements, is harmful to the transportation sector.
40 CFR 50 (NAAQS)	Strengthen NAAQS by reducing standards to common ground pre-air pollution standards, applying standards to emission source and not average area and eliminating time averaging.
40 CFR 50 (NAAQS)	Recommends going back to the 2008 ozone standard of 0.075 ppm. Also recommends reviewing this standard every 10 years.
40 CFR 51 subpart P (Regional Haze)	Authority should reside in the States.
40 CFR 59, subpart E (VOC Standards for Consumer and Commercial Products)	Update the reactivity factors used for the product weighted reactivity limits.
40 CFR 59, subpart E (VOC Standards for Consumer and Commercial Products)	Eliminate the formulation report required to be submitted by the manufacturers every 3 years.
40 CFR 60, subpart JJJ (Petroleum Dry Cleaner NSPS)	Add definition in rule that states that dry-to-dry machines are not affected sources under the NSPS.

TRI requirements include an exemption for small businesses, but these are defined as entities with 10 employees or fewer; this is too small to represent the size of a small manufacturer. EPA should consider revising the definition to take into account the characteristics of a small manufacturer.	Support
EPA lowered the TRI reporting threshold for lead based on EPA's classification of lead as a persistent bioaccumulative toxic (PBT) metal. As a result, the reporting burden increased greatly and more facilities now have to report although they have few releases. The PBT methodology is more appropriate for organic compounds and should not be used to evaluate metals. EPA should reconsider the lowered threshold and look to the Metals Assessment Framework for evaluating lead, not one intended for organic chemicals.	Support
Under the TRI program, EPA treats chemical distributors just like chemical producers, although there are significant differences in the amount of releases. The distributors reported 0.004% of the chemical manufacturers releases. These facilities should be exempt from TRI reporting.	Support
Notes that federal highway funds are tied to attainment status and the constantly changing landscape means states and cities are reluctant to plan long term transportation projects due to the uncertainty of future federal funding. Recommends that the EPA take into account the air quality improvements that have occurred and that continue to occur from one NAAQS change before lowering a NAAQS again.	Support
Commenter provided a number of infant mortality, cardiac arrest, and other health statistics that have been reduced as a result of the NAAQS.	Maintain
States that the new ozone standard of 0.070 ppm is forcing more areas into non-attainment, causing states to revise their SIPs and VOC standards and increasing costs to facilities.	Support
The Regional Haze authority should reside with the States, rather than EPA's approach of forcing States to implement the federal guidance, and the 2028 compliance cycle should be extended by 3 years.	Support
Reactivity factors should be based on the latest science.	Support
This report is unnecessary and is a burden to manufacturers. Information provided on aerosol cans or can be provided to EPA through a notice.	Support
EPA Region 4 made an applicability determination that dry-to-dry machines do not meet the definition of dry cleaning systems under the NSPS, but this determination is only in a letter and not included in the rule. Because of new technology and practices in the industry, the commenter suggests that this rule may not be necessary.	Support

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General Opposition

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Docket

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

EPA-HQ-OA-2017-0190-4942	Anonymous public comment	Regulator
N/A	James W. Conrad, Jr.	Conrad Law and Policy Counsel, representing the Society of Chemical Manufacturers and Affiliates
N/A	James W. Conrad, Jr.	Conrad Law and Policy Counsel, representing the Society of Chemical Manufacturers and Affiliates
N/A	Jennifer Gibson	National Association of Chemical Distributors
N/A	Martha Marrapese	Wiley Rein LLP, representing the Nanomanufacturing Association
N/A	Martha Marrapese	Wiley Rein LLP, representing the Nanomanufacturing Association
N/A	Martha Marrapese	Wiley Rein LLP, representing the Nanomanufacturing Association
N/A	Martha Marrapese	Wiley Rein LLP, representing the Nanomanufacturing Association

State	Asbestos removal issues	Air
Industry group	Chemical Manufacturing Area Sources (CMAS) final rule	Air
Industry group	Chemical Manufacturing Area Sources (CMAS) final rule	Air
Industry group	RMP	Air
Industry group	Reporting new nanoscale materials	Chemicals and Toxics
Industry group	Reporting new nanoscale materials	Chemicals and Toxics
Industry group	Reporting new nanoscale materials	Chemicals and Toxics
Industry group	Reporting new nanoscale materials	Chemicals and Toxics

OCSPP	Asbestos
OAR	Specialty chemicals
OAR	Specialty chemicals
OAR	All
OCSPP	Nanomanufacturers
OCSPP	Nanomanufacturers
OCSPP	Nanomanufacturers
OCSPP	Nanomanufacturers

40 CFR 61, subpart M (Asbestos Emission Standard)	The EPA is presently regulating all asbestos mineral alike, however there is research showing that only one of the three major asbestos minerals is a significant health risk. Recommends that the EPA be required to perform an open-minded review of the toxicological data.
40 CFR 63, subpart VVVVVV (CMAS Area Sources)	Area sources must obtain Title V operating permits under certain conditions
40 CFR 63, subpart VVVVVV (CMAS Area Sources)	Exemption from the rule for research and development facilities should extend to companies that do research and development for others.
40 CFR 68 (Chemical Accident Prevention Provisions)	RMP amendments provide no environmental benefit.
Toxic Substances Control Act (TSCA)	Clarify in the rule itself that a company can go to market as soon as the new chemical information is submitted.
Toxic Substances Control Act (TSCA)	Raise the small business exemption.
Toxic Substances Control Act (TSCA)	Put out guidance before the effective date of the rule, or change the effective date.
Toxic Substances Control Act (TSCA)	Treat nanomaterials as existing substances rather than new materials.

