

Office of Air and Radiation (OAR) FY 2018-2019 NPM Guidance: External Comments and Responses

September 29, 2017

Issue Area	Comment	Commenter(s)	Location in FY 2018-2019 NPM Guidance	Response
NAAQS	This section should include language in support of continued coordination between states and EPA related to the implementation of the Ozone and PM 2.5 NAAQS, SIP submittals, and upcoming rules including the Lead and Ozone NAAQS. States expressed interest in this coordination in the early engagement process, and ECOS' Cooperative Federalism 2.0 paper emphasizes a model of cooperative federalism in which states engage with EPA in the development of national minimum standards to protect human health and the environment, and in any federal requirements regarding implementation of those standards.	Environmental Council of States (ECOS)	2.1 NAAQS	Thank you for your comment. OAR supports continued coordination with states and engagement with states on appropriate federal minimum standards described in ECOS' Cooperative Federalism 2.0 paper. OAR has included language in the Introduction.
NAAQS	Appreciate prioritizing SIP activities; Suggest that EPA SIP Implementation Rules and Guidance be created or updated to foster submittal of approvable SIPs that receive timely and appropriate EPA review and action.	Wyoming Department of Environmental Quality	Section 2.1.1.1 SIP	OAR appreciates your comment and will continue to look for ways to facilitate submission of approvable SIPs and timely action.
NAAQS	Appreciate that review and comment opportunities will be provided. Much remains to be understood about intermountain, high-altitude, background and international pollution contributions.	Wyoming Department of Environmental Quality	Section 2.1.1.3 Other – Modeling – Item 6 – modeling platform	Thank you for your comment. In partnership with state agencies and stakeholders, OAR plans to apply, evaluate, and ultimately improve global air quality model-based estimates of background contributions which will be especially valuable at higher elevation portions of the intermountain western U.S.

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NAAQS	<p>On January 6, 2017, EPA issued a Notice of Data Availability (NODA) to provide preliminary interstate transport modeling data for the 2015 NAAQS. Following issuance of this NODA, several state agencies have requested that EPA revise the projected 2023 emissions inventory to remove assumptions related to implementation of the Clean Power Plan, to reflect specific known changes to future emissions, and to utilize a more recent baseline period. Should EPA elect to update the 2023 emissions inventory or re-do the modeling, this would impact at least two of the items contained in the Guidance Document:</p> <ul style="list-style-type: none"> • Section 2.1.1.1, item 1, “Develop and submit good neighbor SIPs for the 2008 and 2015 ozone NAAQS.” • Section 2.1.1.3, item 3, “Review and comment on the latest Modeling Platform, including future year emissions projections.” <p>Depending on EPA’s decision in regard to these requests, the Division recommends appropriate revisions to the Guidance Document accordingly</p>	Tennessee Department of Environment and Conservation, Division of Air Pollution Control	Section 2.1.1	With regard to the Section 2.1.1.3, item 3 of your comment, OAR anticipates providing additional opportunities during FY 2018 for review of OAR emissions modeling platform data. These opportunities may take various forms, including (but not limited) to NODAs and proposed rulemakings. OAR edited the guidance to specify “Emissions Modeling Platform.” <i>(The item referenced in the comment pertains to item 6, not item 3).</i>
NAAQS	EPA should extend the 5-year cycle for reviewing NAAQS to an 8-10-year cycle for review. This extension allows for a more thorough vetting process for all participants.	Knox County Department of Air Quality Management	OAR Guidance, Appendix B, Ambient Monitoring	Section 109 of the Clean Air Act requires EPA to review NAAQS every five years.

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NAAQS – Other	Is this for wood stoves only or does it include wood-fired boilers that are covered under MACT/GACT. It is very important that the wording “where it is a significant contributor” is retained so states/locals have the ability to analyze any particular situation and take appropriate actions, if necessary.	North Carolina Department of Environmental Quality, Department of Air Quality	Section 2.1.1.3 Other – number 2	The 2015 Residential Wood heater NSPS applies only to residential wood heaters. OAR continues to encourage States to reduce wood smoke, regardless of the source. This can be done through best burn practices education, wood heater changeout programs, and other locally derived solutions.
NAAQS – Other	So long as EPA provides documentation and methodology well in advance of due dates, N.C. DAQ is prepared to submit data to EIS for the 2017 NEI.	North Carolina Department of Environmental Quality, Department of Air Quality	Section 2.1.1.3 Other – number 5	OAR is committed to provide necessary documentation and methodology well in advance of due dates and appreciates your commitment to submit data to EIS for the 2017 NEI.
NAAQS – Other	N.C. DEQ-DAQ requests that this goal be removed from the funding agreement. Participation in the EPA ozone and PM Advance programs is voluntary, and should not be included in a funding agreement.	North Carolina Department of Environmental Quality, Department of Air Quality	Section 2.1.1.3 Other – number 8	The draft OAR NPM guidance communicates the range of activities state and local air agencies may undertake. Item 8 has been modified to convey the voluntary nature of the ozone and PM Advance programs.
NAAQS – Ozone	Recommend correction to text – Develop and submit good neighbor SIPs for the 2008 (if not yet submitted) and 2015 ozone NAAQS.	North Carolina Department of Environmental Quality, Department of Air Quality	Section 2.1.1.1 – number 1	This update has been incorporated.
NAAQS – Ozone	Not applicable during the 2018-19 cycle with delayed designations. This part may need to be removed.	North Carolina Department of Environmental Quality, Department of Air Quality	Section 2.1.1.1 – number 6	The “if required” clause at the end of Section 2.1.1.1, item 6, acknowledges several pending steps in the 2015 ozone NAAQS designation process.
Regional Haze	EPA has been unclear about the release of the final Regional Haze guidance document. This document and modeling release should be made well in advance.	North Carolina Department of Environmental Quality, Department of Air Quality	Section 2.2	OAR is working to determine what additional guidance is appropriate.

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Regional Haze	Recommend correction to text – Implement BART and other SIP Requirements, as applicable.	North Carolina Department of Environmental Quality, Department of Air Quality	Section 2.2.1 – number 2	The suggestion was incorporated.
Regional Haze	Appreciate the forward looking encouragement and support for SIP submittals prior to the 2021 deadline.	Wyoming Department of Environmental Quality	Section 2.2.1.4 and 5 – Regional Haze SIPs and visibility estimates	Thank you for your comment.
Title V and New Source Review Permitting	We urge EPA to maintain protection of public health and the environment as it considers actions to repeal, replace, or modify existing regulations to streamline the federal permitting process and reduce regulatory burdens for domestic manufacturers pursuant to the January 24, 2017, Presidential Memorandum on permit streamlining and Executive Order 13777.	Massachusetts Department of Environmental Protection	2.3 Title V and New Source Review Permitting	Thank you for your comment.
Title V and New Source Review Permitting	Support and encourage sensible permit streamlining that reduces regulatory burdens and removes backlogs while also being consistent with CAA requirements.	Wyoming Department of Environmental Quality	Section 2.3 - Title V and New Source Review Permitting	Thank you for your comment.

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Title V and New Source Review Permitting	With the current level of funding and other higher-priority activities which have a greater immediate impact on air quality, it is already an issue for New York to provide timely data on the Title V permits, BACT/LAER determinations, and PSD permits to EPA. Further resource cuts would compound this problem.	New York State Department of Environmental Conservation Division of Air Resources and Bureau of Stationary Sources	2.3: Title V and New Source Review Permitting (2.3.1 Expected State & Local Agency Activities, #s 1, 5, & 6)	The air program is committed to working collaboratively with states, tribes, and local agencies during the course of work planning.
Title V and New Source Review Permitting	New York believes the program guidance should reflect a more collaborative approach to responding to EPA’s Title V permit program evaluation report and implementing recommendations. New York believes activity 3. “Participate with EPA in Title V permit program evaluations, set targets to respond to EPA’s evaluation report, and implement recommendations,” should include a discussion process to attempt to reach mutually agreed upon solutions.	New York State Department of Environmental Conservation Division of Air Resources and Bureau of Stationary Sources	2.3: Title V and New Source Review Permitting (2.3.1 Expected State & Local Agency Activities, # 3)	OAR will consider this comment in developing forthcoming guidances: “Program and Fee Evaluation Strategy and Guidance for 40 CFR Part 70” (Title V Evaluation Guidance) and the “Updated Guidance on EPA Review of Fee Schedules for Operating Permit Programs under Title V” (Updated Fee Schedule Guidance).
Title V and New Source Review Permitting	5. refers to RBLC Clearinghouse and 6. Refers to RBLC national database. This implies two separate databases, but we believe there is only one. We suggest sticking with one term or the other in both items.	Wisconsin Department of Natural Resources	2.3.1 items 5., and 6.	The suggestion was incorporated.

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Title V and New Source Review Permitting	New York supports commonsense efforts to repeal, replace, or modify existing regulations to streamline the federal permitting process pursuant to the January 24, 2017, Presidential Memorandum on permit streamlining and Executive Order 13777, provided that the changes will not have a negative impact on air quality. Regulatory proposals must be developed through an open and transparent process that includes parties with a wide range of viewpoints and interests. Any notion of an arbitrary two repeals for every new regulation must be dropped.	New York State Department of Environmental Conservation Division of Air Resources and Bureau of Stationary Sources	2.3: Title V and New Source Review Permitting	Thank you for your comment.
Ambient Monitoring	EPA Should Extend the Comment Period to Allow States Additional Time to Review the Ambient Monitoring Appendix. Due to what appears to be a technical issue, the Ambient Monitoring Appendix to the NPM Guidance was not made available to the public until July 24, 2017. Given the importance of ambient air monitoring to state air programs, ADEQ requests additional time to review this critical document to allow supplementary comments to be developed on issues pertaining to this Appendix. Specifically, ADEQ requests at least an additional two weeks to allow a thorough review.	Arkansas Department of Environmental Quality, Office of Air Quality	2.4 Ambient Air Monitoring for Criteria Pollutants	While the monitoring appendix was slightly delayed in posting, OAR commits to working collaboratively with state and local agencies on ambient air monitoring planning and commitments to address concerns agencies may have.

