

# January 2023 SBO/SBEAP NSC Call

January 10, 2023

11:00 – 12:00 PT; 12:00 – 1:00 MT;  
1:00-2:00 CDT; 2:00-3:00 pm EST

**Zoom Meeting:**

<https://ksu.zoom.us/j/91093765394>

(305) 224-1968 or Find your local number:

<https://ksu.zoom.us/j/91093765394>

Meeting ID: 910 9376 5394

## **NSC MISSION**

*To serve, support, and strengthen the Small Business Environmental Assistance Programs through representation and collaboration*

### **Minutes to be taken by Region 2**

❖ **Attendees:**

**Region 1: Sara Johnson**

**Region 2: Edward Bakos**

**Region 3: Jeremy Hancher, Nancy Herb**

**Region 4: Donovan Grimwood, Crystal Warren**

**Region 5: Renee Bashel, Mark Stoddard, Kari**

**Region 6: Lucy Cross**

**Region 7: Jennifer Wittenburg, Nancy Larson, Dan Nickey, Allison Crowther**

**Region 8: Eleanor Divver**

**Region 9: Chris Lynch**

**Region 10: Belinda Bredenbach**

❖ **Agenda repair**

❖ **Approve minutes notes last month of December 2022**

❖ **CAAAC update – Dan Nickey**

- Notes: Dan's term expires in August. Based on [CAAAC website](#), nominations are likely to open in April with selections named in August (when Dan's term expires). Nomination form is on website. NSC will support SBEAP representatives that want to be part of CAAAC if known. Dan Nickey attended CAAAC meeting on December 14<sup>th</sup>, 2022 regarding the inflation reduction act where EPA is looking for comments and public input. Also, watch for OECA's new list of enforcement and compliance initiatives. They are expected to be published in the Federal Register in "early January."
- EPA Comments on IRA deadline Jan 18<sup>th</sup>. Several have noted that NSC should make comments, especially on [Docket 4: Funding to Address Air Pollution](#). Grants are not yet open in relation to this, but EPA is seeking comments on where to focus funding. EJ is also involved. The CAAAC discussed how to get message out in relation to IRA and also once funding is established, how would the message about funding availability be distributed. NAACA has also discussed this and it appears that EPA is preferring to use existing programs to get message out as opposed to creating new programs. It was noted that some states/people may feel that the IRA is a politically charged issue, which may cause some states to have increased scrutiny regarding state level comments on IRA.
- Note that some state SBEAPs wouldn't be able to receive money directly but would instead be part of a general allocation. Also, some programs wouldn't be allowed to apply for grants if there is a matching requirement.

❖ **Recap of ASBO/NSC monthly call**

- No call in December.

From OAQPS Small Business Outreach newsletter discussed:: Summary on IRA Air Toxins

- - [Reconsideration of Miscellaneous Organic Chemical Manufacturer rule. Has a focus on Ethylene Oxide.](#)
  - [Reconsideration of Air Toxics Standards for Site Remediation](#)
  - [Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review](#)
  - Cannot find a link/contact for the OAQPS Small Business newsletter that was designed as a more general listserv and so Rhonda didn't have to essentially forward the information. Have asked Rhonda how to sign up and will update when I have that information.

❖ **Subcommittee Updates**

- **Annual Training Planning- Chris Lynch**
  - Trying to finalize the hotel located in Lake Tahoe. s. Annual Training has a registration fee of \$300 Registration for 2023 Annual Training Conference. Next Planning call is January 11, 2023. Agenda coming together and drafts are posted to [National SBEAP website](#) (see meeting notes for drafts of agenda as of now). Discussion of planning scholarship applications with 19 applicants.
- **Technical – Mark Stoddard/Jenifer Dixon**
  - No meeting in December. Discussed Safer Choice Program presenting at training, unused or left-over hand sanitizer. issues with storage and fire hazards and RCRA improvement rules.
- **Website – Nancy Larson discussed the next website sub-committee meeting will be in June.**
- **Education / Annual Report** – Belinda Breidenbach Annual training meeting will be January 24 to finalize the speakers. Chris Lynch and Any Fisher are narrowing topics for the annual training. Also, data collection for annual report will be asked for in January
- **Promotional** – Allison Crowther finalizing presentation for education and Donovan volunteered to take over the awards' subcommittee. 2 award nominees applications have been submitted while the due date is Jan 23<sup>rd</sup>. A state/program can self-nominate for the awards. Discussed that one shouldn't be hesitant to talk to state/program/individual that you want to nominate as it can provide the details needed to build a good nomination.
- **EJ workgroup – Lisa Ashenbrenner-Hunt** Paula is working with Lisa to secure a speaker for an EJ session at the Annual Training. Will discuss weblinks to be added to EJ webpage on National SBEAP website.
- **Metrics workgroup**
  - No meeting in December. Next is planned for January 19<sup>th</sup>.

❖ **Allied Updates**

- **NAACA - (Nancy H.)**
- **ECOS - (Donovan)** Meeting on 7<sup>th</sup> was a generalized meeting that went over the National Compliance Initiatives planned by EPA. Several were recurring and there were some clear successes. For example, water and wastewater violations are down significantly. Looking at potential of additional NCIs for next cycle. Should be published soon.  
Call on 19<sup>th</sup> was a combination of ECOS Compliance Committee and EPA EJ workgroup to discuss changes to the grant application relating to Title VI. Went over some of the key factors and where EPA is able to provide some level of assistance if an applicant doesn't meet the requirements at the time of application (such as no non-discriminatory statement)

❖ **National Compliance initiatives and revamping . call on the 19<sup>th</sup> ECOS in relation to title 6**

- **CAAAC – (Dan) (See above)**
- **AAPCA – no discussion**
- **Others**

**Next NSC call – February 7, 2023**

**11:00 – 12:00 PT; 12:00 – 1:00 MT; 1:00-2:00 CDT; 2:00-3:00 pm EST**

# February 2023 SBO/SBEAP NSC Call

February 7, 2023

11:00 – 12:00 PT; 12:00 – 1:00 MT;  
1:00-2:00 CDT; 2:00-3:00 pm EST

**Zoom Meeting:**

<https://ksu.zoom.us/j/94067670673>

(305) 224-1968 or Find your local number:

<https://ksu.zoom.us/j/94067670673>

Meeting ID: 940 6767 0673

## **NSC MISSION**

*To serve, support, and strengthen the Small Business Environmental Assistance Programs through representation and collaboration*

### **Minutes taken by Region 3**

❖ **Attendees:**

Region 1: Sara Johnson

Region 2: Edward Bakos

Region 3: Jeremy Hancher, Nancy Herb

Region 4: Donovan Grimwood, Crystal Warren, Tony Pendola

Region 5: Renee Bashel, Mark Stoddard, Jenifer Dixon, Lisa Ashenbrenner,

Region 6: Lloyd Kirk

Region 7: Jennifer Wittenburg, Nancy Larson. Allison Crowther

Region 8: n/a

Region 9: Chris Lynch

Region 10: Jim Plosay

❖ **Agenda repair – none.**

❖ **Approve December minutes – approved.**

❖ **CAAAC update – Dan Nickey**

- Notes: Dan's term expires in August. Based on [CAAAC website](#), nominations are likely to open in April with selections named in August (when Dan's term expires). Nomination form is on website. NSC will support SBEAP representatives that want to be part of CAAAC if known.
  - Anyone who is interested should let Donovan & Chris know.