The EPA continues to require costly remedial measures for demolition of old buildings requiring all asbestos be treated alike.	Support
Specialty chemical manufacturers are area sources, not major sources. CMAS would normally be except from needing a Title V permit, except the final rule requires that area sources that have a control advice necessary to maintain their emissions at area source levels still need a Title V permit.	Support
No further information provided.	Support
EPA's recent amendments to the RMP are a clear example of regulatory overreach. These changes will add significant burden without improving safety in any way. The RMP program was already robust and effective. Many of these changes were in response to the fertilizer plant explosion in West Texas. However, if these new rules were in place and the facility in full compliance, the explosion would still have occurred.	Support
The rule goes well beyond reporting requirements per TSCA section 8(a). Companies with existing materials have 1 year to report, but those with new material have to file lengthy forms at least 135 days in advance of commercialization, without a sunset period.	Support
The preamble indicates that a company can go to market as soon as this information is submitted, but the rule does not state this. Even the most hazardous chemicals do not have this requirement.	
The rule poses a hidden cost on small businesses. Although small manufacturers or processors are exempted from reporting, the rule defines "small" as a company that has sales of less than $11 million per year. While this threshold was raised from the draft rule, in this industry a small business has annual revenues closer to $22 million.	Support
The reports call for a lot of new information, and there is a lot of uncertainty about how to interpret the rule. However, EPA will not issue guidance until after the effective date of the rule (May 12, 2017). Although proposed in 2011, the rule only came out in final form after TSCA reauthorization.	Support
No further information provided.	Support

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April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

Docket

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 20 Webinar

N/A	James W. Conrad, Jr.	Conrad Law and Policy Counsel, representing the Society of Chemical Manufacturers and Affiliates
N/A	Michael Mittelholzer	National Association of Home Builders
N/A	Michael Mittelholzer	National Association of Home Builders
EPA-HQ-OA-2017-0190-4753	Anonymous public comment	Anonymous public comment
N/A	LeAnn Johnson	Perkins Coie LLP, representing a coalition of small refinery owners
N/A	LeAnn Johnson	Perkins Coie LLP, representing a coalition of small refinery owners
N/A	Brian Pope	CountryMark
N/A	Tony Pendola	NC DEQ

Industry group	Reporting new nanoscale materials	Chemicals and Toxics
Industry group	Lead Renovation, Repair, and Painting Rule	Lead
Industry group	Lead Renovation, Repair, and Painting Rule	Lead
General public	Issue with EPA lead renovation, repair and painting rule	Lead
Industry group	Renewable Fuel Standard	Air
Industry group	Renewable Fuel Standard	Air
Industry	Fence Line Monitoring and Tier III Gasoline Standards	Air
State	Summer gasoline volatility requirements	Air

OCSPP	Specialty chemicals
OCSPP	Home builders
OCSPP	Home builders
OCSPP	Renovation contractors
OAR	Small refineries
OAR	Small refineries
OAR	Refineries
OAR	States

Toxic Substances Control Act (TSCA)	Do not require reporting of new nanosize products.
40 CFR 745 (Lead Renovation, Repair and Painting Rule)	Ensure that there is a reliable test kit.
40 CFR 745 (Lead Renovation, Repair and Painting Rule)	Tailor the rule to homes with the highest risk.
40 CFR 745 (Lead Renovation, Repair and Painting Rule)	EPA lead rules place the full burden and liability on the contractor in charge, which makes the small business vulnerable to liability.
40 CFR 80 (Regulation of Fuels and Fuel Additives)	Change the definitions of "obligated party" and "renewable fuel blender" to stop the unfair practice of selling Renewable Identification Numbers (RINs).
40 CFR 80 (Regulation of Fuels and Fuel Additives)	Rescind the 2014 addendum that changed the method of scoring for the hardship exemption for small refineries.
40 CFR 80 (Regulation of Fuels and Fuel Additives)	Tier 3 standards are biased against small refiners.
40 CFR 80.27 (Summertime Fuel Standards)	Eliminate the summertime commercial gasoline volatility requirements.

The new rule calls for the reporting of new nanoscale materials, although this is not required by statute. EPA already has a backlog of new chemical submissions; a voluntary rule is beyond EPA's resources. The need for this reporting discourages innovation and encourages the use of existing chemicals. Not requiring reporting of new nanosize products would not diminish protection for environment and health.	Support
EPA recognizes three lead test kits (two available nationwide) for use in identifying whether lead is present in a home for the purpose of complying with the rule. The EPA-recognized lead test kits are unreliable. They have false positives about two-thirds of the time, so homes where there is no lead paint or where lead is at very low levels are having to apply the rule.	Support
EPA should review the cost-benefit analysis of this rule and review its applicability to ensure that it is tailored to those homes with the highest risk (i.e., those constructed before 1960).	Support
Notes that it is expensive to obtain general liability insurance policy which covers the business for lead.	Support
Small refineries cannot blend enough renewable fuel into their finished products and therefore must purchase credits (RINs), which are open for anyone to purchase. Large refineries sell RINs to small refineries and are profiting from them while thwarting the purposes of the program. Refineries that do not have to blend do so in order to sell RINs, driving up their prices. This harms small business and does not serve the regulatory intent. RINs represent one of the highest costs of small refineries.	Support
Small refineries can receive a hardship exemption, and many small refineries did so in the first years of the rule. However, an EPA and U.S. Department of Energy addendum issued in May 2014 (the "midnight addendum") changed the scoring to qualify for this exemption. This change makes it nearly impossible for a small refinery to receive the exemption unless almost bankrupt. Large refineries are now buying the smaller ones.	Support
	Support
Believes that the removal of this requirements saves the public money and reduces the extra emissions from refining to meet these volatility requirements.	Support

