



# NACAA Member Manual

The National Association of Clean Air Agencies

Washington DC | July 4, 2019

## Overview

**Who We Are** | The National Association of Clean Air Agencies (NACAA) is the national, non-partisan, non-profit association of air quality agencies across 41 states, including 115 local air agencies, the District of Columbia and four territories. The association exists to help you, our member agencies from every region of the country, achieve your clean air goals and protect the health of your residents. We are uniquely positioned to enable a national conversation across regional, political and geographical borders on best practices for agency success and to help our members effectively inform federal actions. Guided by a board of directors made up of representatives of 17 of our member agencies, NACAA finds common ground and gives equal voting rights and a national voice to state and local air pollution control agencies.

**What We Do** | NACAA's mission is to advance the protection of clean air and public health, and to improve the capability and effectiveness of state and local air agencies. Our small, Washington DC-based staff of experts advocates for our members and amplifies your views whenever relevant regulations or legislation are on the table. We facilitate access for our members to, and enhance communication and collaboration with, EPA headquarters, regions, field offices and labs. On Capitol Hill, we fight for air agencies' and EPA's budgets and appropriations as well as for other issues of importance to our members. We also provide an interface for state and local air agencies with other federal agencies and elected officials, utility commissions, energy agencies, transportation officials, industry, environmental and public health groups and other stakeholders.

**What We Offer** | We provide a host of technical information and tools to keep our members informed in a way that helps you be effective in your work. Our publications, conference calls and webcasts help member agency staff stay up to date as experts in their fields and stay ahead of emerging rules and issues.

NACAA's online, members-only portal, *Air Web*, hosts a wide array of information and resources related to the association's activities and air pollution in general including a compilation of NACAA's comment letters and positions, a comprehensive summary of legal and judicial action related to air pollution, pages for each of NACAA's standing committees, a calendar of events and a directory of every clean air agency in the country, to name a few (available to members at [members.4cleanair.org](https://members.4cleanair.org)).

The NACAA team publishes a weekly electronic newsletter, the *Washington Update*, which provides the latest information about regulatory and legislative developments, policies and guidance documents, NACAA and EPA activities, meetings, workshops, hearings, new reports and studies and other items of interest to our members. The *Washington Update* is e-mailed to all NACAA members every Friday, and is also available on *Air Web*. Other NACAA publications include our "4y" factsheets, which have covered issues like hurricanes, PFAS, wildfires and air sensors, and our *Funding Opportunities Updates*, which highlight funding opportunities available from federal agencies and private organizations.

**Our Community** | Most of all, we bring together thousands of people who work for 156 state and local clean air agencies across America. Our committees allow your work to be informed by the best ideas from colleagues around the nation. Each committee convenes regular conference calls and opportunities to learn from each other, EPA and other organizations and experts on key topics: Agriculture; Air Toxics; Criteria Pollutants; Emissions and Modeling; Enforcement; Global Warming; Mobile Sources and Fuels; Monitoring; Permitting and New Source Review; Program Funding; Public Outreach; Resilience & Sustainability; and Training. Ours is a community of excellence, and of friendship as well.

NACAA holds two membership meetings a year, where we connect with federal agencies and national leaders. These meetings are a chance for you to learn about the timeliest and most relevant air pollution

information and to have an opportunity to meet and network with your colleagues from across the country. We also host stand-alone workshops on topics that relate directly to the work you do.

## Your Team

### [Miles Keogh](#)

Executive Director, staff lead for Enforcement Committee & Ad Hoc Committee on Resilience & Sustainability

### [Nancy Kruger](#)

Deputy Director, staff lead for Criteria Pollutants Committee and Mobile Sources & Fuels Committee

### [Mary Sullivan Douglas](#)

Senior Staff Associate, staff lead for the Program Funding Committee and Air Toxics Committee, and for the VW Settlement Workgroup

### [Karen Mongoven](#)

Senior Staff Associate, staff lead for the Permitting & NSR Committee, Monitoring Committee, and Emissions & Modeling Committee