❖ **National Enforcement Compliance Initiatives –** Would like comments from any interested parties by March 1<sup>st</sup>. <https://www.govinfo.gov/content/pkg/FR-2023-01-12/pdf/2023-00500.pdf>

- No comments received yet, but they are encouraged.

❖ **Recap of ASBO/NSC monthly call.**

- Discussion of upcoming Annual Training and if RASBLs will be there. Also, potential keynote address and EPA speaker requests. All three members of the ASBO office will be there.
- Presentation on new EJ tool. From Office of Advocacy and WHEJAC, this tool is known as the Climate and Economic Justice Screening Tool. Current version launched November 2022 and is designed to be the decision making tool in relation to the Justice 40 Initiative on where funding to support disadvantaged communities is to be focused.
- Noted that if a registration required for a training event, then it would need a separate process for EPA staff than travel.
  - Still unknown if RASBLs will be there. Mary Grover is new at EPA ASBO.

- New EJ tool – it is designed to be the major decision-making tool for disadvantaged communities in terms of federal programs.  
<https://screeningtool.geoplatform.gov/en/#6.63/54.284/-85.939>
- The tool focuses on individual census tracts.
- Were any examples provided as to how to use the tool? Regulators are often confused with how these types of tools are used for small business interests.
- Concern that CEJST may cause undue/excess burdens from EPA Enforcement/Compliance.
- Requested more information from SBA Office of Advocacy but have not received it as of yet. Office of Advocacy was waiting on information from presenter.

#### ❖ Subcommittee Updates

- **Annual Training Planning- Chris Lynch** – registration at 22, about 13-14 paid. Hotel reservations & registrations should be done by March 1<sup>st</sup>. Regional representation and attendance earlier than later is highly encouraged. Agenda is still coming together so any last minute suggestions for speakers should be done soon. Parking costs are still being negotiated with the hotel.
  - Will some of the training or awards be available virtually? The issue is still be discussed but the idea is not to open up the entire training virtually. Suggestion was made to make an announcement to the main SBEAP listserv that the entire training will not be available virtually.
- **Technical – Mark Stoddard/Jenifer Dixon** – upcoming speaker Michelle Bergen from EPA will talk about SIP plan rules. Possible discussion on annual training topics.
- **Website – Nancy Larson** – discussion earlier today about the training topic. 17 scholarships for the training were awarded.
- **Education / Annual Report – Belinda Breidenbach** – 2-3 panel speakers secured for the training.
- **Promotional – Allison Crowther** – working on panel for training, core speaker group setup. Awards are moving along and orders have been sent in.
- **EJ workgroup – Lisa Ashenbrenner-Hunt** – subcommittee meeting tomorrow. Working on speaker for training and putting links on the national SBEAP website.
  - NEJAC nominations open?
    - No one has spoken up yet. Deadline is due March 17<sup>th</sup>. Jenifer Dixon has expressed interest in applying.
- **Metrics workgroup**
  - Looking at ways that different studies or groups may have determined the cost of compliance vs. non-compliance. Example was the MI university study of about 100 manufacturers within the state. May also be able to use EPA health impacts that are used in determining potential gains from different rules.
    - Jeremy will send Donovan 2 studies on compliance costs and Jenifer will ask Jim Ostrowski about the MI study.

#### ❖ Allied Updates

- **NAACA - (Nancy H.)** – NACAA developing comments and may comment on EPA's proposal to drop aftermarket defeat devices for diesel vehicles from the NECI list. EPA proposal to add an NECI for PFAS is another area being evaluated. IRA funding is still an area of discussion.
- **ECOS - (Donovan)** No meeting in Jan.
- **CAAAC – (Dan) (See above)** – n/a
- **AAPCA - (Tony)** – no report.
- **Others** – n/a

Next NSC call – March 7, 2023

11:00 – 12:00 PT; 12:00 – 1:00 MT; 1:00-2:00 CDT; 2:00-3:00 pm EST



# March 2023 SBO/SBEAP NSC Call

March 7, 2023

11:00 – 12:00 PT; 12:00 – 1:00 MT;  
1:00-2:00 CDT; 2:00-3:00 pm EST

Zoom Meeting:

<https://ksu.zoom.us/j/94067670673>

(305) 224-1968 or Find your local number:

<https://ksu.zoom.us/j/94067670673>

Meeting ID: 940 6767 0673

## NSC MISSION

*To serve, support, and strengthen the Small Business Environmental Assistance Programs through representation and collaboration*

### Minutes taken by Region 4

❖ **Attendees:**

Region 1: Sara Johnson

Region 2: Edward Bakos

Region 3: Jeremy Hancher

Region 4: Donovan Grimwood, Crystal Warren, Tony Pendola

Region 5: Renee Bashel, Mark Stoddard, Jenifer Dixon, Lisa Ashenbrenner-Hunt

Region 6: Lloyd Kirk

Region 7: Jennifer Wittenburg, Nancy Larson, Allison Crowther

Region 8: n/a

Region 9: Chris Lynch

Region 10: Belinda Breidenbach

❖ **Agenda repair**

❖ **Approve December minutes**

❖ **CAAAC update – Dan Nickey**

- Notes: Dan's term expires in August. Based on [CAAAC website](#), nominations are currently open with deadline of March 30 with selections named in August (when Dan's term expires). Nomination form is on website. NSC will support SBEAP representatives that want to be part of CAAAC if known.
- Donovan is drafting a letter of support for one person who is planning to apply. Donovan is willing to draft other letters of support, as needed, for any other interested parties since there are multiple positions open.

❖ **National Enforcement Compliance Initiatives – Final call if we want to comment on NECIs.**

<https://www.govinfo.gov/content/pkg/FR-2023-01-12/pdf/2023-00500.pdf>

- No comments have been submitted to the NSC yet. If no one submits comments, then National SBEAP likely won't submit any comments to EPA because the NECIs don't seem to apply to small businesses.

❖ **Recap of ASBO/NSC monthly call.**

- Paula developing report and hopes to share some of it at Annual Training, but it won't be completed until April. The report will focus solely on the ASBO office and include information such as work outcomes and products, how to interact with ABSO, and their impacts to the community.
- Rhonda hopes to be able to show something about the guidance manual that OAQPS is developing. The manual is not geared towards SBEAPs. Instead, it is aimed at general stakeholders and the public and how to interact/engage with OAPQS.

- SBEAPs are concerned that the manual has not been shared with SBEAPs up until this point for our feedback. However, it is planned to be a living document that can more easily be changed so if the SBEAPs do have feedback, it should be relatively easy to incorporate. Many expressed concerns about National SBEAP not being involved in the development of the manual and the relationships, or lack thereof, of the RASBLs with regional SBEAPs. Region VI is losing their RASBL to EJ; hopefully this is not a sign of losing other RASBLs.

#### ❖ Subcommittee Updates

- **Annual Training Planning- Chris Lynch**
  - If you are attending and haven't registered, please register so that final numbers can be provided to hotel and catering! Last session of the meeting will be a discussion on the direction and future of the national program, including creation of a National CAP. Bring suggestions of people to nominate for the National CAP. Will go over strategy plan developed by the NSC in June 2022 and discuss status updates.
- **Technical – Mark Stoddard/Jenifer Dixon**
  - Preparing for Annual Training
- **Website – Nancy Larson**
  - Preparing for Annual Training
- **Education / Annual Report – Belinda Breidenbach**
  - Annual Report is live. Deadline is April 15, 2023. Response so far is small.
- **Promotional – Allison Crowther**
  - Preparing for Annual Training
- **EJ workgroup – Lisa Ashenbrenner-Hunt**
  - Preparing for Annual Training
  - NEJAC nominations open? Jenifer Dixon planning to apply. Want others to apply, too, since there are multiple positions open.
- **Metrics workgroup**
  - Have studies to review to learn how others get their metrics.

