

INSIGHTS

## FAQ: Reversal of "Once In Always In"

March 6, 2018

By: [Jeffrey R. Holmstead](#)

On February 8, 2018, ERM and Bracewell presented a webinar that took a look at the legal and technical issues related to EPA's January 25th memo reversing the long standing "Once In Always In" policy. With this policy change, facilities that are able to be permitted as "area sources" under Section 112 of the Clean Air Act will generally be able to reduce the burden of paperwork, monitoring, recordkeeping and reporting requirements and comply with air quality requirements with greater certainty and less headache.