

Harold P. Wimmer  
National President and  
CEO

May 3, 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 American Lung Association 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, we request EPA to extend the public comment deadline to July 30, 2018. Under the current comment timeline, we and other commenters will have difficulty completing detailed comments that fully analyze the

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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, we note that EPA has failed to complete a regulatory impact analysis that explains the impacts of the proposal. Absent such analysis, we will have to pursue our own efforts to understand the anticipated implications of the proposal. That will require additional time to complete.

In light of the significant public health ramifications of the proposal and the challenge of the brief comment period with the proposal publication in the April 30, 2018 Federal Register, 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 that reads "Harold Wimmer". The signature is written in a cursive style and is placed on a light gray rectangular background.

Harold P. Wimmer  
National President and CEO

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