November 30, 2020

U.S. Environmental Protection Agency
WJC West Building (Air Docket), Room 3334
1301 Constitution Ave., NW
Washington, DC 20004

Attention: Docket ID Number EPA–HQ–OAR–2020–0372
submitted via regulations.gov

Re: **Environmental Protection Agency's (EPA's) revisions to 40 CFR part 60 subpart Kb, proposed at 85 FR 65774 (October 16, 2020).**

To Whom It May Concern:

The International Liquid Terminals Association (ILTA), the American Fuel & Petrochemical Manufacturers (AFPM), and the American Petroleum Institute (API) appreciate the opportunity to provide comments on the proposed amendments to the "Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984," 40 CFR Part 60, Subpart Kb (85 FR 65774, October 16, 2020).

Our organizations strongly support the proposed amendments and we greatly appreciate EPA's efforts to address an issue that became especially challenging in recent months due to imbalances in petroleum and fuels markets constraining the storage sector. We urge the Agency to finalize this proposal as quickly as possible and to provide interim regulatory relief until promulgation.

We appreciate your consideration of our comments. If you have any questions about this submittal, please contact us.

Sincerely,

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Introduction

The International Liquid Terminals Association,[1] the American Fuel & Petrochemical Manufacturers,[2] and the American Petroleum Institute[3] appreciate the opportunity to provide comments on the proposed amendments to the "Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984," 40 CFR Part 60, Subpart Kb[4] (85 FR 65774, October 16, 2020) (NSPS Kb).

Our organizations strongly support the proposed amendments to facilitate in-service inspections as a common-sense solution to lower emissions, enhanced safety, and increased regulatory flexibility. We greatly appreciate EPA's efforts to address an issue that became especially challenging in recent months due to imbalances in petroleum and fuels markets constraining the storage sector.

By allowing greater use of an alternative, well-established, safe, and effective inspection method, this new policy is a meaningful contribution to our shared goal of environmentally responsible facility management. This proposed action provides operators with added regulatory flexibility through the ability to choose the appropriate inspection method for their circumstances. It is important to note that other regulatory programs, such as Spill Prevention, Control, and Countermeasure (SPCC), continue to require routine inspections to verify the mechanical integrity of the structure. The proposed revisions focus more narrowly on CAA regulatory compliance without altering storage tank inspection programs for structural integrity.

In addition to our overall support of this policy, we offer specific recommendations that are consistent with the Agency's intent and would help implement the new policy. Specifically, these comments address the frequency and timing of inspection deadlines, request clarification of certain reporting requirements, and seek certainty with respect to applicability of the proposed revisions.

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[1] Founded in 1974, the International Liquid Terminals Association represents 80 companies operating liquid terminals in all 50 states and in over 40 countries. Our members' facilities provide critical links between all modes of transportation for liquid commodities, such as crude oil, petroleum products, chemicals, renewable fuels, fertilizer, vegetable oils and other food-grade materials that are central to the U.S. economy. Terminals provide essential logistics services that spur trade both within the United States and connect the U.S. economy with overseas markets. ILTA's membership also includes about 400 companies that supply equipment and services to the terminal industry.

[2] The American Fuel & Petrochemical Manufacturers (AFPM) is a national trade association representing nearly all U.S. refining and petrochemical manufacturing capacity. AFPM members produce the fuels that drive the U.S. economy and the chemical building blocks integral to millions of products that make modern life possible.

[3] API represents all segments of America's oil and natural gas industry. Our more than 600 members produce, process and distribute most of the nation's energy. The industry supports more than ten million U.S. jobs and is backed by a growing grassroots movement of millions of Americans. API was formed in 1919 as a standards-setting organization. In our first 100 years, API has developed more than 700 standards to enhance operational and environmental safety, efficiency and sustainability.

[4] EPA, "Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984," 40 CFR Part 60, Subpart Kb.