Existing

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April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 20 Webinar

Docket

Docket

April 20 Webinar

April 20 Webinar

Docket

April 20 Webinar

N/A	Martha Roberts	Environmental Defense Fund
N/A	Paul Schlegel	American Farm Bureau Foundation
N/A	Brian Pope	CountryMark
N/A	Tony Pendola	NC DEQ
EPA-HQ-OA-2017-0190-4253	Anonymous public comment	Anonymous public comment
EPA-HQ-OA-2017-0190-4942	Anonymous public comment	Regulator
N/A	Danielle Cioce	Harris County Engineering Department
N/A	Laura Rectenwald	Titanium Environmental Services
EPA-HQ-OA-2017-0190-4423	Anonymous public comment	Anonymous public comment
N/A	Laura Rectenwald	Titanium Environmental Services

Environmental group	Federal Clean Car standards	Air
Industry group	Wetlands - delineation manuals	Water
Industry	Fence Line Monitoring and Tier III Gasoline Standards	Air
State	NESHAP Paint Stripping and Miscellaneous Surface Coatings (Autobody Rule)	Air
General public	Applicability threshold for boiler area source NESHAP	Air
State	Waste at Superfund sites	Air
County	Water Regulations	Water
Consultant	Stormwater regulation recommendations	Water
General public	Stormwater regulation recommendations	Water
Consultant	Overlap/redundancy between the EPA Title V Permit and the TCEQ NSR Permit	Air

OAR	Automobile industry
OW	farmers and ranchers
OAR	Refineries
OAR	Surface Coating
OAR	Area source boilers
OLEM	Not Specific
OW	Not Specific
OW	General Permit for Stormwater Discharge with Industrial Activities
OW	General Permit for Stormwater Discharge with Industrial Activities
OAR	Redundancy between Title V and NSR Permitting

40 CFR 85, 86, and 600 (Mobile Source Standards)	Retain federal clean car standards.
40 CFR Part 232; 1987 U.S. Army Corps of Engineers Wetland Delineation Manual, with 10 regional supplements	Clarify use of a consistent manual for wetlands delineation that is put through the rulemaking process.
40 CFR part 63, subpart CC (Refinery MACT)	Fenceline monitoring is burdensome on small businesses.
40 CFR part 63, subpart HHHHHH (Paint Stripping and Surface Coating Area Source NESHAP)	Requests change to the applicability requirements for this rule.
40 CFR part 63, subpart JJJJJ (Boiler Area Source NESHAP)	Applicability threshold in area source boiler NESHAP is too low (10 MMBtu/hr) and should be raised to 30 MMBtu/hr. Notes that the primary sources impacted by this regulation include small businesses, high schools, middle schools, and hospitals.
EPA Superfund program - General	Believes that the EPA Superfund program is incredibly wasteful and is incredibly slow in making decisions, by delaying the implementation of remedial measures until multiple layers of review and comment are completed.
40 CFR 122 (NPDES)	Supports continued use of best management practices (BMP) in lieu of numeric limits for stormwater quality municipal separate storm sewer system (MS4) permits.
40 CFR 122 (NPDES)	Eliminate quarterly stormwater monitoring for facilities that are less than 25 acres and employ best management practices (BMP).
40 CFR 122 (NPDES)	Eliminate quarterly stormwater monitoring for facilities that are less than 25 acres and employ best management practices (BMP).
None specified	Eliminate or reduce burden of public notice.

These programs, including greenhouse gas reduction and fuel efficiency standards, reduce consumer spending fuel. The U.S. automobile industry has returned to profitability even as environmental standards were strengthened.	Maintain
EPA states that the 1987 Corps wetlands delineation manual should be used. The manual includes three criteria that must be present to find an area a wetland (based on vegetation, soils and hydrology). In practice, regional delineation manuals that do not necessarily include all three criteria are used.	Support
The cost of fenceline monitoring for small businesses relative to their operating budget is much higher than large refineries. Possible compliance issues because there are not enough laboratories in the country to process all the samples that will be generated by this program. Believes the provisions in the fenceline monitoring program for less frequent sampling needs to less than 8 years. Concerned about public access to the data.	Support
Rule assumes all facilities are affected sources until they complete Petition of Exemption. Old rule limits Cd, Pb, Mn, Ni, and Cr, however paint manufacturers no longer use these metals in their products. Burdensome for facilities to complete exemption petition for rule that does not apply to them.	Support
States that the staff at those facilities generally have no experience interpreting regulations or are unaware they are responsible for complying with new federal regulations. The burden for informing these small businesses and institutions of this requirement falls upon the State and Local agencies that are already understaffed and overburdened.	Support
For example, at Durham Meadows over a million dollars was spent to remove lead that exceeded criteria, even though it was related to native minerals and not releases at the metal working facility. Believes that the site was not a significant risk to health since public water was extended as the final solution and that public exposure to the soils could have been much more cost effectively achieved by capping.	Support
BMPs are a cost effective approach to maintaining water quality in communities. Effluent limitations are burdensome and increase costs to communities.	Support
Quarterly stormwater monitoring is a burden for small businesses. Small businesses that have implemented BMPs do not have violations and therefore should not be required to perform the quarterly stormwater monitoring.	Support
Quarterly stormwater monitoring is a burden for small businesses. Small businesses that have implemented BMPs do not have violations and therefore should not be required to perform the quarterly stormwater monitoring.	Support
Unnecessary costs to take out public notice in newspapers and signage at the facility.	Support

