



MEMORANDUM OF RESPONSE

To: Ethan Wittkorn, Regulatory Policy Advocate

From: Mandi Payton, Rules Coordinator

Date: November 9, 2021

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

Recommendations

On November 9, 2021, Ohio EPA received the recommendations for the Division of Air Pollution Control's Lead Emissions Rules (OAC 3745-71-01 and 3745-71-03) rules.

The CSI memorandum stated that:

"EPA notes in its BIA that no adverse impacts are expected as a result of the proposed rule rescissions. Accordingly, the CSI Office notes that if an agency determines that a proposed rescinded rule or rules will not result in an adverse impact to business, then filing with the CSI Office is not required as a prerequisite to filing such rules with the Joint Committee on Agency Rule Review (JCARR).

Based on the information above, the CSI Office has no recommendations on this rule package.

The CSI Office concludes that the EPA should proceed in filing the proposed rules 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 amanda.payton@epa.ohio.gov.