#### ❖ Allied Updates

- **NAACA (Nancy H.)** – Looking at EPA's NEICs.
- **ECOS (Donovan)** – Discussion on resolutions and whether they should be renewed or sunsetted. Continue to be in support of Supplemental Environmental Projects which have returned. Also, ECOS calls on EPA to make Supplemental Environmental Project funds available to the states rather than retain Federal control. Added comment for resolution to using compliance assistance rather than enforcement that existing groups such as SBEAP should be utilized more. Resolution supporting state delegated enforcement. Discussion on NEICs. Main discussion appeared to be on sunseting of NEIC against after market defeat devices. AAPCA may not comment and NACAA may not get full support from their states for comments.
- **CAAAC (Dan) – (See above)**
- **AAPCA (Tony)** – No updates
- **Others**

**Next NSC call – April 4, 2023**

**11:00 – 12:00 PT; 12:00 – 1:00 MT; 1:00-2:00 CDT; 2:00-3:00 pm EST**



# April 2023 SBO/SBEAP NSC Call

April 4, 2023

11:00 – 12:00 PT; 12:00 – 1:00 MT;

1:00-2:00 CDT; 2:00-3:00 pm EST

## NSC MISSION

*To serve, support, and strengthen the Small Business Environmental Assistance Programs through representation and collaboration*

### Minutes taken by Region 5

❖ **Attendees:**

Region 1: Sara Johnson

Region 2: Edward Bakos

Region 3:

Region 4: Donovan Grimwood, Crystal Warren, Tony Pendola

Region 5: Renee Bashel, Mark Stoddard, Lisa Ashenbrenner, Julie Rhodes - IN

Region 6: Lloyd Kirk

Region 7: Jennifer Wittenburg, Nancy Larson. Allison Crowther

Region 8: Gabe Catenacci - CO

Region 9: Chris Lynch

Region 10:

❖ **Agenda repair** – none.

❖ **Approve March minutes** – approved.

❖ **Recap of National Training**

- Crystal - disappointed in the type and amount of info provided by EPA staff when we look to them for guidance; Chris - agreed, and disappointed in their virtual attendance rather than in person
- kudos from many on the overall event
- 59 in person attendance including speakers that came (chicago and denver were very similar, preCOVID)
- Nancy relayed that Leena was impressed with networking and very friendly group, cooperative and will to share info
- Gabe - learned much more about programs in 4 days than in the last few months since he started, in person informal convo were critical to his understanding of his role

❖ **NSC Discussion at training**

- Technical topics
  - Demos of EJ screen, ECHO notify,
  - PFAS controls
  - solar panel recycling, e-batteries, other emerging waste
  - dry cleaner neshap amendments
  - new topics in states (like CO presented on cannabis)
  - semiconductor chip (5B neshap) mfg - increase in facilities due to CHIP executive order from Biden
  - changes to 6H - tony

- Education
  - Develop training for regional reps
  - encourage in person regional meetings
- Promo: copy EMAP emails for success stories
- NCAP: discussions included value of regional representation and individual SB; seems like National associations have strongest voice, and target those we work with most frequently (national coatings, IFI, autobody, SBA advocacy, NFIB)
  - Sara - find a way to spread outside of DC associations and make sure they are small business focused
  - Lloyd note: businesses where the \$\$ and credits are going - EV, Battery, Solar, Lithium, Hydrogen, Critical Minerals..and related supply chains. I know some is large business but smaller businesses provide services for all of the above. If you want momentum I would tie to the \$\$ that everyone is receiving. Example the 3 million most states applied for the Climate Pollution Reduction Act. Most of the states submitted NOI by last Friday in DC at ECOS.
  - NACAA - Miles Keogh
  - email Chris and Donovan other association ideas
  - ACTION ITEM: will get started with a short term workgroup to develop a NCAP: set up structure, who to invite, how to approach them, work it with the goal of inviting assoc to TN training

#### ❖ Subcommittee Updates

- **Annual Training Planning- Chris Lynch** – call tomorrow to debrief, pass the torch next month to TN
- **Technical – Mark Stoddard** – rcra presentation, also looking for speaker on expired hand sanitizer from OK; jenifer d no longer co-chair with mark; Lee Ann might be willing to be co-chair...
- **Website – Nancy Larson** – discussion earlier today about the training topic. 17 scholarships for the training were awarded.
- **Education / Annual Report – Belinda Breidenbach** – annual report data collection, another email reminder out yesterday
- **Promotional – Allison Crowther** – will discuss all good ideas from training at meeting next week
- **EJ workgroup – Lisa Ashenbrenner-Hunt** – speaker next week from region 9 who couldn't make the training; Jamie Mancola? OECA R9, the enforcement perspective; then follow up on training ideas
  - Also noted that lost our NEJAC nomination since Jenifer Dixon had to decline due to new position, and not enough notice to engage someone else
- **Metrics workgroup**
  - Looking at ways that different studies or groups may have determined the cost of compliance vs. non-compliance. Example was the MI university study of about 100 manufacturers within the state. May also be able to use EPA health impacts that are used in determining potential gains from different rules.

#### ❖ Allied Updates

- **CAAAC – (Donovan)** – annual meeting topics to Donovan to share with Dan; did get one volunteer for nomination to CAAAC (Jeremy)
- **No other updates**

❖ **Other business**

- Addition to website for EJ and possibly other subcommittees to post a whiteboard for sharable lists of ideas or topics for discussion; possible use of google docs
  - up to subcommittees to manage and use the additions
  - will need regular reminders to use
  - better than just having discussions once a year at training

**Next NSC call** – May 2, 2023

11:00 – 12:00 PT; 12:00 – 1:00 MT; 1:00-2:00 CDT; 2:00-3:00 pm EST

## **SBO/SBEAP NSC Call – May 2, 2023**

Meeting Minutes taken by Lucy Cross, ADEE – Region 6

Members in attendance:

Donovan Grimwood, TN – Region 4  
Jenifer Dixon, MI – Region 5  
Tony Pendola, NC – Region 4  
Belinda Breidenbach, ID – Region 10  
Crystal Warren, TN – Region 4  
Nancy Larson, KS – Region 7  
Allison Crowther, KS – Region 7  
Eleanor Divver, UT – Region 8  
Lee Ann Briggs, PA – Region 3  
Renee Bashel, WI – Region 5  
Sara Johnson, NH – Region 1  
Gabe Catenacci, CO – Region 8  
Lisa Ashenbrenner Hunt, WI – Region 5  
Jeremy Hancher, PA – Region 3  
Christopher Lynch, NV – Region 9  
Nancy Herb, PA – Region 3  
Jennifer Wittenburg, IA – Region 7  
Maxwell Graham – NJ – Region 2  
Lloyd Kirk, OK – Region 6  
Lucy Cross, AR – Region 6

Donovan Grimwood initiated call at 1:00 pm (cdt) via Zoom.

### **Agenda Repair**

No repairs or corrections were needed to today's agenda.

### **Approve April Minutes**

No repairs or corrections were needed to April's meeting minutes – approved.