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Ambient Monitoring	Appreciate EPA's commitment and continue to encourage regional offices to work closely with states to ensure sensible and flexible improvements in ambient air monitoring networks tailored to address each state's unique priorities, challenges and approaches.	Wyoming Department of Environmental Quality	Ambient Monitoring Appendix – page 1	Thank you for your comment.
Ambient Monitoring	Support continued 103 and 105 resources that are sufficient to meet EPA monitoring goals and requirements.	Wyoming Department of Environmental Quality	Ambient Monitoring Appendix – page 3	Thank you for your comment.
Ambient Monitoring	Support use of resources directed towards improved data management systems	Wyoming Department of Environmental Quality	Ambient Monitoring Appendix – page 8	Thank you for your comment.
Monitoring - Grant Funding	Ensuring acceptable QA audits for applicable monitoring systems relies on a steady supply of equipment and materials including a sufficient supply of calibration gases and replacement parts for calibrators and various other audit devices measuring flow, temperature and pressure. Funding cuts could significantly curtail necessary maintenance and certification of instrumentation and devices used to conduct audits which could result in a reduction to the scope and frequency of QA audits compromising the validity of monitoring data.	New York State Department of Environmental Conservation Division of Air Resources	Section 2.4: Ambient Air Monitoring for Criteria Pollutants (Section 2.4.1, # 2)	OAR appreciates the challenges of maintaining monitoring equipment, materials, and replacement parts to ensure acceptable QA audits, especially under reduced funding scenarios. OAR commits to working with state and local agencies to minimize disruptions.

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Monitoring - Grant Funding	Quality Assurance (QA) checks for PM2.5 speciation monitors are currently conducted on a semiannual basis. Monthly QA checks represent a significant additional mandate which would be difficult to sustain in light of funding cuts. Monthly QA checks should not be required unless additional funding is provided.	New York State Department of Environmental Conservation Division of Air Resources	Section 2.4: Ambient Air Monitoring for Criteria Pollutants (Section 2.4.1, # 3)	Per the current Chemical Speciation Network (CSN) Field Quality Assurance Project Plan (QAPP) (https://www3.epa.gov/ttnamti1/files/ambient/pm25/spec/CSN_QAPP_v120_05-2012.pdf), EPA requires monthly flow checks/verifications and semi-annual flow audits. Submittal of the monthly flow checks/verifications is voluntary; however, submittal of the semi-annual flow audit results is required (page 128). EPA will revise the statement in the NPM guidance to the following “Conduct monthly QA flow checks/verifications and semi-annual flow audits of PM2.5 speciation monitors. Submit semi-annual flow audit results to the Air Quality System (AQS). Submittal of monthly flow checks/verifications to AQS is optional.”
Monitoring - Grant Funding	Operation and maintenance of ambient air and air toxics monitoring equipment relies on a constant supply of repair parts and equipment to ensure adequate data recovery. Funding for this operation and maintenance, along with real time data reporting to AirNow for the Air Quality Index (AQI), is funded primarily through grants. In order to continue to operate the existing monitoring network, this funding must be maintained.	New York State Department of Environmental Conservation Division of Air Resources and Bureau of Air Quality Surveillance	Sections 2.4 and 2.6: Ambient Air Monitoring for Criteria Pollutants and Air Toxics	The air program is committed to working collaboratively with states, tribes, and local agencies during the course of work planning.

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Monitoring - Grant Funding	<p>Adequate air quality monitoring is essential for air agencies. Historically, many states have received a disproportionate amount of funding for monitoring. This has allowed those states to have increased monitoring efforts while states that have been underfunded have been required to reduce monitoring efforts to minimal levels. Providing additional money to States so that they may maintain expanded monitoring programs partially consisting of unrequired monitors is unfair to those underfunded States. We request that in any allocation formula used by EPA the required number of monitors be used instead of the total number of monitors for funding calculations.</p>	Alabama Department of Environmental Management	Section 2.4: Ambient Air Monitoring for Criteria Pollutants	OAR will consider your comments as we explore refinements to the Section 105 grant allocation in the future through a process that engages state and local air agencies, associations, and other interested parties.
Air Toxics	<p>New York would like some clarification on 2.5.1 Expected State and Local Agency Activities, item 1. "Implement delegated or approved air toxic standards, as appropriate, for major sources and area sources."</p> <p>Only air toxic standards for major and area sources that New York accepts for delegation would be implemented by the State. All other promulgated air toxic standards (for which delegation has not been accepted) would need to be implemented by EPA.</p>	New York State Department of Environmental Conservation Division of Air Resources	Section 2.5 Air Toxics Program Implementation (Section 2.5.1, # 1)	OAR agrees with your clarification.

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Allowance Trading and Other Stationary Source Programs	N.C. DEQ-DAQ notes that the NPM language “CSAPR requires 27 states in the eastern half of the US...” is incorrect. Rather there are 22 states listed in this rulemaking. https://www.gpo.gov/fdsys/pkg/FR-2016-10-26/pdf/2016-22240.pdf Additionally this rule making states “The EPA also determines that it has fully satisfied its FIP obligation as to 9 states (Florida, Georgia, Maine, Massachusetts, Minnesota, New Hampshire, North Carolina, South Carolina, and Vermont), which the EPA has determined do not contribute significantly to nonattainment in, or interfere with maintenance by, any other state with respect to the 2008 ozone NAAQS.”	North Carolina Department of Environmental Quality, Department of Air Quality	Section 2.7 CSAPR	OAR has clarified the language, which now reads, “CSAPR (inclusive of the CSAPR Update) requires 27 states in the eastern half of the United States to significantly improve air quality by reducing emissions that cross state lines and contribute to ground-level ozone and/or fine particle pollution in other states.”
Allowance Trading and Other Stationary Source Programs	This section is applicable to the states identified in CSAPR update rule only for 2008 O3 NAAQS. Need clarification... This language seems to come from a previous obligation under CAIR when the states helped determine actual allowances, including New Unit Set-Aside (NUSA) allowances; whereas, CSAPR, which is federally administered, issues all allowances including NUSA allowances.	North Carolina Department of Environmental Quality, Department of Air Quality	Section 2.7.1 – number 1	Thank you for your comment. Number 1 of Section 2.7.1 is accurate because states can submit SIPs to determine allowance allocations under CSAPR. Through SIP revisions, states are expected to submit any state-promulgated allowance allocations decisions to OAR for incorporation into unit accounts.
Allowance Trading and Other Stationary Source Programs	N.C. DEQ-DAQ provides technical assistance with regard to monitor certifications, emissions monitoring and non-electronic reporting. Any requirements for electronic reporting to EPA needs to be supported by EPA.	North Carolina Department of Environmental Quality, Department of Air Quality	Section 2.7.1 – number 2	The statement in the draft NPM Guidance covers both electronic and non-electronic reporting.

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Allowance Trading and Other Stationary Source Programs	N.C. DEQ-DAQ requests that this goal be modified to say: "Perform electronic review of monitor audits using ECMPS or CDX for certifications of Part 75 continuous emissions monitoring systems (CEMS). Perform compliance evaluation of periodic emissions and audits reported by sources." Remove the obligation to do Part 75 field audits unless additional funding is provided.	North Carolina Department of Environmental Quality, Department of Air Quality	Section 2.7.1 – number 3	Accurate emission data are essential to ensure sources are complying with the emission limits of CSAPR. CSAPR was developed to enable affected states to comply more cost-effectively with the "good neighbor" requirements of CAA section 110(a)(2)(D)(i) than the states could do on their own. CSAPR allows for the benefits of interstate allowance trading and centralized emissions tracking, quality assurance, and monitor certification systems. Accordingly, OAR has asked affected states to conduct Part 75 field audits which are intended to assess a monitoring system's performance and a source's compliance with monitoring requirements. The field audits are an existing and ongoing state and local agency activity.
Allowance Trading and Other Stationary Source Programs	Recommend removal of the language unless additional funding is provided.	North Carolina Department of Environmental Quality, Department of Air Quality	Section 2.7.1 – number 4	Providing audit and corrective action reports to OAR is an existing and ongoing state and local agency activity.

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Mobile Sources	<p>The Guidance Document, Section 2.8.1, item 3 states “Work with transportation agencies, as appropriate, to update mobile SIP budgets in response to changing needs such as updates to the mobile model MOVES or other changes.” EPA regulations and guidance require the use of the most recent version of MOVES whenever a new mobile vehicle emission budget (MVEB) is established through the SIP process. Use of the most recent version of MOVES is also required to be used when transportation agencies conduct conformity analysis, following allowed graced periods. However, there is no requirement, nor is it common practice, to update existing MVEBs whenever MOVES is updated. Existing MVEBs established using previous versions of MOVES are usually sufficient for transportation conformity purposes even when newer versions of MOVES are used for conformity analyses. State and local agencies do, however, have the option of creating new MVEBs through the SIP process when the revision of MOVES necessitates such in order to satisfy transportation conformity needs. The decision to do so is done in collaboration between the state and local air quality and transportation agencies and should not be a part of EPA guidance. The Division suggests that item 3 be removed from the Guidance Document</p>	Tennessee Department of Environment and Conservation, Division of Air Pollution Control	2.8 Mobile Source Programs	OAR is simplifying this activity to clarify that consultation with transportation agencies is necessary when a SIP is developed that includes a new or revised motor vehicle emissions budget. A MOVES release does not require a SIP revision.