### [Phil Assmus](#)

Senior Staff Associate, staff lead for the Training Committee, Global Warming Committee, and Agriculture Committee

### [Stephanie Steigman](#)

Office Manager, staff lead for the Public Outreach Committee

### [Monique Faye](#)

Administrative Assistant and Database and Web Manager

## Your Washington Office

National Association of Clean Air Agencies

444 North Capitol Street, NW, Suite 307

Washington, DC 20001

Phone: (202) 624-7864

[www.4cleanair.org](http://www.4cleanair.org)

Twitter: @WeAre4CleanAir

## Our Mission & Values

At the Board of Directors meeting in Cleveland, Ohio on October 14, 2018, the NACAA Board of Directors adopted the following statement articulating the values, mission, and strategy priorities for the association.

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### *Our values*

NACAA is:

- An advocate for the protection of clean air and public health;
  - A provider of valued services and resources to the members;
  - A source of credible expertise to decision-makers;
  - forum for learning with, and from, each other;
  - A point of focus for effective state and local agency interaction with the federal government; and
  - A national association that thrives because its members have common interests, while respecting one another's differences.
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### *Our mission:*

NACAA exists to advance the protection of clean air and public health, and to improve the capability and effectiveness of state and local air agencies.

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### *Our long-term strategic priorities:*

1 – Strengthen our core

2 – Expand our base

3 – Advocate for intelligent advances in policy

4 – Facilitate cross-programmatic efforts

5 – Be the pre-eminent authority on clean air policy matters

## Background & Structure

NACAA's members are state and local air pollution control agencies. The association was preceded by the State and Territorial Air Pollution Program Administrators (STAPPA) and Association of Local Air Pollution Control Officials (ALAPCO), which partnered in 1980 to open a staffed Washington, DC-based office. In 2007, STAPPA and ALAPCO merged and became NACAA – the National Association of Clean Air Agencies. However, our by-laws and organizational model preserve the unique voices of state and local air agencies by creating a co-led governance structure with equal roles for state and local agencies. Each officer role is held jointly by a state air director and a local air director and our committees are also co-led. Voting on association matters is conducted by separate state and local votes with equal weight.

NACAA is governed by bylaws passed in 2006 and amended in 2012. They are available online at <http://members.4cleanair.org/bylaws>.

### Officers

The association has a 17-member board of directors including 10 state representatives (one from each EPA region) and seven local representatives. Eight members of the board are officers – the co-presidents, co-vice presidents, co-treasurers and immediate past co-presidents.

### Committees & Committee Chairs

NACAA's committees are co-led by a state co-chair and a local co-chair appointed by the state co-president and the local co-president, respectively. Most committees host conference calls on a regular basis – typically monthly or bimonthly but in some instances quarterly – usually with featured speakers. Committees also develop NACAA comments and various resources.

## Activities & Resources

### Online Resources

We publish a weekly *Washington Update* that summarizes the week's essential clean air news. We also publish a regular factsheet series, *4yi* (<http://www.4cleanair.org/4yi-technical-factsheets>), and a bimonthly *Funding Opportunities Update* that offers links to grants, cooperative agreements and other funding sources that may be useful to members. As needs arise, NACAA has published large-scale support documents that offer guidance, templates, tools and menus of options for new national clean air rules and other timely topics.

NACAA's online, members-only portal, *Air Web*, hosts:

- a compilation of NACAA's comment letters and positions as well as preliminary drafts for members' review and comment;
- a library of the current and past editions of our weekly *Washington Update*;
- collections of important documents by topic; comprehensive information about legal and judicial action related to air pollution;
- pages for each of NACAA's standing committees;
- a catalogue of presentations from past membership meetings;
- a listing of important legislative activities;
- a calendar or events;
- materials related to NACAA's governance;
- postings of clean air jobs; and

a directory of every clean air agency in the country.

Air Web is available to NACAA members at <http://members.4cleanair.org>.

