



MEMORANDUM OF RESPONSE

To: Emily Kaylor, Regulatory Policy Advocate

From: Mandi Payton, Rules Coordinator

Date: August 9, 2016

Subject: Memorandum of Response to CSI Review – Lead Emissions Rules (OAC 3745-71-01 and 3745-71-03)

Recommendations

On August 8, 2016, Ohio EPA received the Recommendations for the Division of Air Pollution Control's Lead Emissions Rules (OAC 3745-71-01 and 3745-71-03).

The CSI memorandum stated that:

"OEPA generally determines where lead monitoring stations are necessary and will incur all costs associated with them. The BIA states that the estimated cost for a business to establish and operate a monitoring station is between \$5,000 and \$20,000 annually depending on where and how the monitor is installed.

After reviewing the proposed rule and the BIA, the CSI Office has determined that the standards espoused by the CSI Office have been met and the purpose of the rule package is justified.

For the reasons explained above, the CSI Office does not have any recommendations for this rule package.

Based on the above comments, the CSI Office concludes that the Ohio Environmental Protection Agency should proceed with the formal filing of this rule package with the Joint Committee on Agency Rule Review."

Next Steps

At this time, it is Ohio EPA's plan to move forward with the original filing of these rules with the Joint Committee on Agency Rule Review.

If you have any questions please contact Mandi Payton at 614-644-2782.