UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 30 2018

OFFICE OF
AIR AND RADIATION

MEMORANDUM

SUBJECT: Final Agency Review Meeting on SAN 4908, Reclassification of Major Sources as Area Sources Under Section 112 of the Clean Air Act

FROM: for Wanda Farrar
Steering Committee Representative, OAR (6103A)

TO: See Addressees

The Final Agency Review meeting on SAN 4908, proposed rule, Reclassification of Major Sources as Area Sources Under Section 112 of the Clean Air Act, is scheduled for November 15, 2018, at 2:00 pm, Room 6530 of the William Jefferson Clinton North Building, call-in number Conference Line/Code / Ex. 6

The Final Agency Review package is attached. The proposed rule for the Reclassification of Major Sources as Area Sources Under Section 112 of the Clean Air Act (Amendments to 40 CFR part 63, subpart A and General Provision Tables of National Emission Standards for Hazardous Air Pollutants subparts) is being developed as a Tier 2 project under EPA's regulatory development process.

Final Agency Review is the final point for internal agency concurrence for the attached package. The Final Agency Review meeting provides a forum for confirming that:

1. The workgroup successfully completed its job and all issues have been resolved or elevated;
2. The package (action and relevant documents) is complete and ready for the Assistant Administrator's signature; and
3. All agency and external requirements have been met.

Each workgroup member must come to the meeting representing the position of his/her Assistant Administrator (AA)/Regional Administrator (RA). Prior to the meeting, you should either have briefed the AA/RA or their representative (if delegated), or have received written sign-off. In addition, any documents should be given in writing to the Workgroup Chair and the Regulatory Management Division (RMD) of OP or at the meeting.

Your response at this meeting will constitute your AA's/RA's position in one of three ways: "concurrence," "concurrence with comment" or "non-concurrence." "Concurrence" should be used to show full agreement, although strictly editorial or non-substantive comments should also be included in this category of response. "Concurrence with comment" indicates that the concurring office would like the package to move forward, but has substantive disagreements or issues. "Non-concurrence" indicates that the responding office does not think the package should move forward and has major substantive concerns. If a participating office or Region is not represented at the meeting or has not previously

contacted the Workgroup Chair or RMD with a position, "concurrence without comment" will be assumed.

You should come to the meeting prepared to respond with one of these choices and to briefly characterize any issues on which you have comments. The RMD will provide a closure memorandum subsequent to the meeting, documenting all positions given and any further action agreed upon. If, prior to signature, the lead office is unable to incorporate requested changes that have AA/RA level support, it should address them (and the reasons for rejecting them) in the action memorandum to the Administrator accompanying the package for signature.

Please address your FAR comments to Assistant Administrator Bill Wehrum and send the original memorandum directly to him. Please also forward a copy of your comments to me at Farrar.Wanda@epa.gov; Elineth Torres, Workgroup Chair (torres.elineth@epa.gov); and Darryl Adams, RMD Desk Officer (adams.darryl@epa.gov).

If you have any questions on this package, please contact Elineth Torres at (919) 541-4347.

Attachments

Addressees: (Workgroup Members)
Elineth Torres, OAR (RTP), Chair
Sara Ayres, OECA (C-19J)
Scott Jordan, OGC (2344A)
Barry Elman, OP (1830A)
Susan Lancey, R1 (OEP05-2)
Yolanda Adams, R4 (9T25)
Ward Burn, R7 (AWMDAPCO)
Lanelle Wiggins, OP (1803A)
Darryl Adams, OP (1803A)

cc: (Steering Committee Members)
Tom Eagles, OAR (6103A)
Keith Bartlett, OECA (2201A)
Andrew Simons, OGC (2333A)
Mark Corrales, OP (1803A)
Pat O'Brien, R1 (OARM05-1))
Tina Martin, R4 (9T25)
Alice Todd, R7 (PLMGSSFM)

cc: OP ADP Calendar
Bill Lamason, OAR (RTP)
Janet Eck, OAR (RTP)
Kevin Culligan, OAR