

September 12, 2000

Air and Radiation Docket (6102)  
U.S. Environmental Protection Agency  
Attn: Docket No. A9840  
401 M Street, SW.  
Washington, DC 20460

To Whom It May Concern:

On behalf of the State and Territorial Air Pollution Program Administrators (STAPPA) and the Association of Local Air Pollution Control Officials (ALAPCO), we would like to revise our July 7, 2000 comments on the U.S. Environmental Protection Agency's (EPA's) Consolidated Emissions Reporting Rule (CERR) proposed in the *Federal Register* on May 23, 2000 (65 FR 33268).

The associations continue to encourage consistency between the CERR and the Title V universe of major sources. However, we recognize that incorporating the Title V definition of major source into the rule to identify point sources subject to annual emission inventory reporting requirements could result in increased resource burdens that could pose problems for some state and local agencies. Therefore, we support the additional flexibility in reporting requirements based on emissions thresholds similar to those EPA has provided in §51.25 of the May 23, 2000 proposed rule.

STAPPA and ALAPCO are committed to working with EPA to simplify and improve emissions reporting. To that end, we encourage EPA to incorporate our revised recommendation in the final version of the CERR. If you have any further questions, or require additional information, please do not hesitate to contact either of us, or Geri O'Sullivan of STAPPA and ALAPCO.

Sincerely,

Herb Williams,  
STAPPA Chair  
Emissions and Modeling  
Committee

Roger Westman,  
ALAPCO Chair  
Emissions and Modeling  
Committee

Cc: David Mobley  
Bill Kuykendal