General Opposition

Existing

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Docket

April 25 Public Meeting

Docket

April 25 Public Meeting

April 20 Webinar

Docket

April 25 Public Meeting

April 25 Public Meeting

Docket

Docket

Docket

EPA-HQ-OA-2017-0190-0226	Jed Anderson	Environmental Attorney with the AL Law Group and an Adjunct Professor of Law at the University of Houston Law School
N/A	Samantha McDonald	Independent Petroleum Association of America (IPAA)
EPA-HQ-OA-2017-0190-4942	Anonymous public comment	Regulator
N/A	Theresa Pugh	Theresa Pugh Consulting
N/A	Danielle Cioce	Harris County Engineering Department
EPA-HQ-OA-2017-0190-4942	Anonymous public comment	Regulator
N/A	Nick Goldstein	American Road and Transportation Building Association (ARTBA)
N/A	Jeffrey Leiter	Bassman, Mitchell, Alfano & Leiter, representing the Independent Lubricant Manufacturers Association
EPA-HQ-OA-2017-0190-3315	Anonymous public comment	Anonymous public comment
EPA-HQ-OA-2017-0190-1309	Anonymous public comment	Anonymous public comment
EPA-HQ-OA-2017-0190-4326	Frank Gaudet, PE	Regulatory Compliance Services, Inc.

General public	Reforms to the CAA	Air
Industry group	Independent oil and natural gas production	Water
State	RCRA issues for small businesses	Air
Consultant	1) New Source Review/PSD and permit streamlining, 2) Clean Power Plant regulation revisiting, 3) Dispersion modeling under CAA, 4) either CSAPR issues and Water rules	Air
County	Water Regulations	Water
State	Inflexibility of TCSA	Air
Industry group	Clean Air Act Reforms (NAAQS and Transportation Conformity)	Air
Industry group	Chlorinated paraffin review	Chemicals and Toxics
General public	General small business comment	All
General public	Support for reduced EPA regulations	All
Consultant	Update existing regulations	All

OAR	Not Specific
OW	Oil and gas industry
OCSPP	Not Specific
All	Not Specific
OW	States
OCSPP	Remodelers
OAR	Transportation
OPPT	Producers of automotive and metalworking lubricants
All	Not Specific
All	Not Specific
All	Not Specific

None specified	Provided a proposal that reduces regulations by approximately 75% and provides considerations for small businesses while improving air quality.
Oil and Gas effluent guidelines (ELGs)	ELGs target unconventional formations, but do not exclude conventional formations that had been developed for decades and are largely operated by small businesses.
Resource Conservation and Recovery Act (RCRA)	Believes that the RCRA Corrective Action program is more concerned about "bean counting" than environmental protection. States that regulatory staff regularly apply pressure on small business to change their fiscal priorities in order to quickly address low risk items to meet agency goals and to document the program's "success".
SBREFA Process	The EPA needs to be more attentive to the SBREFA process
Texas Water Code	Supports the incorporation of nutrient data with bacteria total maximum daily load (TMDL).
Toxic Substances Control Act (TSCA)	Believes that TSCA regulations (most notably for PCBs) are inflexible in comparison to other EPA programs.
40 CFR Part 51 (Transportation Conformity regulations)	Long term solutions should be developed rather than the current "stop-gap" approach
Toxic Substances Control Act (TSCA)	Do not ban mid- and long-chain chlorinated paraffins.
None specified	Some small businesses are restricted by EPA regulations, which affects their revenue and increases their expenses
None specified	Opposes the power that the EPA has over small businesses
None specified	Believes that many regulations need updating. Notes that many of these regulations have not been reviewed since they were originally promulgated and contain rules that are awkward, outdated or reflect old technology.

The proposal could be accomplished via reforms to the Clean Air Act or potentially by consolidating statutory programs via a regulation or Executive Order that creates an alternative means of compliance approach consolidating compliance with the programs.	Support
ELGs include pretreatment standards that apply to onshore unconventional oil and gas extraction facilities that discharge to POTWs. These ELGs prohibit discharges to POTWs from oil and natural gas facilities and deny the use of environmentally acceptable options such as underground injection or recycling.	Support
The sites covered by RCRA are only a few percent of the total number of sites needing attention, and frequently present very low risk to human health and the environment, but they become a higher priority than other sites because they are tracked on a specific federal database which is reported annually to Congress.	Support
Cited several examples where the EPA just "checked the box" and it was clear did not value any of the input from small businesses (CPP, RMP, utility MACT).	Support
Relationship between nutrient data and bacteria not included in current regulations. Regulations should be based on complete science for benefit of taxpayers.	Support
States that trace levels of PCBs in window caulk, widely used in the 1950s and 1960s, must be removed regardless of whether it poses a risk. This removal is creating havoc on local school budgets for any building undergoing renovation.	Support
The transportation conformity process is not really following the requirements of the CAA and has lost the focus on any aspect that affects air quality.	Support
EPA has indicated that it was considering banning mid- and long-chain chlorinated paraffins, which would result in a cost of more than $70 for manufacturers and their customers to reformulate their metalworking fluids.	Support
Some companies rely on income from natural resources, which may include the destruction of the environment.	Support
	Support
As an example, the RCRA regulatory definition for the term, "Solid Waste", includes liquid and gas. Recommends changing the term to "Waste".	Support

