WESTAR's
Rule Writing Training for
Air Pollution Control Planners

June 24, 2026

Mike Silverstein

Overview

The "Rule Writing Training for Air Pollution Control Planners" course will present the history and purpose of air pollution control law and regulation while exploring the fundamentals of regulation development and structure. Participants will be encouraged to question the presenters and bring forward experiences and challenges faced in their daily work.

- Introductions
  - Meet Your Colleagues
  - What Do You Hope to Learn
  - What Can You Contribute
- Why Do We Need Air Pollution Control Rules and Regulations?
- Foundations for Air Pollution Control Rules and Regulations
- Why Do Planners Need to Learn Rule Writing?
- Regulation Development Process Overview
- Basic Elements of Rules

About Your Instructor

Mike Silverstein has been working in the environmental space for more than 40 years, and his primary area of expertise is air quality planning. Mike presently is the Executive Director of the Regional Air Quality Council in Colorado. Mike has worked for the Colorado Department of Public Health and Environment, the U.S. EPA Region 8, a consulting firm in Florida, and for the U.S. Forest Service in Colorado. Mike has degrees in Geography but gets lost quite easily.

Fun fact: I try my best to recall the Greek and Roman constellations in the night sky. My family & camping buddies get sick of my stories which I picked up in high school astronomy. (Praying that the Starlink grid doesn't mess things up…)

Sunset in Finland 4/22/26

Preview: End of Training Break-Out Time

- Introductions & volunteers (or voluntolds) for note taking & capturing ideas)
- Discussion of training content
- What's next – rule writing topics for future deep dives
  - Structure
  - Systems
  - Enforceability
  - Communications/Stakeholdering
  - Others?
- Feedback

Why Do We Need Air Pollution Control Rules and Regulations?

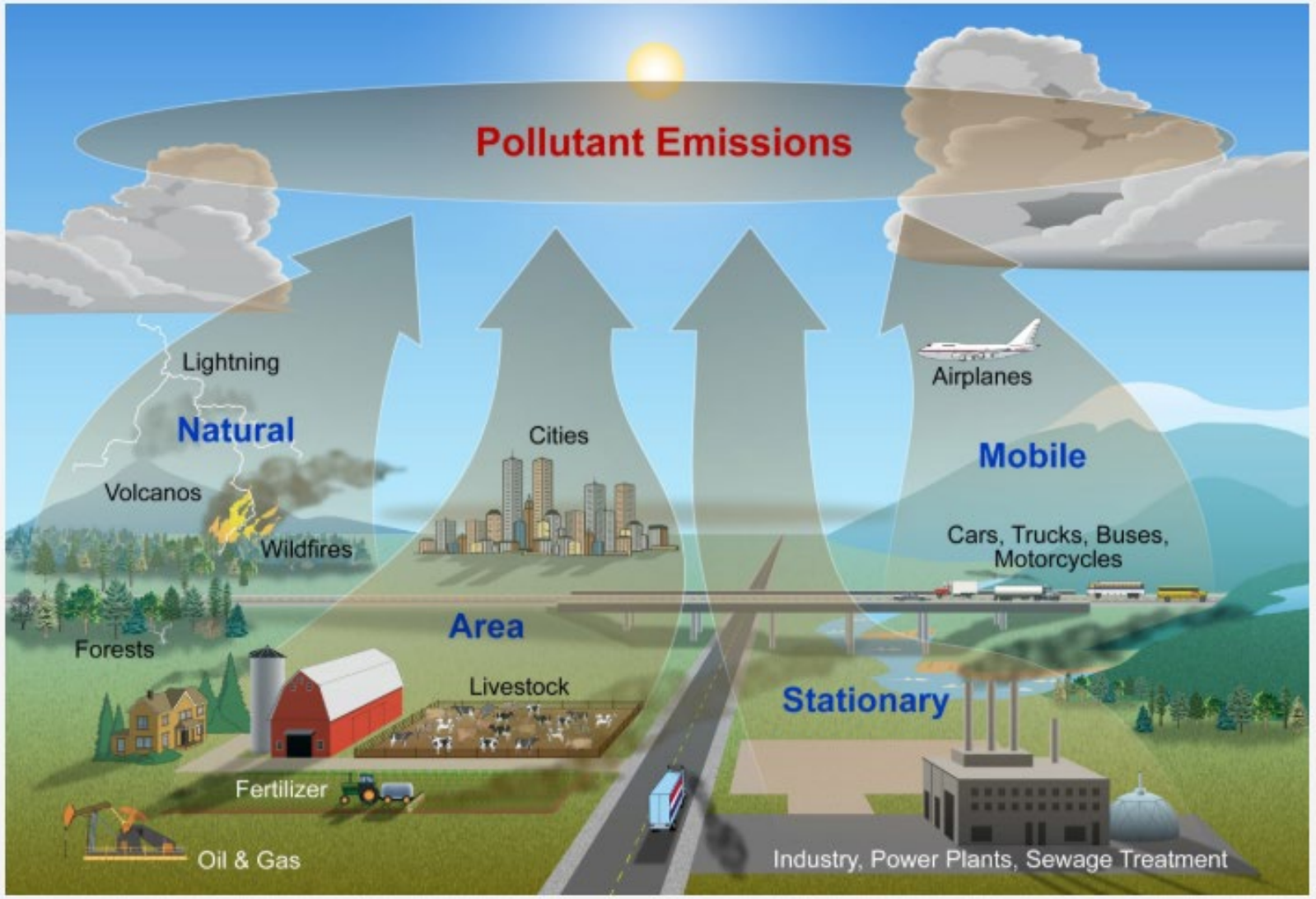
Regulations and rules are pretty close to the same thing.

A regulation is a bit more formal than a rule – it prescribes the required conduct or action exactly;

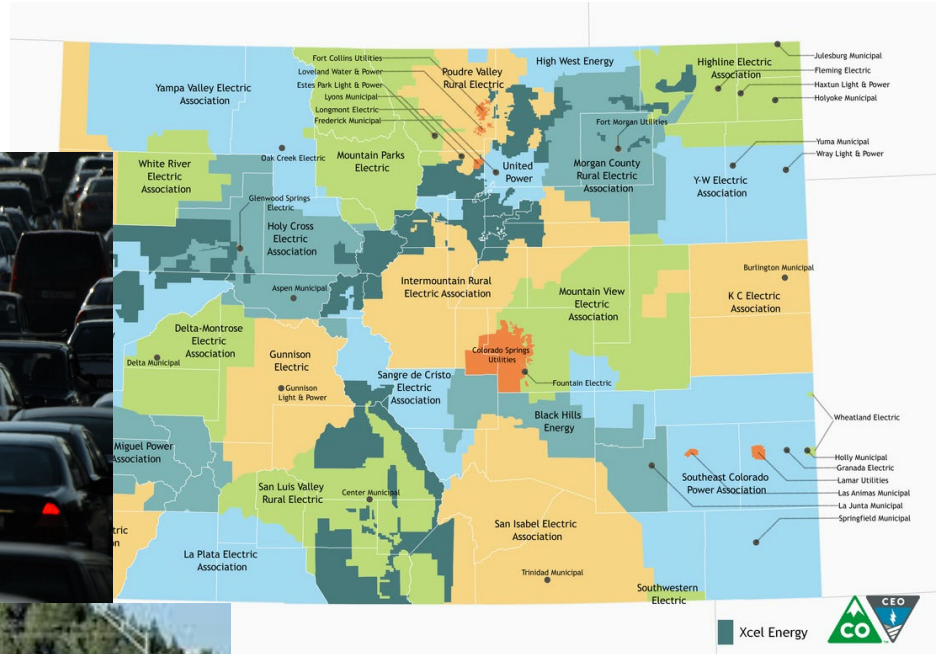
Rules are also binding, but, by contrast, describe what is generally considered to be the proper course of conduct.

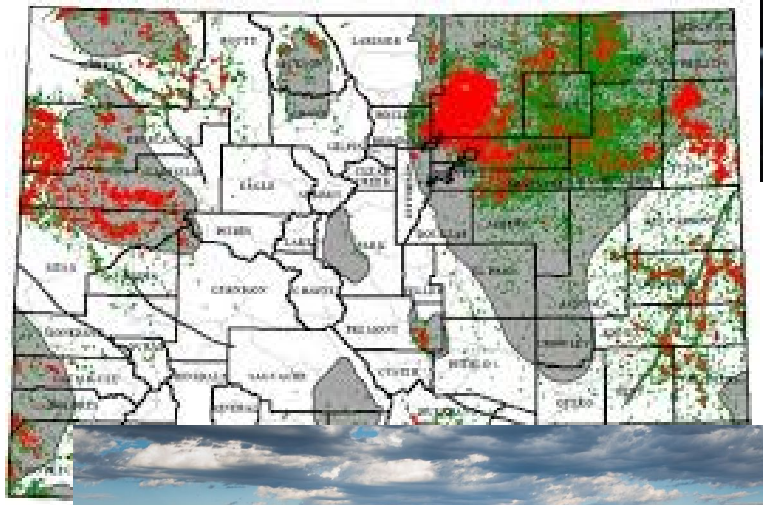
Yakima Regional Clean Air Agency

ASSUMPTION:
For the purposes of this course, “rule” & “regulation” will be used interchangeably.