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Mobile Sources	Similarly, the NPM guidance document should include language in support of continued coordination between states and EPA regarding Fuel Efficiency Standards and the Interstate Transport Rule.	Environmental Council of States (ECOS)	2.8 Mobile Source Programs	OAR has incorporated the suggestion in the Mobile Sources section.
Tribal Programs	The Tribe was awarded a Tribal Air Grant for the first time for fiscal year 2017, and the Tribe is a member of the National Tribal Air Association (NTAA). A few years ago, Owens Lake (located approximately 50 miles south of Big Pine) was the largest emitter of PM 10 in the nation. Efforts by the regional air pollution control district as well as the Los Angeles Department of Water and Power (LADWP) have served to control dust emissions in recent years. Although PM 10 from the lake has diminished, LADWP's land and water management practices throughout the rest of Owens Valley, such as groundwater pumping, livestock grazing, and unmanaged vehicle use, affect air quality in the region, including the lands immediately surrounding the Big Pine Indian Reservation. The Tribe has initiated an ambient air monitoring program. Area residents have been observing excessive dust on some days in recent years, but the Big Pine region of Owens Valley is a noteworthy gap with regard to site-specific measured quantities of ambient particulate matter (PM 10 and PM 2.5). Therefore, establishment of an air program has been and remains a priority for the Tribe. Owens Valley, located in Inyo County, has been home to the	Big Pine Paiute Tribe of the Owens Valley	2.9 Improving Outdoor Air Quality in Indian Country and Alaska Native Villages	Thank you for your comment. OAR is committed to identifying ways to help tribes address air quality issues and develop air quality programs and, to the extent possible, providing funding to support tribes.

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	<p>Numu (Paiute) people since time immemorial and is an exceptional place. The valley has been called “the Deepest Valley,” because it is a long, narrow land bordered on both sides by 14,000-foot mountain peaks. The landscape is diverse in terms of natural resources and the scenery is unmatched to anywhere else in this country. The region is sparsely populated, and the valley is surrounded by public lands managed by the Bureau of Land Management and Inyo National Forest (an area deemed worthy of national protection in the early 1900s).</p>			
<p>Tribal Programs</p>	<p>1. Add Further Details to Section on Indian Country and Alaska Native Villages for the 2016-2017 Guidance, the NTAA recommended that specific reference be made to Alaska Native Villages as Indian Tribes covered by the Guidance, and that the Guidance distinguish air issues unique to Alaska Native Villages for which EPA intends to undertake air quality activities. The NTAA’s purpose for this recommendation was that, within the 2016-2017 Guidance, Alaska Native Villages were referenced only once while “Indian Country” was referenced several times. EPA agreed with NTAA’s recommendation and attempted to modify the 2016-2017 Guidance to better reflect Alaska Native Villages where appropriate. However, more detail should be added to describe how the Guidance will specifically address Alaskan Native Villages and would be helpful to better understand how EPA plans to address the unique air quality issues</p>	<p>Big Pine Paiute Tribe of the Owens Valley</p>	<p>2.9 Improving Outdoor Air Quality in Indian Country and Alaska Native Villages</p>	<p>Thank you for your comment. OAR has revised the language in Section 2.9 to include language specific to Alaska Native Villages.</p>

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	<p>found within the 229 Alaska Native Villages that represent over 40% of the Nation’s federally-recognized Tribes. Of the 229 Alaska Native Villages, 228 are not eligible to receive any direct allocation of federal CAA monies and resources designated for Indian Tribes with reservation lands due to a regional rule interpretation. It must be observed that Alaska Native Villages share many of the same air quality issues as Indian Country, but warrant particular attention by EPA. In addition, other air quality issues (e.g.: cruise ship emissions and lead pollutants from small airplanes at rural airports) are unique to Alaska Native Villages, and are, in fact, included in several recent annual Status of Tribal Air Reports published by the NTAA.</p>			
<p>Tribal Programs</p>	<p>Indian Tribes are often required to act alone without strong communication with other entities including co-regulators. Partnerships between Tribes and other air quality regulators will provide benefits for these entities through gaining Tribal perspectives on air quality issues faced by many Tribes. Partnerships through entities like Regional Planning Organizations provide Tribes with a seat at the table with other air quality co-regulators to tackle complex issues together. The NTAA recommends that the 2018-2019 Guidance encourage and fund partnerships between Indian Tribes, and other entities and co-regulators, specifically in areas of co-regulations, monitoring analysis, and indoor</p>	<p>National Tribal Air Association</p>	<p>OAR Guidance, 2.9 Improving Outdoor Air Quality in Indian Country and Alaska Native Villages</p>	<p>OAR encourages partnerships between Tribes and other air quality regulators through membership in entities like the Western Regional Air Partnership and other Multi-Jurisdictional Organizations.</p>

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	air quality testing and remediation.			
Tribal Programs	More detail should be added to describe how the Guidance will specifically address Alaskan Native Villages and would be helpful to better understand how EPA plans to address the unique air quality issues found within the 229 Alaska Native Villages that represent over 40% of the Nation’s federally-recognized Tribes. Of the 229 Alaska Native Villages, 228 are not eligible to receive any direct allocation of federal CAA monies and resources designated for Indian Tribes with reservation lands due to a Regional rule interpretation. It must be observed that Alaska Native Villages share many of the same air quality issues as Indian Country, but warrant particular attention by EPA. In addition, other air quality issues (e.g.: cruise ship emissions and lead pollutants from small airplanes at rural airports) are unique to Alaska Native Villages, and are, in fact, included in several recent annual Status of Tribal Air Reports published by the NTAA.	National Tribal Air Association	OAR Guidance, 2.9 Improving Outdoor Air Quality in Indian Country and Alaska Native Villages	Thank you for your comment. OAR has revised the language in Section 2.9 to include language specific to Alaska Native Villages.
Tribal Programs	In the FY 2016-2017 Guidance, the NTAA recommended that the Guidance identify plans on how EPA intends to engage Indian Tribes in consultation with states regarding the development and implementation of SIPs. In response to this recommendation, EPA focused instead on the regional approaches to these	National Tribal Air Association	OAR Guidance, 2.9 Improving Outdoor Air Quality in Indian Country and Alaska	The OAR NPM Guidance reflects the core work related to meeting statutory, regulatory, and court-ordered requirements. OAR, working with Institute of Tribal Professionals (ITEP), currently holds TAS and SIP trainings on how to participate in the SIP process. OAR strives to increase the number of these trainings and also will look into developing a guidance document for

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	<p>issues through the Tribe’s EPA-Tribal Environmental Plans. The NTAA does not find EPA’s response to be respectful to the needs of Indian Tribes. EPA is requiring individual states to submit several SIPs to EPA on a number of air-related issues. This is not only burdensome to the states, but is a barrier to the many Tribes that could be significantly impacted by such SIPs. Therefore, Tribes need to be engaged in the development and implementation of SIPs. The reason is that states are not obligated to consult with Tribes under the law unless a Tribe has treatment-as-a-state (TAS) for such Clean Air Act provisions as Section 126. However, EPA has a trust responsibility to Tribes that necessitates it to protect the treaty rights, lands, assets, and resources of Tribes which could be impacted by the SIPs that EPA requires states to submit. As such, Tribes require more specificity from EPA as to how it will honor this trust responsibility to Tribes. The NTAA recommends that, in the 2018-2019 Guidance, EPA commits to the development of national and regional guidance specifically including a framework on how EPA will engage Indian Tribes in the development and implementation of SIPs and strategies for encouraging states to participate in this engagement with Tribes.</p>		Native Villages	the Regions on how to engage with the tribes on SIPS.
Tribal Programs	The 2016-2017 Guidance committed EPA resources to address a number of issues related to the Title V operating permits program including timely permit issuance and compliance	National Tribal Air Association	OAR Guidance, 2.9.1.2 Tribal Title V and	OAR has conducted webinars on permitting and in working closely with ITEP, will continue to provide in person, trainings on permits and, on how to engage states on the permit process and the value of TAS for

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	<p>monitoring. A number of Title V sources upwind to Tribal lands are being issued or reissued Title V permits. It would benefit Indian Tribes to review these permits for compliance and other issues, and provide comments as appropriate or necessary in order to protect the health and environment of their communities from the sources requiring Title V permits. Unfortunately, there are Tribes that lack the capacity and expertise to conduct these reviews and/or to make comments regarding Title V permits which is compounded by the number of permits requiring such reviews and/or comments. The NTAA recommends that, in the 2018-2019 Guidance, EPA commit to providing Indian Tribes with ongoing training support, and additional technical and financial support, to assess and comment on Title V permits.</p>		<p>New Source Review Permitting Activities</p>	<p>505(a).</p>
<p>Tribal Programs</p>	<p>On July 6, 1979, the Confederated Salish and Kootenai Tribal (CSKT) Council passed a resolution formally requesting to redesignate the Flathead Indian Reservation air shed to Class I Status. On or about October 18, 1981 the CSKT formally requested the administrator of the Environmental Protection Agency (EPA) to approve the redesignation of the classification from Class II to Class I. EPA authorized the Class I redesignation. On August 15, 1980, the Tribal Air Quality Program was funded by EPA to develop an air monitoring network and to hire legal services to write the rules and regulations for the tribes. On August 7, 1987, EPA designated</p>	<p>Environmental Protection Division, Natural Resource Department, Confederated Salish and Kootenai Tribes</p>		<p>Thank you for your comment. OAR looks forward to working with the tribes on tribal Air Quality Programs.</p>

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	<p>Polson and Ronan a Group I (Non-Attainment) area for PM based on the TSP data collected by the CS&KT Air Quality Program from 1982-1986. PM₁₀ began at Ronan on August 1, 1988 and on July 1, 1994 in Polson. PM_{2.5} monitoring began January 1, 2000 and ended December 31, 2005 at Ronan and Polson. Particulate matter is monitored on the Flathead Reservations as PM₁₀ and Interagency Method of Protecting Visual Environments (IMPROVE). CSKT asks that the CAA Section 105 program be funded at current fiscal year 2017 levels.</p>			
Measures	<p>Over the course of 2017, ECOS has been working on a major project to change the way state environmental agencies tell their story through the use and graphical communication of performance measures and data. The ECOS Measures Project will create a small, manageable set of robust common measures that can serve as indicators of environmental quality and public health as well as economic impacts associated with protecting public health and the environment. States have worked to shift the focus from measuring outputs to measuring a more limited set of outcomes; an additional emphasis has been placed on using graphic design, dashboards, and other visual techniques to make the information contained in these measures clear and compelling to a broad audience. ECOS hopes that EPA will encourage their regional staff through the NPM Guidances to cooperate with states to align with</p>	Environmental Council of States (ECOS)	Appendix A: FY 2018 Measures	Thank you for your comment. OAR appreciates the opportunity to be actively involved in the ECOS Measures Project and looks forward to continued engagement in that effort. OAR has added language to the Introduction to reflect the important collaboration on measures effort and looks forward to continued involvement in measures refinement efforts.

