



ASTSWMO, Providing Pathways to Our
Nation's Environmental Stewardship Since 1974

May 11, 2017

Samantha K. Davis
Regulatory Reform Officer and Associate Administrator
U.S. Environmental Protection Agency
Office of Policy
Mail Code 1803A
1200 Pennsylvania Ave NW
Washington, DC 20460

Docket ID No.: EPA-HQ-OA-2017-0190

Dear Associate Administrator Davis:

The Association of State and Territorial Solid Waste Management Officials (ASTSWMO) is a non-profit association representing the waste management and remediation programs of the 50 States, five Territories and the District of Columbia (States). Our membership includes State program experts with individual responsibility for the regulation or management of waste and materials management, and environmental restoration.

We are submitting this comment letter in response to Executive Order 13777 (EO 13777) of January 30, 2017 (Reducing Regulation and Controlling Regulatory Costs), regarding offsetting the number and cost of new regulations. We understand that EO 13777 seeks to reduce regulatory burdens on the American people by implementing and enforcing regulatory reform. However, we are concerned about the potential impact EO 13777 will have on our members, specifically:

- States that adopt federal rules by reference
- State Authorization

If U.S. EPA is repealing, replacing or modifying a rule, it may also cause confusion with the regulated community not knowing how those changes will affect State programs, causing concern about which State requirements they will need to meet. Rulemaking is a lengthy process and any rules repealed, replaced or modified by this administration may create associated administrative and financial burdens on States. We ask that EPA continue to consult with States throughout the entire process, including during review of comments and prior to the finalization of decisions regarding which rules will remain unchanged or be repealed, replaced or modified.

Respectfully,

Dania Rodriguez
ASTSWMO Executive Director

cc: ASTSWMO Board of Directors
Barry Breen, U.S. EPA OLEM