



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

APR 27 2011

OFFICE OF  
ENFORCEMENT AND  
COMPLIANCE ASSURANCE

Mr. Eddie Terrill  
Co-Chair, NACAA Enforcement & Compliance Committee  
National Association of Clean Air Agencies (NACAA)  
444 North Capitol Street, NW, Suite 307  
Washington, DC 20001

Dear Mr. Terrill:

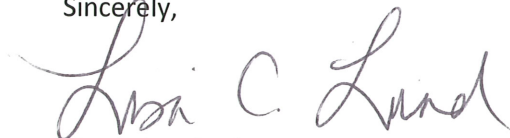
On behalf of Cynthia Giles, the Assistant Administrator of the Office of Enforcement and Compliance Assurance, we would like to thank the National Association of Clean Air Agencies (NACAA) and their representatives for your support of the Air Facility System (AFS) modernization efforts. We value your continued support as we move forward.

We appreciate your concern, per your February 18, 2011 letter to Cynthia Giles, on the concepts that have been discussed for changing AFS and enhancing its operability. AFS modernization is important to ensure that EPA and our state and local partners can aggressively pursue significant pollution problems that make a difference in communities. While no final decisions have been made concerning the specifics of what will be addressed in the modernized AFS, we have identified a clear set of system requirements through close coordination with the national user community, including many of your members. Currently, we are reviewing various approaches and options for modernization arising from this coordination. We cannot, however, commit to timeframes for when modernization will be completed given the current budget uncertainty.

We understand that the new AFS needs to balance the needs of EPA and state and local air compliance and enforcement programs, while providing enough flexibility so that the system is usable and understandable by the large set of customers. Specifically, we would like to receive input from the NACAA Compliance and Enforcement Committee on reporting scenarios, particularly for tracking violations. We understand the concerns raised about federally-reportable violations (FRV) and are willing to engage in a policy discussion on this matter. This policy discussion is a separate and distinguishable issue from AFS modernization, as modernization simply reflects existing policy. We would be pleased to host continued discussion of both the modernization scenarios and FRV through national webinars to ensure our state and local partners stay engaged. Please let me know if your organization is interested in participating in such an effort.

We value your input to this effort, and I look forward to continuing to work with NACAA to reach our shared goals.

Sincerely,

A handwritten signature in cursive script that reads "Lisa C. Lund". The signature is written in dark ink and is positioned above the printed name.

Lisa C. Lund, Director  
Office of Compliance

cc: Adam Kushner