Process

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General Support

General Support

General Support

Docket

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

EPA-HQ-OA-2017-0190-5410	Anonymous public comment	Anonymous public comment
N/A	Theresa Pugh	Theresa Pugh Consulting
N/A	Steven Smith	Hoosier Energy
N/A	Jennifer Gibson	National Association of Chemical Distributors
N/A	Samantha McDonald	Independent Petroleum Association of America (IPAA)
N/A	Steven Smith	Hoosier Energy
N/A	Martha Roberts	Environmental Defense Fund
N/A	Martha Roberts	Environmental Defense Fund
N/A	Etta Albright	Private citizen
N/A	Etta Albright	Private citizen
N/A	Etta Albright	Private citizen
N/A	Claudia Crane	Private citizen

General public	Support for EPA regulations	All
Consultant	1) New Source Review/PSD and permit streamlining, 2) Clean Power Plant regulation revisiting, 3) Dispersion modeling under CAA, 4) either CSAPR issues and Water rules	Air
Industry	PSD/NSR Permitting	Air
Industry group	General Duty Clause	Air
Industry group	Independent oil and natural gas production	Air
Industry	MATS	Air
Environmental group	Chemical safety	Chemicals and Toxics
Environmental group	General environmental protection	All
General public	General environmental protection	All
General public	General environmental protection	All
General public	General environmental protection	All
General public	General environmental protection	All

All	Not Specific
OAR	Not Specific
OAR	Not Specific
OAR	All
Oar	Oil and gas industry
OAR	Utilities
OPPT	Chemical manufacturers
All	Not Specific
All	Not Specific
All	Not Specific
All	Not Specific
All	Not Specific

None specified	Encourages streamlining compliance with existing and new regulations for small businesses.
40 CFR 51 Subpart I (NSR/PSD)	Recommends that the NSR/PSD guidance be repealed.
40 CFR 51 Subpart I (NSR/PSD)	PSD program should focus on major changes only.
CAA Section 112(r)(1) (General Duty Clause)	Clear guidance/criteria needed for General Duty clause.
Oil and Gas Control Techniques Guidelines (CTG)	CTG does not recognize the impacts on small operators with low producing wells.
40 CFR 63 subpart UUUUU (Mercury Air Toxics Rule)	Many stranded costs due to MATS rule.
Toxic Substances Control Act (TSCA)	Rollbacks of chemical safety regulations would harm public trust of EPA.
None specified	Economic growth and environmental protection are not at odds.
None specified	Environmental regulations can spur innovation.
None specified	Environmental degradation is not a necessary side effect of jobs.
None specified	EPA needs to remain a trusted agency.
None specified	Markets respond positively to environmental protection.

	Support
Indicated that EPA should return to "Prior Guidance". Other countries encourage modifications that improve performance. Believes that the current program discourages industry to perform upgrades to their processes, even if the result is a net environmental benefit.	Support
More and more, regulators are requiring that facilities undergo the full PSD process for small minor and routine changes that do not result in significant increases (maybe no increase) of emissions	Support
It is a common practice for enforcement actions to issue penalties related to this clause, but without clear requirements it is very difficult to avoid these penalties.	Support
CTG applies to existing sources in ozone nonattainment areas. Recommends that the CTG be suspended or withdrawn and that a thorough assessment of the impacts on small businesses be made.	Support
They have spent $250,000 complying with the MATS rule, plus they closed one of their two coal fired plants primarily due to the costs of complying with the MATS rules.	Support
The Lautenberg Act reforming TSCA requires EPA to review the safety of new and existing chemicals and makes more information about chemicals available by limiting companies' ability to claim information as confidential.	Maintain
To implement the law, EPA needs to remain a credible regulatory agency. Industry seeks to tie EPA's hands in its ability to obtain information on chemicals, which undermines public trust.	
Removal of environmental and health safeguards would result in more pollution, early death, more asthma attacks, and missed school and work. EPA should strengthen regulatory safeguards, not roll them back.	
Environmental protection is supported by the public. It helps save lives and avoid illness, and it creates opportunities for economic savings and growth.	Maintain
Robust economic growth has accompanied environmental protection in the United States.	
Rather than roll back regulation, EPA should look at further opportunities to protect public health and spur innovation, recognizing the environmental side effects of modern conveniences.	Maintain
Those who would roll back EPA should remember the environmental problems that led to the enactment of environmental laws.	Maintain
EPA should not deny climate change and deny science.	
EPA needs to restore trust, truth, and transparency in the process of government.	Maintain
Market demand is driving the country towards renewable energy regardless of any rollback in regulations.	
Climate change impacts business, for example in terms of flooding. Many large corporations, as well as the public, are still committed to recognizing climate change.	Maintain