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	and build on this effort, and to undertake further measures innovations. ECOS appreciates the support from OCFO as well as OW, OAR, OLEM, and OECA in these discussions as well as assistance in identifying access to state reported data.			
Measures	New York believes that the Measures that were changed from the FY 2017 Guidance to address the reduced level of funding in the FY 2018 President’s Budget request have more impact on EPA than the States. Most of the deleted Measures are handled by EPA directly. In contrast, the deleted measures would do very little to reduce New York’s obligations. EPA needs to assess those Measures addressed by States to develop a list that is more in line with the decrease in State funding.	New York State Department of Environmental Conservation Division of Air Resources and Bureau Director, Bureau of Stationary Sources	Appendix A: FY 2018 Measures	The measures that are retained in the FY 2018-FY 2019 NPM Guidance are associated with on-going activities based on the FY 2018 President’s Budget Request.
Measures	Appendix A of the Guidance Document lists several measures required by the Clean Air Act as “indicators” and do not have specific FY 2018 targets. Each of these has statutory deadlines set by the Clean Air Act. Measures with statutory deadlines should have specific performance targets of 100% as required by the Act. Some of the measures with statutory deadlines are: <ul style="list-style-type: none"> • OAQPS N07 – Number of final rulemaking actions taken on PM2.5 SIPs, consistent with timeframes established in the Clean Air Act. • OAQPS N09 - Number of final rulemaking actions taken on redesignation requests and Clean Data Determinations for all NAAQS, 	Tennessee Department of Environment and Conservation, Division of Air Pollution Control	Appendix A: FY 2018 Measures	Thank you for your comment. OAR has added language to the Introduction to reflect collaboration on the refinement of measures.

Issue Area	Comment	Commenter(s)	Location in FY 2018-2019 NPM Guidance	Response
	<p>consistent with timeframes established in the Clean Air Act.</p> <ul style="list-style-type: none"> • OAQOS N29 – Number of final rulemaking actions taken on 2008 ozone SIPs, consistent with timeframes established in the Clean Air Act. • OAQPS N33 - Number of final rulemaking actions on 2010 SO2 SIPs, consistent with timeframes established in the Clean Air Act. • OAQOS N34 – Number of final rulemaking actions taken on interstate transport SIPs for the 2012 PM NAAQS, consistent with timeframes established in the Clean Air Act (due December 2015). • OAQPS N35 - Number of final rulemaking actions taken on interstate transport SIPs for the 2010 SO2 and NO2 NAAQS, consistent with timeframes established in the Clean Air Act 			
Measures	<p>Measure Codes OTAQ 04, ORIA IAQ5, ORIA IAQ8, ORIA IAQ9, SIRG 1, SIRG 2, SIRG 3, and SIRG4 are all proposed to be deleted. It appears there is no narrative or justification as to why each of these measures are no longer needed. Please provide an explanation for these proposed deletions.</p>	<p>New York State Department of Environmental Conservation Division of Air Resources and Bureau of Mobile Sources and Technology Development</p>	<p>Appendix A: FY 2018 Measures</p>	<p>The measures that are retained in the FY 2018-FY 2019 NPM Guidance are associated with on-going activities based on the FY 2018 President’s Budget Request.</p>
Measures	<p>EPA Should Continue Support for its Energy Support Programs. In Appendix A of the National Program Manager Guidance, EPA has removed</p>	<p>Arkansas Department of Environmental</p>	<p>Appendix A: FY 2018 Measures</p>	<p>Thank you for your comment. EPA will continue to find ways to partner with stakeholders in the private sector to innovate, improve our environment, and strengthen</p>

Issue Area	Comment	Commenter(s)	Location in FY 2018-2019 NPM Guidance	Response
	<p>Energy Star-related tasks. The ADEQ Office of Energy relies upon Energy Star for its Home Energy Score Program, which has been in development for the last two years. Cessation of the Energy Star Program would effectively end the ADEQ Office of Energy's Home Energy Score Program. The Energy Star program has proven to result in cost-savings and emissions reductions opportunities. Before a final determination is made as to whether or not to continue the program, the states should be given an opportunity to engage in a meaningful exchange with EPA regarding this issue." The Energy Star Program is also a crucial management tool used for implementation of the State Buildings Energy Efficiency Program. The rules for the State Buildings Energy Efficiency Program require that data be stored in EPA's Energy Star measurement and tracking tool, as well as the Energy Star Portfolio Manager, so that the agency can easily manage and update information. Additionally, the Energy Star Program is an essential component of energy efficiency programs that ADEQ Office of Energy's private partners offer to residential customers. Some of these energy efficiency programs are mandated by state law. For example, the Arkansas Public Service Commission requires investor-owned utilities to meet a 0.9% energy efficiency resource standard. Energy efficiency assistance programs are essential to help residential, commercial,</p>	<p>Quality, Office of Air Quality & Arkansas Energy Office</p>		<p>our economy.</p>

Issue Area	Comment	Commenter(s)	Location in FY 2018-2019 NPM Guidance	Response
	and industrial entities overcome upfront cost barriers for upgrades that will ultimately save them money, save the electricity ratepayers of Arkansas money, generate economic development, and result in cost-effective emission reductions of pollutants, including nitrogen oxides, particulate matter, sulfur dioxide, carbon monoxide, carbon dioxide, and hazardous air pollutants. As such, EPA should continue to support and implement its Energy Star Program.			
Grants - CAA Training	“CAA Section 103(b) authorizes EPA to provide training for air pollution control personnel and agencies...” It is critical that EPA provide training for States and Locals. A new wave of personnel is joining the agencies and we need more training than in the past. Additional STAG dollars are needed, but not as a tradeoff for State and Local grant funding.	Knox County Department of Air Quality Management	OAR Guidance, Appendix B, Clean Air Act Training	Thank you for your comment. We are engaging through the Joint Training Committee with the six Multi-Jurisdictional Organizations (NESCAUM, CENSARA, LADCO, SESARM, WESTAR, and MARAMA), AAPCA, NAACA, ECOS, and state and local agencies to establish a process for developing and updating course content and delivery.
Grants - CAA Training	Appendix B page 3 Section 1.A. Clean Air Act Training. EPA should significantly enhance its staffing and contractor support for the national air training program. Funding for training should come from EPA’s operating budget and should not be withheld from STAG funding.	Alabama Department of Environmental Management	OAR Guidance, Appendix B, Page 3 (Section 1.A)	OAR appreciates the importance of training to state and local agencies. For example, OAR provides training through the Air Pollution Training Institute (APTI-Learn). EPA manages a national learning management system that provides opportunities for classroom courses, self-instructional courses, recorded webinars and training videos on-line.
Grants - DERA Funding	NACAA is pleased that the President’s budget request called for funding for the Diesel Emission Reduction Act (DERA) program. This is an important program to address emissions from the large legacy fleet of diesel engines. It is important that DERA not be funded at the	National Association of Clean Air Agencies (NACAA)	Appendix B, Page 3 (Effective Use and Distribution of STAG Funds)	Please note that Congress determines through the appropriations process how funds are provided, not EPA.

Issue Area	Comment	Commenter(s)	Location in FY 2018-2019 NPM Guidance	Response
	<p>expense of the Section 103/105 grants and we strongly urge that any future funding for DERA not be in lieu of increases to state and local air grants. Additionally, since many of the DERA funds are not provided to state and local governments, we recommend that future DERA activities not be funded through the STAG account. Instead, we suggest that the grants be provided through one of EPA's other accounts.</p>			
<p>Grants - DERA Funding</p>	<p>EPA Should Maintain Level Funding or Consult with State and Local Air Agencies Over Possible Reductions to State Diesel Emission Reduction Act Grants. In the National Program Managers Guidance Appendix B, EPA describes a reduction in funding for State Diesel Emission Reduction Act (DERA) grants by eighty-three percent from FY 2017 funding levels in accordance with the FY 2018 presidential budget request. ADEQ uses funds allocated to the State of Arkansas from DERA grants to implement the Reduce Diesel Emissions (Go RED!) Program, which helps public and private organizations replace aging heavy-duty vehicles and engines with newer cleaner models. These replacements would not occur without state DERA grants funded by EPA. An eighty-three percent reduction to Arkansas's allocation of funding under the State DERA grant from FY 2017 levels would only be sufficient to fund one to two projects, and this would result in the missed opportunity to voluntarily reduce approximately eleven tons of nitrogen oxides, two tons of PM2.5, one ton of hydrocarbons,</p>	<p>Arkansas Department of Environmental Quality, Office of Air Quality</p>	<p>Appendix B: Effective Use and Distribution of STAG Funds</p>	<p>Please note that Congress determines through the appropriations process how funds are provided, not EPA.</p>

Issue Area	Comment	Commenter(s)	Location in FY 2018-2019 NPM Guidance	Response
	and three tons of carbon monoxide. EPA should maintain level funding or engage in a collaborative process with state and local air agencies about how best to ensure any funding reductions would have minimal impact on the DERA program.			
Grants - DERA Funding	DERA grant funds have helped many agencies across the country. Knox County supports the focus of DERA grants to “ports and goods movement, etc....” Much of this work will now focus on private, not government fleets. Therefore, it is imperative that DERA funding not come in lieu of State and Local STAG funds.	Knox County Department of Air Quality Management	OAR Guidance, Appendix B, Diesel Emissions Reduction Act (DERA) Grants	Please note that Congress determines through the appropriations process how funds are provided, not EPA.
Grants – General Funding	The Guidance Document indicates it is consistent with the FY 2018 President’s Budget request, which provides for \$159.5 million in grants to state and local air programs. This funding amount represents a dramatic reduction in funding to state and local air programs and the Guidance Document provides no indication of a corresponding cut to state and local program responsibilities. The Division is gravely concerned about the significant funding reduction proposed. To propose a funding reduction of this magnitude without indicating a reduction to corresponding program responsibilities amounts to placing a significant hardship on state and local air programs that is not sustainable, and may result in failure to fulfill specific regulatory responsibilities and ultimately, failure to recognize the objective of the Clean Air Act to protect the nation’s air	Tennessee Department of Environment and Conservation, Division of Air Pollution Control	Appendix B: Effective Use and Distribution of STAG Funds	The air program is committed to working collaboratively with states, tribes, and local air agencies during the course of work planning and to provide flexibility to state and local air agencies to the extent possible.