The Organizations Support EPA's Proposed Rule as It Resolves Existing Ambiguity in NSPS Kb and Avoids Unnecessary Volatile Organic Compound (VOC) Emissions

The proposed revisions to NSPS Kb would specifically allow facilities to conduct 10-year inspections of floating roofs while tanks are in-service. The prior policy, put in place through the 1987 NSPS emission standards for storage vessels (tanks), set vague storage vessel inspection procedures that were interpreted by some EPA and state inspectors to require storage vessels to be emptied and degassed prior to inspection when emptying and degassing would not have otherwise been required.

Emptying and degassing of tanks imposes burdens on operators because tanks must be taken completely out-of-service, often for several weeks, with no assurance of any improvement in inspection quality as compared to an in-service inspection. In addition to imposing operational inefficiencies, the process inherently contributes to added emissions of VOCs through the emptying and degassing process.

The proposed rule is also consistent with EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP) for storage vessels finalized on June 29, 1999 (NESHAP WW[5]). NESHAP WW allows the use of alternative tank inspection procedures that do not require emptying and degassing the storage tank. Tanks regulated by NESHAP WW are virtually identical to tanks regulated by NSPS Kb, but NESHAP WW clearly authorizes in-service inspections. EPA's proposal would allow tank operators that meet certain requirements to follow the requirements specified in the 1999 NESHAP WW in lieu of the 1987 NSPS Kb standards.

Using the NESHAP WW alternative, "in service," or "rooftop" inspection procedures would become an added option for tanks subject to NSPS Kb standards and which are equipped with either an external floating roof (EFR) or internal floating roof (IFR). The proposed amendments also provide for certain caveats and exceptions for monitoring, recordkeeping, and reporting.

The Proposal Should be Finalized as Quickly as Possible with Interim Regulatory Relief

Covid-depressed fuel demand has led to historically high inventories that limit the ability to remove tanks from service. This has exacerbated the need to perform internal floating roof inspections with the tank in service wherever possible. Therefore, we strongly encourage the Agency to finalize this proposal as quickly as possible and to provide interim relief. This could be accomplished by providing a direct final rule aligned with this proposal or by establishing section §63.1063(d) of NESHAP WW as a generally accepted alternative monitoring procedure to section §60.113(a)(4) of NSPS Kb. Another option for interim relief would be to provide the Regional enforcement divisions with a template administrative compliance order allowing a facility to inspect their tanks in accordance with NESHAP WW requirements rather than NSPS Kb requirements.

[5] EPA, "National Emission Standards for Storage Vessels (Tanks)–Control Level 2," 40 CFR Part 63, Subpart WW.

Specific Comments

1. *The Organizations Recommend Clarifying Applicability of the Proposed Revisions to Other Regulations that Reference NSPS Kb (e.g. BWON[6], GD MACT[7])*

Paragraph §60.110b(e)(5) specifies that the provisions of this paragraph may be utilized to satisfy the requirements of §§60.112b through 60.117b for:

> …storage vessels either with a design capacity greater than or equal to 151 m^3 containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa but less than 76.6 kPa, or with a design capacity greater than or equal to 75 m^3 but less than 151 m^3 containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 27.6 kPa but less than 76.6 kPa.

These are the capacity and vapor pressure thresholds specified in §60.112b(a). However, storage vessels that do not exceed these thresholds may in certain circumstances become subject to the control requirements of §60.112b by reference in another regulation. For example, a tank may be subject to §60.112b(a) through the requirements of §61.351 in the National Emission Standard for Benzene Waste Operations (BWON), rather than through the applicability criteria specified in NSPS Kb. A similar reference to §60.112b occurs at §63.423 of the Gasoline Distribution MACT rule (GD MACT). In order to clarify that the option to apply the NESHAP WW inspection standards is available to all tanks subject to §60.112b, the Agency should revise the proposal to more clearly specify this applicability change. The revisions to §60.110b would more clearly apply to all tanks that are subject to the control requirements of §60.112b if they were edited to read as shown below.

