

October 22, 2007

Docket ID Nos. EPA-HQ-OAR-2006-0424, -0360, -0940  
National Emission Standards for Hazardous Air Pollutants for Area Sources: Clay Ceramics Manufacturing, Glass Manufacturing, and Secondary Nonferrous Metals Processing  
U.S. Environmental Protection Agency  
Air and Radiation Docket and Information Center  
Mailcode: 2822T  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Sir/Madam:

On behalf of the National Association of Clean Air Agencies, thank you for this opportunity to comment on the proposed National Emission Standards for Hazardous Air Pollutants for Area Sources: Clay Ceramics Manufacturing, Glass Manufacturing, and Secondary Nonferrous Metals Processing, which were published in the *Federal Register* on September 20, 2007 (72 *Federal Register* 53838). The National Association of Clean Air Agencies (NACAA) is the national association of air pollution control agencies in 53 states and territories and over 165 metropolitan areas across the country.

NACAA supports the establishment of effective regulations to reduce emissions of hazardous air pollutants from area sources, pursuant to the mandates of the Clean Air Act. The adverse effects of the emissions from these sources in the aggregate are significant and should be ameliorated. In order for these rules to be implemented properly, however, EPA should provide sufficient additional funds for state and local clean air agencies to carry out this important work. Currently, federal grants fall far short of what is needed to support state and local agencies in carrying out their existing responsibilities. In recent years, federal grants for state and local air programs have amounted to only about one-third of what they should be and budget requests for the last two years have called for additional cuts. Additional area source programs, which are not eligible for Title V fees, will require significant new resources for state and local air agencies, above and beyond what is currently provided.

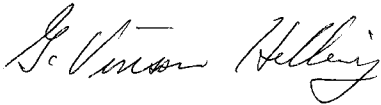
Without additional funding, some state and local air agencies may not be able to adopt and enforce additional area source rules. Even for permitting authorities that do not adopt the rules, it is possible that implementation of the area source standards will increase the workload and resource needs of state and local agencies. For example, synthetic minor permits (or Federally Enforceable State Operating Permits) will need to incorporate all applicable requirements, which would include the area source standards. These requirements also must be enforced. However, Title V permit fee funds are not available for those efforts and many state and local air agencies do not have sufficient resources for these responsibilities. Accordingly,

NACAA recommends that EPA provide state and local air agencies with sufficient additional grants so that they may participate in the implementation of these important area source rules.

We believe it was the intent of the Clean Air Act that the area source program result in reductions in emissions from area sources of hazardous air pollution. It is, therefore, disappointing when EPA issues proposals that, in the agency's own words, will not result in additional reductions in emissions (e.g., for Clay Ceramics Manufacturing and Secondary Nonferrous Metals Processing). We are concerned that such proposals are merely paperwork exercises and are not responsive to Congress' intent when it included the area source provisions in the Clean Air Act. We recommend that in this rule and in future area source proposals, EPA incorporate provisions that will provide additional public health protection from the adverse effects of emissions of hazardous air pollutants from area sources.

Thank you for this opportunity to comment on the proposal. Please contact us if we can provide additional information.

Sincerely,



Vinson Hellwig  
Michigan  
Co-Chair  
NACAA Air Toxics Committee



Robert Colby  
Chattanooga, Tennessee  
Co-Chair  
NACAA Air Toxics Committee