

## ***Proposed Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources Rule***

On October 25, 2007, the U.S. Small Business Administration's Office of Advocacy (Advocacy) filed a comment letter on a rule proposed by the U.S. Environmental Protection Agency (EPA), *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* [72 Fed. Reg. 52,958 (September 17, 2007)]. Advocacy recommends that EPA consider several clarifications and revisions to this rule prior to its finalization. A complete copy of Advocacy's comments may be accessed at <http://www.sba.gov/advo/laws/comments/>.

- Advocacy has learned that the rule, as proposed, could impose higher equipment costs on as many as 200,000 existing area sources, most of which are small businesses.
- If EPA is unable to certify with an adequate factual basis, EPA would be required to convene a small business review Panel under section 609(b) of the Regulatory Flexibility Act (RFA).
- Additional facilities with some type of surface coating operation may fall within the scope of this rule and be required to install spray booths or undertake other costly compliance measures.
- EPA must either clarify that the rule does not apply to a broader universe of facilities or be prepared to convene a small business review Panel under section 609(b) of the RFA.

For more information, visit Advocacy's Web page at <http://www.sba.gov/advo> or contact Assistant Chief Counsel Keith Holman by email at [keith.holman@sba.gov](mailto:keith.holman@sba.gov) or by phone at (202) 205-6936.