### **ASBO updates**

- Potential SBAR panel for Lime Manufacturing NESHAP and Other Solid Waste Incinerator NSPS
  - Donovan stated that about 2 years ago OSWI rule was up for proposal and NSC did send comments in support of changes that EPA was proposing, which included removing Title V requirements for air permit incinerators that only burn wood/yard waste. The rule was never finalized. Appears they may be proposing rule again.
  - Two weeks prior, Donovan and Chris Lynch were on Office of Advocacy (Small Business Administration) regional call; Donovan nominated himself for SBAR panel member. Donovan will share information as it's received.

- Several states may be sending in individual comments to support rule.
  - Series of five (5) rules: 4A – 4E, all similar (municipal, industrial commercial, other solid waste, etc.) – want to provide good comments to EPA on these.
  - Title V permits are federally enforceable because they go through EPA review. States could create general permit which EPA would review but the facility would only be classified as a minor source.
  - Donovan stated that he would be classified as a Small Entity Representative Assistant, since we don't represent small businesses directly.
- Some RASBLS are willing to help nearby regions. However, that is at their discretion. OAQPS will support either decision by a region.
    - There are currently a few RASBLS vacancies.
    - NSC still hoping to be able to speak directly with the RASBLS.
    - Belinda stated that her and Alaska were invited to Region 8 call and were told that the RASBL announced that he was leaving. Suggested we inform Rhonda Wright as an FYI.
    - Donovan stated it would be at the discretion of new RASBL to support Region 10 and Region 8.
- Rhonda plans to begin sharing summary of quarterly RASBL workgroup meetings
    - Provide us with ideas of how to connect with them and provide updates.
    - Grimwood and Lynch hope to meet with workgroup in June or October in order to determine ways to better connect and how they can help us.
- New/revised Presidential Executive Order on Climate Change. Strengthens more meaningful engagement and also removes focus on only large/classic impacts on communities.
    - Focuses on any level of impact on community that may cause them to be adversely affected – opens door for any level of EPA enforcement whether it be from classic impactors to small businesses.
- Lots of activity on Oil and Gas and EtO
    - A few hearings and public meetings coming up soon. Please share to get the information out.
- Small Business Week is here! Paula and OSDBU team working a lot on how to do contracts with EPA and working with EPA.
    - Thursday is EPA Administrator's Small Business Awards. Link sent out – can join virtually but will most likely need to register to attend.
    - Each state may be using social media to promote Small Business Week.
    - It's also Air Quality Awareness Week.
- Paula's report is getting more attention by EPA leadership. Which is a good thing though it brings its own set of questions from leadership.
    - Like what is intent of Ombudsman and the report

- Potentially the report may become an internal report, though preference is for it to be able to be public
  - We hope to get a summary of report.
- 507 report planned for next year would definitely be public.
- Looking forward to hearing more about Gabe Catenacci's survey of SBEAPs (CO)
  - Gabe stated that he was in final stages of project and he has the report written; it is currently in an internal review. Supervisors are pushing for report to be internal. Gabe is pushing for information to be public since the information is from other states. He may have to create separate report for external use compared to internal. Advocating to share data.
  - Jenifer Dixon expressed interest in seeing data and thought it might be helpful.
  - Gabe stated that he would be presenting sometime in August 2023 and hopes to disseminate data to states.

### **Subcommittee Updates**

- **Annual Training Planning – Crystal Warren**
  - Review of comments from NV and current progress on TN planning
    - TN hosting Annual Training Event for 2024
    - First meeting is Thursday, May 11, 2023 at 1:00 pm (central)
    - Get with Crystal Warren if interested in joining subcommittee
- **Technical – Mark Stoddard (Jenifer Dixon)**
  - Jenifer Dixon's last NSC meeting to provide Technical updates as Technical Co-Chair.
  - Next meeting will feature Tyler Salamasic from EPA to discuss defeat devices.
- **Website – Nancy Larson**
  - New banner for Small Business week
  - Lots of updates – try to make sure subcommittees know who their members are and ensure things are up to date, including state contacts.
  - Please email Nancy Larson if contact information needs to be updated.
  - Planning website tour in June – Date to be announced.
  - Working with Gabe Catenacci on presentation in August on data findings – will be on YouTube site.
  - Other things planned for fall
- **Education/Annual Report – Belinda Breidenbach**
  - Belinda stated Annual report didn't get as many states as anticipated – haven't closed the survey yet.
  - Lucy stated that Arkansas had some trouble submitting data through the survey; Belinda will make a note for Emily.

- **Promotional – Allison Crowther**
  - Plan for what to do with Annual Report data. Will post examples from states on website.
  - Reorganization of promotional webpage
  - Changing the meeting time to second Thursday of month at 11:00 am (central).
  - Donovan will draft regional letter for reps to sign; please send him examples.
  
- **EJ workgroup – Lisa Ashenbrenner-Hunt**
  - Last month had EPA Region 9 Enforcement guest speaker. Presentation was recorded and is on the webpage under the EJ subcommittee section.
  - Next meeting will discuss takeaways from the Annual Training and what priorities need to be.
  
- **Metrics workgroup**
  - Still trying to schedule more meetings.
  - Still needing to look at studies from Jeremy. Discussion was on database and data collection and what options are out there.
    - Spreadsheets
    - On-line methods of tracking

### Allied Updates

- **NAACA (Nancy H.)**
  - Spring membership meeting coming up on May 9<sup>th</sup> and 10<sup>th</sup> – Nancy will not be attending.
- **ECOS (Donovan)**
  - Gearing up for spring meeting
- **CAAAC (Dan)**
  - Jeremy – Extended self-nomination until end of April
- **AAPCA (Tony)**
  - No updates on AAPCA, but Tony did attend CAAPCA. Minor new source up for EPA review. May require modeling for some minor source permits.
  - EPA may start scrutinizing smaller permits.
- **Others**
  - Tony – 6H is not where we wanted it to be right now – May 9<sup>th</sup> may be electronic; will not outreach on topic. EPA may classify all chromium compounds as carcinogenic.
  - Tony – Updates on South Carolina: Rhonda Thompson, Myra head of Secretary to change Phyllis' job to multi-media; more responsibility.
  - Jeremy/Lucy – Update on reconstitution on National CAP?
    - Donovan – have list group members interested in discussing. First meeting will focus on trying to determine what structure we want from national advocacy board – thinking of potential names of board. Want to get away from CAP name, because it will not be a replacement for the state CAPs. This will provide better connections and resources at a national level for

us and states with no CAP. Will discuss who to reach out to. Need clear idea of what we want to ask them and what we expect from them.

- Contact with David Darling.
- Tony – Ethylene Oxide limits proposal – could be damaging to small businesses
  - Nancy – limit to one (1) ton.
  - Have to monitor to detectable limit – some background is already at that limit
  - EPA pushing strong public hearings and outreach
  - If you stay in exact location for 70 years, chances of getting cancer very high.
  - Proposal also including employee exposure
  - Jeremy – David Roster said Rule could possibly be a bottle neck. Comments due June 12, 2023. Public requesting more time.
  - 50% of medical products have to be sterilized with EtO.
  - Jenifer – spoke at air toxics conference last week and the main focus was EtO and outreach. Stressing how to communicate risk. She suggested getting small businesses to comment on the proposal.
  - Donovan requested any comments from those who are more involved with EtO; develop draft comment letter to move forward on.

