



June 20, 2000

Gere Glover, Chief Counsel
Office of Advocacy
U.S. Small Business Administration
409 3rd Street, SW - Suite 7800
Washington, DC 20416

RE: SBA Office of Advocacy assistance to small business

Dear Gere:

The Council of Industrial Boiler Owners ("CIBO") is a trade association representing nineteen industrial sectors and universities. CIBO's membership is constituted in large part by small businesses, which due to their size and inability to take advantage of economies of scale, are disproportionately burdened by federal regulation. These regulations are typically environment related.

CIBO actively participates in the Small Business Roundtable sponsored by your Office as means to identify potentially burdensome regulations and collaborate with others also affected by those rules. The roundtables providing an invaluable forum for information sharing and direct contact with regulators that would otherwise be very difficult to arrange. CIBO members have also benefitted directly from your efforts to address concerns with specific agency actions.

Just one example of your successful efforts involved a recent enforcement action by the Environmental Protection Agency ("EPA") under the Toxic Release Inventory ("TRI") program. In that enforcement effort, EPA targeted businesses that had failed to report nitrates on their TRI reports and sent out 600 notices of violation that covered multiple reporting periods. Only through the coordination provided by your office did CIBO members and others fully appreciate the scope of this EPA enforcement effort. CIBO learned that like its members, other small businesses fully compliant with TRI were now charged with TRI violations due mostly to unclear regulations, failure by EPA to adequately notify companies of their obligation to report nitrates and even uncertainty regarding the scientific basis for requiring nitrates reporting.

In response to the concerns of the small business community, your office arranged a briefing by the EPA enforcement office and several meetings with EPA decision-makers. These meetings proved fruitful and the matter was satisfactorily resolved. In addition, participants were able to

COUNCIL OF INDUSTRIAL BOILER OWNERS

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make suggestions to EPA for a more informed regulatory process in the future.

Based on this and many other similar experiences with your office, CIBO has great respect for your staff and its dedication to assisting small business in the sometimes daunting federal regulatory arena. The Office of Advocacy serves this critical role with distinction, bringing energy and true dedication to small business. CIBO thanks you for your past efforts and looks forward to collaborating in the future.

If you have questions or need additional information, please contact me at 703/250-9042.

Sincerely yours,



Robert D. Bessette
President

*Our counsel,
Scott Segal, sends
his regards as well —
RDB*