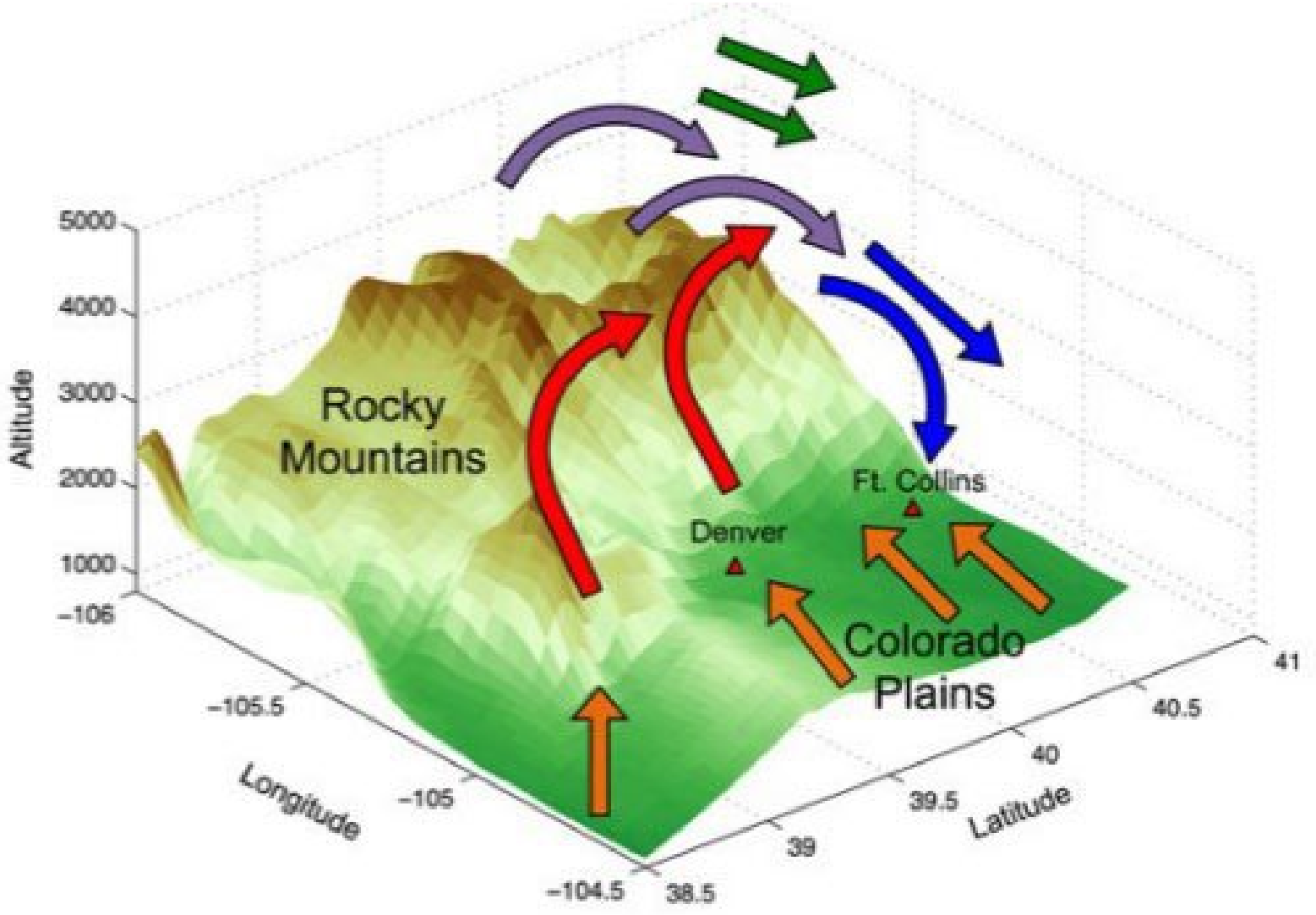
Examples of emission sources causing air pollution in the RAQC region.





msilverstein@raqc.org

Our complex meteorology is natural and conducive to the buildup of pollutants.



Source: Sullivan et al., (2016)

4

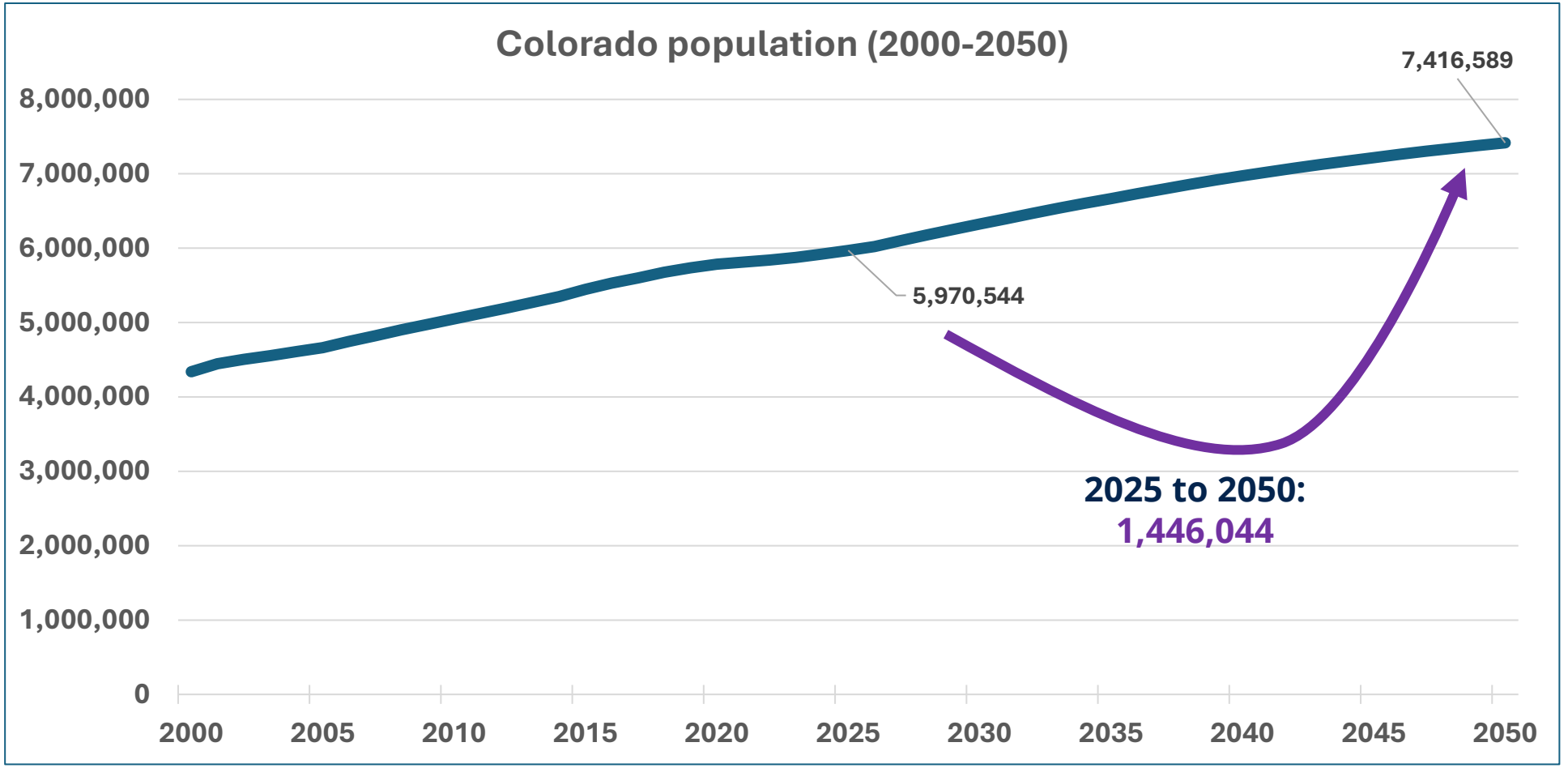
HOW'S THE AIR QUALITY IN METRO DENVER?


AAUGH!
HERE COMES
COLORADO!!!
40
EPA
OZONE
VIOLATIONS

Denver Metro/North Front Range Air Quality Status

Fine Particulates ($PM_{2.5}$)	Never Violated - Occasional Exceedances Do Occur
Nitrogen Dioxide (NO_2)	Denver Attained in mid '80's
Sulfur Dioxide (SO_2)	Never Violated
Lead (Pb)	Denver Area Attained in mid '80's
Carbon Monoxide (CO)	Denver, Longmont, Ft. Collins, Greeley Attained in 1990's - Maintenance Areas
Coarse Particulates (TSP&PM_{10})	Denver Area Attained in 1993 – Maintenance Area
Ozone (O_3)	
1979 1-hour standard: 125 ppb	Region Attained 1987 (Standard Revoked)
1997 8-hour standard: 84 ppb	Region Attained in 2009 (Standard Revoked)
2008 8-hour standard: 75 ppb	Region Out of Compliance
2015 8-hour standard: 70 ppb	Region Out of Compliance

Population Growth



Colorado State Demography Office

WHERE WE SOMETIMES ARE, AND WHERE WE NEED TO BE

Air Pollution: Local Exposure is Definitely a Concern

5 Minute Pause for Discussion

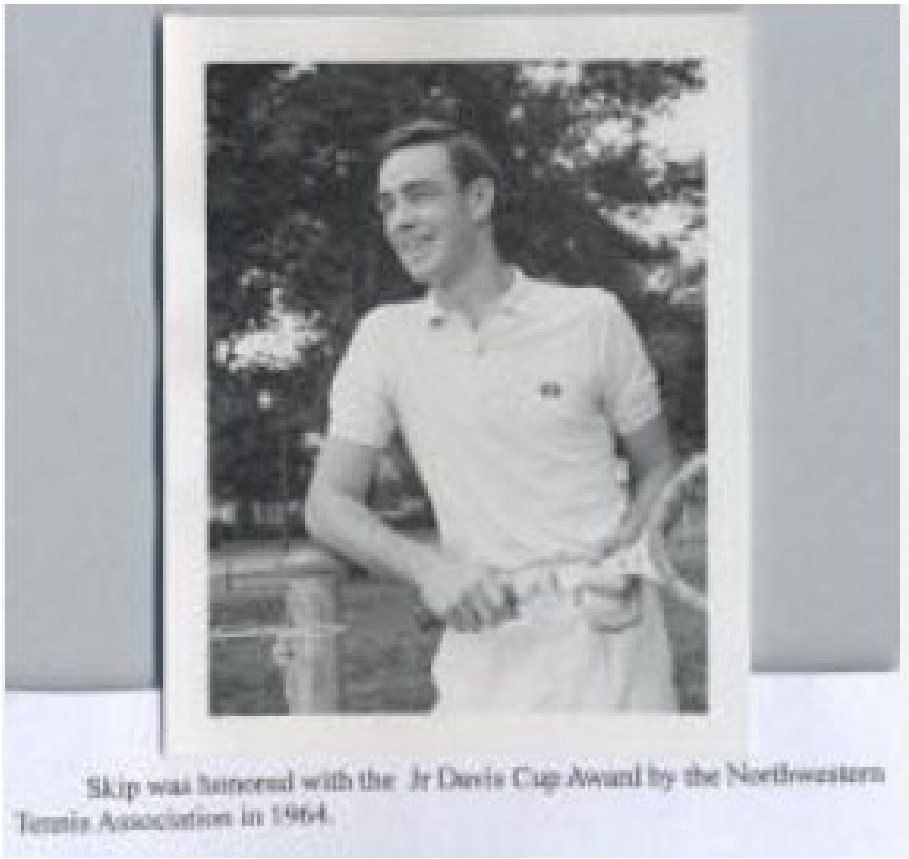
Foundations for Air Pollution Control Rules and Regulations – "A ~~Little~~ Lotta History!"