To register for *Air Web*, go to [www.4cleanair.org](http://www.4cleanair.org), click on "Member Login", go to "New to our site? Click here to join," then follow the instructions. Once you are registered, you will be automatically added to our general members email distribution list. To receive committee-specific mailings, go to your *Air Web* user profile (on the *Air Web* home page, click on "Welcome (your name)" and go to "Personal Information") and check the box next to each committee you would like to join (and uncheck the box to leave a committee).

NACAA offers a broad array of other resources like networks of experts, training, information-sharing, the development of shared policy and connections to other clean air activities through our committees, described next.

## Committees

NACAA's 13 committees are the backbone of the association. They include Agriculture, Air Toxics, Criteria Pollutants, Emissions and Modeling, Enforcement, Global Warming, Mobile Sources and Fuels, Monitoring, Permitting and NSR, Program Funding, Public Outreach, Training, and the Ad Hoc Committee on Resilience & Sustainability.

### **Agriculture**

The NACAA Agriculture Committee focuses on agricultural sources of air pollution and air quality issues related to animal feeding operations (AFOs) and concentrated animal feeding operations (CAFOs); grain processors; agricultural burning practices (including prescribed fires); and silvicultural practices. The Agriculture Committee holds conference calls on the third Tuesday of every other month, from 2:00 PM to 3:00 PM Eastern Time.

Recent issues:

- New Emissions Reporting Requirements Under CERCLA and EPCRA
- EPA's Denial of a Petition to Regulate AFOs Under Section 111

Co-Chairs: Merlin Hough, (Eugene, OR) & Kevin J. Stoner (Nebraska)

Staff: Phil Assmus, [passmus@4cleanair.org](mailto:passmus@4cleanair.org)

Webpage: <http://members.4cleanair.org/committees/details/agriculture>

Email list: [agriculture@lists.4cleanair.org](mailto:agriculture@lists.4cleanair.org)

Call-in number and access code: 866-365-4406, 7578536#

### **Air Toxics**

The NACAA Air Toxics Committee addresses issues related to the Clean Air Act's Hazardous Air Pollutants (HAP) control program. These include, among others, the technology-based Maximum Achievable Control Technology (MACT) standards that EPA has developed to limit air pollution from the source categories that emit any of the 187 hazardous air pollutants required to be regulated under the Clean Air Act. Additionally, the committee's jurisdiction includes the establishment of Residual Risk standards that are designed to address the risks that remain after the imposition of MACT. The Air Toxics Committee holds a conference call on the first Thursday of every other month, from 11:30 AM to 12:30 PM Eastern Time.

Recent issues:

- Source Category List
- Risk and Technology Review
- National Air Toxics Assessment
- Once in Always in

Co-Chairs: Bob Colby (Chattanooga TN) & Frank Steitz (New Jersey)

Staff: Mary Douglas, [mdouglas@4cleanair.org](mailto:mdouglas@4cleanair.org)

Webpage: <http://members.4cleanair.org/committees/details/air-toxics>

Email list: [air\\_toxics@lists.4cleanair.org](mailto:air_toxics@lists.4cleanair.org)

Call-in number and access code: 866-365-4406, 5870993#

## **Criteria Pollutants**

The NACAA Criteria Pollutants Committee focuses on issues associated with the establishment, implementation, attainment and maintenance of the six health-based National Ambient Air Quality Standards (NAAQS) – for ozone, particulate matter (PM), sulfur dioxide (SO<sub>2</sub>), nitrogen dioxide (NO<sub>x</sub>), lead and carbon monoxide (CO) – as well as regional haze and the interstate transport of pollution. The Criteria Pollutants Committee has particular interest in all aspects of the development and approval of State Implementation Plans (SIPs), including the preparation by EPA of implementation rules and guidance, and in improving the SIP process. The Criteria Pollutants Committee holds conference calls on the fourth Wednesday of every month, from 1:30 PM to 2:30 PM Eastern Time.