**Next NSC Call – June 6, 2023**



# June 2023 SBO/SBEAP NSC Call

June 6, 2023

11:00 – 12:00 PT; 12:00 – 1:00 MT;  
1:00-2:00 CDT; 2:00-3:00 pm EST

Zoom Meeting:

<https://ksu.zoom.us/j/94067670673>

(646) 931-3860 or Find your local number:

<https://ksu.zoom.us/j/94067670673>

Meeting ID: 940 6767 0673

## NSC MISSION

*To serve, support, and strengthen the Small Business Environmental Assistance Programs through representation and collaboration*

### Minutes to be taken by Region 7

#### ❖ Attendees

Region 1: Sara Johnson (NH)

Region 2:

Region 3: Jeremy Hancher, Lee Ann Briggs (PA)

Region 4: Donovan Grimwood, Crystal Warren, (TN); Tony Pendola, (NC)

Region 5: Mark Stoddard, Kari Clevenger, (IN)

Region 6: Lloyd Kirk, (OK)

Region 7: Jennifer Wittenburg, (IA); Nancy Larson, Allison Crowther (KS)

Region 8: Eleanor Divver, (UT); Gabe Catenacci, (CO)

Region 9:

Region 10: Belinda Breidenbach, (ID)

EPA

#### ❖ Agenda repair

#### ❖ Approve May minutes

#### ❖ ASBO updates

- Paula's report is getting more attention by EPA leadership. Which is a good thing though it brings its own set of questions from leadership
  - Nearing completion
  - With more attention, results and recommendations are likely to be more internal
  - 507 report planned for next year would definitely be public – outward facing activities in line with 507 program
- Held multiple events during SB week in May as well as an In-Reach event for small businesses
- Talked with a region about support in connected to other regional states and holding an in-person regional meeting.
- Talked with OECA about 507 programs
- Looking forward to hearing more about Gabe Catenacci's survey of SBEAPs (CO) – Gabe reports it is finalized and external presentation approved; keeping CO recommendation private; needs approval on presentation

#### ❖ NSC Updates

- OSWI rule SBAR panel potentially still planned. Office of Advocacy had requested outreach for trying to get hospitals and universities that may have a municipal solid waste incinerator to get involved as that area is not represented on the current panel options. 40 CFR subpart <https://www.epa.gov/stationary-sources-air-pollution/other-solid-waste-incinerators-oswi-new-source-performance>. **\*\*Update: June Technical Subcommittee will have a presentation from EPA on OSWI\*\***
- Next NSC would need to be offset to **July 11<sup>th</sup>** due to July 4<sup>th</sup> holiday on first Tuesday of the month.

## ❖ Subcommittee Updates

- **Annual Training Planning- Crystal Warren**
  - Chattanooga currently selected as host city, at least \$500 cheaper for attendees as compared to other cities. Working on potential locations/venues and details related to approval to use subaward for food. Looking at later March to early April
- **Technical – Mark Stoddard**
- July topic: Effluent guidelines, August – auto and light duty truck; Dec. Mya Gilcrest of MN will present on PFAS; may have open forum one month; trying to get NCAC presentation, but EPA not responding, may go through the RASBL. Drycleaner NESHAP should be finalized in June, so that is also a potential topic. Others mentioned include, anesthetic gases and climate, 6H changes, LGEAN, TURI **\*\*Update: June Technical Subcommittee will have a presentation from EPA on OSWI\*\***
- **Website – Nancy Larson**
  - Drafted EJ flier for EJ subcommittee and EPA to review. Trying to finalize TN subaward and obtain needed quarter reports from NV.
- **Education / Annual Report – Belinda Breidenbach**
  - Finalizing Annual Report
- **Promotional – Allison Crowther**
  - **Need a new chair**
  - **Letters**
- **EJ – Lisa Ashenbrenner-Hunt**
  - No report, but meeting items shared via chat
- **Metrics workgroup**
  - Reviewed studies provided by Jeremy Hancher. Noted that studies were purely on costs and did not include benefits. Does show a clear SB impact and the economy of scale.
- **National Advocacy workgroup – first meeting scheduled for 6/13 –**
  - Plan to develop a structure – more to come

## ❖ Allied Updates

- **NAACA - (Nancy H.)**
- **ECOS - (Donovan)**
- **CAAAC – (Dan)**
- **AAPCA - (Tony) 6H;** EPA Released a fee memo warning that not adequately administering or enforcing a part 70 program (which includes SBEAP funding in Section 9) will have consequences.
- **Others**

## ❖ Other

- **EtO – Tony** has worked with this topic and EPA data collected show range of >1 million lbs used to <100 lbs. Tony recommend we advocate (via comment letter) for the small emitters to help them avoid Title V applicability. New technology installed can also reduce emissions further. Recommends have a MACT and a GACT, don't require MACT for all. Donovan asked Tony to take the lead, invite RTP reps to site visit Tony would facilitate. Draft comments can be taken to Seneca, R4 SBARL. Resources - <https://www.fda.gov/medical-devices/general-hospital-devices-and-supplies/fda-innovation-challenge-2-reduce-ethylene-oxide-emissions> and <https://www.epa.gov/il/addressing-ethylene-oxide-emissions-lake-county-illinois#:~:text=Quarterly%20emissions%20reports%20indicate%20that,leaking%20valves%20and%20other%20equipment>

Next NSC call – July 11, 2023

11:00 – 12:00 PT; 12:00 – 1:00 MT; 1:00-2:00 CDT; 2:00-3:00 pm EST

# August 2023 SBO/SBEAP NSC Call

August 1, 2023

11:00 – 12:00 PT; 12:00 – 1:00 MT;  
1:00-2:00 CDT; 2:00-3:00 pm EST

Zoom Meeting:

<https://ksu.zoom.us/j/94067670673>

(646) 931-3860 or Find your local number:

<https://ksu.zoom.us/j/94067670673>

Meeting ID: 940 6767 0673

## NSC MISSION

*To serve, support, and strengthen the Small Business Environmental Assistance Programs through representation and collaboration*

### Minutes to be taken by Region 9

#### ❖ Meeting attendees

Region 1: Sara Johnson (NH), Julie Churchill (ME)

Region 2: Ed Bakos (NJ)

Region 3: Jeremy Hancher (PA), Lee Ann Briggs (PA)

Region 4: Donovan Grimwood (TN); Crystal Warren (TN); Tony Pendola (NC)

Region 5: Renee Bashel (WI); Kari Clevenger (IN)

Region 6: Lloyd Kirk (OK)

Region 7: Nancy Larson (KS); Allison Crowther (KS)

Region 8: Gabe Catenacci (CO); Eleanor Divver (UT)

Region 9: Chris Lynch (NV)

Region 10: Belinda Breidenbach (ID)

#### ❖ Agenda repair

#### ❖ Approve July minutes - approved

#### ❖ ASBO/OAQPS updates

- OSWI SBAR looking over comments from Technical Subcommittee prior to planning SBAR start. **Donovan waiting to hear.**
- Starting to look ahead to next potential grant cycle that funds National SBEAP website and Annual Training. We're in year 4 of 5 of cycle. Paula's office has been discussing economic analysis with KS and what needs to change and what can remain the same. **Again, multiple competitive bids (3-5) will be needed from the SBEAP community or the solicitation could go out to third parties. This is a reflection of EPA bidding rules, not any dissatisfaction with KS.**

#### ❖ NSC Updates

- AERR signed, and **published on August 9** (<https://www.federalregister.gov/documents/2023/08/09/2023-16158/revisions-to-the-air-emissions-reporting-requirements>). Proposes implementation of HAP reporting from all sources by 2027. 70 day comment period following publication (**Comment period closes Oct 18, 2023**). Several webinars coming up:
  - **August 3 at 1 CST with focus on Point sources:** Click [HERE](#) to Register
  - **August 22 at 1 CST with focus on Fires, Nonpoint, and Mobile:** Click [HERE](#) to Register
  - **August 17, 24, and 29. Click here for more info:** <https://www.epa.gov/air-emissions-inventories/aerr-informational-webinars>

