

NSC Technical Subcommittee Call Minutes – February 18, 2025

Participation [by region]:

- 3: Luke Hershey – PA
- 4: Griffin Jones & Dylan Edeker – FL; Donovan Grimwood – TN and Tony Pendola – NC
- 5: Lisa Ashenbrenner-Hunt & Jennifer Feyerherm – WI; Samantha Connolly – MN and Mark Stoddard – IN
- 7: Jennifer Wittenburg – IA and Keely Hutchinson & Leena Divakar – KS
- 8: Jarrett Vigil – CO and Michael Gustafson – MT

Tech-Subcommittee: <https://nationalsbeap.org/committees/technical>

**** This discussion was not recorded. However, you can still review past videos posted on the National SBEAP YouTube channel at <https://www.youtube.com/channel/UC5PupYpZ1W6IG8CtzCINK8Q> ****

- Management of the 507 Program’s Collaboration and Communication Activities.
 - Kansas State University’s current grant expires on July 31.
 - New grant cycle starts August 1 and expires on July 31, 2030.
- It was suggested future topics might revisiting some of the case studies - <https://nationalsbeap.org/small-businesses/sustainability/case-studies>. There are a large number of web links presumably to case study digests. A suggested case study to review is the environmental impacts of organic farming, presumably referring to <https://www.deq.virginia.gov/home/showpublisheddocument/7520/637523481743270000>.
- It was also suggested that a topic could be picked from one of a number of industry sectors - <https://nationalsbeap.org/small-businesses/sustainability/industry-sectors>.
- Inviting a representative with a trade association such as autobody was suggested. <https://nationalautobodycouncil.org/> and <https://scrs.com/>.
- A number of general topics were mentioned in quick succession: chemicals, energy, electronics, food, die casting, pharmaceuticals and PFAS (Per & Poly Fluoro Alkyl Substances – defined by EPA - <https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/tsca-section-8a7-reporting-and-recordkeeping> - “What are PFAS?” (about half way down the web page).
- Petroleum tanks (above and underground) was mentioned.
- A recent NSC (National Steering Committee) letter was referenced - [Enforcing the Regulatory Reform Agenda, EO 13777](#) (May 2017). It was suggested that we revisit some of the topics mentioned in the letter which include:
 - Integrating enforcement and compliance assistance, e.g., plain language assistance tools;
 - Once In, Always In Policy (changing again? <https://guthrie.house.gov/news/documentsingle.aspx?DocumentID=389420>);
 - Eliminate the need to calculate potential to emit when actual emissions are less than half of federal thresholds;
 - Limit electronic reporting to major sources;
 - Consider the obsolescence of 40 CFR 63, Subpart HHHHHH since “...all major paint manufacturers reformulated their traditional automotive paints and/or substituted compliant paints....”;
 - Make key definitions and terminology with significant meaning consistent, e.g., engines (NSPS and NESHAP) and VOC (RACT and NESHAP - VHAP);

- Replace daily recordkeeping for VOC or other pollutants with permitted emission limits with less frequent recordkeeping for those regulated entities diligent in meeting their emission limits;
- Small business audit policies; complying with regulations which seem to change very frequently;
- Replace 40 CFR 63, Subpart XXXXXX visible emissions observation requirements with records indicating adherence to work practice standards;
- Consider eliminating 40 CFR 60, Subpart JJJ – Petroleum Dry Cleaners – as it may no longer be relevant;
- “SBREFA and RFA requirements should be re-examined by the agency to ensure the mandates are taken seriously....” and
- Much more.
- <https://www.federalregister.gov/documents/2017/03/01/2017-04107/enforcing-the-regulatory-reform-agenda>
- [EPA Regulatory Reform Task Force 90-Day Progress Report Under Executive Order 13777 – Enforcing the Regulatory Reform Agenda \(PDF\)](#)(11 pp, 378 K)

It was suggested that a curated list of regulations which could potentially be reformed, removed or replaced be prepared. This action would need the input of several of the members of the Technical Subcommittee presumably for the intent of making suggestions to EPA. Refer to the e-mail dated February 24, 2025 from Tony Pendola, NC SBO regarding “SBA Administrator Loeffler Issues Memo on Day One Priorities” and “Creating a strike force to cut regulation.”

It would be helpful if a poll could be created that would elicit responses as to the top five topics from past case studies, industry sectors or of particular interest and suggest a means for sharing this information, one or two knowledge experts or a general open forum discussion with no planned agenda.

Future topics:

- **March 18:** Perc Drycleaning NESHAP final rule (Subpart M), Reginald (Reggie) Goodwin, Lead EPA Subpart M Rule Writer - Goodwin.Reginald@epa.gov. **The topic scheduled for July 15 is a backup in case EPA elects not to present.**
- **April 15:** EV charging and alternative fuels for fleets (many hurdles for small businesses to overcome), Belinda Breidenbach, ID
- **May 20:** Demonstrating the MiEnvrio Portal & Oregon’s Your DEQ Online platforms, Kaitlyn DeVries, EGLE and Hillarie Sales, OR DEQ
- **June 17:** Vape pen disposal - both from a nicotine and a Li battery perspective, Jacob Larson, KSU and Jarrett Vigil, CO DPHE(?)
- **July 15:** Printing topic, Gary Jones, Vice President, Environmental, Health & Safety Affairs, PRINTING United Alliance
- **Other 1:** AERR (*Air Emissions Reporting Requirements*) & MM2A (*Major MACT to Area*) Status and Final Steps
- **Other 2:** EPA Air Toxic Screen

Next Call: March 18

1 pm CDT (2 pm EDT) (3rd Tuesday of month)