Recent issues:

- NAAQS Implementation
- Residential Wood Smoke
- Transport
- NAAQS Reviews
- Exceptional Events
- Regional Haze

Co-Chairs: Lynne Liddington (Knoxville, TN) & Tad Aburn (Maryland)

Staff: Nancy Kruger, [nkruger@4cleanair.org](mailto:nkruger@4cleanair.org)

Webpage: <http://members.4cleanair.org/committees/details/criteria-pollutants>

Email list: [criteria\\_pollutants@lists.4cleanair.org](mailto:criteria_pollutants@lists.4cleanair.org)

Call-in number and access code: 866-365-4406, 2682624#

## **Emissions and Modeling**

The NACAA Emissions and Modeling Committee tracks issues associated with emissions inventories and air quality modeling including the National Emissions Inventory (NEI) and Emissions Modeling Platforms, the Greenhouse Gas Reporting Program, regulatory modeling associated with the National Ambient Air Quality Standards and stationary-source permit modeling. The Emissions and Modeling Committee holds conference calls on the first Tuesday of every other month, from 1:00 PM – 2:30 PM Eastern Time.

Recent issues:

- Modeling Guidance for Ozone, PM<sub>2.5</sub> and Precursors
- Combined Air Emissions Reporting Project
- Appendix W Revisions
- SO<sub>2</sub> NAAQS Implementation

Co-Chairs: Charlene Albee (Reno, NV) & Gail Good (Wisconsin)

Staff: Karen Mongoven, [kmongoven@4cleanair.org](mailto:kmongoven@4cleanair.org)

Webpage: <http://members.4cleanair.org/committees/details/emissions-and-modeling>

Email list: [modeling@lists.4cleanair.org](mailto:modeling@lists.4cleanair.org)

Call in number and access code: 866-365-4406, 1232457#

## **Enforcement**

The NACAA Enforcement Committee works on issues related to the enforcement of the Clean Air Act. This includes enforcement actions by EPA against sources violating the Clean Air Act; state and local enforcement actions; EPA oversight of state and local enforcement programs; EPA's reporting requirements for state and local air agencies regarding enforcement and compliance activities conducted by these agencies; and EPA's data tools for tracking state and local enforcement efforts, including the Air Facility System (AFS) and the Enforcement and Compliance History Online (ECHO) website. The Enforcement Committee holds conference calls on the first Wednesday of every other month, from 12:30 PM to 2:00 PM Eastern Time.

Recent issues:

- Implementation of the VW Settlement
- Next Generation Compliance

Co-Chairs: Richard Stedman (Monterey, CA) & Mike Dowd (Virginia)

Staff: Miles Keogh, [mkeogh@4cleanair.org](mailto:mkeogh@4cleanair.org)

Webpage: <http://members.4cleanair.org/committees/details/enforcement>

Email list: [enforcement@lists.4cleanair.org](mailto:enforcement@lists.4cleanair.org)

Call-in number and code: 866-365-4406, access code 1226491#

### ***Global Warming***

The NACAA Global Warming Committee focuses on the impacts of global warming and efforts to limit emissions of greenhouse gases (GHGs), which include carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride. The Committee follows a number of issues including federal efforts related to GHG emissions; state and local programs and initiatives to reduce GHG emissions; federal global warming legislation; international efforts to reduce worldwide GHG emissions such as meetings hosted under the auspices of the UN Framework Convention on Climate Change); efforts to promote energy efficiency and renewable energy; adaptation; and scientific findings related to global warming. The Global Warming Committee holds conference calls on the second Wednesday of every other month, from 2:00 PM to 3:30 PM Eastern Time.

Recent issues:

- EPA's Proposed Repeal of the Clean Power Plan
- EPA ANPRM for a CPP Replacement Rule
- State and Local Initiatives

Co-Chairs: Alberto Ayala (Sacramento CA) & Stu Clark (Washington)

Staff: Phil Assmus [passmus@4cleanair.org](mailto:passmus@4cleanair.org)

Webpage: <http://members.4cleanair.org/committees/details/global-warming>

Email list: [global\\_warming@lists.4cleanair.org](mailto:global_warming@lists.4cleanair.org)

