

**SUMMARY OF EARLY ENGAGEMENT ON THE OFFICE OF AIR AND RADIATION (OAR)  
FY 2018-2019 NATIONAL PROGRAM MANAGER (NPM) GUIDANCE**

*December 5, 2016*

On September 9, 2016, OAR offered the opportunity for national, state, local, and tribal air, public health, and radiation associations to provide early input to inform the development of the OAR NPM Guidance for FY 2018-2019 via letters of invitation. OAR received four sets of comments and shared that input with its offices and other national program offices, where relevant.

OAR will describe how early input influenced its NPM Guidance when a draft is released for public comment following the release of the FY 2018 President's Budget. OAR will provide responses to public comments when the final OAR NPM Guidance for FY 2018-2019 is issued.

Below is a summary of comments OAR received during the early engagement period.

*National Association of Clean Air Agencies (NACAA): October 12, 2016*

- General:
  - Support for early engagement on NPM Guidance.
  - Continue collaboration/flexibility between EPA and states in developing and tailoring work plans, as appropriate.
- Effective Use and Distribution of STAG Funds:
  - Increase funding for State and Tribal Air Grants (STAG).
  - Continue funding for PM2.5 monitoring using Section 103 authority of the Clean Air Act.

*Environmental Council of the States (ECOS): October 12, 2016*

- General:
  - Need for adequate resources, flexibility and timely guidance.
  - Support for continued collaboration on State Implementation Plans (SIPs), grant guidance alignment and Title VI obligations.
- E-Enterprise:
  - Support for E-Enterprise for the Environment and continued work together as smart tools are considered for air programs.

*National Tribal Air Association (NTAA): October 17, 2016*

- General:
  - Support expanded and substantive discussion in NPM Guidance about Indian Tribes and Alaska Native Villages; how their air quality issues will be addressed; and how EPA will support Indian Tribes.
  - Support for EPA facilitation of partnerships with co-regulators.
- Improve Outdoor Air Quality:
  - Provide training support for Indian Tribes to assess and comment on Title V permits.
  - Help Indian Tribes engage in development and implementation of SIPs.
  - Consider adding a section on Tribal Minor New Source Review Rule.

*Local Government Advisory Committee (LGAC): October 26, 2016*

- General:
  - Support for early engagement on NPM Guidance and continued collaboration/flexibility.
  - Consider impacts of air requirements, particularly affordability for small and disadvantaged communities.
  - Consider health of environmental justice (EJ) communities near industrial facilities, power plants, landfills, and oil and gas operations.
  - Focus on reducing harmful and toxic emissions and in building climate resiliency and sustainability in EJ communities.
  
- Improve Outdoor Air Quality:
  - Continued support for: NAAQS, Ambient Monitoring, Stationary Sources, Mobile Sources, and other air programs.
  - Encourage that vehicle emissions regulations continue to be monitored and reviewed, following up on the rules already in place for vehicle emissions.
  - Consider compiling cumulative impact of multiple air pollutants and sources.
  - Support for addressing non-attainment in small communities.
  
- Research:
  - Support research and calculations on methane emissions to determine guidelines for its emissions.
  - Provide research on how to address thermal inversions, in addition to other weather phenomena, that influence the dispersal of air pollution.
  - Support research on substances such as petroleum coke, metallurgical coke, and coke breeze in order to determine impacts on public health.