Message

From: Segall, Martha [Segall.Martha@epa.gov]
Sent: 8/28/2018 9:12:51 PM
To: Dombrowski, John [Dombrowski.John@epa.gov]
CC: Anderson, Kate [Anderson.Kate@epa.gov]; Duffy, Rick [Duffy.Rick@epa.gov]; Lischinsky, Robert [Lischinsky.Robert@epa.gov]; Ayres, Sara [Ayres.Sara@epa.gov]
Subject: CAA Major Source 2 Area Source (MM2A) Rule Workgroup: Analytical Blueprint Waiver Request

John,

Here is a draft email for Susan and Patrick on the request to waive the Analytic Blueprint on the Reclassification of Major Sources to Area Sources (Once In, Always In) Proposed Rulemaking. Let us know if you need additional information from us. Thanks!

****
Susan and Patrick

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 (see below). This rule was originally a Tier 3 rule, but based on OECA's request, OAQPS has 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. Base on this and the fact that we do not currently have any issues, we recommend agreeing to the request. Please let us know if you agree or if you have any concerns.

~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~

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

From: Torres, Elineth
Sent: Tuesday, August 14, 2018 10:26 AM
To: Dykes, Teresa <Dykes.Teresa@epa.gov>; Ayres, Sara <Ayres.Sara@epa.gov>; Jordan, Scott <Jordan.Scott@epa.gov>; Elman, Barry <Elman.Barry@epa.gov>; Lancey, Susan <lancey.susan@epa.gov>; Burns, Ward <Burns.Ward@epa.gov>; Adams, Yolanda <Adams.Yolanda@epa.gov>
Cc: Dalcher, Debra <dalcher.debra@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>; Shrager, Brian <Shrager.Brian@epa.gov>; Mckelvey, Laura <Mckelvey.Laura@epa.gov>; Sorrels, Larry <Sorrels.Larry@epa.gov>; Page, Lee <Page.Lee@epa.gov>; Castro, Grecia <Castro.Grecia@epa.gov>; Mataway-Novak, Dylan <Mataway-Novak.Dylan@epa.gov>
Subject: Major Source 2 Area Source (MM2A) Workgroup: Analytical Blueprint Waiver Request

Dear ADP Workgroup Team Members,
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~

As we discussed with you in the last Workgroup Meeting on 8/9/2018, we had received a request to up-Tier the MM2A proposal to Tier 2. As we discussed in our last meeting we will need to complete a few additional activities to meet ADP requirements for a Tier 2 rule. We appreciate your continued support in meeting the ADP requirements for a Tier 2 rule.

To ensure we can meet the current schedule for the Proposal we are requesting the WG to waive the preparation of the analytical blueprint. We believe we have met this requirement by providing a comprehensive review of the draft plan for the proposal titled "National Emission Standards for Hazardous Pollutants: General Provisions" to the workgroup in May 2018. The draft plan included key policy areas to be addressed in the action and analyses to support the action. The draft plan was also reviewed and approved by senior management during the same time period.

We created an individual waiver form for the for each primary member of the workgroup to waive the preparation of the "Analytical Blueprint". On the MM2A SharePoint site we saved the waiver forms for your review and completion. Link to the Blueprint waiver form folder:
https://usepa.sharepoint.com/:f:/r/sites/OAR_Custom/MM2A/Shared%20Documents/ADP%20Milestones%20and%20Forms/Blueprint%20Waiver%20Form?csf=1
Please note that we must submit a complete form for all primary members of the workgroup. Please take a moment to review the form over the next few days and either complete the form online (in SharePoint) or upload a signed version to the same folder (either procedure is acceptable). Please complete the form NLT August 24, 2018.

If you have any questions or comments, please reach out to Elineth or Debra to discuss. We anticipate having additional workgroup meetings (beyond those currently scheduled) to keep you up-to-date on any new developments and to discuss your review of the draft Proposal.

Best Regards to all and thank you for all your hard work!
Elineth and Debra

Elineth Torres
OAQPS
919-541-4347