Call-in number and access code: 866-365-4406, 7578536#

### ***Mobile Sources and Fuels***

The NACAA Mobile Sources and Fuels Committee focuses on the impacts of transportation-related sources on air quality and public health, efforts to reduce emissions from these sources, the need for additional federal standards to further reduce emissions from the mobile source sector. This sector includes passenger cars and light trucks, heavy-duty trucks and buses, locomotives, marine vessels, aircraft, construction and agricultural equipment and other nonroad engines, recreational vehicles and lawn and garden equipment, as well as the fuels that power them. The Committee also focuses California's unique statutory authority to establish motor vehicle standards and the statutory authority of other states to opt into California's standards as well as on vehicle use and driving, transportation planning and conformity. In addition, the Committee tracks federal legislation related to all these issues. The Mobile Sources and Fuels Committee holds conference calls on the third Tuesday of every other month from 1:30 PM to 3:00 PM Eastern Time.

Recent Issues:

- EPA's and NHTSA's Reconsideration of the Federal Light-Duty Vehicle GHG Emission Standards and Fuel Economy Standards for MYs 2020-2025
- States' Rights under Sections 209 and 177 the Clean Air Act
- EPA's and California's Initiatives to Adopt More Stringent Federal NO<sub>x</sub> Emission Standards for Heavy-Duty Trucks
- Implementation of the VW Settlement
- Aftermarket Catalysts
- DERA Reauthorization

Co-Chairs: Erik White (Auburn, CA) & Steve Flint (New York)

Staff: Nancy Kruger, [nkruger@4cleanair.org](mailto:nkruger@4cleanair.org)

Webpage: <http://members.4cleanair.org/committees/details/mobile-sources-and-fuels>

Email list: [mobile\\_sources@lists.4cleanair.org](mailto:mobile_sources@lists.4cleanair.org)

Call-in number and access code: (866) 365-4406, 2682624#

### ***Monitoring***

The NACAA Monitoring Committee focuses on ambient air monitoring including issues associated with all of the nationwide monitoring networks operated by state and local agencies to meet EPA regulatory requirements. The committee also examines emerging issues such as air sensor technologies. The Monitoring Committee holds conference calls on the third Thursday of every other month, from 1:30 – 3:00 pm Eastern Time.

Recent issues:

- Ozone Monitoring Requirements and PAMS Realignment
- Air Quality Sensors as a Complement to Monitoring Networks
- SO<sub>2</sub> NAAQS Implementation
- Part 58 Rule Revisions

Co-Chairs: Sam Rubens (Akron OH) & Heidi Hales (Vermont)

Staff: Karen Mongoven, [kmongoven@4cleanair.org](mailto:kmongoven@4cleanair.org)

Webpage: <http://members.4cleanair.org/committees/details/monitoring>

Email list: [monitoring@lists.4cleanair.org](mailto:monitoring@lists.4cleanair.org)

Call-in number and access code: 866-365-4406, 1232457#

### ***Permitting and New Source Review***

The NACAA Permitting and New Source Review Committee focuses on issues associated with application and implementation of the Clean Air Act permitting programs for major sources, including the Title V operating permits program, the Prevention of Significant Deterioration (PSD) program and the Nonattainment New Source Review (NNSR) program. It also addresses other permitting-related issues such as minor source permitting.

Recent issues:

- NACAA's Recommendations for Streamlining Clean Air Act Permitting
- NSR Reforms
- E-Permitting

Co-Chairs: Ursula Nelson (Tucson, AZ) & Ali Mirzakhilili (Oregon)

Staff: Karen Mongoven, [kmongoven@4cleanair.org](mailto:kmongoven@4cleanair.org)

Webpage: <http://members.4cleanair.org/committees/details/permitting>

Email list: [permitting@lists.4cleanair.org](mailto:permitting@lists.4cleanair.org)

Call-in number and access code: 866-365-4406, 1232457#

### ***Program Funding***

The NACAA Program Funding Committee focuses on resources for state and local air agencies including the congressional appropriations process and federal grants under Sections 103 and 105 of the Clean Air Act. The Committee focuses on the President's annual budget request, EPA's budget and program guidance, the Congressional appropriations process and other budget and planning issues. NACAA provides input to EPA and Congress on the need for adequate funding for state and local air agencies including the federal grant program under Sections 103 and 105 of the Clean Air Act, and any other funding, appropriations and grant matters that affect state and local air agencies. Because of the sensitivity associated with many of the Program Funding discussions and the need to ensure regional representation on the committee, its membership consists of the NACAA board of directors and committee co-chairs. The Committee holds conference calls on an as-needed basis and meets four times each year as part of the quarterly NACAA Board of Directors and Committee Chairs' Meetings.

