



THE
ENVIRONMENTAL
COUNCIL OF
THE STATES

444 North Capitol Street, N.W.
Suite 445
Washington, D.C. 20001

Tel: (202) 624-3660
Fax: (202) 624-3666
Email: ecos@ssso.org
Webpage: www.ecos.org

Robert W. King, Jr.
Deputy Commissioner
South Carolina Department of
Health and Environmental
Control
PRESIDENT

David K. Paylor
Director, Virginia Department of
Environmental Quality
VICE PRESIDENT

Stephen A. Owens
Director, Arizona Department of
Environmental Quality
SECRETARY-TREASURER

Stephanie Hallock
Director, Oregon Department
of Environmental Quality
PAST PRESIDENT

R. Steven Brown
Executive Director

April 17, 2007

The Honorable Steven L. Johnson, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building (1101A)
1200 Pennsylvania Avenue, NW
Washington D.C. 20460

Ken Legler, Chair
National Compliance Advisory Panel
President,
Houston Wire Works
514 Michigan
South Houston, TX 77587

Dear Mr. Johnson and Mr. Legler:

The Environmental Council of the States (ECOS) supports beginning a constructive dialogue with the U.S. Environmental Protection Agency (EPA) and the National Compliance Advisory Panel (NCAP) on development of a comprehensive small business environmental assistance initiative for the states. Elements that drive this support are as follows:

- A need to get beyond restrictions for Small Business Environmental Assistance and Ombudsman Programs and Compliance Advisory Panels that limit actions to the development of air compliance assistance tools.
- Small businesses' environmental regulatory requirements that span land, water, air and waste and present complexity beyond the capabilities of many small operations.
- The continuing trend of environmental requirements extending to more small business sectors and more requirements for small businesses that are already part of the regulated community.
- The need for education and assistance that is framed for small business to both achieve greater compliance and secure better environmental outcomes.
- Creating a coordinated comprehensive small business environmental assistance initiative responsive to EPA, states and Compliance Advisory Panels.

We are proposing that the NCAP's Comprehensive Small Business Environmental Assistance Legislative Initiative (copy attached) be the starting point for our discussions.

The best interests of small business owners, state environmental programs and EPA can be met with stable, comprehensive environmental compliance assistance programs operating in the states. We propose that the dialogue include representatives from the following groups: ECOS Cross-Media Committee, National Steering Committee of State Small Business Environmental Assistance and Ombudsman Programs, NCAP and EPA. We look forward to working with the both of you in addressing the environmental assistance needs of small businesses while maintaining the integrity of our core environmental regulatory programs.

Sincerely,

R. Steven Brown,
Executive Director

CC:

Renee Bashell	Wisconsin Department of Commerce
Jeannette Brown	EPA
Steve Chester	Michigan Department of Environmental Quality
Jim Edward	EPA
David Fiedler	Michigan Department of Environmental Quality
Annette Fulgenzi	Illinois Department of Commerce and Economic Opportunity
Michelle Hiller-Purvis	ECOS
Mike Linder	Nebraska Department of Environmental Quality
Mark McDermid	Wisconsin Department of Natural Resources
Arleen O'Donnell	Massachusetts Department of Environmental Protection
Angela Suber	EPA