General Support

Guidance

Guidance

Guidance

Guidance

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General Opposition

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General Opposition

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

Docket

Docket

Docket

Docket

Docket

N/A	Ivy Main	Sierra Club volunteer and Renewable Energy Chair
N/A	Ivy Main	Sierra Club volunteer and Renewable Energy Chair
N/A	Sara Sass	Private citizen
EPA-HQ-OA-2017-0190-1667	Anonymous public comment	Anonymous public comment
EPA-HQ-OA-2017-0190-2412	Anonymous public comment	Anonymous public comment
EPA-HQ-OA-2017-0190-1776	Tim Herman	Whitehouse, OH
EPA-HQ-OA-2017-0190-4223	Anonymous public comment	Anonymous public comment
EPA-HQ-OA-2017-0190-4236	Anonymous public comment	Anonymous public comment

Environmental group	General environmental protection	All
Environmental group	General environmental protection	All
General public	Clean Water Act	Water
General public	Support for EPA environmental programs	All
General public	Support for EPA environmental programs	All
General public	Support for EPA environmental programs	All
General public	Support for EPA regulations	All
General public	Support for EPA regulations	All

All	Solar and wind businesses
All	Solar and wind businesses
OW	Not Specific
All	Not Specific
All	Not Specific
All	Not Specific
All	Not Specific
All	Not Specific

None specified	EPA should not set aside public health, and its responsibility to the public, to help businesses, whether large or small.
None specified	New businesses in the renewable energy field will be hurt by regulatory rollbacks.
None specified	Consider costs to small businesses from reduced environmental protection, not just costs from regulation.
None specified	Also supports the Clean Air Act, Clean Water Act, Safe Drinking Water Act (SDWA), Safe Drinking Water Act Compliance Assistance and Monitoring, National Pollutant Discharge Elimination System (NPDES) , Endangered Species Act (ESA), Municipal Solid Waste Landfill Air Pollution Standards, Resource Conservation and Recovery Act (RCRA) Corrective Action, Ozone Layer Protection Regulatory Programs, Comprehensive Environmental Response, Compensation and Liability Act of 1980, BEACH Act, Hazardous Waste Act, and Hazardous Waste Compliance Monitoring.
None specified	Repealing environmental regulations will lead to greater costs and burden on local communities, small businesses, and the middle-class
None specified	Opposes a rollback of environmental regulations in the name of "job growth"
None specified	Without regulations, there will be 50 different regulations and standards, which will cause confusion and difficulties for small businesses, corporations or citizens to comply.
None specified	EPA regulations and reforms are necessary and provide benefits to the American people that outweigh any perceived or potential burdens.

American ingenuity will always find a way to comply with regulations without losing businesses. The United States has become the world's largest economy while also protecting the environment.	Maintain
New businesses are now involved with renewable energy and will be affected by changes to environmental regulations that lessen protections aimed at traditional energy companies.	Maintain
Small businesses along rivers, such as those in recreation and tourism, depend on the health of the rivers for their business. EPA needs to consider not only the needs of "industry" small businesses but also those of small businesses dependent on a clean environment in determining the potential impacts of regulations and any repeal or lessening of their protections. These small businesses are impacted by the pollutants that large and small industries have emitted into the rivers. Cost may be an excuse for small businesses not to comply with a rule, but the cost can be greater if they do not comply. Spills of toxic chemicals result in both health risks and costs.	Maintain
Need to prioritize the health of the U.S. people over business development.	Maintain
If regulations are repealed, industries will be allowed to pollute our air, soil, and water which will lead to greater risk of illness and disease. Also, the cost of cleaning up polluted resources will ultimately fall on communities and local municipalities.	Maintain
Environmental regulations create new and diverse employment opportunities and a niche for small businesses to establish themselves and grow. These jobs diversify the workforce and are much more resilient than the low level positions for large corporations.	Maintain
When there were no EPA regulations, there were polluted rivers, acid rain and a hole in the ozone layer.	Maintain
Reducing regulations would impair our health via decreased water and air quality and through global warming which are already costing us billions from unpredictable weather patterns and natural disasters.	Maintain

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General Opposition

Docket

Docket

Docket

Docket

Docket

Docket

Docket

Docket

Docket

Docket

April 25 Public Meeting

April 20 Webinar

EPA-HQ-OA-2017-0190-4585	Anonymous public comment	Anonymous public comment
EPA-HQ-OA-2017-0190-4610	Anonymous public comment	Anonymous public comment
EPA-HQ-OA-2017-0190-4726	Anonymous public comment	Anonymous public comment
EPA-HQ-OA-2017-0178-0012	Anonymous public comment	Anonymous public comment
EPA-HQ-OA-2017-0190-1098 & -1099	Anonymous public comment	Anonymous public comment
EPA-HQ-OA-2017-0190-1683	Alan Lowenthal	Public comment
EPA-HQ-OA-2017-0190-5410	Anonymous public comment	Anonymous public comment
EPA-HQ-OA-2017-0190-5678	Anonymous public comment	Anonymous public comment
EPA-HQ-OA-2017-0190-1667	Anonymous public comment	Anonymous public comment
EPA-HQ-OA-2017-0190-1446	Anonymous public comment	Anonymous public comment
N/A	Martha Roberts	Environmental Defense Fund
N/A	Heidi McAuliffe	American Coatings Association