- More information is available [here](#), including a [pre-publication version](#) of the proposed rule
- Julie Churchill noted that Maine currently collects HAP data similar to what AERR is calling for every three years from larger businesses.
- Potential for many quality issues from smaller businesses that don't understand how to determine HAP emissions or submit data. Could require SBEAP programs to do outreach and develop new tools to report.
- Feeling that EPA may not follow up on smaller sources, but it remains an option for them to request it.
- Mark Stoddard noted a potential for two databases relating to HAP collection.
- Jeremy Hancher asked if HAP data can be picked up via ambient monitoring. There is a possibility it can be, though it would be dependent on system and sensitivity. It may have issues for picking up extremely low amounts that have been diluted by the time it reaches the ambient monitor.
- Tony Pendola noted that the AERR may become a driver for information to Air Toxics and EJ Screen
- If you have comments, send to Donovan and Chris
- Next planned comment on rules would be Perchloroethylene under TSCA. What comments might NSC want to make? Comments are due Aug 15; requesting all proposed comments to Donovan and Chris by Aug 9
  - Suggested: Comment on where P2 funds go to support outreach to perc users. SBEAPs already have familiarity with dry cleaners and many other sources.
  - Ban on new machine installation to prevent selling of old machine to another part of the country that would then have to be replaced soon due to overall perc ban for dry cleaners.
  - Extend to 3 years phase-out for non-dry cleaner uses of perc. This is in keeping with prior rules to allow for a period of transition.
  - Overall question: Do we feel we have enough information to substantially comment on rule?
  - Ed Bakos noted that 15 years should be a more appropriate period for perc machines based on their observed lifespan and cost issues. There is still a potential for 3<sup>rd</sup> generation machines to be in operation (can confirm. Based on research, about 28% of perc machines may still be 3<sup>rd</sup> gen.)

#### ❖ Subcommittee Updates

- **Annual Training Planning- Crystal Warren**
  - Chattanooga currently selected as host city. Working on potential locations/venues.
  - Of initial planned period, only Good Friday week was available at most likely venue (at govt per diem rate). Have reached out to other venues to see about additional options. Week of March 11 was another option and available at initial venue. March 12-14 for conference with travel days on either end.
- **Technical – Mark Stoddard**
  - There is a 15 minute overview planned for the August 15<sup>th</sup> Technical (didn't note subject) then Automobile and Light Duty Truck NESHAP
  - Aug: New emission reduction techniques – speaker, Paula Hirtz; and AERR update from Mark Houydux
  - Sept: PFAS in metal plating and finishing industry – speaker, Maya Gimchrist
  - Oct: EJ Screen, ECHO Notify, and CEJST – speaker, Tony Pendola
  - Nov: Solar panel recycling – speaker, Donovan Grimwood
  - Potential on National Compliance Centers at Annual Training
- **Website – Nancy Larson**
  - Annual Report is ready and posted!
  - Web tour coming up on August 16 (30 minutes)
- **Education / Annual Report – Belinda Breidenbach**
  - Planning a grant writing webinar

- **Promotional – Crystal Warren/Allison Crowther**
  - Crystal has stepped up as co-chair for Promotional. Needs another co-chair to help out.
  - **Dan Sowry of OH has stepped up to be co-chair with Crystal**
- **EJ workgroup – Lisa Ashenbrenner-Hunt**
  - **Working on identifying training needs.**
- **Metrics workgroup**
  - Next meeting in August. Looking at percentages of permits issued by state vs. number of assistances in specific media (air, water, etc.) to indicate comparative impact.
- **National Advocacy workgroup**
  - Working on guidance for National Advocacy Committee based on National CAP. Planning to invite potential members to Sept. call to review guidance and get feedback.

❖ **Allied Updates**

- **NAACA - (Nancy H.) – no updates**
- **ECOS - (Donovan) –** accepting comments on draft resolutions supporting E Enterprise for Environment, Rule Promulgation and Implementation, and issuance of guidance. Not really seeing a need for NSC to comment. Also ECOS published a press statement and letter regarding House Appropriations Funding for FY24 entitled: ECOS Urges Congress Not to Harm State Environmental Programs. Also comments were accepted on CAA, CWA, and RCRA Plain Language Guides (Round 5).
- **CAAAC – (Dan)**
- **AAPCA - (Tony) – Fall meeting in Raleigh**
- **Others**

**Next NSC call – September 12, 2023 (NOTE CHANGE OF DATE DUE TO LABOR DAY)**

**11:00 – 12:00 PT; 12:00 – 1:00 MT; 1:00-2:00 CDT; 2:00-3:00 pm EST**

# September 2023 SBO/SBEAP NSC Call

September 12, 2023

11:00 – 12:00 PT; 12:00 – 1:00 MT;  
1:00-2:00 CDT; 2:00-3:00 pm EST

**Zoom Meeting:**

<https://ksu.zoom.us/j/98427111646>

(669) 444-9171 or [Find your local number:](#)

<https://ksu.zoom.us/u/aeCw4pmX3s>

Meeting ID: 984 2711 1646

## **NSC MISSION**

*To serve, support, and strengthen the Small Business Environmental Assistance Programs through representation and collaboration*

### **Minutes to be taken by Region 1**

- ❖ **Attendees:** Chris Lynch, Donovan Grimwood, Crystal Warren, Allison Crowther, Angela Hughes, Lee Ann Briggs, Kari Clevenger, Elanor Divver, Mark Stoddard, Jennifer Wittenburg, Jeremy Hancher, Sara Johnson, Nancy Herb, Gabe Catenacci
- ❖ **Agenda repair – no repair to agenda**
- ❖ **Approve August minutes- minutes approved**
- ❖ **ASBO/OAQPS updates**
  - Helping Region 6 with planned regional in-person conference. R6 RASBL is currently vacant. Hope to make a connection at the annual training in Reg 6. Paula may be able to help with regional calls/meetings.
  - New system for grants at EPA now. Working through it for the grant to support the SBEAPs. Working with KSU for ideas/suggestions on next grant cycle. Start talking to organization now to determine if your state will apply. Paula working on grant proposal. Not sure if the exclusivity clause will continue, it may need to be released to general public. In the past, prior to current Kansas award, there have been outside contractors, EPA staff, and a few years that no one that managed web page and annual training.
  - Working on Stakeholder Guidelines with goal to do more informal outreach on lesser issues or perhaps prep for the more formal SBAR. Not sure if Paula will be able to share this information with us, but SBEAP may be included in the outreach. Rhonda is back.
- ❖ **NSC Updates**
  - OSWI rule SBAR still upcoming. TN is following this closely and lots of questions.
  - Question – Past 2 letters to EPA on SBEAP comments – check to verify they are online and share with SBEAP Main, Donovan will send. Jeremy shared these letters to their Reg 1 advocacy committee.
  - Next planned comment on rules would be AERR. See attached summary. There have been multiple webinars from EPA on this. Deadline for comments is Oct 18<sup>th</sup>. Changes to AERR appear to be connected with FY 2024-27 EPA National Enforcement and Compliance Initiatives (see attached). Some items from webinar focused on Small Businesses and Tribes:
    - Emission reporting not confidential information. It may be feeding into ECHO.
    - Thresholds for each HAP. Those with less data on toxicity set at 10 tons/year.
    - Some reduced reporting burdens on small businesses. Currently asking for feedback on whether to use SBA or CAA definition of small business.
    - All major sources and those non-major within specific NAICS classifications would need to report.

