From: Walter Cybulski
To: Lynn Beasley
Cc: Gerain Perry; Richard Mattick; beasley.lynn@epa.gov; Kim Jennings; matthiessen.craig@epa.gov
Subject: Re: Fw: Concurrence Requested: Detailed Analytic Blueprint for CERCLA/EPCRA Reporting Requirements for Air Releases of Hazardous Substances from Animal Waste at Farms NPRM (Tier 2; SAN 5484)
Date: 05/18/2011 03:28 PM

Hello, Lynn.

Thank you for the updated specific information. My main question was more what Gerain was asking below regarding my general query, were we still going to go with reviewing the doc provided on 5/5/11, given the subsequent cancelling of Options Selection and indication that some reanalysis was occurring for a number of factors (i.e.., did OSWER feel the 5/5/11 DABP reflected enough where you are at now to proceed with reviewing that doc for concurrence?). It is okay if the answer is to proceed as planned for DABP review, just that it may mean more in terms of comment on things that may have undergone some recent shifts in development.

From reading below, it seems the message is to still proceed with review of the DABP provided, so I will continue on that path.

Thank you for addressing my question.

- Walter

Walter J. Cybulski III, Ph D.
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▼ Lynn Beasley---05/18/2011 03:02:30 PM---Hi Walter, Here's what the analysis and options development is looking like now.

From: Lynn Beasley/DC/USEPA/US
To: Gerain Perry/DC/USEPA/US@EPA, Walter Cybulski/DC/USEPA/US@EPA
Cc: Richard Mattick/DC/USEPA/US@EPA, beasley.lynn@epa.gov, Kim Jennings/DC/USEPA/US@EPA, matthiessen.craig@epa.gov
Date: 05/18/2011 03:02 PM
Subject: Re: Fw: Concurrence Requested: Detailed Analytic Blueprint for CERCLA/EPCRA Reporting Requirements for Air Releases of Hazardous Substances from Animal Waste at Farms NPRM (Tier 2; SAN 5484)

Hi Walter,

Here's what the analysis and options development is looking like now.

Regarding *de minimus* thresholds. [redacted]

Regarding the methodology or conversion factors. [redacted]f

[redacted]

Regarding streamlined reporting. [redacted]

Does that help you?

Lynn M Beasley
Regulation and Policy Development Division (5104A)
Office of Emergency Management
Office of Solid Waste and Emergency Response
(202) 564-1965
(202) 309-4538 (cell)
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▼ Gerain Perry---05/18/2011 01:57:29 PM---What response should I give Walter or have you already responded? Thanks. ----- Forwarded by Gera

From: Gerain Perry/DC/USEPA/US
To: Lynn Beasley/DC/USEPA/US@EPA, Richard Mattick/DC/USEPA/US@EPA
Date: 05/18/2011 01:57 PM
Subject: Fw: Concurrence Requested: Detailed Analytic Blueprint for CERCLA/EPCRA Reporting Requirements for Air Releases of Hazardous Substances from Animal Waste at Farms NPRM (Tier 2; SAN 5484)

What response should I give Walter or have you already responded? Thanks.

----- Forwarded by Gerain Perry/DC/USEPA/US on 05/18/2011 01:56 PM -----

From: Gerain Perry/DC/USEPA/US
To: Lynn Beasley/DC/USEPA/US@EPA, Richard Mattick/DC/USEPA/US@EPA
Date: 05/17/2011 09:01 AM
Subject: Fw: Concurrence Requested: Detailed Analytic Blueprint for CERCLA/EPCRA Reporting Requirements for Air Releases of Hazardous Substances from Animal Waste at Farms NPRM (Tier 2; SAN 5484)

I would think you can proceed with the DABP since items are discussed (albeit not in great detailed). The document is a living document and can be modified at any point in time after approval. But it's OEM's call. Let me know and I'll let the folks know.

----- Forwarded by Gerain Perry/DC/USEPA/US on 05/17/2011 08:56 AM -----

From: Walter Cybulski/DC/USEPA/US
To: Gerain Perry/DC/USEPA/US@EPA
Cc: Richard Mattick/DC/USEPA/US@EPA, Lynn Beasley/DC/USEPA/US@EPA
Date: 05/17/2011 08:48 AM

Subject: Re: Concurrence Requested: Detailed Analytic Blueprint for CERCLA/EPCRA Reporting Requirements for Air Releases of Hazardous Substances from Animal Waste at Farms NPRM (Tier 2; SAN 5484)

Hello, Gerain.

I will still proceed with a review due date of 5/25/11 for this ABP, but just wanted to clarify if this ABP will be what OSWER wants to proceed with after the postponement of Options Selection due to reanalysis of a few issues (i.e., setting a "de-minimus" reporting threshold; creating a methodology or conversion factors to calculate emissions for a RQ determination; and how we would streamline reporting requirements). I think a couple of those items being reconsidered are covered by some mention in the current ABP, but how OSWER will potentially go about creating a methodology or conversion factors to calculate emissions for a RQ determination is not (for example, the scientific analysis section does not discuss this aspect and currently says thresholds will not be presented in options). Therefore, I wanted to check if the reanalysis for Options Selection may impact the draft of this ABP in any way as I am proceeding to review and gain concurrence for the current version.

Thank you.