General public	Support for EPA regulations	All
General public	Support for EPA regulations	All
General public	Support for EPA regulations	All
General public	Support for EPA small minority business assistance	All
General public	Support for the EPA	All
General public	Support for the EPA	All
General public	Support for EPA regulations	All
General public	Support for small renewable energy businesses	Air
General public	Support for EPA environmental programs	Water
General public	Support for EPA water regulations	Water
Environmental group	Clean energy programs	Air
Industry group	Reducing coating regulations burden	Air

All	Not Specific
All	Not Specific
All	Not Specific
All	Not Specific
All	Not Specific
All	Not Specific
All	Not Specific
OAR	Not Specific
OW	Oil and gas industry
OW	Not Specific
OAR	Energy industry
OAR	Coatings Manufacturing Industry

None specified	Small business owner who believes that it is their responsibility to strive to have as little negative impact as possible on employees, customers, community, supply chain, and our world.
None specified	Small business owner who has not found federal environmental laws and regulations to be onerous or taxing.
None specified	Supports the EPA to protect the environment, and thus the health of America.
None specified	Supports a number of EPA programs including the small minority business assistance program
None specified	Opposes any rollback of EPA regulations and believes that the EPA should be fully funded and supported.
None specified	Believes that the EPA regulations have a direct positive impact on citizens and no real effect on business.
None specified	Urges the Regulatory Reform Task Force to consider whether existing rules are strict enough given advances in the science of each of the regulated pollutants. The commenter notes that in many cases, the human, animal or environmental health risks begin at much lower exposure levels than currently mandated limits.
None specified	Regulate clean air, regulate clean water, tax fossil fuel companies, support small renewable energy businesses, sponsor policies that encourage American innovation in the environmental sector.
None specified	Need stronger regulations to ensure that drinking water is not polluted during fracking operations
None specified	Supports the current water regulations
40 CFR 60, subpart UUUU (Clean Power Plan)	Clean energy is an economic driver.
Coating Manufacturing regulations - general	Plans to provide suggestions for improvements to existing coating regulations that reduce burden to the industry without sacrificing environmental benefits.

Notes that there are costs that come with mitigating risks and harm, and for small businesses, those costs represent a greater percentage of our profits than multinational organizations. Urges the administration to keep policies in place to protect American citizens and the environment in which we live. The decisions made today will have an impact for generations to come.	Maintain
Believes that the Clean Air Act and Clean Water Act along with other regulations have markedly improved the air and water in communities.	Maintain
Believes that repealing regulations helps big corporations make more profit, but does not help small businesses or American citizens.	Maintain
The EPA protect the most vulnerable of our citizens, namely the poor and children, and minorities.	Maintain
	Maintain
Notes that small business decline is a result of large businesses and their unfair practices and the fact that much of the small business work is becoming automated.	Maintain
	Maintain
	Maintain
Notes that fracking involves pushing thousands of chemicals into the earth, and only about 50% of those chemicals are later extracted. The rest of the chemicals infiltrate various systems (water systems, food/ planting, etc.).	Maintain
Repealing or rolling back any regulations regarding clean water will hurt small businesses and increase health care costs.	Maintain
Clean energy programs include renewable energy and energy efficiency initiatives, including waste and transportation programs.	
The clean energy market is growing. Clean energy industries employ more people than the coal industry does, including people in rural and minority communities.	Maintain
	Support

General Opposition

General Opposition

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Creates Jobs

Not Specific

April 20 Webinar

April 25 Public Meeting

April 25 Public Meeting

April 20 Webinar

April 25 Public Meeting

April 20 Webinar

Docket

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

April 25 Public Meeting

N/A	Grant Carlisle	Environmental Enterprises (E2)
N/A	Linda Noonan	Chestnut Hill United Church
N/A	Marcia Kinter	Specialty Graphic Imaging Association, also representing the Graphic Arts Coalition
N/A	Bruce Motheral	Not Specified
N/A	James W. Conrad, Jr.	Conrad Law and Policy Counsel, representing the Society of Chemical Manufacturers and Affiliates
N/A	Grant Carlisle	Environmental Enterprises (E2)
EPA-HQ-OA-2017-0190-5410	Anonymous public comment	Anonymous public comment
N/A	Theresa Pugh	Theresa Pugh Consulting
N/A	Theresa Pugh	Theresa Pugh Consulting
N/A	Marcia Kinter	Specialty Graphic Imaging Association, also representing the Graphic Arts Coalition
N/A	Marcia Kinter	Specialty Graphic Imaging Association, also representing the Graphic Arts Coalition

Consultant	Support for automotive and heavy-duty truck regulations	Air
General public	General environmental protection, particularly air quality	Air
Industry group	General environmental protection	All
Consultant	Water System Regulations in Texas	Water
Industry group	General environmental protection	All
Consultant	Regulatory reform recommendations	
General public	Support for EPA regulations	All
Consultant	1) New Source Review/PSD and permit streamlining, 2) Clean Power Plant regulation revisiting, 3) Dispersion modeling under CAA, 4) either CSAPR issues and Water rules	Air
Consultant	1) New Source Review/PSD and permit streamlining, 2) Clean Power Plant regulation revisiting, 3) Dispersion modeling under CAA, 4) either CSAPR issues and Water rules	Air
Industry group	General environmental protection	Air
Industry group	General environmental protection	Air

OAR	Automotive and heavy duty truck industry
OAR	Not Specific
All	Screen and digital printers
OW	Not Specific
All	Specialty chemicals
All	Not Specific
All	Not Specific
OAR	Not Specific
OAR	Not Specific
OAR	All
OAR	All