Issue Area	Comment	Commenter(s)	Location in FY 2018-2019 NPM Guidance	Response
	quality and public health.			
Grants – General Funding	<p>The Guidance Document indicates that the President’s Budget reflects a “refocusing on statutory requirements, streamlining of core environmental work, and a reduction of duplicative of activities. EPA is prepared to work collaboratively with air agencies to resolve issues that may arise during the course of work planning as necessary and appropriate.”</p> <p>Guidance, Appendix B at pg. 1. The Division appreciates EPA’s recognition that there will not be sufficient resources and we will be relying on EPA’s commitment to work with state and local air agencies to adjust resources to meeting challenging priorities. However, the Division also believes it is EPA’s responsibility to ensure adequate funding for mandatory program responsibilities and to remove or identify as voluntary non-statutory or nonregulatory requirements if EPA’s intent is aligned with what is quoted above.</p>	Tennessee Department of Environment and Conservation, Division of Air Pollution Control	Appendix B: Effective Use and Distribution of STAG Funds	OAR is committed to the use of Performance Partnerships Grants (PPGs) for eligible grant programs, including Section 105 grants, that can provide important flexibility for states with work planning. We have added language to the Introduction to reflect OAR’s commitment to the use of PPGs and other flexibility mechanisms.
Grants – General Funding	EPA Should Maintain Level Funding or Consult with State and Local Air Agencies Over Possible Grant Reductions. ADEQ supports the Administrator’s efforts to return the states to the forefront of air quality regulation implementation. In doing so, states must receive funding commensurate with this shifted responsibility. ADEQ recommends that EPA should maintain level funding for state and local air grants and if EPA continues in its efforts to restore states with their rightful authority to	Arkansas Department of Environmental Quality, Office of Air Quality	Appendix B: Effective Use and Distribution of STAG Funds	Thank you for your commitment to work with OAR. We have added language to the Introduction to reflect support for cooperative federalism.

Issue Area	Comment	Commenter(s)	Location in FY 2018-2019 NPM Guidance	Response
	<p>implement programs pursuant to cooperative federalism principles, EPA should engage in a collaborative process with state and local air agencies about how best to ensure any funding reductions would not impact critical activities. The President of the Association of Air Pollution Control Agencies, in which ADEQ is a member, presented testimony before the U.S. House Appropriations Committee on May 23, 2017 regarding this issue. ADEQ directs EPA's attention toward that document, which is attached.</p>			
Grants – General Funding	<p>MassDEP appreciates EPA OAR's recognition of the state work needed to attain and maintain health-based air quality standards and supports funding in FY 2018-2019 at FY 2017-2018 levels. MassDEP will work with EPA to adjust resources consistent with state and federal priorities.</p>	<p>Massachusetts Department of Environmental Protection</p>	<p>Appendix B: Effective Use and Distribution of STAG Funds</p>	<p>Thank you for your comment and for your commitment to work with OAR in the work planning process.</p>
Grants – General Funding	<p>The draft guidance documents are based on the FY 2018 Administration budget request, which calls for \$159.5 million in grants for state and local air pollution control agencies under Sections 103 and 105 of the Clean Air Act (CAA). This is a reduction of 30 percent from the FY 2017 level of \$227.8 million. NACAA is very concerned about the significant hardship such a reduction would pose on public health and welfare. For many years, state and local air pollution control agencies have struggled with insufficient resources and have done what they could to address budget shortfalls. Therefore, state and local agencies would find it difficult to</p>	<p>National Association of Clean Air Agencies (NACAA)</p>	<p>Appendix B: Effective Use and Distribution of STAG Funds</p>	<p>Thank you for your comment. OAR has added language to the Introduction to reflect OAR's commitment to flexibility.</p>

Issue Area	Comment	Commenter(s)	Location in FY 2018-2019 NPM Guidance	Response
	<p>accommodate any cuts to federal air quality grants; cuts of 30 percent would be devastating. Such reductions would severely impede the ability of many agencies to continue essential programs and, in the most extreme cases, some smaller local agencies could conceivably have to close down entirely. With such cuts, many state and local air pollution control agencies will have trouble fully implementing the CAA's health-based air quality standards and delivering the clean and healthful air the public expects and deserves. Additionally, these agencies and their regions could be subject to harsh sanctions under the CAA, including the withholding of millions of dollars in federal highway funds, severe emissions "off-set" limits that could interfere with economic development, and the possibility of EPA imposing Federal Implementation Plans on states. While we understand that increased funding is unlikely this year, at least maintaining current funding levels for state and local agencies will allow not only protection of public health, but also the continuation of services that benefit the public and the regulated community, such as more expedited permit processing, compliance assistance and streamlined regulatory operations. These services, if adequately funded, contribute to economic development and administrative efficiencies. Accordingly, NACAA urges EPA and the Administration to do whatever it must to ensure that federal air</p>			

Issue Area	Comment	Commenter(s)	Location in FY 2018-2019 NPM Guidance	Response
	grants to state and local air pollution control agencies in FY 2018 and 2019 are not reduced in any way.			
Grants – General Funding	The Department continues to have serious concerns with the President’s proposed FY2018 budget reductions to State and Tribal Assistance Grants (STAG) as outlined in Appendix B of the Office of Air and Radiation National Program Manager Guidance. This grant funding for our joint state and EPA commitments to protect human health and the environment, even before the proposed reductions, is already insufficient assistance from the EPA to effectively carry out the core functions of state and local air programs and has not kept pace over recent years with the higher costs of running these programs. While the funding for these programs has been proposed to be reduced, the commitments and requirements for states as outlined in the NPMG has not. The Department respectfully requests the Administration to reconsider these grant reductions.	Vermont Department of Environmental Conservation	Appendix B: Effective Use and Distribution of STAG Funds	Thank you for your comment. OAR has added language to the Introduction to reflect OAR’s commitment to flexibility.
Grants – General Funding	EPA must recognize that State/Local agencies need more funding, not less in order to carry out these activities. If adequate funding is not provided, agencies will be forced to cut activities.	Knox County Department of Air Quality Management	OAR Guidance, Part 1	Thank you for your comment. OAR has added language to the Introduction to reflect OAR’s commitment to flexibility.
Grants – General Funding	EPA appropriately acknowledges that there will not be sufficient resources for all activities and that priorities may vary throughout the nation. NACAA supports EPA’s plan to work with state	National Association of Clean Air Agencies (NACAA)	OAR Introduction, Page 1	Thank you for your comment. OAR has added language to the Introduction to reflect OAR’s commitment to flexibility.

Issue Area	Comment	Commenter(s)	Location in FY 2018-2019 NPM Guidance	Response
	<p>and local air agencies “to adjust resources to meet changing priorities” and to work collaboratively with state and local air agencies to resolve planning issues. However, we believe it is even more important for EPA to ensure that there is sufficient funding for state and local air quality efforts and, at a minimum, that such funding will not be cut. It is especially important that state and local programs be strong and well-funded if they are to take on any additional responsibilities.</p>			
Grants – General Funding	<p>Page two of Appendix B has the following statement: “Since 1998, all the affected states in each of the interstate air pollution control programs have elected to contribute a portion of their STAG dollars each year for the implementation of centralized allowance trading and emissions tracking systems.” We take issue with EPA characterizing that the States have “elected to contribute” to this program. EPA should use administrative budgetary funds to pay for these program infrastructure costs which support federal initiatives.</p>	Alabama Department of Environmental Management	OAR Guidance, Appendix B, Page 2	<p>CSAPR, and other programs for controlling the interstate transport of pollution, do not have a separate funding source. These programs were developed by EPA to enable the affected states to comply more cost-effectively with the “good neighbor” requirements of CAA section 110(a)(2)(D)(i) than the states could do on their own. CSAPR allows for the benefits of interstate allowance trading and centralized emissions tracking, quality assurance, and monitor certification systems. Accordingly, EPA has asked affected states that participate in an interstate emissions allowance trading program administered by EPA to satisfy the CAA section 110(a)(2)(D)(i) requirements to share the program costs. Each year, EPA contributes FTE for program administration, monitor certification, compliance determination, and assessment whereas the participating states contribute a portion of the Section 105 funds towards the implementation and operation of the centralized allowance trading and emissions tracking systems.</p>
Grants -	Once non-attainment areas come back into	Knox County	OAR	Thank you for your comment. OAR will consider your

Issue Area	Comment	Commenter(s)	Location in FY 2018-2019 NPM Guidance	Response
Potential Refinements to Allocation	attainment, significant work must be performed to stay in attainment. This should be reflected in the weighting of this category.	Department of Air Quality Management	Guidance, Appendix B, Funding Formula	comments as we explore refinements to the Section 105 grant allocation in the future through a process that engages state and local air agencies, associations, and other interested parties.
Grants - Potential Refinements to Allocation	<p>The N.C. DEQ-DAQ strongly supports EPA moving toward a more up-to-date Section 105 allocation methodology and data. The N.C. DEQ-DAQ provided supportive comments on the November 21, 2016 proposal and reiterates those thoughts here. We applaud EPA’s efforts to develop a methodology that will result in a fair and equitable distribution of the limited Section 105 grant funds. In particular, N.C. DEQ-DAQ agrees with the proposed weighting of the monitoring program as the highest amount. The air agencies expend the most time and resources on the operation of the monitoring networks, and the resulting data provides the basis for much of the rest of the work performed by the air programs.</p> <p>N.C. DEQ-DAQ also agrees with the delineation of 90 percent of the funding to cover the routine, ongoing operations of the air programs and 10 percent to cover the new and emerging activities. This provides a stable funding basis for the programs while recognizing other emerging efforts also need additional funding to help cover the costs of those activities. One element of the “short-term factors” includes the consideration of the implementation of the sulfur dioxide (SO2) NAAQS. We strongly</p>	North Carolina Department of Environmental Quality, Department of Air Quality	Appendix B – 2. Allocation of Section 105 Grants	Thank you for your comment. OAR will consider your comments as we explore refinements to the Section 105 grant allocation in the future through a process that engages state and local air agencies, associations, and other interested parties.