You want an expert opinion, you got it! Perspectives from Skip Spensley

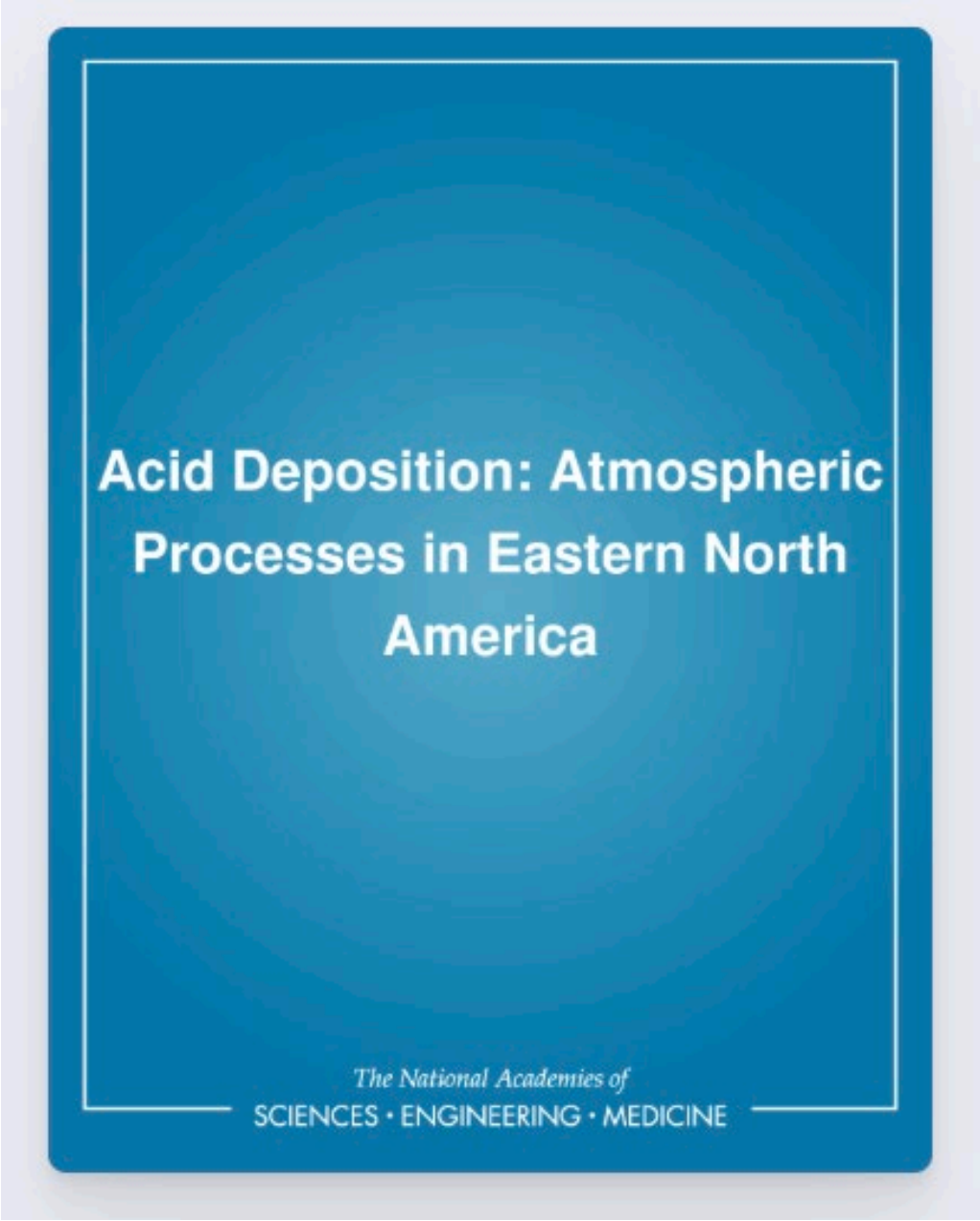
James "Skip" Spensley has an engineering degree from Iowa State University and a law degree from the National Law Center at George Washington University specializing in environmental law. While in Washington, D.C., Skip worked for the first President's Council on Environmental Quality, and later served as Staff Director and Legal Counsel for the U.S. House of Representative's first Renewable Energy Subcommittee in the Congress in 1979-80. Skip also organized the first Earth Day in 1970 in Washington, D.C.

Skip was a member of the Regional Air Quality Council for 16 years. He also was an adjunct professor at University of Denver for over 45 years teaching environmental management courses in the Sturm College of Law and Daniels College of Business.

Fun fact: Skip is an acclaimed competitive tennis player. He was inducted into the South Dakota Tennis Hall of Fame in recognition of his lifelong contributions and tournament success.


Skip was honored with the Jr Davis Cup Award by the Northwestern Tennis Association in 1964.

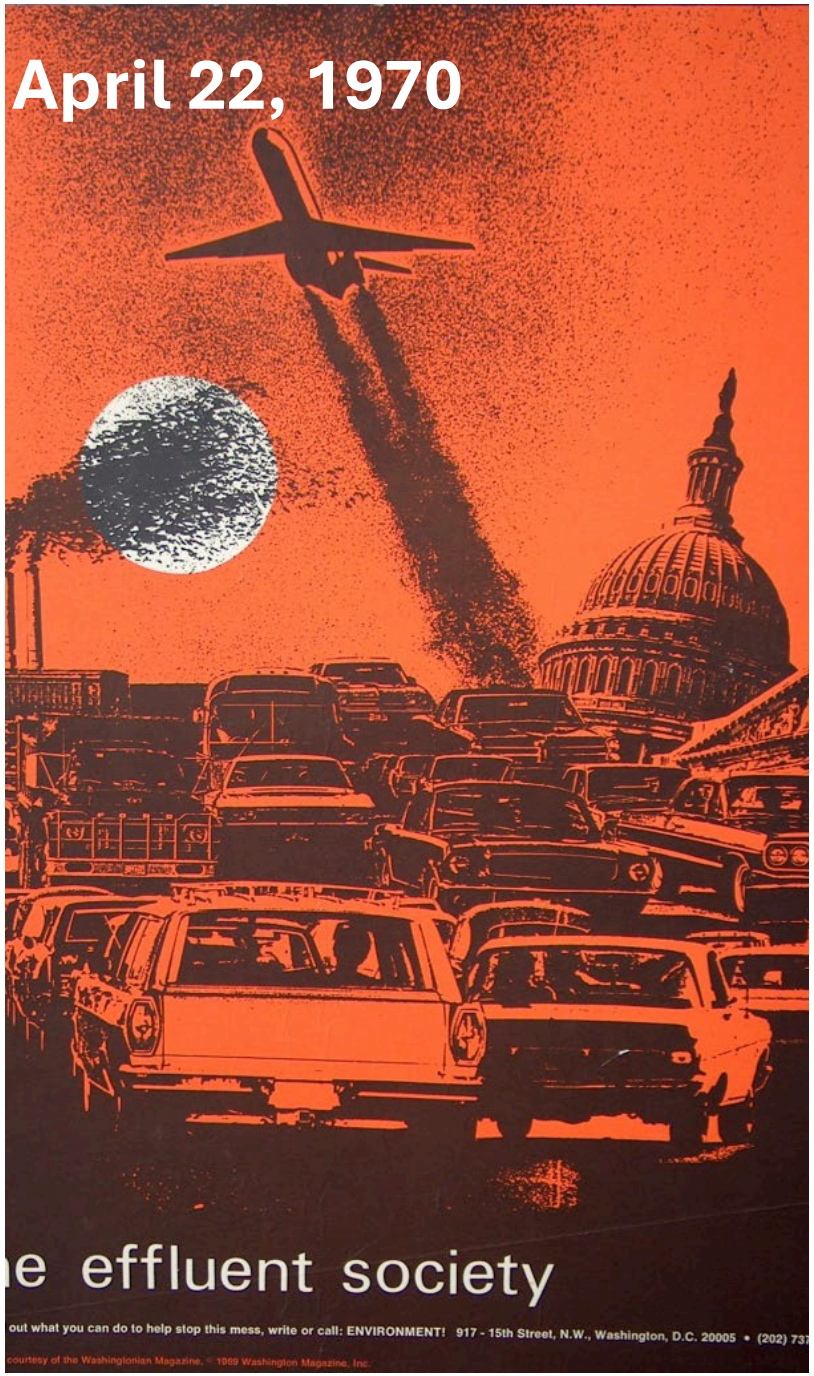
Denver Brown Cloud



National Academy of Sciences Study on Long Range Transport of Air Pollution, 1973

Forest Fire Smoke

EARTH DAY April 22, 1970



A BRIEF HISTORY OF Air pollution

1881
Cincinnati and Chicago introduced the **country's first clean air laws**, influencing other cities to do the same

1947
L.A. Air Pollution Control District formed, establishing the **first air pollution control bureau** in the

1948
Donora, PA, smog incident. 20 people died, 600 were hospitalized, and thousands were sick due to this environmental disaster. (7)