> (5) *Option to comply with part 63, subpart WW, of this chapter.* Except as specified in paragraphs (e)(5)(i) through (iv) of this section, owners or operators may choose to comply with 40 CFR part 63, subpart WW, to satisfy the requirements of §§ 60.112b through 60.117b for storage vessels to which the control requirements of §60.112b(a) apply either by the applicability criteria of this subpart or by reference to §60.112b(a) in any other subpart in parts 60, 61, and 63. ~~either with a design capacity greater than or equal to 151 m^3 containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa but less than 76.6 kPa, or with a design capacity greater than or equal to 75 m^3 but less than 151 m^3 containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 27.6 kPa but less than 76.6 kPa.~~

[6] EPA, "National Emission Standard for Benzene Waste Operations," 40 CFR Part 61, Subpart FF.

[7] EPA, "National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)," 40 CFR Part 63, Subpart R.

2. The Organizations Recommend Clarifying Reporting Requirements in the Proposed Revisions

Subparagraphs §60.110b(e)(5)(iv)(B) & (e)(5)(iv)(C) specify that facilities "[k]eep a record of each affected facility using the alternative standard . . . and submit with the report required under § 63.1066 [NESHAP WW] of this chapter." NESHAP WW, §63.1066, requires multiple reports including the notification of initial startup, the notification of inspection, and the notification of inspection failures. Thus, it is not clear as to when the facility's selection of the alternative standard needs to be submitted.

If this language refers only to the first inspection that occurs after electing to comply with the alternative standard, then these subparagraphs would appear redundant given the requirement of subparagraph §60.110b(e)(5)(iv)(A) to submit a notification of the first inspection.

Alternatively, if this language refers to every subsequent inspection as well, then these subparagraphs would appear in conflict with the requirement in §60.110b(e)(5)(iv)(F)(*2*) to submit inspection reports only when inspection failures occur.

Given that subparagraph §60.110b(e)(5)(iv)(A) requires the tank owner or operator to submit notification prior to switching standards, the appropriate additional requirement to be specified in subparagraphs §60.110b(e)(5)(iv)(B) & (e)(5)(iv)(C) would be to maintain records of which standard has been selected for each affected facility. This could be achieved by editing these subparagraphs as shown below:

> (B) Keep a record of each affected facility using the alternative standard described in this paragraph (e)(5) when conducting an inspection required by § 63.1063(c)(1) of this chapter ~~and submit with the report required under § 63.1066 of this chapter~~.
>
> (C) Keep a record of each affected facility using the alternative standard described in this paragraph (e)(5) when conducting an inspection required by § 63.1063(c)(2) of this chapter ~~and submit with the report required under § 63.1066 of this chapter~~.

3. The Organizations Recommend Clarifying Reporting Frequency in the Proposed Revisions

The proposed requirement in §60.110b(e)(5)(iv)(F)(*2*) would maintain the reporting frequency in NSPS Kb even when opting for the proposed alternative standard of NESHAP WW. This could lead to inconsistent and duplicative reporting requirements which, as discussed below, EPA has repeatedly acknowledged impose unnecessary burden with no environmental benefit.

EPA should allow for semi-annual reporting frequency. This could be achieved by editing proposed subparagraph §60.110b(e)(5)(iv)(F)(*2*) and adding an additional subparagraph §60.110b(e)(5)(iv)(F)(*3*) to provide the option of submitting reports pursuant to dates established by a permitting authority, as shown below (utilizing language from Organic Liquids Distribution MACT §63.2386(b)):

> (*2*) The reference in § 63.1066(b)(2) of this chapter to periodic reports ‘‘when inspection failures occur’’ means to submit inspections results on a semiannual basis, with reports postmarked no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period. ~~within 60 days of the initial gap measurements required by § 63.1063(c)(2)(i) of this chapter and within 30 days of all other inspections required by § 63.1063(c)(1) and (2) of this chapter.~~
>
> (*3*) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the semiannual reports according to the dates the permitting authority has established instead of according to the dates in paragraph (e)(5)(iv)(F)(*2*) of this section.