- Walter

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▼ Gerain Perry---05/05/2011 09:55:56 AM---Attached is the detailed analytic blueprint for the CERCLA/ECPRA Reporting Requirements for Air Rele

From: Gerain Perry/DC/USEPA/US
To: Erik Swenson/DC/USEPA/US@EPA, Alicia Kaiser/DC/USEPA/US@EPA, Charlotte Bertrand/DC/USEPA/US@EPA, Robin Dunkins/RTP/USEPA/US@EPA, Bill Schrock/RTP/USEPA/US@EPA, Larry Elmore/RTP/USEPA/US@EPA, Allison Mayer/RTP/USEPA/US@EPA, Sanda Howland/DC/USEPA/US@EPA, Tim Sullivan/DC/USEPA/US@EPA, Kimberly Fedinatz/DC/USEPA/US@EPA, Nina Bonnelycke/DC/USEPA/US@EPA, Walter Cybulski/DC/USEPA/US@EPA, Perry Pandya/R3/USEPA/US@EPA, Bryce Covington/R4/USEPA/US@EPA, Caron Falconer/R4/USEPA/US@EPA, RUTH MCNAMARA/R5/USEPA/US@EPA, Dan Breedlove/R7/USEPA/US@EPA, Alyse Stoy/R7/USEPA/US@EPA, George Hess/R7/USEPA/US@EPA, David Cobb/R8/USEPA/US@EPA, Michael Boydston/R8/USEPA/US@EPA, Jennifer Meints/R8/USEPA/US, Michael Massey/R9/USEPA/US@EPA, Mary Wesling/R9/USEPA/US@EPA, Suzanne Powers/R10/USEPA/US@EPA, Nicholas Peak/R10/USEPA/US@EPA
Cc: Lynn Beasley/DC/USEPA/US@EPA, Kim Jennings/DC/USEPA/US@EPA, Craig Matthiessen/DC/USEPA/US@EPA, Peter Oh/DC/USEPA/US@EPA, MaryAnn Petrole/DC/USEPA/US@EPA, Dana Tulis/DC/USEPA/US@EPA, Patrick Easter/DC/USEPA/US@EPA, Kawana Cohen-Hopkins/DC/USEPA/US@EPA, Richard Mattick/DC/USEPA/US@EPA, Sicy Jacob/DC/USEPA/US@EPA, Marilyn Kuray/DC/USEPA/US@EPA, Grant MacIntyre/DC/USEPA/US@EPA, Lesley Schaaff/DC/USEPA/US@EPA, Stuart Miles-McLean/DC/USEPA/US@EPA, Wanda Farrar/DC/USEPA/US@EPA, Tom Eagles/DC/USEPA/US@EPA, Gerard Kraus/DC/USEPA/US@EPA, Loan

Nguyen/DC/USEPA/US@EPA, Lynne Davies/DC/USEPA/US@EPA, Sandy Evalenko/DC/USEPA/US@EPA, Katharine Dowell/DC/USEPA/US@EPA, Robert Fegley/DC/USEPA/US@EPA, Stephen Watkins/DC/USEPA/US@EPA, Rita Tate/R3/USEPA/US@EPA, Maryanne Ruiz/R3/USEPA/US@EPA, Michelle Boyd/R4/USEPA/US@EPA, Annette Hill/R4/USEPA/US@EPA, Robert Tolpa/R5/USEPA/US@EPA, Rita Culp/R5/USEPA/US@EPA, Alice Todd/R7/USEPA/US@EPA, Sonya Moore/R8/USEPA/US@EPA, Kathy Meltzer/R9/USEPA/US@EPA, Andrea Westenberger/R10/USEPA/US@EPA, StephanieN Brown/DC/USEPA/US@EPA, Matt Straus/DC/USEPA/US@EPA, Barbara Hostage/DC/USEPA/US@EPA, Sue Priftis/DC/USEPA/US@EPA
Date: 05/05/2011 09:55 AM
Subject: Concurrence Requested: Detailed Analytic Blueprint for CERCLA/EPCRA Reporting Requirements for Air Releases of Hazardous Substances from Animal Waste at Farms NPRM (Tier 2; SAN 5484)

Attached is the detailed analytic blueprint for the CERCLA/ECPRA Reporting Requirements for Air Releases of Hazardous Substances from Animal Waste at Farms NPRM (Tier 2, SAN 5484). Please provided your AA/RA-level concurrence to me (cc Lynn Beasley and Richard Mattick) by no later than 5/25 (sooner would be great!). For the detailed analytic blueprint stage, only two levels of concurrences are possible: concur or concur with comment. Attached also are: (1) a list of people who have been delegated to concur for the AA/RA on detailed analytic blueprint; (2) workgroup list; and (3) a redlined/strikeout version of latest changes.

Let me know if you have any questions or concerns. Thanks.

[attachment "AnalyticBluePrint-CERCLA-EPCRA-ReportingRequirements-Farm-FINAL.docx" deleted by Walter Cybulski/DC/USEPA/US]

[attachment "Designees for Concurring on Detailed Analytic Blueprint.docx" deleted by Walter Cybulski/DC/USEPA/US]

[attachment "Workgroup.xls" deleted by Walter Cybulski/DC/USEPA/US]

[attachment "AnalyticBluePrint-CERCLA-EPCRA-ReportingRequirements-Farm-FINAL-redline.docx" deleted by Walter Cybulski/DC/USEPA/US]

Gerain H. Perry,
OSWER's Regulatory Steering Committee Representative

Regulatory Management Team Leader
Policy Analysis and Regulatory Management Staff (PARMS),
Office of Program Management (OPM),
Office of Solid Waste and Emergency Response (OSWER)

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