1963
The **Clean Air Act of 1963** was
Research on controls

1967
The **Air Quality Act of 1967** was
Expand research

1970
Earth Day
EPA created
NEPA enacted
Environmental Decade

1970
The **Clean Air Act of 1970** was
NAAQS
SIPs
NSPS
HAPs
Motor vehicle control
Stronger enforcement

1977
Clean Air Act **Amendments of 1977**, which introduced more
PSD
Stronger MV emission standards

1978
The EPA set new national air pollution standards for **lead**. (13)

1985
EPA announced a new national strategy for **toxic air pollutants**. (14)

1990
Clean Air Act **Amendments of 1990**; implemented tighter
Acid deposition control
189 toxic pollutants
Title 5 Permits
Ozone pollution out
Cap & Trade program

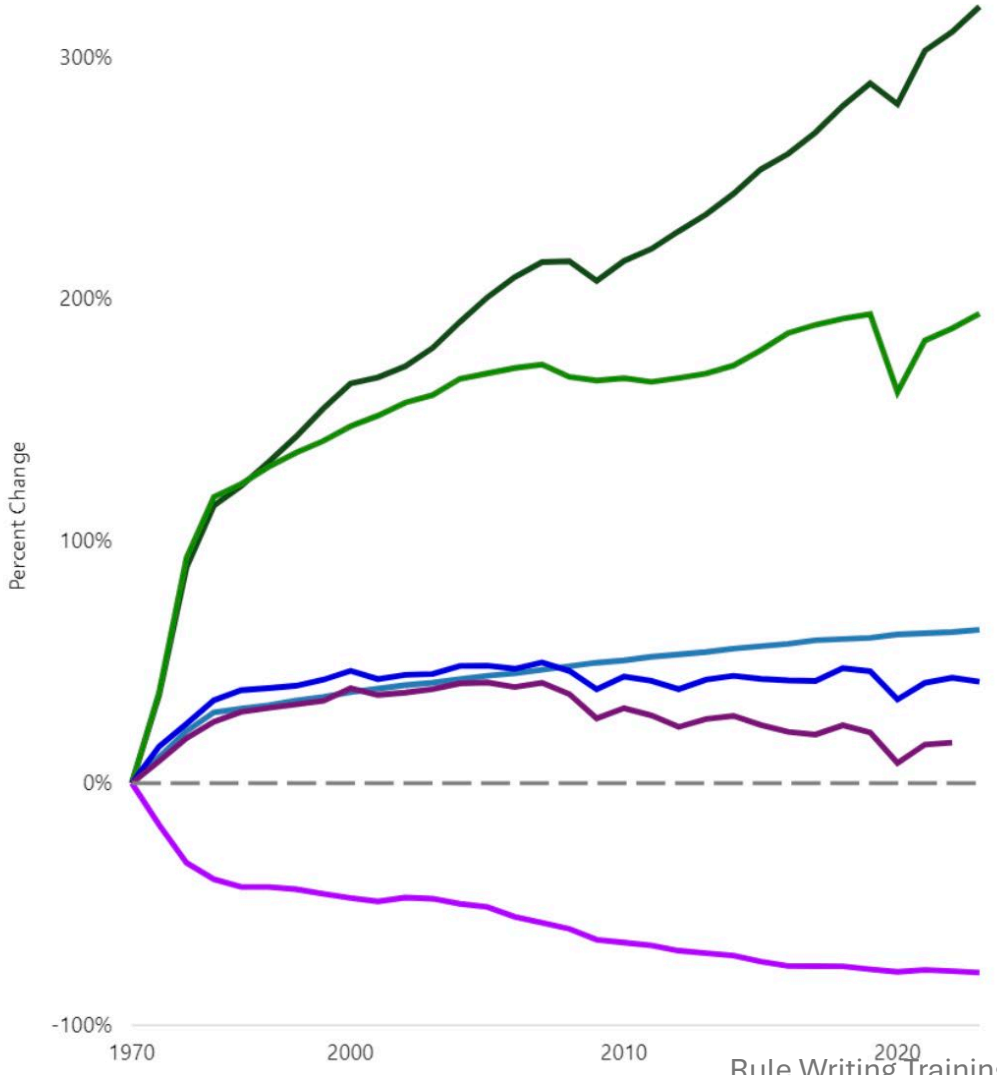
2003
Bush administration proposes **"Clear Skies" legislation,**
To cut power plant emissions by 70% using a market-based cap-and-trade system.

2015
USA **committed to the Paris Agreement**, which came into effect in 2016. (17)

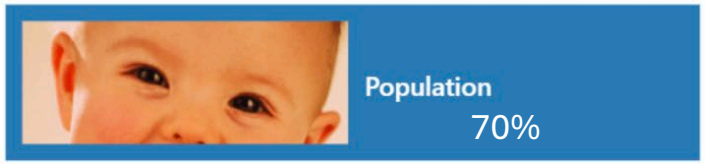
2017
Donald Trump announced that the U.S would **withdraw from the Paris Agreement**. (18)

Trump has revoked over 28 air pollution reduction regs to date (New York Times 1/20/21) and eliminated the 2009 Greenhouse Gas Endangerment Finding. (New York Times 2/12/26)

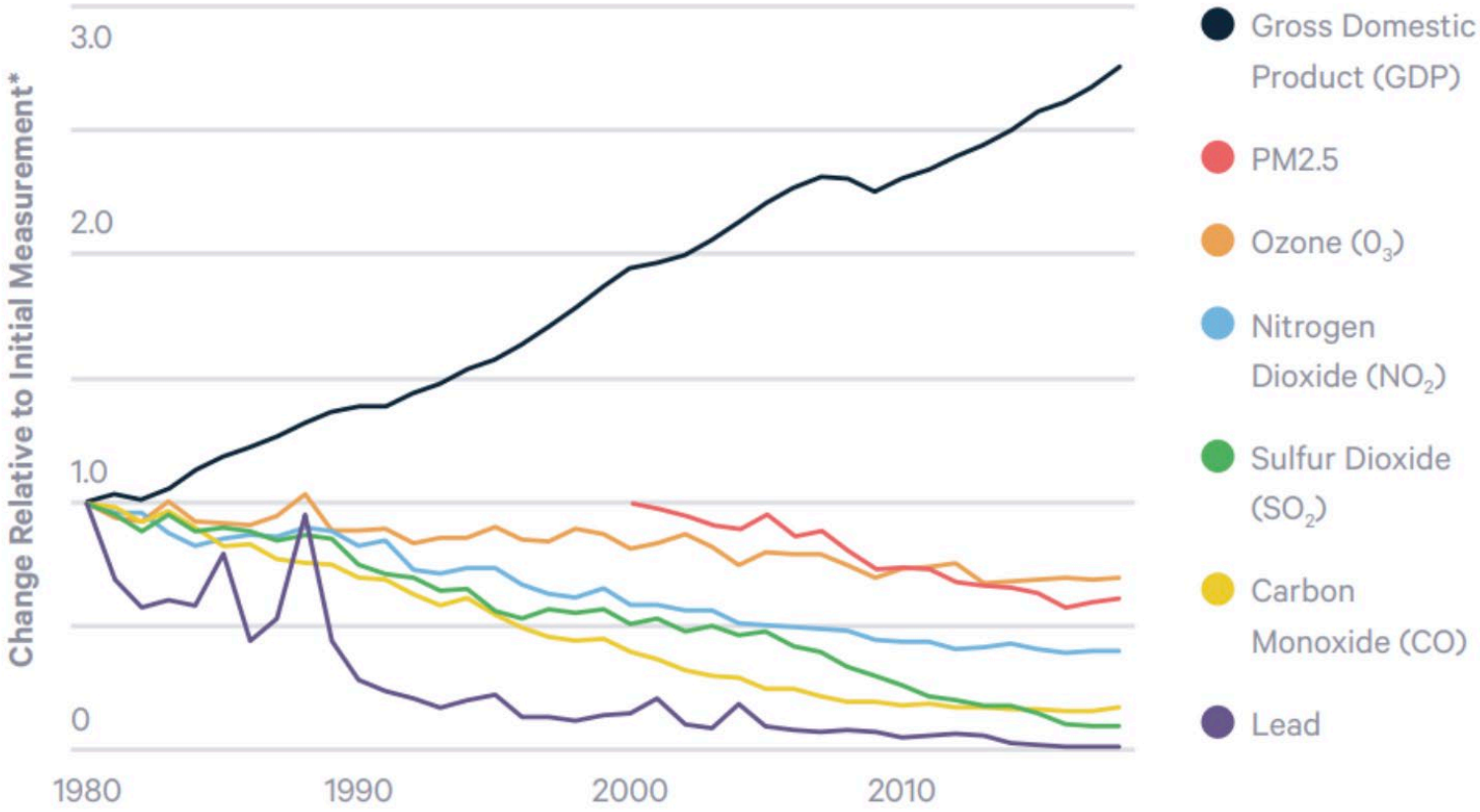
Comparison of Growth areas and Declining Emissions 1970-2023