The 1987 NSPS Kb rule specifies that reports of failed inspections must be submitted within 30 days after the inspection, but EPA has subsequently established a regulatory paradigm of semi-annual compliance reporting. Facilities that are now otherwise subject to semi-annual compliance reporting are still subject to the 30-day deadline for reporting inspection failures under NSPS Kb unless the storage tank in question is also subject to a Part 63 NESHAP rule with “overlap” provisions that expressly address this inconsistency in reporting requirements.

Multiple rules have overlap provisions to address requirements for storage tanks that are subject to both the given rule and NSPS Kb. These overlap provisions consistently allow the compliance reporting for such tanks to be submitted on a semi-annual basis. This same allowance should be made for all NSPS Kb tanks, including those that are not subject to another rule.

EPA has expressed the view in both general and specific rulemakings that it is appropriate to convert the reporting frequencies in older rules to the semi-annual basis specified in more recent rules.

General Rulemaking

In a 1999 rulemaking termed the Recordkeeping and Reporting Burden Reduction Rule, EPA revised the General Provisions of 40 CFR Parts 60, 61, and 63 to change any requirement for quarterly reporting to a semi-annual reporting requirement. In the preamble to the final rule, EPA stated:

> As explained in the proposal notice (61 FR 47844), the EPA’s experience over the past ten years with a variety of NSPS and NESHAP rulemakings covering industries of all types suggests that semi-annual reporting provides sufficiently timely information to both ensure compliance and enable adequate enforcement of applicable requirements, while imposing less burden on the affected industry than would quarterly reporting. [64 FR 7459, Feb. 12, 1999]

In the preamble to the proposed rulemaking, EPA stated:

> The Agency now believes that the semiannual reporting frequencies contained in recently promulgated NSPS and NESHAP regulations and proposed in this rulemaking for all types of information are generally appropriate… EPA sees no reason to retain different reporting frequencies in the NSPS and NESHAP General Provisions compared to the reporting frequencies contained in recently promulgated rules. [61 FR 47844, Sep. 11, 1996]

In this Recordkeeping and Reporting Burden Reduction Rule, EPA set forth that it was appropriate to require compliance reporting on a semi-annual basis for all NSPS and NESHAP rules, and EPA revised the General Provisions for these rules to change general reporting frequencies to semi-annual. In this rulemaking, however, EPA did not review each existing NSPS and NESHAP rule to identify and revise reporting requirements in the individual rules that may be inconsistent with this semi-annual reporting paradigm.

Specific Rulemaking

In multiple individual rules, EPA has expressly allowed that compliance reporting for storage tanks subject to NSPS Kb may be submitted on a semi-annual basis rather than on the schedule given in NSPS Kb. Examples of such rules include Refinery MACT,[8] the HON,[9] OLD MACT,[10] the MON,[11] and Generic MACT.[12]

In the preamble to the Refinery MACT amendments by which the overlap provisions of paragraph §63.640(n)(8) were added, EPA explained that their intent in these overlap provisions was to provide:

> ". . consistency for reporting requirements between storage vessels that are to comply with the NESHAP and storage vessels that are to comply with subpart Kb and subpart Ka, without altering the control requirements of subpart Kb or Ka."[13]

This statement was repeated verbatim in the preamble to the final rule amendments as well.[14] It is well established, then, that EPA allows NSPS Kb compliance reporting to be submitted on a semi-annual basis, rather than on the schedule given in NSPS Kb, when a facility is subject to another rule that provides for semi-annual compliance reporting.

[8] EPA, "National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries," 40 CFR Part 63, Subpart CC.

[9] EPA, "National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater," 40 CFR Part 63, Subpart G.

[10] EPA, "National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)," 40 CFR Part 63, Subpart EEEE.

[11] EPA, "National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing," 40 CFR Part 63, Subpart FFFF.

