

Incorporation by Reference Discussion

Recap of Review Process

IBR spreadsheets in Excel for Reg. Nos. 18, 19 and 26

- Blue cells indicate a revision to federal rule since the IBR date in the Regs.
- Orange cells refer to the PSD supporting document (40 CFR 52.21 pdf file) outlining all changes as of a date certain.
- Green cells indicate that the IBR date listed has no apparent basis in federal law; the currently listed date may represent the date of adoption of the related Reg. revisions by the Commission, or?
- Gray cells indicate the IBR is not affected by subsequent rule changes because there have been

Streamlining and Simplifying Reg. No. 19 (and Reg. No. 18)

- NAAQs, and other conditions in found in Reg. No. 18:
 - Adopt these into Reg. No. 19
 - “As adopted in Reg. No. 19” for Reg. No. 18 references

Consensus: NO DATE for IBRs (or remove IBRs), unless important to lock it in by a date certain; then choose most recent date that does not expand conditions further than necessary.

Reg. No. 19 IBR Review

The group continued with line-by-line discussion of IBR dates in Reg. No. 19, beginning with 19.2, “NAAQS” definition. See the revised IBR chart for the group’s suggested revisions.

- Definitions of particulate matter emissions, PM_{2.5}, PM₁₀, PM_{2.5} emissions, PM₁₀ emissions:
 - Discuss with Permitting group dropping IBR dates (using Reg. No. 19 effective date for all)
 - Guidance or reference document needed for quick-glance to determine what is effective on a given date
- Delegated Federal Programs, NSPS/NESHAPS/PSD:
 - Consolidation of Reg. 19.103 and Reg. 19.304 to reduce redundancy and remove information that is no longer accurate
 - Suggestion to include in guidance or an appendix the specific delegations for NESHAPs and NSPS
 - Could include a link to EPA’s list

ADEQ to develop additional discussion aids for the workgroup’s evaluation of Regulation No. 19, Chapter 9 (PSD)

The group will continue with line-by-line discussion of IBR dates in Regulation No. 26 and discuss revisions to simplify and update the PSD chapter in Regulation No. 19 at the next meeting.

The group will meet again on May 21, from 9:00 a.m. to 11:00 a.m., at ADEQ headquarters in North Little Rock.