Issue Area	Comment	Commenter(s)	Location in FY 2018-2019 NPM Guidance	Response
	<p>support a weighting of at least 5.5% for the number of SO2 sources on the DRR list. As states implement the SO2 standard, we are getting a better understanding of the significant amount of time and resources needed to address those issues. Considering that as a short-term allocation factor is critically important in this cycle. N.C. DEQ-DAQ encourages immediate implementation of the new allocation methodology. However, we understand that EPA considered (in late 2016) a phased implementation approach that would limit regional losses to more than 2.5% from each region's prior year amount. If this is the approach EPA implements, we suggest consideration of the regional losses experienced over that last decade as well. One way to account for those losses is through a separate air quality focused grant that represents a direct equity adjustment for the unrealized funds.</p>			
<p>Grants - Potential Refinements to Allocation</p>	<p>We urge EPA to continue to consult with states and consider their limited resources as it seeks to update the §105 allocation methodology.</p>	<p>Massachusetts Department of Environmental Protection</p>	<p>Appendix B: Effective Use and Distribution of STAG Funds</p>	<p>Thank you for your comment. OAR will consider your comments as we explore refinements to the Section 105 grant allocation in the future through a process that engages state and local air agencies, associations, and other interested parties.</p>
<p>Grants - Potential Refinements to Allocation</p>	<p>The Division also appreciates EPA's continued work to adjust the funding formula associated with allocation of the Section 105 funding. A revised funding formula should reflect current, realistic agency responsibilities and investments of resources and infrastructure. The Division would like to see further consideration of base</p>	<p>Tennessee Department of Environment and Conservation, Division of Air Pollution Control</p>	<p>Appendix B: Effective Use and Distribution of STAG Funds</p>	<p>Thank you for your comment. OAR will consider your comments as we explore refinements to the Section 105 grant allocation in the future through a process that engages state and local air agencies, associations, and other interested parties.</p>

Issue Area	Comment	Commenter(s)	Location in FY 2018-2019 NPM Guidance	Response
	and variable factors used in the formula as well as additional consideration of the growing responsibilities state and local air programs are experiencing in the monitoring arena.			
Grants - Potential Refinements to Allocation	<p>The proposed budget reductions are drastic and untenable. Basic infrastructure issues have never been adequately federally funded and now these cuts further exacerbate this problem and make it almost impossible for New York to sustain an adequate level of effort. This damaging budget coupled with the proposal advanced last year to change the funding formula for state grants, essentially a 2.5% reduction in funding every year for the next decade, will have a long lasting and substantially deleterious impact on New York.</p> <p>On page 5 of Appendix B, EPA highlights the history associated with the methodology for allocating CAA §105 resources and concludes that the agency is still interested in moving toward a more up-to-date method. As an interested party, New York would like to actively participate in any process that EPA establishes to refine the allocation methodology prior to its release for review and public comment. At a minimum: the methodology needs to more accurately reflect the resources needed to implement a successful clean air program; the process needs to be more transparent; the rationale behind each decision needs to be offered; and the details necessary to fully review the calculations in support of the revisions must</p>	New York State Department of Environmental Conservation Division of Air Resources	Appendix B: Effective Use and Distribution of STAG Funds	Thank you for your comment. OAR will consider your comments as we explore refinements to the Section 105 grant allocation in the future through a process that engages state and local air agencies, associations, and other interested parties.

Issue Area	Comment	Commenter(s)	Location in FY 2018-2019 NPM Guidance	Response
	be included.			
Grants - Potential Refinements to Allocation	Appendix B Page 5, Section 2 Allocation of 105 Grants. EPA should further consider a more up-to-date allocation methodology; specifically, with respect to correcting historical inadequate funding for some Regions.	Alabama Department of Environmental Management	Appendix B: Effective Use and Distribution of STAG Funds	Thank you for your comment. OAR will consider your comments as we explore refinements to the Section 105 grant allocation in the future through a process that engages state and local air agencies, associations, and other interested parties.
Grants - General	NPM guidance language should encourage state and EPA regional staff to pursue flexibility in state grant program implementation through the use of Performance Partnership Grants (PPGs). According to a report released in June by EPA's Office of Intergovernmental Relations (OIR), only 41 percent of PPG-eligible FY 2016 STAG categorical grant funds were being awarded and managed under a PPG.	Environmental Council of States (ECOS)	Appendix B: Effective Use and Distribution of STAG Funds, Item 3	OAR is committed to the use of PPGs for eligible grant programs, including Section 105 grants, that can provide important flexibility for states with work planning. OAR has added language to the Introduction to reflect OAR's commitment to flexibility.
Grants - Timing	<p>The Proposed National Program Manager Guidance Should Have Been Released for Comment and Finalized Prior to the Due Date for Clean Air Act Section 105 State Grant Applications and Work Plans</p> <p>State and local agencies utilize the National Program Managers Guidance to identify the EPA's implementation priorities and develop work plans for the Clean Air Act Section 105 grant for each fiscal year. Applications and work plans are typically due at least thirty days prior to the close of the previous grant cycle. For Arkansas, this means that the application and work plan for FY 2018 would have been due June 1, 2017 because the Arkansas FY 2017 105 grant cycle closed on June 30th. We were</p>	Arkansas Department of Environmental Quality, Office of Air Quality	N/A	The draft NPM Guidances were delayed due to the late release of the President's FY 2018 Budget request.

Issue Area	Comment	Commenter(s)	Location in FY 2018-2019 NPM Guidance	Response
	<p>contacted by our EPA Region 6 project officer on April 5, 2017 and asked to submit our application and work plan “as soon as possible.” In future, EPA should release its National Program Manager Guidance for comment and subsequent finalization prior to requiring submission of 105 grant applications and work plans. Timely notice of EPA’s expectations is critical to EPA’s relationship with the states and the smooth operation of the section 105 grant cycle.</p>			
Grants - MJOs	<p>Appendix B, page 2 Section 1.A. states “State and local agencies that participate in multiple organizations can only direct their federal funds to a single organization.” Since each MJO offers different perspectives and expertise, EPA should allow states and locals to determine the best ways for agencies to fund MJOs to which they belong. Holdbacks should not be limited to one organization membership.</p>	Alabama Department of Environmental Management	OAR Guidance, Appendix B, Page 2 (Section 1.A)	Thank you for your comment. The language has been removed.
Grants - MJOs	<p>When discussing the mechanism for state and local agencies to fund multi-jurisdictional organizations (MJOs), the draft says, “State and local agencies that participate in multiple organizations can only direct their federal funds to a single organization.” It is unclear why EPA would impose this restriction. The various MJOs across the country focus on different geographic areas and issues. State and local agencies often benefit from having a variety of resources to provide information and support, especially since funding is inadequate. NACAA</p>	National Association of Clean Air Agencies (NACAA)	Appendix B, Page 3 (Effective Use and Distribution of STAG Funds)	Thank you for your comment. The language has been removed.

Issue Area	Comment	Commenter(s)	Location in FY 2018-2019 NPM Guidance	Response
	recommends it be up to the state and local agencies (with input from the EPA regional offices, as appropriate) to determine the best way for state and local agencies to provide funding to the multi-jurisdictional groups to which they belong.			
Grants - MJOs	EPA has said that “State and Local agencies that participate in multiple organizations can only direct their federal funds to a single organization”. This should be left to the individual State and Local organizations to decide where their MJO funding is directed.	Knox County Department of Air Quality Management	OAR Guidance, Appendix B, Multi-Jurisdictional Organizations (MJO’s)	Thank you for your comment. The language has been removed.
Grants - PM2.5 Shift from 103 to 105 Authority	EPA Should Not Transition the Funding Authority for PM2.5 from Section 103 to Section 105. EPA should not transition the funding authority for PM2.5 monitoring funding from Section 103 grant funding to Section 105 grant funding. In order to provide stable and consistent funding expectations on the part of the states, EPA should maintain the current funding structure for monitoring of PM2.5 and other criteria pollutants. The current fiscal environment is not conducive to transitions that would increase the burden on grant with greater demands on state funding grant matches.	Arkansas Department of Environmental Quality, Office of Air Quality	Appendix B: Effective Use and Distribution of STAG Funds	OAR believes the transition of the funding for the PM 2.5 monitoring network to §105 authority is appropriate given the maturity of this network. OAR believes that the PM2.5 monitoring network is more in line with the intent of § 105 to provide grants “for the prevention and control of air pollution or implementation of national primary and secondary ambient air quality standards.” OAR appreciates the challenges posed by the match requirements. Please note that while final congressional approval of the budget in recent years has precluded OAR from making the transition, OAR encourages states to continue to plan for the eventual transition of the PM2.5 network.
Grants - PM2.5 Shift from 103 to 105 Authority	MassDEP requests that EPA maintain the existing §103 funding authority for PM2.5 monitoring, rather than transition to §105 funding authority, which would require state matching funds.	Massachusetts Department of Environmental Protection	Appendix B: Effective Use and Distribution of STAG Funds	OAR believes the transition of the funding for the PM 2.5 monitoring network to §105 authority is appropriate given the maturity of this network. OAR believes that the PM2.5 monitoring network is more in line with the intent of § 105 to provide grants “for the