[12] EPA, "National Emission Standards for Hazardous Air Pollutants for Source Categories: Generic Maximum Achievable Control Technology Standards," 40 CFR Part 63, Subpart YY.

[13] 63 Federal Register 13533-13541, March 20, 1998; page 13535, top of third column.

[14] 63 Federal Register 44135-44143, August 18, 1998; page 44137, middle of third column.

Overlap Gaps

Many facilities are subject in part to semi-annual reporting requirements but have specific emission points subject to an older rule which imposes reporting frequencies inconsistent with the semi-annual paradigm. This is the case, for example, at gasoline distribution facilities that have storage tanks which are also subject to NSPS Kb. Such facilities are subject to either the Gasoline Distribution MACT[15] or GACT[16] rule, neither of which addresses inconsistent reporting frequencies for storage tanks that are also subject to NSPS Kb. Thus, storage tanks at these facilities are subject to the reporting schedule given in NSPS Kb whereas other compliance reports for these facilities are subject to semi-annual frequency.

Many storage tanks subject to both NSPS Kb and a more recent NESHAP rule are allowed to submit compliance reports on a semi-annual frequency rather than per the reporting frequency given in NSPS Kb. EPA has repeatedly stipulated that it is appropriate to allow compliance reporting under older rules to be submitted on a semi-annual schedule for consistency with newer regulations, and that the semi-annual reporting frequency is adequate to both ensure compliance and enable adequate enforcement of applicable requirements. An inconsistency remains, however, for storage tanks in certain scenarios, such as being located at a gasoline distribution facility. For the reasons EPA has given in multiple rulemakings, storage tanks subject to NSPS Kb in these scenarios should be allowed to have compliance reporting submitted on a semi-annual basis.

4. The Organizations Recommend Clarifying Inspection Deadlines in the Proposed Revisions

The proposed requirement in §60.110b(e)(5)(iv)(A) refers to "the compliance schedule for events," but there is uncertainty as to the deadlines associated with this compliance schedule. As discussed later in these comments, EPA has elsewhere presented a policy of inspections being due at some point within the "standard calendar period" provided there is a reasonable interval between successive inspections.

Because the proposed alternative standard references the compliance schedule, it would be appropriate to clarify the deadlines associated with this compliance schedule. This could be achieved by editing §60.110b(e)(5)(iv)(A) as shown below:

> (A) For each affected facility, the owner or operator must notify the Administrator at least 30 days before the first inspection is conducted under 40 CFR part 63, subpart WW. After this notification is submitted to the Administrator, the owner or operator must continue to comply with the alternative standard described in this paragraph (e)(5) until the owner or operator submits another notification to the Administrator indicating the affected facility is using the requirements of §§ 60.112b through 60.117b instead of the alternative standard described in this paragraph (e)(5). The

[15] EPA, "National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)," 40 CFR Part 63, Subpart R.

[16] EPA, "National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities," 40 CFR Part 63, Subpart BBBBBB.

> following requirements apply whether compliance is with this subpart or with 40 CFR part 63, subpart WW:
>
> (*1*) The compliance schedule for events does not reset upon switching between compliance with this subpart and 40 CFR part 63, subpart WW.
>
> (*2*) Compliance with inspections required on an annual, 5-year, or 10-year frequency is required before the end of the calendar year in which the compliance deadline occurs, provided there is at least 3 months between successive annual inspections.

EPA has signaled in the HON[17] and the CAR[18] that periodic inspections are due at some point within the specified calendar period (*e.g.* monthly inspections to be conducted within each calendar month, annual inspections to be conducted within each calendar year) provided there is a "reasonable interval" between successive inspections.

As documented in the discussion below, these standards were intended by EPA to supersede certain tank regulations including NSPS Kb.