Recent issues:

- FY 2019 Appropriations & NACAA's FY 2020 Budget Request

Co-Chairs: Craig Kenworthy (Seattle, WA) & Eddie Terrill (Oklahoma)

Staff: Mary Sullivan Douglas, [mdouglas@4cleanair.org](mailto:mdouglas@4cleanair.org)

Webpage: <http://members.4cleanair.org/committees/details/program-funding>

Email list: [program\\_funding@lists.4cleanair.org](mailto:program_funding@lists.4cleanair.org)

### ***Public Outreach***

The NACAA Public Outreach Committee focuses on issues related to communicating important air quality messages and on outreach activities to the stakeholders and the general public. Among other things, the Committee provides a forum for state and local air agency communicators to share their knowledge, experience and resources to help educate the public on the causes and effects of air pollution and what citizens can do to respond. The Public Outreach Committee holds monthly conference calls on the second Tuesday of the month, from 4:00 PM to 5:00 PM Eastern Time.

Recent Issues:

- Amplifying Federal, State and Local Messaging During Air Quality Awareness Week 2019
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- Federal, State and Local Wildfire and Wood Smoke Resources

Co-Chairs: Wayne Nastri (Los Angeles, CA) & Christine Kirby (Massachusetts)

Staff: Stephanie Steigman, [scooper@4cleanair.org](mailto:scooper@4cleanair.org)

Webpage: <http://members.4cleanair.org/committees/details/public-outreach>

Email list: [public\\_outreach@4cleanair.org](mailto:public_outreach@4cleanair.org)

Call-in number and access code: (866) 365-4406, 6247864#

### ***Training***

The NACAA Training Committee works on issues associated with developing and making available high-quality, cost-effective training materials for federal, state and local air regulators. The Committee maintains the NACAA Training Resources Hub, a web-based resource that lists upcoming classroom courses, highlights online training resources and describes the various organizations that provide training opportunities. NACAA also participates in the Joint Training Committee, a national collaborative with EPA and Multi-Jurisdictional Organizations. The Training Committee holds conference calls on an as-needed basis.

Recent Issues:

- NACAA Training Resources Hub
- Identifying and Recruiting New Course Instructors

Co-Chairs: Mark Buford (Mount Vernon, WA) & Cecily Beall (District of Columbia)

Staff: Phil Assmus, [passmus@4cleanair.org](mailto:passmus@4cleanair.org)

Webpage: <http://members.4cleanair.org/committees/details/training>

Email list: [training@lists.4cleanair.org](mailto:training@lists.4cleanair.org)

Call-in number and access code: 866-365-4406, 7578536#

### ***Resilience & Sustainability (Ad Hoc)***

The NACAA The Ad Hoc Committee exists to serve member information sharing, communication, and interest in planning, coordination and the development of tools and resources for clean air agencies on:

- Resilience, which describes activities contending with unusual adverse conditions; and
- Sustainability, which describes activities that harmonize clean air goals with other environmental, societal or infrastructure goals.

The Ad Hoc Committee maintains a library of Resilience & Sustainability Plans [on this page](#):

[http://members.4cleanair.org/Resilience\\_and\\_Sustainability\\_Library](http://members.4cleanair.org/Resilience_and_Sustainability_Library)

The Ad Hoc Committee holds conference calls on the first Wednesday of every month, from 3:00 PM to 4:00 PM Eastern Time.

