



# Environmental Council of the States

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October 23, 2020

Mr. Marc Vincent  
Mr. Timothy Roberts  
U.S. Environmental Protection Agency  
Office of Air and Radiation  
1200 Pennsylvania Ave. NW  
Washington, D.C. 20460

## Re: Early Engagement on FY 2022 – FY 2023 National Program Guidance

Dear Mr. Vincent and Mr. Roberts:

ECOS members appreciate the opportunity to provide early input on the OAR FY 2022 – FY 2023 National Program Guidance. EPA's efforts to engage with states in enhancing planning and communication in air program work will lead to improvements in our collective ability to protect human health and the environment.

In recent discussions with EPA senior leadership and with OMB, ECOS has identified four priority issues: adequate funding, flexibility, E-Enterprise for the Environment, and technology infrastructure. These priorities will be reflected in much of the input we provide for your consideration in developing the National Program Guidance.

Federal funding makes up about 27% of average state environmental agency budgets, and overall STAG funding has been flat for 18 years. Budget impacts from the COVID pandemic stand to impose further challenges. Increased federal funding and flexibility in the use of funds and in program implementation will be important to continued success in delivering results.

States urge continued investment in data systems to improve the interoperability between state and federal databases. Better integration of the data systems can improve reporting, reduce regulatory burden, and improve data accuracy. Joint governance under E-Enterprise for the Environment is a key tool for driving program modernization and coordinating needed investments in information systems. Support for technology infrastructure and the latitude for state pilot projects will accelerate the adoption of new more efficient tools to meet our shared goals. Current air program related E-Enterprise projects streamlining the business of environmental agencies include:

- The Combined Air Emissions Reporting project which streamlines industry air emissions reporting to the National Emissions Inventory, the Toxic Release Inventory, reporting to the Compliance and Emissions Data Reporting Interface and the Greenhouse Gas Reporting Program.
- The State Plan Electronic Collaboration System project which improves efficiencies across agencies by allowing state and local air agencies to electronically submit and track State Implementation Plans and Exceptional Events Demonstrations with further expansion to include additional types of air quality submissions, specifically for the Regional Haze Plans.
- The Advanced Monitoring Strategy and Implementation project which aims to better understand the application of new technologies and to strengthen the quality of real-time monitoring data being generated by promoting quality data, identifying new technologies as they emerge on the market, developing data interpretation guidance, and promoting standardization of data collection and exchange.

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ECOS Executive Director

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- The Regulation Navigation (Reg Nav) tool project which continues to add interactive tools that allow owners, operators, and other industry personnel to generally determine the applicability and regulatory requirements of certain air quality rules to their facilities.

ECOS also encourages EPA to continue to work cooperatively with states as they update the National Emission Standards for Hazardous Air Pollutants, specifically regarding lead-acid battery manufacturing.

Additionally, in line with recent updates to ECOS Resolution 17-5, *On National Ambient Air Quality Standards*, ECOS encourages EPA to continue to support states' efforts to address equity issues in environmental justice and low-income communities disproportionately impacted by air pollution.

Thank you again for this early opportunity to provide input on the OAR FY 2022 – FY 2023 National Program Guidance. ECOS members continue to advance and streamline air program activities in response to new technologies and these unprecedented times. EPA's continued prioritization of adequate funding, flexibility, E-Enterprise for the Environment, and technology infrastructure will enable all parties to continue to improve outcomes for all people.

Sincerely,



Donald Welsh  
Executive Director  
Environmental Council of the States