- If threshold to report is met, would also need to include criteria pollutants and precursors (VOC)
- Requires reporting of performance tests to meet NESHAP or similar rules
- Excludes auto body collision industry specifically. Due to comments during SBAR panel.
- Plan to have draft by October NSC. Please send comments to Donovan and Chris. These can also include supporting comments for changes that EPA is proposing as well as suggestions for improvements, especially if there is data supporting the comments.
- From PA: <https://askemap.org/implications-of-the-aerr-proposed-rule-for-small-businesses/>
- EPA looking for more data but not sure what they are using that data for. Iowa concerned about asking for additional reporting to EPA. Facility wide vs individual devices reporting.
- A question came up that if a facility doesn't have a permit, but meets a threshold, would they still have to report? As best as can be determined: Yes.
- Some states have this in place already. IA reports about 1800 facilities through a similar AERR HAP tracking, though not as often as new requirement is asking.
- Dan Sowry has stepped up to join Crystal as co-chairs of Promotional.

#### ❖ Subcommittee Updates

- **Annual Training Planning- Crystal Warren**
  - Chattanooga currently selected as host city. Working on potential locations/venues. 6 months to training. Training is week of March 11, 2023. Save the date flyer going out after TN OGC gives us the go ahead to sign contract. Contract under OGC review currently.
- **Technical – Mark Stoddard/Lee Ann Briggs** – Wants to work on increasing membership, such as Reg 6, 9 and 10. Mia Gilcrest presenting PFAS in metal plating in Sept. Oct will be on ECHO notifying and screening tool. Nov may be solar paneling recycling with Donovan Grimwood presenting. Potential annual training session on National Compliance Centers.
- **Website – Nancy Larson** – Allison – Last meeting web site tour, recorded and will be posted soon. Next meeting Gabe presenting on his findings on Nov 8.
- **Education / Annual Report – Belinda Breidenbach** – no comments
- **Promotional – Crystal Warren/Dan Sowry** – Thank you Dan for co-chairing. No meeting this month. Trying to get more states involved. Want more engagement and members.
- **EJ workgroup – Lisa Ashenbrenner-Hunt** – nothing to report and agenda for this week's call has been sent via email.
- **Metrics workgroup**
  - Sept. 21. Looking at how we can better report outcomes, especially in terms of pollution prevented and dollars saved. If we come up with some good methods, may work with Education on a session.
- **National Advocacy workgroup**
  - Next call being postponed until October due to overlap with NSC. Working on revisions to draft guidelines.

#### ❖ Allied Updates

- **NAACA - (Nancy Herb)** - Annual meeting in October
- **ECOS - (Donovan)** – FY 2024-27 EPA National Enforcement and Compliance Initiatives sent out (see attached). Next meeting planned for Sept 20<sup>th</sup>.
- **CAAAC – (Dan Nickey)** – Jeremy Hancher has been invited to be on the CAAAC. Next meeting this fall. Congratulations
- **AAPCA - (Tony)** – no comments
- **Others**

Next NSC call – October 3, 2023

11:00 – 12:00 PT; 12:00 – 1:00 MT; 1:00-2:00 CDT; 2:00-3:00 pm EST





# October 2023 SBO/SBEAP NSC Call

**October 3, 2023**

**11:00 – 12:00 PT; 12:00 – 1:00 MT;  
1:00-2:00 CDT; 2:00-3:00 pm EST**

**Zoom Meeting:**

<https://ksu.zoom.us/j/98427111646>

(669) 444-9171 or [Find your local number:](#)

<https://ksu.zoom.us/j/98427111646>

Meeting ID: 984 2711 1646

## **NSC MISSION**

***To serve, support, and strengthen the Small Business Environmental Assistance Programs through representation and collaboration***

## **Minutes to be taken by Region 2**

- ❖ **Agenda repair**
- ❖ **Approve August minutes**
- ❖ **ASBO/OAQPS updates**
  - Looking ahead to next fiscal year, including working on travel plans. If your state/region has conferences that are upcoming that may be a good fit for Paula and team to attend, please pass that information on to her. Examples are Small Business oriented or sustainability conference. Especially standing (i.e. annual events at the same time of year) events as that can more easily be planned for.
  - Working on 2024 507 public report. This report among other things helps advocate for more informal interaction even prior to SBAR panels. Note: 2025 the 507 program will be turning 30 yrs old.
  - Smart Steps to Sustainability being updated (last updated in 2016). Adding information to web page.
  - Wants to hear from States with P2 programs to share ideas or information for P2 page (links or cloning of information). OSDBU is looking to update sustainability guide and are interested in surveying what the state's use for sustainability resources to help small biz, and/or will be seeking feedback from the states on their upcoming sustainability guide. Still early on this so may come back around to this later.
- ❖ **NSC Updates**
  - Next planned comment on rules would be AERR. There have been multiple webinars from EPA on this. Deadline for comments is Oct 18<sup>th</sup>. Comments will be shared with others. Changes to AERR appear to be connected with FY 2024-27 EPA National Enforcement and Compliance Initiatives. Some items from webinar focused on Small Businesses and Tribes:
  - AERR deadline moved to Nov. 17<sup>th</sup>.
  - MM2A comments due Nov. 13<sup>th</sup>. Tony sent out a quick bullet-point summary of some of the highlights of the proposed changes. Of especial interest is potential redefining of PTE.
- ❖ **Subcommittee Updates**
  - **Annual Training Planning- Crystal Warren**
    - Continuing with Chattanooga currently selected as host city. Working on potential locations/venues.
  - **Technical – Mark Stoddard/Lee Ann Briggs**
    - Workgroup is looking for the future presenters. On Oct 17<sup>th</sup> speaker Tony Pendola and echo, November Solar Panels, December future topics, January Mary Baker from Kansas presenting economic screening tool
  - **Website – Nancy Larson**

- Meeting Oct 26 for update on topics like EJ, Grants, Sustainability, Compliance Assistance, and Tennessee Sub Award
- **Education / Annual Report – Belinda Breidenbach**
  - Information provided by Nancy Larson meeting Sept 26 discussed grant writing: RFA
- **Promotional – Crystal Warren/Dan Sowry:** No updates
- **EJ workgroup – Lisa Ashenbrenner- Hunt**
  - NEJAC (National Environmental Justice Advisory Committee) may have an opening coming up. Asking for interested people now to prepare for submission of nomination. Also, working on an EJ flyer that can be used by all states.
- **Metrics workgroup**
  - Oct. 19. Looking at how we can better report outcomes, especially in terms of pollution prevented and dollars saved. If we come up with some good methods, may work with Education on a session. May include cost analysis for the SBEAP
- **National Advocacy workgroup**
  - Invitations sent out to initial National Advocacy Committee potentials. Will resend as have not had meeting accepted yet by potentials. Some comments received on guidelines to review.

