

MEMORANDUM

SUBJECT: Update on the Credit for the 15 Percent Rate-of-Progress Plans for Reductions from the Architectural and Industrial Maintenance (AIM) Coatings Rule

FROM: John S. Seitz, Director
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TO: Director, Air, Pesticides and Toxics
Management Division, Regions I and IV
Director, Air and Waste Management Division,
Region II
Director, Air, Radiation, and Toxics Division,
Region III
Director, Air and Radiation Division,
Region V
Director, Air, Pesticides, and Toxics Division,
Region VI
Director, Air and Toxics Division,
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This memorandum supplements my memorandum of March 22, 1995 concerning State credit for reductions from the forthcoming Federal AIM coating rule. Although the draft rule requirements have changed significantly over the past year, the overall reduction estimate for the rule remains at 20 percent. Attached for your information is a fact sheet which summarizes the major requirements in the draft rule. The draft rule is currently undergoing final EPA and Office of Management and Budget review. We hope to propose the rule by the end of next month followed by a 45-day public comment period. It is our expectation that the rule will be promulgated in October 1996 with a compliance date of April 1, 1997.

Even though the compliance date has been delayed until early 1997, States may still claim credit for the 20 percent reduction from the rule in their 15 Percent Rate-of-Progress Plans. The EPA believes this position is justified in light of the significant delays in proposing the rule. Many of the issues involved now appear to be resolved. However, if the EPA rule

does not provide a 20 percent reduction, any State claiming credit from the National rule will be responsible for developing measures to make up the shortfall.

If you have any questions or comments regarding this approach, please contact Laurel Schultz at (919) 541-5511. Any questions regarding the status of the AIM rule may be directed to Ellen Ducey at (919) 541-5408.

2 Attachments

cc: William Becker, Executive Director, STAPPA/ALAPCO
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