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				prevention and control of air pollution or implementation of national primary and secondary ambient air quality standards.” OAR appreciates the challenges posed by the match requirements. Please note that while final congressional approval of the budget in recent years has precluded OAR from making the transition, OAR encourages states to continue to plan for the eventual transition of the PM2.5 network.
Grants - PM2.5 Shift from 103 to 105 Authority	Although the Guidance Document itself does not make clear, EPA proposes to shift the funding for the PM2.5 monitoring network from Clean Air Act Section 103 to Section 105 authority in the Ambient Air Monitoring Appendix mentioned in Appendix B of the Guidance Document. This transition would require state and local air programs to provide matching funds, a requirement that does not exist today for funds provided under Section 103. The Division believes the funding arrangement under Section 103 has worked very well and recommends the funding continue to be provided under Section 103. The Division believes these monitoring sites represent a nationwide monitoring effort and should continue to be funded under Section 103. Having to provide a 40% match to receive these funds will be a burden to the Division and may impact our ability to continue this critical work.	Tennessee Department of Environment and Conservation, Division of Air Pollution Control	Appendix B: Effective Use and Distribution of STAG Funds	OAR believes the transition of the funding for the PM 2.5 monitoring network to §105 authority is appropriate given the maturity of this network. OAR believes that the PM2.5 monitoring network is more in line with the intent of § 105 to provide grants “for the prevention and control of air pollution or implementation of national primary and secondary ambient air quality standards.” OAR appreciates the challenges posed by the match requirements. Please note that while final congressional approval of the budget in recent years has precluded OAR from making the transition, OAR encourages states to continue to plan for the eventual transition of the PM2.5 network.
Grants - PM2.5 Shift from 103 to 105	The ability of state and local agencies to meet the EPA’s expectations detailed in section 2.4 with respect to ambient monitoring is, in part,	North Carolina Department of Environmental	Appendix B: Effective Use and	OAR believes the transition of the funding for the PM 2.5 monitoring network to §105 authority is appropriate given the maturity of this network. OAR

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Authority	<p>contingent on funding. Appendix B to the OAR NPM Guidance notes that “funding of air monitoring, including a proposed transition in funding authorities for PM2.5 monitoring” is being proposed. More specifically, EPA is proposing to transition the funding authority for PM2.5 monitoring from Clean Air Act section 103 to section 105. The N.C. DEQ opposes the proposal to transition funding for PM2.5 from CAA Section 103 to 105. The PM2.5 monitoring program has been funded under Section 103 and this arrangement has worked very well. There is no legal or scientific basis to propose this change. First, the law clearly provides that the EPA Administrator is authorized to make grants to “conduct...studies relating to the causes [and] ...extent of air pollution.” The CAA Section 103 funding is being used precisely for these purposes. There is nothing in the law that requires a transition. The PM2.5 program has been and continues to be one of the most successful monitoring programs precisely because the EPA has funded the program in this manner. Scientifically, transitioning the funding jeopardizes the success of this program and is unsupported. PM2.5 is one of the most important pollutants with respect to public health impacts. As researchers learn more about the impacts of PM2.5, the need to continue to collect more – not less – data, including speciation data, is critical. Ambient</p>	Quality, Department of Air Quality	Distribution of STAG Funds	<p>believes that the PM2.5 monitoring network is more in line with the intent of § 105 to provide grants “for the prevention and control of air pollution or implementation of national primary and secondary ambient air quality standards.” OAR appreciates the challenges posed by the match requirements. Please note that while final congressional approval of the budget in recent years has precluded OAR from making the transition, OAR encourages states to continue to plan for the eventual transition of the PM2.5 network.</p>

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	<p>monitoring of PM2.5 is evolving and improving as the community moves from gravimetric filters to continuous monitors. These continuous monitors are improving and new devices are being tested at the federal and state level using 103 grant funding. These continuous monitors provide real-time data that is being used to help EPA and states forecast air quality and allow citizens to make important health decision on a real-time basis. The transition to 105 funding will also put additional stressors on state budgets as additional match and maintenance-of-effort funding requirements will kick in.</p>			
<p>Grants - PM2.5 Shift from 103 to 105 Authority</p>	<p>EPA is proposing to begin shifting funding for the fine particulate matter (PM2.5) monitoring network from Section 103 to Section 105 authority, which would require state and local agencies to provide matching funds. The PM2.5 monitoring program has been funded under Section 103 and this arrangement has worked very well. NACAA recommends that it continue and, therefore, we oppose the transition of the program to Section 105 authority. The proposed shift would require state and local agencies to provide a 40-percent match, which not all agencies can afford. Those agencies that are unable to provide matching funds would not be able to accept the grants for these important monitoring programs. As a result, these agencies could be forced to discontinue required monitoring at existing sites. Since these are nationwide monitoring efforts, NACAA believes</p>	<p>National Association of Clean Air Agencies (NACAA)</p>	<p>Appendix B: Effective Use and Distribution of STAG Funds</p>	<p>OAR appreciates the challenges posed by the match requirements. OAR believes the transition of the funding for the PM2.5 monitoring network to §105 authority is appropriate given the maturity of this network. Please note that while final congressional approval of the budget in recent years has precluded OAR from making the transition, OAR encourages states to continue to plan for the eventual transition of the PM2.5 network.</p>

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	the funding should be provided under Section 103 authority so it is accessible to all, regardless of their ability to match the grants.			
Grants - PM2.5 Shift from 103 to 105 Authority	EPA proposes to shift PM 2.5 Section 103 funding (no local match required) to Section 105 funding, which requires a 40% match. EPA already grossly underfunds the Section 103 funding, resulting in State and Local agencies dipping into their Section 105 funds to cover PM 2.5 costs.	Knox County Department of Air Quality Management	OAR Guidance, Appendix B: STAG Funds	OAR appreciates the challenges posed by the match requirements. OAR believes the transition of the funding for the PM2.5 monitoring network to §105 authority is appropriate given the maturity of this network. Please note that while final congressional approval of the budget in recent years has precluded OAR from making the transition, OAR encourages states to continue to plan for the eventual transition of the PM2.5 network.
Grants - PM2.5 Shift from 103 to 105 Authority	A transition in funding authorities for PM _{2.5} monitoring from Section 103 to Section 105 is proposed. There has been no increase in Section 105 funding to accommodate for the cost of monitors, and there would also be a match requirement. We request that funding for PM _{2.5} monitoring remain under Section 103.	Alabama Department of Environmental Management (ADEM)	OAR Guidance, Appendix B: STAG Funds	OAR believes the transition of the funding for the PM 2.5 monitoring network to § 105 authority is appropriate given the maturity of this network. OAR believes that the PM2.5 monitoring network is more in line with the intent of Section 105 to provide grants “for the prevention and control of air pollution or implementation of national primary and secondary ambient air quality standards.” OAR appreciates the challenges posed by the match requirements. Please note that while final congressional approval of the budget in recent years has precluded OAR from making the transition, OAR encourages states to continue to plan for the eventual transition of the PM2.5 network.
General	In order to minimize the potential adverse impacts of the proposed drastic budget reductions, greater flexibility is needed to meet statutory, regulatory, and court-ordered requirements. New York appreciates the references to “working collaboratively ... to	New York State Department of Environmental Conservation Division of Air Resources	Section 2: Program Activities	The air program is committed to working collaboratively with states, tribes, and local agencies during the course of work planning.

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	prioritize activities and agree on the level of effort within available resource levels,” and believes the phrase “as resources allow” should be used for more of the listed program activities, similar to its use in Program Activity 2.5 Air Toxics Program Implementation.	and Bureau of Stationary Sources		
General	NPM guidance language should reference the benefit of collaborative efforts to develop shared services, to streamline programs (including process improvement), and to modernize systems including electronic reporting. Language should reference support for states to include streamlining and modernization activities in grant work plans with regions and recognize that there may be tradeoffs in workload as a result.	Environmental Council of States (ECOS)	2. Program Activities	Thank you for your comment. OAR has added language to the Introduction reflecting these important collaborative efforts.
General	Specifically, throughout the Guidance Document, EPA has listed “Expected State and Local Agency Activities.” Some of the activities contained in these lists include actions that are not required by federal regulation or statute. Thus, the Division recommends that EPA clarify that these are voluntary actions that state and local agencies may choose to do or not to do. The Guidance Document should make clear that should a state or local agency elect not to undertake one of these voluntary activities, it will not affect the program’s air funding. Should EPA elect not to make this clarification, these measures should be removed from the Guidance Document. These include, but are not limited to: <ul style="list-style-type: none"> • Section 2.5.1, item 3, “Conduct data 	Tennessee Department of Environment and Conservation, Division of Air Pollution Control	Throughout OAR Guidance	The draft OAR NPM Guidance reflects the core work related to meeting statutory, regulatory, and court-ordered requirements. OAR regions and air agencies are encouraged to use the established work-planning process to provide flexibility and tailor work expectations and resource allocations to meet local circumstances, as long as core work continues. OAR supports maintaining flexibility for states and locals that wish to pursue voluntary and non-voluntary activities.

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	<p>analysis and assessment of air toxics monitoring data.”</p> <ul style="list-style-type: none"> • Section 2.5.1, item 4, “Assess and address local air toxics issues, including the combined impact of multiple sources of air toxics, and support efforts to reduce emissions encouraging voluntary reductions of air toxics.” • Section 2.8.1, item 6, “Work with a broad range of stakeholders to focus efforts on reducing mobile source emissions in and around ports.” <p>The Division recommends that the Guidance Document be revised to reflect state and local activities and responsibilities that correspond to the stated intent to focus on statutory requirements, streamline core environmental work and reduce duplicative work as well as the proposed dramatic reduction in funding to state and local air agencies.</p>			
General	<p>The Tribe is deeply concerned about the omission of important air quality program guidance for voluntary and non-regulatory programs such as indoor air quality, radon, and climate change. Because the Guidance creates the framework for the programmatic activities that will be the focus of the EPA’s work and grants, Tribes will be adversely affected by any cuts to programs and grants that are not included. We recognize that the proposed draft Guidance document reflects the reduced</p>	Big Pine Paiute Tribe of the Owens Valley	Throughout OAR Guidance	Programs proposed for elimination in the President’s FY 2018 Budget were not included in the draft OAR NPM Guidance.