1970-2026



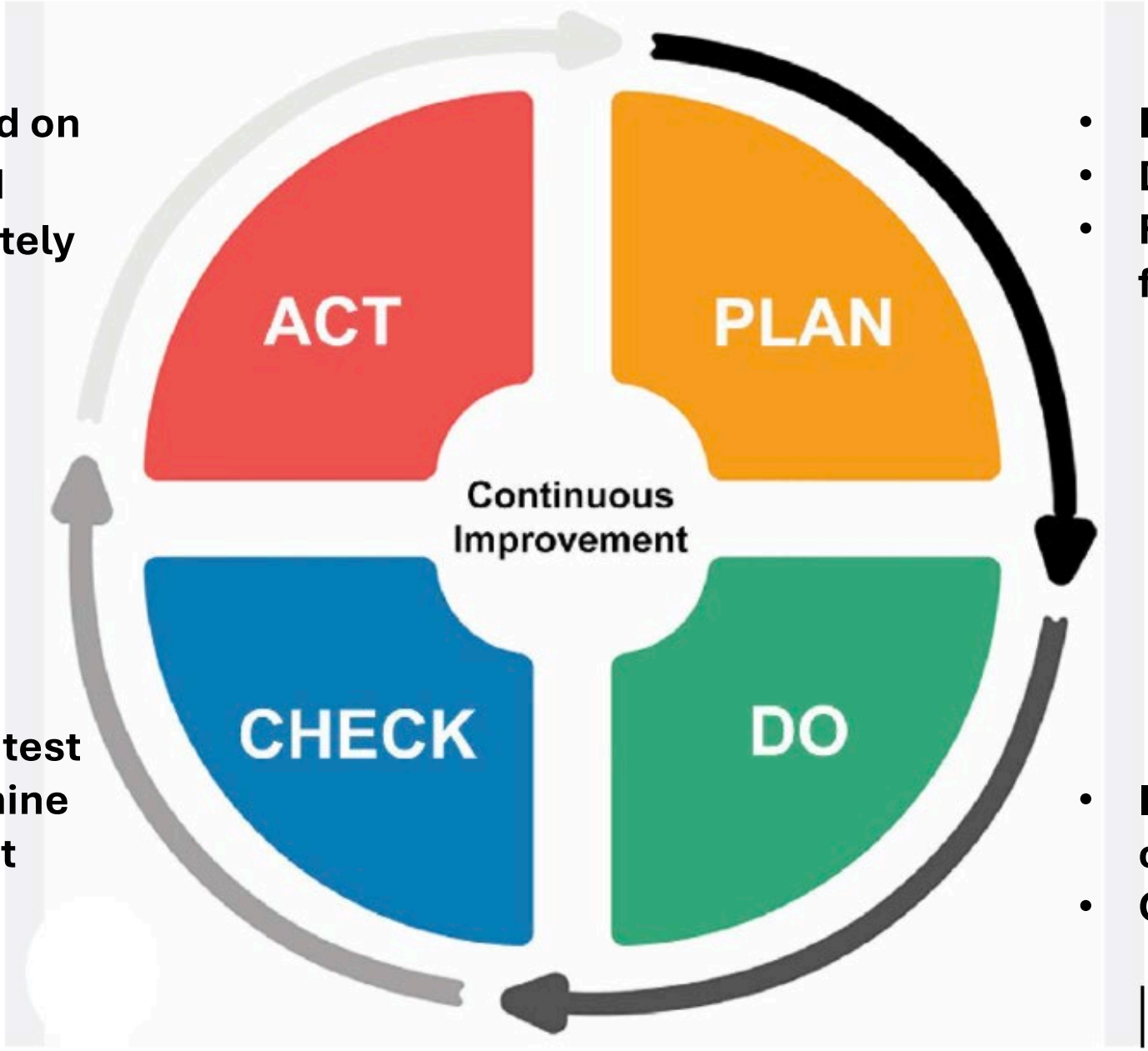
Change in GDP and Six Common Air Pollutants 1980-2018



Source: Federal Reserve Economic Data | Federal Reserve Bank of St. Louis. *The index begins at 1 in 1980, with the exception of PM2.5, which was measured beginning in 2000. The index for each year is the actual value divided by the initial value

- Identify opportunity
- Define the problem
- Formulate hypothesis for change

- Implement proposed change on pilot basis
- Gather relevant data



- Analyze the pilot test results to determine what works or not

- Take action based on what you learned
- Revise appropriately
- Restart cycle

Discussion with Skip

THANK YOU!

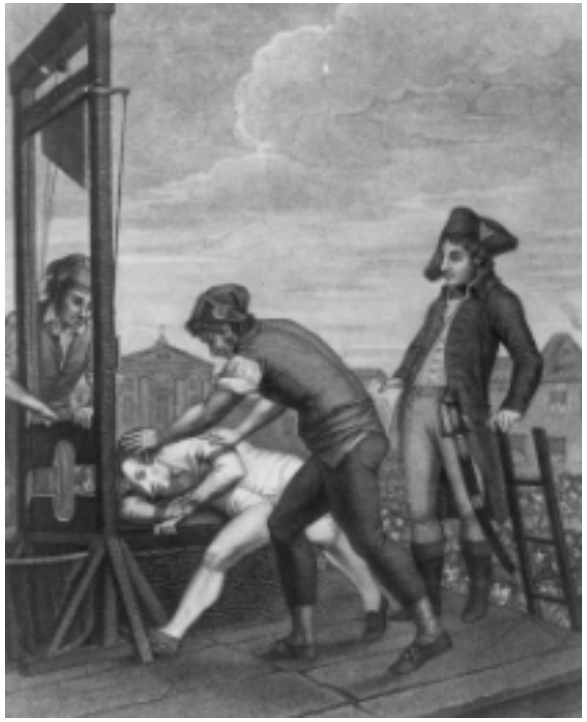
Common Law in the Beginning, Specific Law & Regulation Today

- **Ancient Rome: laws existed to allow land transactions to be terminated as a result of “pestelentia” (unhealthy, malodorous air).**

- **Earliest Known Regulation (1306): King Edward I of England issued a proclamation banning the burning of "sea coal" in London due to smoke.**
  - **Mostly ignored despite threat of fines, furnace destruction or death**
    - **Lack of enforcement , thankfully not the death part…**

Early Responses to Air Pollution

- **Avoidance** – zoning of industrial properties
- **Nuisance lawsuits**
  - Private
  - Public
- **Award of damages or injunctions**
- **Local/State control laws & fines**
- **DEATH by order of the KING**



Spensley, 2016

SMOG

1306 King Edward I

1873 London 268 deaths

1909 Glasgow 1,000 deaths

Spensley, 2016

Specific Law/Regulation Evolve

- **Local Laws: Chicago & Cincinnati "smoke" abatement regulations - 1881. Later, Pittsburg, St. Louis, and St. Paul enact public nuisance laws to deter smoke emissions shortly thereafter.**
- **By 1912, nearly every major city had enacted smoke abatement laws, but many were invalidated by hostile courts.**

February, 1930, article about St. Louis smoke problem being fixed...

St. Louis Making Progress in Smoke Abatement

ITS two-year campaign for the eradication of the smoke evil in St. Louis rewarded by a substantial reduction in the soot fall and by the enactment of a strong and effective amendment to the city smoke ordinance, the Citizens' Smoke Abatement

a reduction of from forty to sixty per cent in the soot fall has been brought about, accurate scientific tests show. The campaign up to the present time has been largely aimed at what were considered the largest "smokers" — large plants, apartment buildings and

that burns fuels smokelessly and how minor changes in heating plants may be made which will eliminate the emission of smoke from such plants.

"The task is now half done," said Sidney Baer, President of the League. "To finish the job fin-

United States

The calls for additional oversight were driven by noteworthy events in the first half of the 20th Century including a period of near zero visibility in St. Louis in 1939, serious smog incidents in Los Angeles in the late 40s, an air pollution inversion event in Donora, PA that killed 40, and three incidents in New York City: a smog incident killing 170-260 and two air inversions killing 405 and 168, among others.

1928 New York City

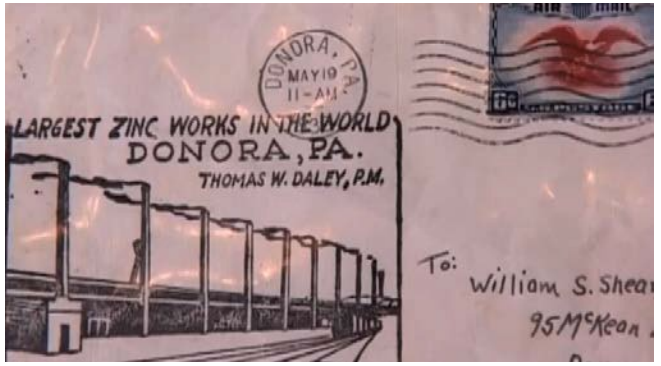
Late 1940's in L.A.

Anytown, USA

1939 St. Louis

Donora, Pennsylvania

Donora 20 deaths



Specific Law/Regulation Evolve

- Early efforts resulted in the creation of “smoke inspector” positions, but these positions were filled by engineers who were more focused on efficiency than smoke abatement.
- Georgia v Tennessee Copper Co. settled in 1915 - emissions reduction and recordkeeping requirements.
- Following World War II, soldiers returned to the United States, the economy and population boomed, and the move toward urbanization and suburban living combined to create a pollution nightmare.
- States and locales had begun to make progress, with Los Angeles taking measures to control photochemical smog in the 1940s and the first state-level air pollution law passed in Oregon in 1952.
- Modern UK Regulation (1956): Following the 1952 Great Smog, the UK Clean Air Act 1956 addressed industrial and domestic smoke.


Soldiers' Return Home to Average 200,000 a Month

400,000 to Be Left In Pacific Areas By End of March

Tokyo, Oct. 11 (AP). American GIs will be returned to the United States from the Pacific at the rate of more than 200,000 a month for the next six months, Allied Headquarters announced today.

- **Touted as the first federal legislation involving air pollution, the Air Pollution Control Act of 1955 was a non-regulatory bill that approved Federal spending on air pollution control research.**
- **Spanning only three pages, the bill was straightforward and established the federal government as having preeminent control over air pollution control matters.**
- **Amendments to continue funding APCA in 1960 and expand the scope of research in 1962.**

California, 1950's; PBS

- **The first legislation to include the term “Clean Air Act” was passed and signed into law in 1963, and set forth additional funding for education, research, and the creation of standards.**
  - **Amendments of 1965 (Motor Vehicle Air Pollution Control Act):**
    - **Worked to establish standards for automobile emissions.**
    - **Promoted research into the effects of emissions on Canada and Mexico.**
  - **Amendments of 1966: Expanded local air pollution control programs.**
  - **Amendments of 1969: Extended authorization for research on low emissions fuels and automobiles.**

- **The 1967 Air Quality Act:**
  - **First step in setting regulations.**
  - **Divided parts of the nation into Air Quality Control Regions for the purpose of monitoring ambient air.**
  - **Established national emissions standards for stationary sources (contested until the establishment of industry standards).**
  - **Set timetables for State Implementation Plans.**
- **By 1969, all 50 states had passed legislation to implement some form of air pollution controls.**
- **Ultimately, the AQA failed due to the lack of enforcement provisions.**

The Clean Air Act of 1970

Original EPA Seal, from October 18, 1971

Highly ambitious, highly complex, and set out to enforce standards.