❖ **Allied Updates**

- **NAACA - (Nancy Herb)** No update
- **ECOS - (Donovan)** – Discussion on policies relating to Supplemental Environmental Projects (SEPs) 2015 is considered current policy with 2022 DOJ interim final rule/memo resetting to 2015 or adding to it a little. There is to be more focus on EJ with SEPs and more focus on Environmental Health. More partnerships with communities to help direct ideas for SEPs. Example is MA order against school system for excessive bus idling led to EJ driven SEP.
- **CAAAC – (Jeremy Hancher)** - discussed orientation NAAPA, Duke Energy Meeting December 7th
- **AAPCA - (Tony)** – Invited Metro 4/SESARM (Region 4 MJO) Executive Director Greg DeAngelo to annual SBEAP conference . Rule to require enhanced public comment and review that states were quite concerned about last year is now on the backburner and likely to be guidance instead.
- **Others**  
Chris Lynch discussed a Technical Meeting on PFAS next month  
AERR Comment draft letter looking forward to  
MM2A

**Next NSC call – November 7, 2023**

**11:00 – 12:00 PT; 12:00 – 1:00 MT; 1:00-2:00 CDT; 2:00-3:00 pm EST**

# November 2023 SBO/SBEAP NSC Call

November 7, 2023

11:00 – 12:00 PT; 12:00 – 1:00 MT;  
1:00-2:00 CDT; 2:00-3:00 pm EST

Zoom Meeting:

<https://ksu.zoom.us/j/98427111646>

(669) 444-9171 or [Find your local number:](#)

<https://ksu.zoom.us/u/ay1zekckJ>

Meeting ID: 984 2711 1646

## NSC MISSION

*To serve, support, and strengthen the Small Business Environmental Assistance Programs through representation and collaboration*

### Minutes to be taken by Region 3

- ❖ Agenda repair **none**.
- ❖ Approve October minutes (Tony had some edits to the AAPCA entry) **Jeremy added some add'l edits. Donovan to send out newly updated minutes.**
- ❖ **ASBO/OAQPS updates**
  - FY 2024 priorities determined and working on new grant cycle. **Taking up a good bit of their time.**
  - EJ Flyer progressing in conjunction with NSC EJ Subcommittee **Next call is tomorrow.**
  - Met with SBA national ombudsman Michelle ?Chimp?. Discussed ESG and how it may impact Stakeholder Engagement guidance **Environment Social Governance (ESG) reporting.**
  - **Rhonda talked about 2 upcoming webinars.**
- ❖ **NSC Updates**
  - MM2A comments due Nov 13<sup>th</sup>. At this point still being worked on. Hope to have draft comment letter by NSC call. **Draft comments sent out 11/6. EPA putting in lots of provisions to prevent backsliding. Ideas are potentially unnecessary because a lot of the requirements are typically in existing air permits. Limits may inhibit a company's growth. Julie sent comment letter to her Air Bureau in Maine and will pass along any comments.**
  - Next planned comment on rules would be AERR. There have been multiple webinars from EPA on this. Deadline for comments is Nov 17<sup>th</sup>. Changes to AERR appear to be connected with FY 2024-27 EPA National Enforcement and Compliance Initiatives. Draft comment letter sent out to main for review. No comments received as of yet. **A lot of info has been shared on this rulemaking and has been getting a lot of notice. Mark H. from EPA has presented repeatedly on the topic.**
  - **Suggestion that Technical Subcommittee take a cursory review or proposed rulemakings for comments.**
  - **General comment in comment letters to change out or edit out "NSC" with "National SBEAPs". The idea is that it might create an identity issue with who the comment letters are actually coming from (e.g. NSC or National SBEAPs). In addition, it might skew how big the national SBEAP actually is – a few states or a national program of collective state programs. A couple of other NSC members were in agreement with this suggestion.**
- ❖ **Subcommittee Updates**
  - **Annual Training Planning- Crystal Warren**
    - Contract making its way through channels. Should be ready to send to venue soon if it hasn't already. **Survey sent out for topics and interest in attending. Agenda and speakers will be a focus moving forward. Popular topic was enforcement and voluntary disclosure. Idea to change format of overall training – less being "talked to" and more**

interaction, discussion, and engagement. K-State working through subcontract with TN. Award nominations have opened in a recent email announcement.

- **Technical – Mark Stoddard/Lee Ann Briggs** – Agreement to promote National SBEAPs over NSC. SBA Advocacy event in Pittsburgh last week. Dave Rostker gave a big shoutout to Nat'l SBEAPs. Technical can get involved in comment letters. Already have some speakers on future subcommittee meetings and will work on annual training topics.
- **Website – Nancy Larson** recent meeting with focus on compliance assistance and enforcement policy. R7 meeting upcoming and will discuss those topics. More than 50 rsvp'd on CAP discussion by Gabe (CO) on 11/8 meeting.
- **Education / Annual Report – Belinda Breidenbach** Week after Thanksgiving on grant writing (Nancy L and Paula will be presenting). In addition, this meeting will include a discussion on the National SBEAP website grant.
- **Promotional – Crystal Warren/Dan Sowry** Very little update, but discussions on the side. Change of direction in terms of promotion, advocacy workgroup, and metrics to better promote SBEAP in general. Thus, some cohesion of these groups would be of interest overall in the grand scheme of things.
- **EJ workgroup – Lisa Ashenbrenner-Hunt** EJ flyer being drafted with website grant in collaboration with Paula and team. First draft wasn't received well. Now on draft seven. Frustration with this much work on one-page flyer. Issue of using template versus graphic design. Quite possibly going back to first draft. Question on who is supposed to distribute the flyer? Thought is it will go on National SBEAP website with hope/intent that each state would use the template, personalize it, and distribute it on each state's own time & resources. If National SBEAPs are the ones expected to distribute this flyer, then SBEAPs should have majority control of content and design of flyer. EJ subcommittee meeting tomorrow. Climate and economic justice tool coming up on the horizon. Looking for interest in NEJAC – no one has spoken up yet.
- **Metrics workgroup**
  - Nov. 19. Further review of Kenya Stump paper from 2006. Maybe use premise from paper and update numbers. Low attendance lately on workgroup. Issue has come up of doing analysis on program inventory of costs and benefits.
- **National Advocacy workgroup**
  - May need to reevaluate goals of workgroup. Had some great advice and critique from Kerry Mattox and David Rostker that may cause a refocus and more strategic development. Great advice and critique provided. Going in the right direction but not a good way to go about it. Perhaps develop a government affairs strategy and promotion strategy to have a national impact. Kerry Mattox of American Coatings Association offered connection to their gov't affairs strategy.

❖ **Allied Updates**

- **NAACA - (Nancy Herb)** no direct updates on NAACA. Spoke to EJ policy, specifically about PA's revised EJ policy that looks to enhance overall public participation. SBEAP's play an important part in helping small businesses get necessary permits so perhaps we could speak to this topic on earlier EJ discussion.
- **ECOS - (Donovan) –**
- **AAPCA - (Tony) –** someone in Tony's department assuming role of AAPCA president (need to verify).
- **Others**

**Next NSC call – December 5, 2023**



















































**11:00 – 12:00 PT; 12:00 – 1:00 MT; 1:00-2:00 CDT; 2:00-3:00 pm EST**

**Attendance for today's call:**

Participants (17)



Q Search

-  Jeremy Hancher (me)  
-  Nancy Larson (Host)  
-  **DG** Donovan Grimwood - TN R4   
-  Belinda Breidenbach  
-  Briggs, Lee Ann  
-  **CW** Crystal Warren - TDEC  
-  **ED** Eleanor Diver  
-  **GC** Gabe Catenacci - CDPHE  
-  Jennifer Wittenburg  
-  **JP** Jim Plosay (ADEC)  
-  **JD** Julie.M.Churchill DEP  
-  **LA** Lisa Ashenbrenner Hunt (WI DNR)  
-  **LK** Lloyd Kirk  
-  **NH** Nancy Herb  
-  **RB** Renee Bashel  
-  Sara Johnson  
-  Tony Pendola 