Recent Issues:

- “100 Resilient Cities”
- Integrating sustainability planning into clean air programs

Co-Chairs: Michelle King (Louisville KY), Matt Mosier (Indianapolis IN) & Jaclyn Palermo (Oregon)

Staff: Miles Keogh, [mkeogh@4cleanair.org](mailto:mkeogh@4cleanair.org)

Webpage: <http://members.4cleanair.org/committees/details/resilience-and-sustainability>

Email list: [resilience@lists.4cleanair.org](mailto:resilience@lists.4cleanair.org)

Call-in number and access code: 866-365-4406, 1226491#

# NACAA Comment-Development Process Guidance

(Guidance Adopted March 2018)

## Introduction:

The National Association of Clean Air Agencies (NACAA) is a national, non-partisan, non-profit association of 154 local and state air pollution control agencies across 40 states, the District of Columbia and four territories. NACAA periodically provides comments to federal agencies and communicates with Congress and others. The association's comment process is governed by a January 29, 2012, *NACAA Board of Directors Resolution on Improving the Association's Processes and Procedures*. That resolution is the basis for NACAA's current process<sup>1</sup>. This document offers guidance to generally create consistency in that process, provide greater clarity to member agencies about the timing of their inputs and approval of final comments (for planning purposes), improve communication pathways and provide greater overall process transparency. As the kinds of comments that NACAA provides evolves over time, so too should this guidance on process. NACAA intends to revisit the process in the future to adjust to meet changing conditions.

## Process:

In general NACAA's current comment process is composed of the following steps, with variations based on factors such as the urgency of an issue and circumstances and deadlines that will create small differences in each comment process.

1. NACAA becomes aware of an issue, for example EPA issues a proposal in the *Federal Register* or through a pre-publication announcement.
2. NACAA staff communicates the issue to the relevant committee(s), and air directors (for example, staff distributes EPA's proposal and associated information, such as fact sheets, etc. to via email, writes an article for the *Washington Update*, and otherwise announces it as needed.
3. The relevant committee chairs determine, with the NACAA staff, whether to commence the comment development process and, if so, the approach and schedule for developing comments.

The association officers (Co-Presidents; Co-Vice Presidents; Co-Treasurers; Ex Officio Co-Presidents) may authorize staff to begin drafting comments if there is a concern that EPA's potential action may occur on an accelerated timeline, and comments are substantially similar to any already submitted.

4. An estimated schedule will be developed by NACAA staff, with the approval of the committee chairs or executive director, for each set of comments. This estimated schedule will be emailed to the relevant committees and air directors and may include:
  - Date of potential briefing call and/or call to discussion potential comments (unless the estimated schedule is determined following such a call)
  - Window for collecting input from members for drafting comments
  - Date draft comments will be circulated for seven-day review

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<sup>1</sup> The relevant committee chairs work with NACAA staff to tailor steps for producing comments based on particular circumstances including, among others:

- the breadth of the proposal (i.e., comprehensive, narrow in scope or purpose),
- whether NACAA has already gone on record with respect to the topic of the proposal,
- the length of the comment period, the timing of the comment period (i.e., whether there are NACAA meetings, holidays or other significant events that fall during the comment period), and
- how familiar members are with the issue.

- Date responses to draft comment are due from members
- Date on which the final NACAA comment letter may be submitted

NACAA staff advises any additional relevant committee(s) and air directors of this schedule so they will know what steps this comment-development process will include and the timing of those steps.

5. NACAA staff gathers input from the relevant committee(s) and air directors on the proposal and possible NACAA comments in one or more of several ways, which is announced to the relevant committee(s) and air directors and posted on Air Web:
  - scheduling time to discuss the proposal during a regularly scheduled committee call;
  - scheduling a stand-alone committee or membership call to discuss possible comments; and/or
  - soliciting input via email.

Prior to the call or email communication to the relevant committee(s) and air directors, NACAA staff typically develops an outline or a list of issues on which the association may wish to consider commenting. The outline or list may include recommendations for potential comments on these issues.