Paired with the National Environmental Policy Act (the law creating the Environmental Protection Agency), the federal government now had two critical components of a federal program:

Regulations and an Agency to enforce the Regulations

Authorized the development of comprehensive federal and state regulations to limit emissions from both stationary (industrial) sources and mobile sources.

Original EPA Seal, from October 18, 1971

CAA Regulatory Programs

- National Ambient Air Quality Standards (NAAQS) for air pollutants that endanger public health or welfare.
  - 6 “criteria” pollutants were among the most hazardous high volume pollutants – carbon monoxide, airborne particulates, sulfur oxide, nitrogen oxide, ozone, lead.
- State Implementation Plans (SIPs), the states are responsible for establishing procedures to attain and maintain the standards. SIPs take on current emissions amounts for their locale, determining where violations are likely to occur.
- New Source Performance Standards (NSPS): new sources can and should be designed with the newest and most advanced technology.
- National Emission Standards for Hazardous Air Pollutants (NESHAPs).
- Increased enforcement authority.
- Authorized requirements for control of motor vehicle emissions.

EPA[1]
CMM Group – Part 2

Original EPA Seal, from October 18, 1971

The Clean Air Act of 1977

- **Primarily concerned provisions for the Prevention of Significant Deterioration (PSD) of air quality in areas attaining the NAAQS.**
- **Contained requirements pertaining to sources in non-attainment areas for NAAQS.**
- **Both of these established major permit review requirements to ensure attainment and maintenance of the NAAQS.**

EPA[1]

The Clean Air Act of 1990

Current EPA Seal, as of November 19, 2002

Title V

Congress established the Title V Operating Permit program as part of the 1990 Clean Air Act Amendments.

- **Title IV - control of acid deposition (acid rain).**
- **Title V - issuance of stationary source operating permits.**
- **NESHAPs were incorporated into a greatly expanded program for controlling toxic air pollutants (189).**
- **Provisions for attainment and maintenance of NAAQS were substantially modified and expanded.**
- **Other revisions: stratospheric ozone protection, increased enforcement authority, and expanded research programs.**

EPA[1]
CMM Group – Part 2

ReCap: Federal Legislation[1]

- 1955 – Air Pollution Control Act
- 1960 – Motor Vehicle Exhaust Study Act
- 1963 – The Clean Air Act of 1963
- 1965 – Motor Vehicle Air Pollution Control Act
- 1967 – The Air Quality Act
- 1970 – The Clean Air Act Amendments 1970
- 1977 – The Clean Air Act Amendments 1977
- 1990 – The Clean Air Act Amendments 1990

Spensley, 2016

[1] *History of Air Pollution Legislation in the United States*, Arthur C. Stern

Clean Air Act

- **Most complex environmental statute**
  - Relies upon the scientific understanding of the causes and effects of air pollution.
  - Melds past state attempts and different legal approaches of 50 states to controlling air pollution.
  - Depends upon cooperation among all levels of government and among the states.
  - Doesn't conform to governmental boundaries.
  - Relies on continuously changing technology.

Clean Air Act Context

- Shift from resources protection to "Environmentalism".
- Relied on Command & Control, not market forces.
- Use of"health-based" ambient standards.
- Feds set standards, specified requirements and policies.
- Required States to develop the plan (SIP) to achieve.
- EPA sets a minimum and the states can adopt standards meeting or exceeding the standards.

Spensley, 2016

5 Minute Pause for Discussion

Why do Planners Need to Learn Rule Writing?

Law vs. Regulation

- ***Laws are broad mandates passed by legislatures (Congress/Legislatures) that establish legal principles.***
- ***Regulations are detailed rules created by administrative agencies to implement and enforce those laws.***

- ***Laws state what is prohibited or required.***
- ***Regulations explain how that law is applied in practice.***

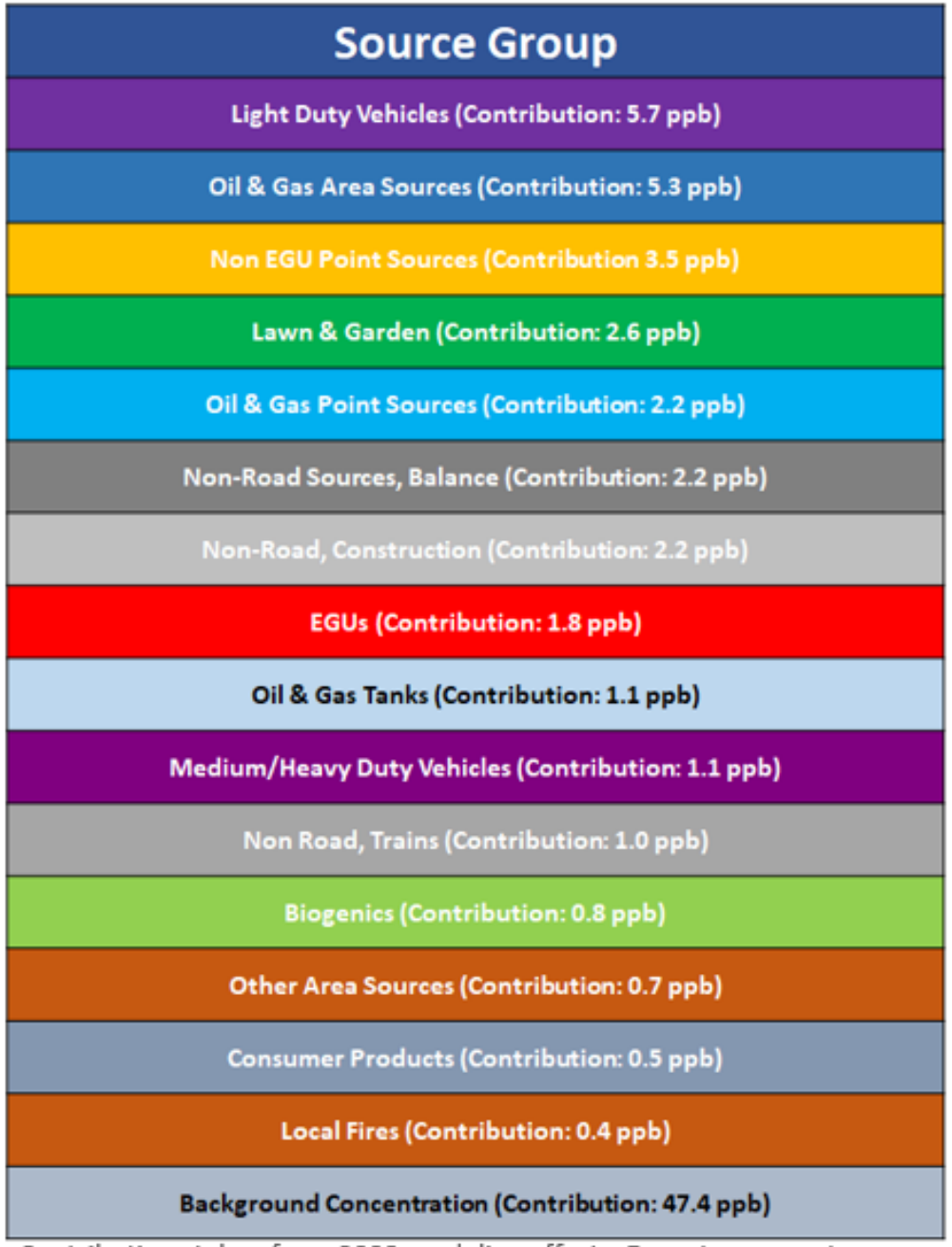
Category	Laws	Regulations	Rules	Supervisory Guidance
Definition	Statutes passed by legislative bodies that create binding legal obligations	Agency-developed directives that implement laws	Prescriptive procedures or methods tied to regulations	Resources that clarify expectations or best practices
Authority	Enacted by Congress or state legislatures	Issued by regulatory agencies under statutory authority	Created by agencies or self-regulatory organizations	Issued by agencies; not legally binding but influential
Enforcement	Enforced through courts and legal proceedings	Enforced by regulatory bodies through exams or enforcement actions	May be enforced as part of a regulatory exam or operational review	Not enforceable, but often considered in supervision or enforcement
Purpose	Establish broad legal frameworks and rights	Translate laws into enforceable operational requirements	Define specific compliance processes or standards	Provide clarity on how to interpret or apply laws and regulations

Tetreau. 2026

- **Air Pollution control is complicated and hard work!**
  - **Structure is mandatory!**
- **To improve air quality, we need to limit/reduce emissions.**
  - **Improved public health and reduced environmental impact**
- **The old adage: the solution to pollution is dilution - really???**
  - ***Not for GHGs!***
- **But how do you achieve this?**

https://www.mikeduran.com/2010/07/07/the-danger-of-writing-rules/

General Contribution to Front Range Summertime Ozone Concentrations



Contributions taken from 2023 modeling efforts. Do not represent contribution at any singular monitor. Additional information available in 2021 Modeling Forum Presentations

Here's another expert for y'all.
Perspectives from Leah Martland

Leah Martland is the supervisor for the Colorado Department of Public Health and Environment, Air Pollution Control Division, Regulatory Development and Engagement Unit. The Division regulates mobile sources, indoor air, and stationary sources. The Regulatory Development and Engagement Unit develops regulations to ensure that Colorado meets clean air goals and standards.

Fun fact: Leah has aspirations to train her German Shepherd to be a library dog and hopes that one day he may actually listen.

Discussion with Leah

THANK YOU!