None specified	Keep the current automobile and heavy duty truck regulations.
None specified	Fix rules where needed but do not arbitrarily repeal two for each new one.
None specified	Maintain environmental protection but reduce burden where costs are imposed with no additional environmental protection.
None specified	Rule writers do not understand the problems faced by the water system design professional.
All	EPA should not overreach to deregulate but rather focus on making implementation less costly while maintaining protection for the environment and health
None specified	Believes that the regulatory reform process needs to be open and balanced. Suggests that adequate notice is provided and a 90-day public comment period is provided.
None specified	Recommends for cost/benefit analyses of regulations that a proper accounting of the non-economic (i.e. environmental and ecosystem service) benefits of these regulations be considered.
None specified	The EPA must be more transparent when proposing requirements which may impact other industries.
40 CFR 63 Startup, shutdown and maintenance (SSM)	Suggests that the EPA repeal the startup, shutdown, and maintenance regulations.
40 CFR 63, Subpart A (General Provisions)	EPA should finalize the proposed amendment to the Part 63 GP to allow credit for pollution prevention options.
40 CFR part 63 (Once In Always In)	EPA should finalize the proposed amendments to the Part 63 GP to allow replace the "once in, always in" policy

Current regulations save money and reduce pollution from automobiles and trucks.	Maintain
Environmental protections promote public health and also make economic sense. Small businesses also benefit from environmental regulations. Decreased air quality would lead to increased illness and therefore time out of work for staff. Those who benefit from reductions in regulatory requirements are not those who would be affected by increased pollution. Downwind entities are more likely to be low income and/or people of color and include vulnerable populations such as children and the elderly.	Maintain
N/A	Support
Commenter provided examples of requirements that can not be performed because of field issues.	Support
	Support
	Support
	Support
Cited the Ferroalloys MACT, which requires a camera technology to measure opacity. Only impacted two plants, however EPA was clear of their intent to require this camera technology to other industries.	Support
	Support
In a 2003 proposal to revise the GP, regulatory relief was proposed for pollution prevention options that achieve equivalent reductions to those require by a specific regulation. This proposed revision should be finalized.	Support
In 2007, EPA proposed to revise the GP to replace the 1995 “once-in, always in” policy and to allow sources to become area sources at any time and no longer be subject to the rule. This proposed revision should be finalized.	Support

Not Specific

Not Specific

General Support

General Support

Overall Support

Overall Support

Process

Process

Existing

Proposed

Proposed

April 20 Webinar

Docket

April 20 Webinar

April 20 Webinar

Docket

April 20 Webinar

April 25 Public Meeting

N/A	Laura Rectenwald	Titanium Environmental Services
EPA-HQ-OA-2017-0190-4423	Anonymous public comment	Anonymous public comment
N/A	Heidi McAuliffe	American Coatings Association
N/A	Tony Pendola	NC DEQ
EPA-HQ-OA-2017-0190-3374	Anonymous public comment	Anonymous public comment
N/A	La Ronda Brown	California Air Resources Board
N/A	Steven Smith	Hoosier Energy

Consultant	Once-in, always-in policy	Air
General public	Once-in, always-in policy	Air
Industry group	Once-in, always-in policy	Air
State	Once-in, always-in policy	Air
General public	Support for small business services	All
State	Support for EPA small business programs	Air
Industry	CCR	Air

OAR	MACT Major Sources
OAR	MACT Major Sources
OAR	MACT Major Sources
OAR	MACT Major Sources
All	Not Specific
OAR	Small Businesses
OCSPP	Utilities

40 CFR part 63 (Once In Always In)	Eliminate the once-in, always-in applicability policy for major sources
40 CFR part 63 (Once In Always In)	Eliminate the once-in, always-in applicability policy for major sources
40 CFR part 63 (Once In Always In)	Eliminate the once-in, always-in applicability policy for major sources
40 CFR part 63 (Once In Always In)	Eliminate the once-in, always-in applicability policy for major sources
None specified	The EPA should help small businesses navigate the compliance of regulations, and to speed up the EIS comment process
None specified	Believes that EPA programs and policies for small businesses need to be continued and fully funded.
40 CFR 257 (Coal Combustion Residuals)	One-size fits all rule not appropriate for coal ash disposal.

Facilities that are considered to be major sources may be below the 10/25 TPY major source applicability threshold. The applicability determination may have been performed using the wrong emission factors, poor recordkeeping or miscalculated.	Support
Facilities that are considered to be major sources may be below the 10/25 TPY major source applicability threshold. The applicability determination may have been performed using the wrong emission factors, poor recordkeeping or miscalculated.	Support
States this is a policy and not a regulation. Notes that many facilities are under the 10/25 limit but are still considered major sources. Notes the high cost of VOC control and the combustion products that are emitted.	Support
Believes this policy is detrimental to small businesses, has no regulatory basis and contradicts the major source definition.	Support
Having this service would help small business owners reduce a vast amount of overhead and reduce delays in all sorts of business proposals.	Maintain
Small businesses are an important part of the US economy and the programs provided by the EPA are essential to this sector. This includes pollution prevention grants, advisory panels and compliance assistance.	Maintain
Should be handled by state permits.	Support

Proposed

Proposed

Proposed

Proposed

Support SB Programs

Support SB Programs

Existing