Message

From: Segall, Martha [Segall.Martha@epa.gov]
Sent: 9/24/2018 8:54:30 PM
To: Lischinsky, Robert [Lischinsky.Robert@epa.gov]
Subject: FW: DRAFT EMAIL TO SEND ASAP: 3 CAA Rules with Actions That Need Your Input

Importance: High

Rob,
Did the Asphalt FAR happen today?

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Martha Segall
Director (Acting)
Monitoring, Assistance, and Media Programs Division
Office of Compliance/OECA
U.S. EPA
ph: (202) 564-0723

From: Segall, Martha
Sent: Wednesday, September 19, 2018 7:18 PM
To: Dombrowski, John <Dombrowski.John@epa.gov>; Anderson, Kate <Anderson.Kate@epa.gov>
Cc: Rick Duffy <Duffy.Rick@epa.gov>; Lischinsky, Robert <Lischinsky.Robert@epa.gov>
Subject: DRAFT EMAIL TO SEND ASAP: 3 CAA Rules with Actions That Need Your Input

John,

Per your guidance at the MAMPD Weekly today, I have attempted to combine three memos. Let us know if you have questions or need additional information.

Thanks,

Martha

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Susan,

There are a number of upcoming CAA rulemaking actions that we need your input on. They include the following:

- [redacted]
- **Major Source 2 Area Source (MM2A) Proposed Rulemaking—**Option Selection Meeting September 27th and Analytic Blueprint waiver request.
- [redacted]

You are invited to two rulemaking meetings next week, the FAR Meeting for Asphalt RTR Rule on Monday and the Options Selection Meeting for the MM2A Rule on Wednesday. We have not identified any issues for OECA and do not expect any issues on either of these rule. **We recommend that you delegate attendance at these meetings to Martha Segall and her staff in MAMPD for both rules.**

[redacted]
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[redacted]

For the MM2A rule, they are requesting to waive the Analytic Blueprint ADP milestone. We had requested the rule be uptiered and they have done that. As a Tier 2 rule, they now trigger the ADP milestone for an Analytic Blueprint. OECA has been fully engaged on the workgroup since the beginning (March 2018), and the workgroup chair provided the workgroup a draft plan for the proposal in May 2018 that we believe could effectively meet the requirement for an Analytic Blueprint. We have not identified any issues. **We recommend agreeing to the request to waive the Analytic Blueprint.**

[redacted]

Please let us know if you are okay with us proceeding as recommended. Below is additional information on each of the rulemaking efforts.

Additional Background Information on Each Action

- **Major Source 2 Area Source (MM2A) Proposed Rulemaking**

We have received a request to waive the Analytic Blueprint ADP milestone on the Reclassification of Major Sources to Area Sources (Once In, Always In) Proposed Rulemaking. This rule codifies the changes outlined in the January 2018 Wehrum Reclassification memo in the General Provisions of Part 63. This rule was originally a Tier 3 rule, but based on OECA's request, OAQPS agreed to raise it to Tier 2. Because the change to Tier 2 was made mid-stream, there are some ADP milestones that OAQPS is just now addressing, including the Analytic Blueprint. In light of Patrick's recent guidance to not approve ADP process waivers until after we had received all materials, we wanted to make sure you were comfortable with us signing this waiver request. OECA has been fully engaged on the workgroup since the beginning (March 2018), and the workgroup chair provided the workgroup a draft plan for the proposal in May 2018 that we believe could effectively meet the requirement for an Analytic Blueprint. Based on this and the fact that we do not currently have any issues, we recommend agreeing to the request to waive the Analytic Blueprint for this rule.

Also, we expect the Options Selection for this rule to be scheduled for September 27th. We have not yet received any official briefing materials, but based on workgroup discussions, we do not expect significant OECA issues at this point. We recommend that you delegate attendance at the meeting to Martha Segall and her staff in MAMPD.

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[redacted]

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