6. Once input is collected from members – orally on a conference call and in writing otherwise – the chairs decide whether NACAA should draft written comments.
7. If the decision on drafting is “yes” the chairs provide direction for doing so and NACAA staff drafts a comment letter, derived from the input received from the members.
8. The following language is included in the body of all non-unanimous letters (per the 1/29/12 NACAA Board Resolution): “The views expressed in these comments do not represent the positions of every state and local air pollution control agency in the country.”
9. The draft comment letter is reviewed by the committee chairs and the executive director for input and revision. Final sign-off on the review draft of the letter is by those signing it. Typically, the committee chairs sign the letters – in some instances, where the issues are cross cutting, the chairs of multiple committees sign – but in some cases, the co-presidents sign.
 

If there is a vacancy in the leadership of the relevant committee, or if a committee co-chair is unable to sign, the co-presidents of the association or their designee(s) may sign and, as necessary, will work with the NACAA staff and any relevant committee chairs to coordinate preparation of the draft and final letters.
10. Once the committee chairs and executive director have approved the draft comment letter, it is shared with all of the NACAA air directors and relevant committee(s) via email. It is also posted on Air Web in the “Committee Highlights” section (located on the front page of Air Web and designed to provide members with a one-stop-shopping site for documents requiring membership review) and on the relevant committee page.
11. The members are given at least seven business days to provide comments. Usually the due date for member comments is several days (often less) before the comment deadline to allow time to consider all comments and make changes to the letter. All input from members must be in writing (per the 1/29/12 NACAA Board Resolution, “members are responsible for providing written notice to NACAA specifying any objections or concerns with the draft.”) Members are often encouraged to provide, in writing, specific alternate language that would address their concerns or suggested changes.

12. All substantive comments received from the members are provided to the committee chairs and, in consultation with the committee chairs, as needed, the comments from the members are incorporated into the draft letter by NACAA staff. If a comment cannot easily be accommodated or is in conflict with what most/all others are saying, NACAA staff generally communicates with the commenter to discuss the issue and explain the situation and/or seek alternative or compromise language that would work. There is not one single method for addressing all input and comments. They are handled on a case-by-case basis in close communication with, and with the approval of, the committee chairs and as necessary, with the assistance of the executive director.<sup>2</sup>
13. NACAA staff finalizes the comments and obtains final sign-off from the committee chairs and executive director. There have been instances when NACAA has decided not to send a letter because there has been significant concern about sending it. Again, this is decided on a case-by-case basis, in close consultation with, and with the decision made/approved by, the committee chairs and in some cases co-presidents.
14. Any state or local director whose agency provided written input on the draft comment letter and is dissatisfied with how the input was addressed may request a vote of the association's officers (i.e., co-presidents, co-vice presidents, co-treasurers, and immediate past co-presidents) on whether or not to submit the comments. A vote will occur if two or more of the officers concur that the matter may proceed to the officers for a vote.
  - a) In order for such a request for a vote to be made:
    - i. The requesting air agency will have participated in the process to develop the comments and provided written input articulating any concerns with NACAA's draft comments and
    - ii. The request for a vote must relate to the issue(s) raised by the requesting agency during the comment development process.
  - b) A request for a vote by the officers must be submitted, in writing, to the NACAA co-presidents and executive director and must include an explanation of why the requesting agency objects to the comments being submitted.
  - c) The request shall be shared with the other NACAA officers and the chairs of the relevant committee(s). Officers will respond with either their concurrence with or opposition to the request for a vote. Responses will be sent to the NACAA co-presidents and executive director.
  - d) If two or more officers concur with the request, the executive director will schedule a call for discussion, to include the relevant committee chairs.
  - e) The officers' vote will be an "up or down" vote on whether or not the comment letter will be sent and will be documented (for example, in minutes.)
15. If final comments are being submitted, NACAA staff submits the final comments, posts them on Air Web, sends them to the membership via email and prepares an article for the *Washington Update*. Staff, committees and other NACAA leaders take action to advance the comments in the federal processes for which they were developed and in other forums where the comments are relevant.

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<sup>2</sup> In the current process, if a particular issue is a lightning rod it can be removed from the letter. However, that must be done with care, since the passage in question may be something other members consider essential to their approval of the letter and they won't have the opportunity to comment on the removal/change.