The HON and the CAR each contain the following language:

> *In all instances where a provision requires completion of a task during each of multiple successive periods, an owner or operator may perform the required task at any time during the specified period provided the task is conducted at a reasonable interval after completion of the task during the previous period.*

The HON and the CAR specify the following reasonable intervals:

Inspection Interval	Reasonable Interval Between Inspections
Weekly	3 days
Monthly	2 weeks
Quarterly	1 month
Annually	3 months

For inspection periods of multiple years, these standards state:

> *In all other cases, compliance shall be required before the end of the first full standard calendar period after the period within which the initial compliance deadline occurs.*

For an inspection interval of 5 or 10 years the "standard calendar period" would be the calendar year, and thus the inspection would be required at any time during the calendar year in which the deadline occurs.

[17] US EPA, , "National Emission Standards for Organic Hazardous Air Pollutants From The Synthetic Organic Chemical Manufacturing Industry," 40 CFR Part 63, Subpart F at §63.100(k)(9).

[18] US EPA, "Consolidated Federal Air Rule," 40 CFR Part 65, Subpart A at §65.3(d).

The provisions in each of the cited standards are expressly applicable to satisfying compliance with NSPS Kb as noted below.

The HON

The provisions for storage vessels in the HON are specified in Part 63 Subpart G.[19] The HON expressly addresses the scenario of a storage vessel that is subject to both the HON and NSPS Kb in paragraph §63.110(b) which reads:

> *(b) Overlap with other regulations for storage vessels. (1) After the compliance dates specified in § 63.100 of subpart F of this part, a Group 1 or Group 2 storage vessel that is also subject to the provisions of 40 CFR part 60, subpart Kb is required to comply only with the provisions of this subpart.*

Thus, the inspection policy specified in the HON is stipulated by EPA as also satisfying NSPS Kb.

The CAR

The CAR may be invoked as a compliance alternative to regulations that are designated "referencing subparts" as specified at §65.1(b). These referencing subparts are listed in the definition of referencing subpart at §65.2 and include NSPS Kb. Furthermore, NSPS Kb specifies the following at §60.110b(e):

> *Alternative means of compliance—(1) Option to comply with part 65. Owners or operators may choose to comply with 40 CFR part 65, subpart C, to satisfy the requirements of §§ 60.112b through 60.117b for storage vessels that are subject to this subpart…*

Thus the inspection policy specified in the CAR is stipulated by EPA as also satisfying NSPS Kb.

Inspection Intervals of Greater than One Year

The HON and the CAR address inspection intervals of greater than one year with the following language:

> *Compliance shall be required before the end of the standard calendar period within which the compliance deadline occurs, if there remain at least 3 days for tasks that must be performed weekly, at least 2 weeks for tasks that must be performed monthly, at least 1 month for tasks that must be performed each quarter, or at least 3 months for tasks that must be performed annually; or*
>
> *In all other cases, compliance shall be required before the end of the first full standard calendar period after the period within which the initial compliance deadline occurs.*[20]

[19] EPA, , "National Emission Standards for Organic Hazardous Air Pollutants From The Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater," 40 CFR Part 63, Subpart G.

[20] §63.100(k)(9)(ii)(A)&(B) and §65.3(d)(2)(i)&(ii).

Thus, for a multiple-year inspection interval, the inspection is due any time before the end of the calendar year in which the deadline occurs. There is inherently a reasonable interval between such inspections because there are multiple years separating the calendar years in which the inspections become due.

Floating roof inspections for purposes of compliance with NSPS Kb are required to be conducted at periodic intervals. Inspections required at intervals of one or more years should be due before the end of the calendar year in which the compliance deadline occurs, provided there is a reasonable interval between inspections. For inspections required annually there should be at least three months between inspections per the specification embodied in the HON and the CAR as promulgated by EPA. For inspection intervals of multiple years, as is the case with mandated 10-year inspections of IFRs per NSPS Kb, the inspection should be conducted at any time before the end of the calendar year in which the inspection deadline occurs.

Conclusion

The organizations strongly support the alternative inspection proposal and the specific comments will further improve the inspection process. We urge EPA to finalize the proposal as quickly as possible and to provide interim regulatory relief until promulgation. If you have any questions about this submittal, please contact us.

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