Message

From: Ayres, Sara [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=CE5147A6A41E4AD488630393BB12C3F0-AYRES, SARA]
Sent: 7/11/2018 1:13:23 PM
To: Bartlett, Keith [Bartlett.Keith@epa.gov]
CC: Lischinsky, Robert [lischinsky.robert@epa.gov]
Subject: RE: Tiering for OIAI

I asked the WG chair why it was Tier 3 during a separate discussion sometime last week and they said sort of the same thing you provided, that it was based on the original action's Tier. I told them my management was wondering why it was Tier 3, but I didn't say we were considering asking for an uptier. I certainly didn't say our concerns were "on hold" as a result of the discussion. However, my management hasn't made a decision yet on if they want to ask for an uptier, they want to know what the process for such a request would entail – who needs to sign what and what kinds of justification do we need for such a request.

Sara Ayres
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From: Bartlett, Keith
Sent: Wednesday, July 11, 2018 8:06 AM
To: Ayres, Sara <Ayres.Sara@epa.gov>
Subject: FW: Tiering for OIAI

Sara, is this accurate? I reached out to OAR Regulatory Steering Committee reps and this was their response. I am not sure why they would have WG Chair reach out to you instead of responding to me, but, this is the world we are living in.

Thanks –

Keith

From: Rush, Alan
Sent: Tuesday, July 10, 2018 4:44 PM
To: Bartlett, Keith <Bartlett.Keith@epa.gov>; Farrar, Wanda <farrar.wanda@epa.gov>
Cc: Henigin, Mary <Henigin.Mary@epa.gov>
Subject: RE: Tiering for OIAI

Keith and Wanda,

I have been told that the WG Chair called and talked to the WG member about this action and our 'rationale'. My understanding is that OECA's 'concerns' are on hold for the moment and that we will revisit tiering in the next month after further management discussions. I'm not privy to the conversations, but after you confer with your WG member, if my characterization is not correct, I will make some more noise about it and see if I can get you an answer.

Alan

From: Bartlett, Keith
Sent: Tuesday, July 10, 2018 9:52 AM
To: Farrar, Wanda <farrar.wanda@epa.gov>

Cc: Rush, Alan <Rush.Alan@epa.gov>
Subject: RE: Tiering for OIAI

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From: Farrar, Wanda
Sent: Tuesday, July 10, 2018 8:42 AM
To: Bartlett, Keith <Bartlett.Keith@epa.gov>
Cc: Rush, Alan <Rush.Alan@epa.gov>
Subject: Re: Tiering for OIAI

Please send the SAN when you have a moment. Thanks.

From: Bartlett, Keith
Sent: Monday, July 9, 2018 3:59 PM
To: Farrar, Wanda; Rush, Alan
Subject: Tiering for OIAI

Hello, OAR RSC Reps: Please see below – Why is OAR using a Tiering approval from 2004 for this new policy direction and decision? Also, what was the documented justification to tier this rulemaking as a Tier 3 rule? OECA has concerns.

Thank you and happy to chat about this –

Keith

Tiering

Tier Status: Approved - By Whom? And when?
Tier Approval Date: 10/1/2004
Tier Level: 3

Regulatory Reporting

Reg Agenda?: Yes

Keith Bartlett
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