

May 17, 2018

The Honorable E. Scott Pruitt
Administrator, U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Public hearing and comment period extension request for proposed rulemaking–
Strengthening Transparency in Regulatory Science- Docket ID No. EPA-HQ-OA-2018-0259

Dear Administrator Pruitt:

The National Association of County and City Health Officials respectfully requests the U.S. Environmental Protection Agency hold a public hearing and extend the comment deadline to July 30, 2018, specifically 60 days after the current May 30, 2018, comment deadline on the proposed rule, “Strengthening Transparency in Regulatory Science” -- Docket ID No. EPA-HQ-OA-2018-0259.

Under the Clean Air Act, EPA must hold a public hearing on this proposal because of the significant impact this rule could have on a wide range of public health safeguards. The proposal would amend the substantive, long-followed standards for decision-making for a host of actions covered by Clean Air Act section 307 (d). Those actions include review of the National Ambient Air Quality Standards (section 307 (d)(1)(A)); residual risk determinations for hazardous air pollutants (section 307 (d) (1)(C)); standards for mobile source air toxics (section 307 (d)(1)(K)), and residual risk standards for municipal solid waste combustors (section 307 (d)(1)(D)). Therefore, Clean Air Act sections 307 (d)(5)(ii) and (iv) require the Administrator to hold a public hearing on his proposal and to keep the record open for an additional thirty days after the hearing “to provide an opportunity for submission of rebuttal and supplementary information.”

Further, NACCHO requests that EPA extend the public comment deadline to July 30, 2018. Under the current comment timeline, NACCHO and other commenters will have difficulty completing detailed comments that fully analyze the proposal, respond to the technical and scientific questions and address these far-reaching and long-lasting adverse impacts of this rule



on the nation's air quality. Furthermore, a major federal holiday falls during the comment period that will limit the time available to review and comment.

Moreover, EPA has failed to publicly share a regulatory impact analysis, which is necessary to determine the impacts of the proposal. In light of the significant public health ramifications of the proposal and the challenge of the brief comment period, we respectfully request that the comment period be extended until July 30, 2018 to permit all stakeholders to provide comments on this proposal.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Lori Tremmel Freeman". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Lori Tremmel Freeman
Chief Executive Officer

cc:

Jennifer Orme-Zavaleta, EPA Science Advisor, U.S. Environmental Protection Agency

Matthew Z. Leopold, General Counsel, U.S. Environmental Protection Agency

Tom Sinks, Office of the Science Advisor, U.S. Environmental Protection Agency