

TITLE III ISSUES RESOLUTION WORKGROUP MEETING
December 14, 1998
Summary

On December 14, 1998, the Title III Issues Resolution Workgroup (Workgroup)¹ reached consensus on a draft framework for developing and reviewing state and local requests to approve requirements that may differ from the federal maximum achievable control technology standards (MACT standards). The Workgroup will now conduct several "pilot tests" to determine if the draft framework will, in practice, achieve the goal of efficiently and effectively making equivalency determinations. After the "pilot tests" are completed, the Workgroup will revisit, and may revise, the draft framework.

The South Coast Air Quality Management District (SCAQMD) and the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) volunteered to participate in the pilot test program. The San Diego County Air Pollution Control District is also expected to participate in the pilot tests. The SCAQMD will consider three rules: aerospace, wood furniture, and gasoline distribution. The San Joaquin Valley will consider two rules: flexible polyurethane foam production and halogenated solvents.

The SCAQMD and SJVUAPCD committed to complete the pilot tests by February 1, 1998. The U.S. EPA committed to complete their review by March 1, 1998. The Workgroup will then meet in the middle of March to discuss the results of the pilot tests.

In parallel with the pilot test, the Workgroup will continue to work on resolving several outstanding issues. These issues include the following:

- an expedited approval process (including public input, an issues resolution process, and procedures for implementing federal requirements if the state or local agency does not implement alternative requirements);
- day-to-day management issues related to the General Provisions;
- new source review and new source implementation issues;
- handling of amendments of MACT standards;
- minor changes to approved alternatives;
- variances; and
- treatment of coating regulations.

¹ The Workgroup includes staff representatives of the United States Environmental Protection Agency, the Air Resources Board, the South Coast Air Quality Management District, the San Joaquin Valley Air Quality Management District, the San Diego County Air Quality Management District, the Northern Sonoma County Air Pollution Control District, the Coalition for Clean Air, the Environmental Health Coalition, the Western States Petroleum Association, and the Regulatory Flexibility Group.