NCI-specific comments from States and Tribes

Air (NSR and Air Toxics)	Supports an NCI that addresses non-attainment and nearing non-attainment. (New Mexico) General Support for continuing Air Toxics– provided close coordination with states. (Region 7 states) Providing timely guidance to facilities on how to revise their permit now that the "Once in Always In" Policy has changed. Specifically provide guidance to ensure national consistency throughout the U.S. that gives certainty to facilities who may be considering revising their permit from major to minor source of HAPs in such a way to avoid a potential permitting error and associated enforcement action. (AZ) Supports focusing on reducing air pollution from the largest sources, including mobile sources (e.g., 2018 Tampering policy) with a focus on nonattainment areas. (AZ)
CWA (Munis, CAFOs, NPDES)	General Support for continuing NPDES– providing close coordination with states. (Region 7 states) SNC rate is not a great metric (did not offer alternatives – MO) We should continue to focus on data issues for SNC (Iowa) Enforcement against point sources is not going to fix the problem. It is suggested that this measure should track only improvement made to waters attributed to point sources. Reestablish funding under 104(g) (Ohio) States are supportive of an NCI that focused on "Keeping Raw Sewage and Contaminated Stormwater Out of Our Nation's Waters." (ACWA) There is a good story to be told as we conclude CSO/SSO (Iowa)
Energy	TCEQ's oil and gas outreach and regulatory activities could be highlighted as a successful state's self-implemented compliance initiative. (Texas) We should consider the impact of fracking, esp. potential exposure of PFOAs to groundwater. (Kansas)

RCRA	General support (Region 7 states) Didn't have early engagement opportunity (OK)
112(r)	No comments
Drinking Water	Allow flexibility including focus on known troubled systems not inspection metrics of every water system; specify which aspect(s) of primary drinking water standard are focus; clarify if the NCI is going to include a review of the secondary standards (Texas) Supportive (Washington – see attached) Troubled by OW metric – perhaps it should be by population and no number of systems. (OK) Interested in hearing more (CT) Supports- they note that an NCI could help bridge connection between public health agencies and environmental (New England states)
Lead or other ideas	Supports lead – they note that an NCI could help bridge connection between public health agencies and environmental agencies. (New England states) Asbestos is an important issue (Iowa) ACWA/ASDWA call, the participants did not voice interest in additional NCIs nor did they request deletion of any of the current ones – not consistent with the written comments on supporting Keeping Raw Sewage… Protect Coastal Waters (Cesspools, Stormwater) (Hawaii)
112r	No comments