States Prepare Rules to Comply with Federal Requirements

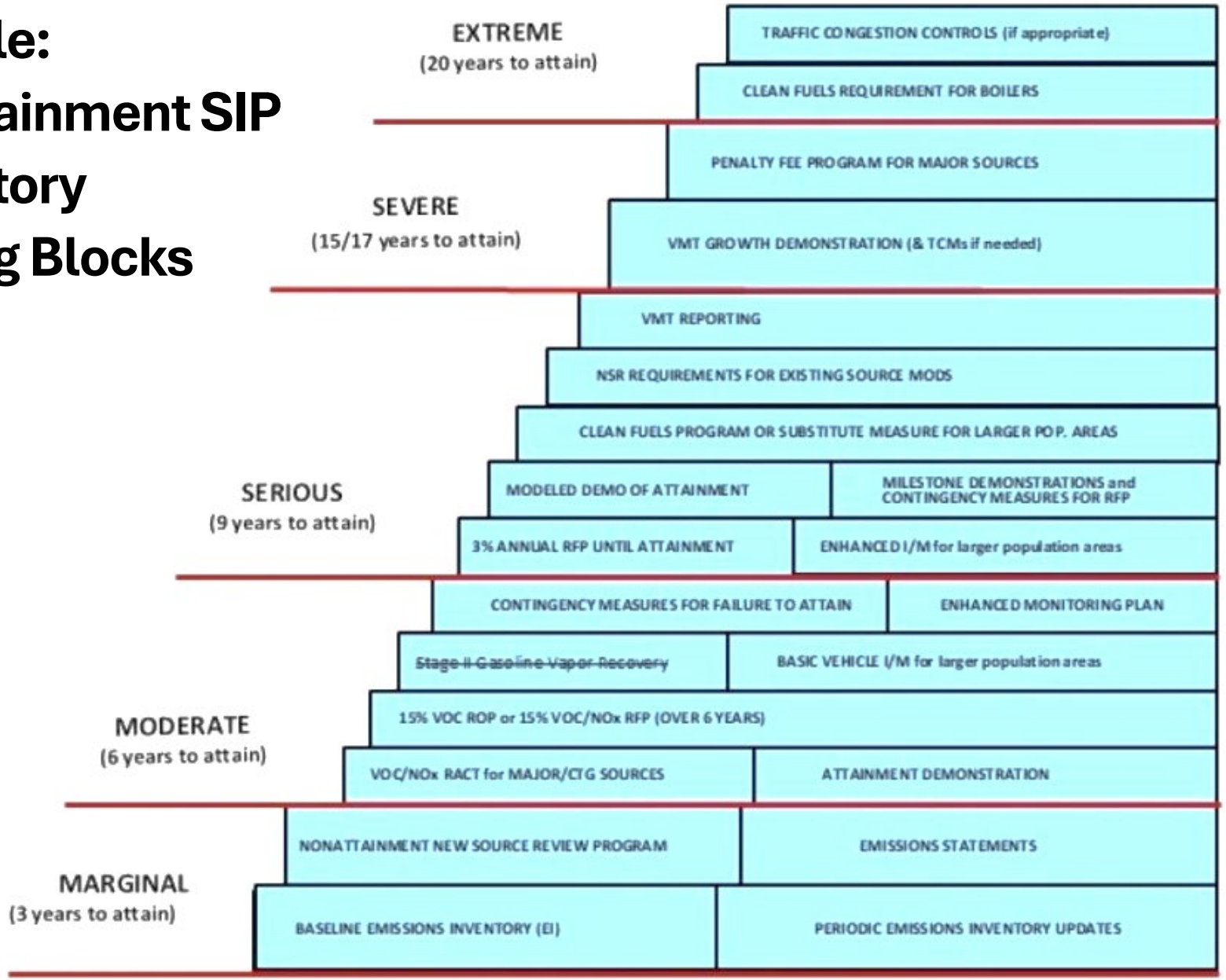
- Achieve Attainment of NAAQS by deadline
- Establish Enforceable Emission Limitations, Schedules of Compliance and other Controls
- Set Monitoring and Reporting Requirements
- Enforcement, Permit Programs, Preconstruction Review and Operational Controls
- Ensure Non-interference with other State Plans
- Provide Adequate Administrative Resources
- Implement Motor Vehicle Inspections and Testing
- Intergovernmental Consultation & Public Notification
- Schedule for Periodic Revisions
- Collect Permit Fees

Spensley, 2016

The Many Types of AQ Rules

- Directives from elected officials (laws/ordinances)
- Resolutions from Boards & Commissions
- State-Only vs. SIP
- Permitting
- Administrative
- Federal Rules
- Legislative Mandates
- Reasonably Available/Best Control Technology
- Lowest Achievable Emission Rates
- Seasonal vs year-round
- Episodic
- Monitoring Recordkeeping & Reporting
- NSPS/NESHAPs
- Toxics
- Attainment Plans
- Maintenance Plans
- Contingency Measures
- Industry-Specific

Example: Nonattainment SIP Regulatory Building Blocks



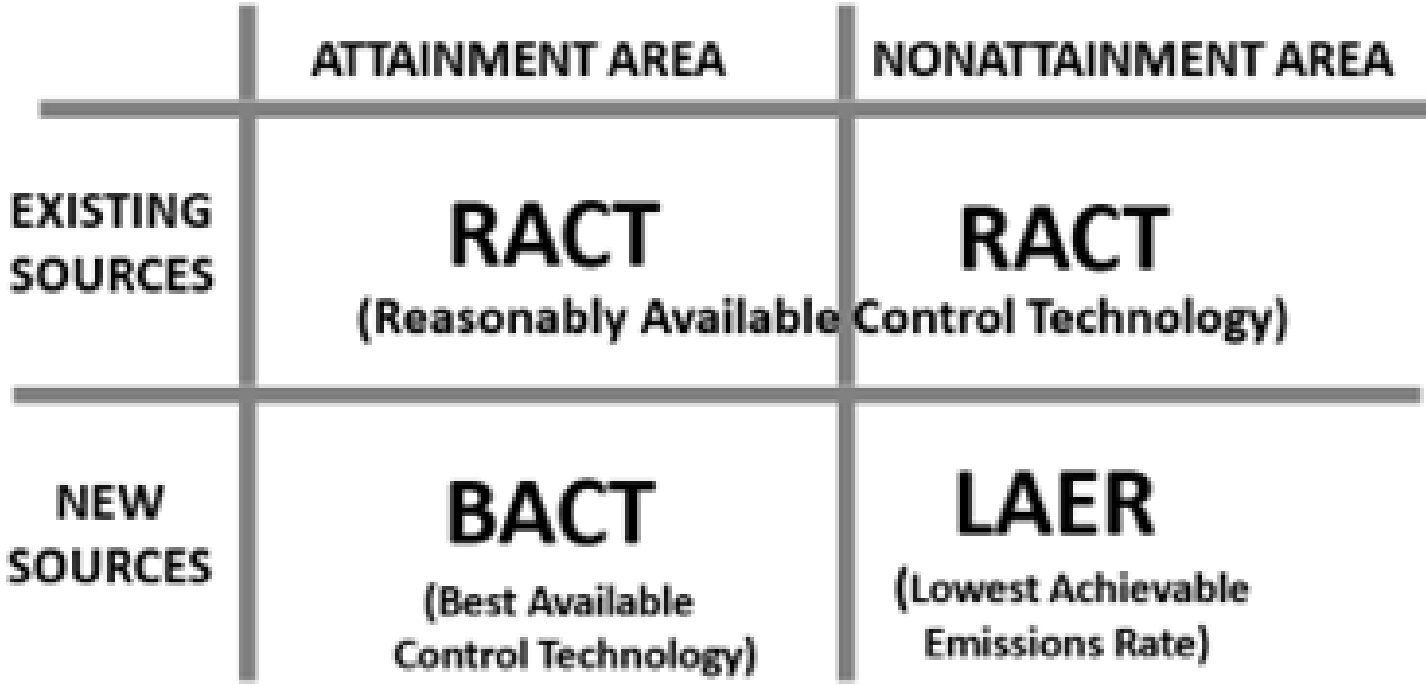
NOTE: Transportation and General Conformity apply in all ozone nonattainment areas.

The Clean Air Act (CAA) details specific requirements for nonattainment areas under the ozone National Ambient Air Quality Standards depending upon the classification of an area.

This table represents the cumulative requirements that apply to an area as the nonattainment status continues.

The CAA-specified classifications refer to the length of time to attain, not the level of ozone air pollution.

Example:
Technology Control Requirements for Stationary Sources – *We Need Rules for This!*



Spensley, 2016

5 Minute Pause for Discussion

Regulation Development Process Overview

First - know your stuff!