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	<p>funding to the Tribal Air Program, EPA and OAR in the President’s Proposed Budget, but these programs continue to be priorities for the Tribes nationwide, as evidenced by the TAMS 2017 Needs Assessment, NTAA National Indoor Air Quality Needs Assessment for Indian Country and the NTAA’s 2017 Status of Tribal Air Report. Additionally, Tribes have important and ongoing programs related to these areas that will be severely impacted by this discontinuation of EPA support if this draft document is finalized as it is written. The Tribe requests inclusion of programmatic activities related to ongoing IAQ, radon, and climate change work and grants. The following program areas were included in the 2016-2017 guidance but omitted from the 2018-2019 guidance:</p> <ul style="list-style-type: none"> • Greenhouse Gas Reporting Program, • Climate Partnership Programs, • Clean Power Plan • Reducing Radon Risk • Reducing Asthma Triggers • Comprehensive IAQ Interventions • Radiation Protection • Radiation Emergency Response Preparedness • Homeland Security: Preparedness, Response, and Recovery • Addressing Climate Change in Indian Country • Improving Indoor Environments in Indian Country 			

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General	<p>The Blue Lake Rancheria is deeply concerned about the omission of important air quality program guidance for voluntary and non-regulatory programs such as indoor air quality, radon, and climate change. Because the Guidance creates the framework for the programmatic activities that will be the focus of the EPA’s work and grants, Tribes will be adversely affected by any cuts to programs and grants that are not included. We recognize that the proposed draft Guidance document reflects the reduced funding to the Tribal Air Program, EPA and OAR in the President’s Proposed Budget, but these programs continue to be priorities for the Tribes nationwide, as evidenced by the TAMS 2017 Needs Assessment, NTAA National Indoor Air Quality Needs Assessment for Indian Country and the NTAA’s 2017 Status of Tribal Air Report. Additionally, Tribes have important and ongoing programs related to these areas that will be severely impacted by this discontinuation of EPA support if this draft document is finalized as it is written.</p> <p>The Blue Lake Rancheria requests inclusion of programmatic activities related to ongoing IAQ, radon, and climate change work and grants. The following program areas were included in the 2016-2017 guidance but omitted from the 2018-2019 guidance:</p> <ul style="list-style-type: none"> • Greenhouse Gas Reporting Program, • Climate Partnership Programs, 	Blue Lake Rancheria	Throughout OAR Guidance	Programs proposed for elimination in the President’s FY 2018 Budget were not included in the draft OAR NPM Guidance.

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	<ul style="list-style-type: none"> • Clean Power Plan • Reducing Radon Risk • Reducing Asthma Triggers • Comprehensive IAQ Interventions • Radiation Protection • Radiation Emergency Response Preparedness • Homeland Security: Preparedness, Response, and Recovery • Addressing Climate Change in Indian Country • Improving Indoor Environments in Indian Country 			
General	<p>The NTAA EC and TAMS SC are deeply concerned about the omission of important air quality program guidance for voluntary and non-regulatory programs such as indoor air quality, radon, and climate change. Because the Guidance creates the framework for the programmatic activities that will be the focus of the EPA’s work and grants, Tribes will be adversely affected by any cuts to programs and grants that are not included. We recognize that the proposed draft Guidance document reflects the reduced funding to the Tribal Air Program, EPA and OAR in the President’s Proposed Budget, but these programs continue to be priorities for the Tribes nationwide, as evidenced by the TAMS 2017 Needs Assessment, NTAA National Indoor Air Quality Needs Assessment for Indian Country and the NTAA’s 2017 Status of Tribal Air Report.</p>	National Tribal Air Association	Throughout OAR Guidance	Programs proposed for elimination in the President’s FY 2018 Budget were not included in the draft OAR NPM Guidance.

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	<p>Additionally, Tribes have important and ongoing programs related to these areas that will be severely impacted by this discontinuation of EPA support if this draft document is finalized as it is written.</p> <p>The NTAA EC and TAMS SC requests inclusion of programmatic activities related to ongoing IAQ, radon, and climate change work and grants. The following program areas were included in the 2016-2017 guidance but omitted from the 2018-2019 guidance:</p> <ul style="list-style-type: none"> • Greenhouse Gas Reporting Program, • Climate Partnership Programs, • Clean Power Plan • Reducing Radon Risk • Reducing Asthma Triggers • Comprehensive IAQ Interventions • Radiation Protection • Radiation Emergency Response Preparedness • Homeland Security: Preparedness, Response, and Recovery • Addressing Climate Change in Indian Country • Improving Indoor Environments in Indian Country 			
General	<p>The Nez Perce Tribe is deeply concerned about the omission of important air quality program guidance for voluntary and non-regulatory programs such as indoor air quality, radon, and climate change. Because the Guidance creates the framework for the programmatic activities</p>	Nez Perce Tribe	Throughout OAR Guidance	<p>Programs proposed for elimination in the President’s FY 2018 Budget were not included in the draft OAR NPM Guidance.</p>

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	<p>that will be the focus of the EPA’s work and grants, Tribes will be adversely affected by any cuts to programs and grants that are not included. We recognize that the proposed draft Guidance document reflects the reduced funding to the Tribal Air Program, EPA and OAR in the President’s Proposed Budget, but these programs continue to be priorities for the Tribes nationwide, as evidenced by the TAMS 2017 Needs Assessment, NTAA National Indoor Air Quality Needs Assessment for Indian Country and the NTAA’s 2017 Status of Tribal Air Report. Additionally, Tribes have important and ongoing programs related to these areas that will be severely impacted by this discontinuation of EPA support if this draft document is finalized as it is written.</p> <p>The Nez Perce Tribe requests inclusion of programmatic activities related to ongoing IAQ, radon, and climate change work and grants. The following program areas were included in the 2016-2017 guidance but omitted from the 2018-2019 guidance:</p> <ul style="list-style-type: none"> • Greenhouse Gas Reporting Program, • Climate Partnership Programs, • Clean Power Plan • Reducing Radon Risk • Reducing Asthma Triggers • Comprehensive IAQ Interventions • Radiation Protection • Radiation Emergency Response Preparedness 			

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	<ul style="list-style-type: none"> • Homeland Security: Preparedness, Response, and Recovery • Addressing Climate Change in Indian Country • Improving Indoor Environments in Indian Country 			
General	<p>The Tribe is deeply concerned about the omission of important air quality program guidance for voluntary and non-regulatory programs such as indoor air quality, radon, and climate change. Because the Guidance creates the framework for the programmatic activities that will be the focus of the EPA’s work and grants, Tribes will be adversely affected by any cuts to programs and grants that are not included. We recognize that the proposed draft Guidance document reflects the reduced funding to the Tribal Air Program, EPA and OAR in the President’s Proposed Budget, but these programs continue to be priorities for the Tribes nationwide, as evidenced by the TAMS 2017 Needs Assessment, NTAA National Indoor Air Quality Needs Assessment for Indian Country and the NTAA’s 2017 Status of Tribal Air Report. Additionally, Tribes have important and ongoing programs related to these areas that will be severely impacted by this discontinuation of EPA support if this draft document is finalized as it is written.</p> <p>The Tribe requests inclusion of programmatic activities related to ongoing IAQ, radon, and</p>	Pyramid Lake Paiute Tribal Council	Throughout OAR Guidance	Programs proposed for elimination in the President’s FY 2018 Budget were not included in the draft OAR NPM Guidance.

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	<p>climate change work and grants. The following program areas were included in the 2016-2017 guidance but omitted from the 2018-2019 guidance:</p> <ul style="list-style-type: none"> • Greenhouse Gas Reporting Program, • Climate Partnership Programs, • Clean Power Plan • Reducing Radon Risk • Reducing Asthma Triggers • Comprehensive IAQ Interventions • Radiation Protection • Radiation Emergency Response Preparedness • Homeland Security: Preparedness, Response, and Recovery • Addressing Climate Change in Indian Country • Improving Indoor Environments in Indian Country 			
General	<p>The guidance presents activities expected to be undertaken by EPA, states, territories and tribal governments. However, unlike previous guidance documents, this draft merely provides general statements about the efforts that EPA headquarters or regional offices will carry out and does not include any detailed activities. This is important information that should be included.</p>	<p>National Association of Clean Air Agencies (NACAA)</p>	<p>OAR Introduction, Page 1</p>	<p>Following the agency-wide decision, along with input from states, OAR developed its draft NPM Guidance in accordance with the two-year FY 2018-2019 NPM Guidance process. OAR utilized a streamlined approach to only focus on key program activities consistent with the FY 2018 President’s Budget (specifically state, local and tribal activities). This also recognizes the opportunity for a FY 2019 Addendum next year which would capture programmatic activities consistent with the FY 2019 budget, changes resulting from the FY 2018 appropriations process, priorities of agency policy officials, and FY 2018-2022 Strategic Plan and will look more like a traditional OAR NPM</p>

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				Guidance.
General	This section should include language in support of the joint-governance initiative, E-Enterprise for the Environment. Specifically recognizing the CAER Team, under which state and EPA representatives work to modernize and streamline industry emissions reporting under multiple statutorily required programs to reduce regulatory burden and increase reporting efficiency and accuracy at the private, state, and federal level.	Environmental Council of States (ECOS)		Thank you for your comment. OAR has added language to the Introduction to reflect OAR’s ongoing engagement in and support for the jointly governed E-Enterprise for the Environment collaborative.