

DEPUTY ADMINISTRATOR MEETINGS WITH SMALL BUSINESS TRADE ASSOCIATION EXECUTIVES

PURPOSE: The purpose of these meetings is to provide the opportunity for small business trade associations to discuss issues of particular concern to small businesses with EPA senior management. Over the years these meetings have served to not only improve understanding on both sides of an issue, but also at times to change practices that may have been unduly burdensome to small businesses.

PROCESS: In the past these meetings were held on an average of twice a year. Karen Brown, EPA Small Business Ombudsman, polls the small business trade associations to find out what topics are of most interest or concern to small business. Karen then works with two or three widely trusted associations to pare down the list of issues and shape an agenda for a manageable two-hour meeting. We assure that the appropriate senior agency officials can attend the meeting – those directly responsible for understanding problems and proposing solutions. Typically the meetings begin with a review of the issues raised at the last meeting and their disposition in the interim. We don't always reach agreement on an issue during the meeting, but establish a process for follow-up and resolution before the next meeting.

ACCOMPLISHMENTS: Some of the actions we have agreed to take as a result of these meetings are: issuing guidance to States on calculating the potential to emit pollutants so that genuinely small sources are not improperly classified as "Major" under the Clean Air Act; removing the requirement that gasoline stored at fuel stations be reported as hazardous substances under the Emergency Planning and Community Right-to-Know Act; and resolving inconsistencies between EPA and the Department of Transportation requirements on the transport of hazardous materials. We have not been able to resolve all of the issues raised, but these meetings have served to bring about thoughtful exchanges of information which have led to better mutual understanding and easier resolution of subsequent issues by less formal means.

OPTIONS FOR FUTURE MEETINGS:

- Have smaller more informal meetings with less participants and focus on a few issues
- Have meetings that are designed specifically for air issues, waste issues, water issues, etc.
- Have meetings with the Assistant Administrators and schedule a meeting only once a year with the Deputy Administrator
- Host meetings at a trade association headquarters for variety in meeting space and to show the Agency's commitment to working with them
- Have quarterly meetings that only involve one or two AAships
- Have quarterly meetings that are designed for one or two industry sectors