- **Study/research – become the expert.**
- **Talk to others – “old timers”, permit engineers, inspectors, attorneys, planners.**
- **Learn from stakeholders and interest groups.**
- **Get in the field – visit the potentially regulated sources/activities.**

https://heavydutyjournal.com/transforming-preventive-service-women-fleet-maintenance/

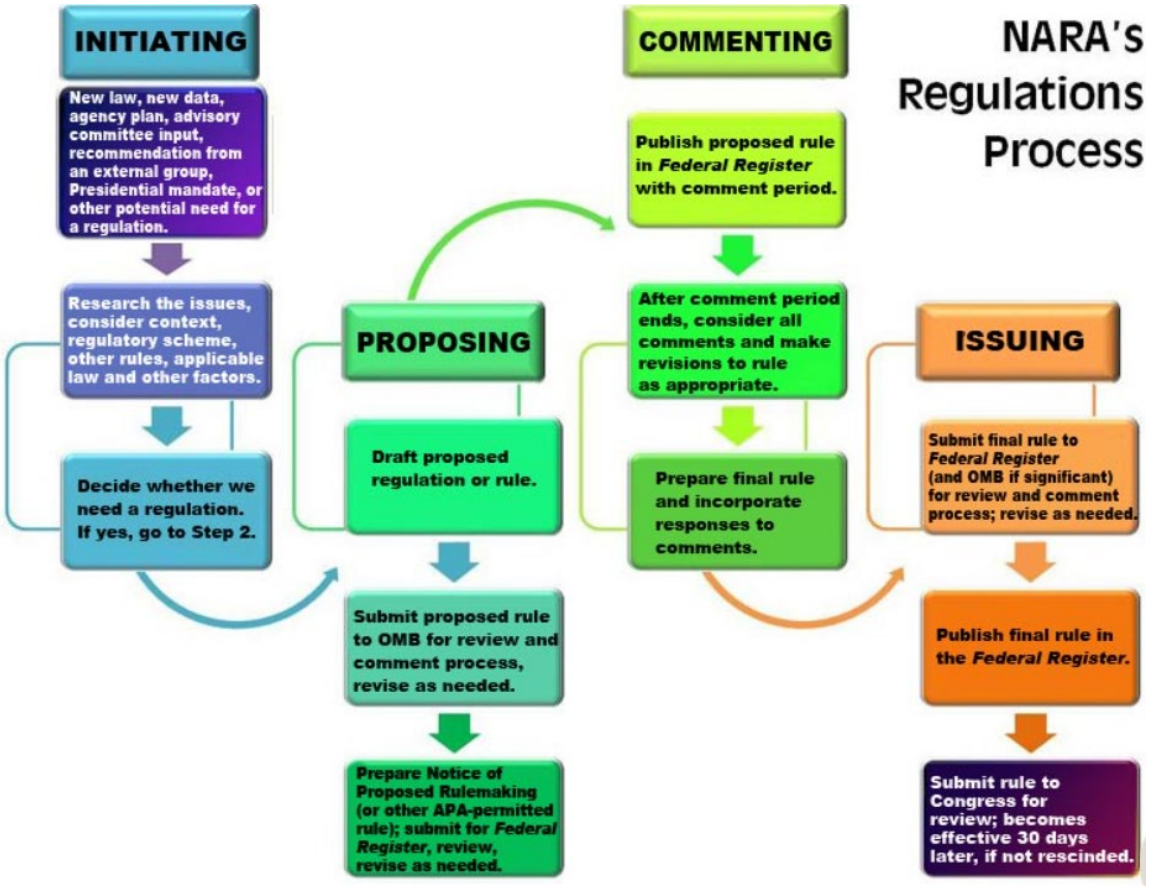
Every rule must have a clear purpose. If the audience cannot identify why a rule exists, its importance should be questioned.

- **Who does this apply to?**
- **What must, must not, or may be done?**
- **Under what circumstances?**

The process generally involves drafting, public comment, and issuing a final rule.

Phases of Rule Development

- **Initiation: Identifying the need.**
- **Stakeholder outreach.**
- **Drafting: Translating technical standards into precise, enforceable language.**
- **Public Participation: Best practices for engaging with the community and handling public comments.**
- **Rulemaking.**



https://www.archives.gov/about/regulations/process.html

Key Concepts in Regulation Writing

- **Structure: Follow a standard outline, use consistent headings, and incorporate numbered lists.**
- **Clarity: Use plain language to avoid ambiguity, ensuring the target audience understands the rules.**
- **Enforceability: Ensure policies are realistic and enforceable.**
- **Consistency: Align new regulations with existing organizational policies to avoid confusion.**
- **Identification of Roles: Clearly define who does what within the regulation.**
- **Implementation: Ensuring rule requirements can be seamlessly incorporated into permits and prepare rules so they are easily interpreted during inspections.**

5 Minute Pause for Discussion

Basic Elements of Rules

Emphasize Clarity & Completeness

- **Plain English!**
  - **Avoid jargon and complex sentence structures that create barriers to understanding.**

- **Avoid Ambiguity.**
  - **Be specific about deadlines, quantities, and responsibilities. Precision in language!**

- **Check for Conflicts.**
  - **Ensure new rules do not contradict existing laws or internal policies.**

- **Iterative Refinement.**
  - **Always build in time for peer review and editing to catch bias or opinion.**

Emphasize Action and Clarity

- Factually and legally accurate.
- Use the fewest words possible.
- Written for the reader’s reading level.
- Uses the same terminology throughout.
- Examples:
  - Clear Emission Limits: Defining exactly "how much of which pollutants" are allowed.
  - Averaging Times: Ensuring limits are measurable over specific periods.
  - Monitoring, Recordkeeping, and Reporting (MRR): Establishing the technical requirements needed to prove compliance.

Example Rule Structure

- Title
- Table of Contents (do we really need roman numerals?!)
- Applicability
- Definitions
- Provisions
  - General & Specific Requirements
- Enforcement
  - Permit to Operate
  - Soft enforcement
  - Advisory
  - Penalty provisions

https://www.axios.com/2018/12/31/the-biggest-stories-2018-trump-world

Example Rule Structure (continued)

- Testing
- Monitoring
- Reporting
- Recordkeeping
- Fees
- References
- Statement of Basis (why), Statutory Authority (citations), and Purpose (intent and narrative)

SALE AND INSTALLATION OF WOOD-BURNING APPLIANCES AND THE USE OF CERTAIN WOOD BURNING APPLIANCES DURING HIGH POLLUTION DAYS

5 CCR 1001-6

[Editor's Notes follow the text of the rules at the end of this CCR Document.]

Outline of Regulation

PART A APPLICABILITY

PART B SALE, INSTALLATION, AND USE OF WOOD-BURNING APPLIANCES

I. Definitions

II. Limitation on the sale and installation of wood-burning stoves

III. Approval procedure for pellet stoves

IV. (State Only) Masonry heaters

V. Enforcement

VI. List of approved wood-burning appliances

VI. High pollution days

VIII. Requirements for installation of fireplaces

IX. Implementation of local control strategies

X. References

PART C STATEMENTS OF BASIS, SPECIFIC STATUTORY AUTHORITY AND PURPOSE

APPENDIX A TEST METHOD PROTOCOLS FOR MEASURING WOOD-BURNING MASONRY HEATER EMISSIONS

https://www.sos.state.co.us/CCR/GenerateRulePdf.do?ruleVersionId=11649&fileName=5%20CCR%201001-6

Fun fact: I finally found the mysterious Masonry Heater!

Silverstein Vacation
Finland, April 2026

Additional Considerations for Rule Writing
(in no particular order & definitely not exhaustive)

- Emission reduction benefits
- Permanent and enforceable
- Legally defensible/statutory authority
- Technical feasibility
- Economic impacts – costs to regulated parties/facilities v public/environmental health benefits
- Formatting – conformance to federal requirements
- New vs. revisions
- Basic tenets vs source specific

Even More Considerations for Rule Writing
(I think we need another class!)

- Local/state-only vs federally enforceable
- SIP gaps - effective upon EPA approval or earlier
- Comparison to other states/regions
- Ensure permits can conform to the rule
- Cross-walk to other rules/programs
- Software/systems
- Timelines for rule development
- A I ??

5 Minute Pause for Discussion

End of Training Break-Out Time

- Introductions & volunteers (or volun-tolds) for capturing ideas
- Discussion of training content
- What's next – rule writing topics for future deep dives
  - Structure
  - Systems
  - Enforceability
  - Communications/Stakeholdering
  - Others?
- Feedback

Closing Remarks

THANK YOU!!

References/Credits

Law, Rule, Regulation, and Policy. Yakima Regional Clean Air Agency. Undated. https://www.yakimacleanair.org/services/definitions.html#Regulations

The History of Air Pollution Laws – Part 1 (undated). The CMM Group. https://www.thecmmgroup.com/history-air-pollution-part-1/

The History of Air Pollution Laws – Part 2 (undated). The CMM Group. https://www.thecmmgroup.com/history-air-pollution-part-2/

The Clean Air Act. History, Overview and Structure. 2016. James "Skip" Spensley. https://edec.ucar.edu/sites/default/files/2022-02/1_Spensley_07_26_2016.pdf

Evolution of the Clean Air Act (undated). US Environmental Protection Agency[1]. https://www.epa.gov/clean-air-act-overview/evolution-clean-air-act

Laws vs. Regulations vs. Rules vs. Guidance: What Are the Differences. Rebecca Tetreau. May 21, 2026. https://www.ncontracts.com/nsight-blog/laws-vs-regulations-vs-guidance-new-interagency-statement-provides-clarification

Overview

Introductions

-Meet Your Colleagues

-What Do You Hope to Learn

-What Can You Contribute

(this section will be scaled back due to the large number of anticipated attendees)

Why Do We Need Air Pollution Control Rules and Regulations?

(general thoughts on the need for rules will be provided; a guest speaker will provide perspectives on communications and policy)

Foundations for Air Pollution Control Rules and Regulations

(the evolution of laws and regulations will be presented)

Why Do Planners Need to Learn Rule Writing?

(distinctions between laws and regulations will be made; a guest speaker will delve into the specifics of regulation development)

Regulation Development Process Overview

(an introduction to regulation writing to be presented)

Basic Elements of Rules

(regulation style and structure will be reviewed)

Break Out Session for Focused Discussion

(opportunity for discussion, next steps)

Closing Remarks

Log

- Feb 26, 2026: 45 minutes (Training Subcommittee meeting)
- Mar 6, 2026: 45 minutes (Rule Writing and Planner Training)
- Mar 16, 2026: 60 minutes (research, notes)
- Mar 18, 2026: 60 minutes (research, notes outline creation)
- Match 25, 2026: 60 minutes (research, notes outline creation)
- March 26, 2026: 60 minutes (training subcommittee call)
- May 5, 2026: 180 minutes (research, presentation preparation)
- May 18, 2026: 120 minutes (research, presentation preparation)
- May 20, 2026: 90 minutes (research, presentation preparation)
- May 23, 2026: 180 minutes (research, presentation preparation)
- May 28, 2026: 120 minutes (research, presentation preparation)
- May 30, 2026: 120 minutes (research, presentation preparation)
- June 15, 2026: 60 minutes (prep call with staff, training overview)
- June 16, 2026: 60 minutes (training development)
- June 18, 2026: 120 minutes (presentation preparation; WESTAR training observation)
- June 22, 2026: 120 minutes (final presentation edits/preparation)