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July 30, 2008

Air Docket

U.S. Environmental Protection Agency

Attention Docket ID No. EPA-HQ-OAR-2006-0735

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1200 Pennsylvania Avenue, NW

Washington, DC 20460

To Whom It May Concern:

The National Association of Clean Air Agencies (NACAA) is pleased to submit these comments on the U.S. Environmental Protection Agency's (EPA's) Proposed Rule to Revise the Lead National Ambient Air Quality Standards (NAAQS) ("Lead NAAQS Proposal"), as published in the *Federal Register* on May 20, 2008 (73 *Federal Register* 29184). NACAA is an association of air pollution control agencies in 53 states and territories and over 165 metropolitan areas across the country.

NACAA urges EPA to follow the science and incorporate the views of the Clean Air Scientific Advisory Committee (CASAC), which was clear in stating that the lead NAAQS should be strengthened significantly. We are also concerned about flaws in EPA's new NAAQS review process, which eliminates the EPA staff paper containing policy-relevant analyses of the science and presenting options for revising the standard, and does not afford CASAC the opportunity to make its recommendations on the NAAQS until late in the process.<sup>1</sup> Our comments also address monitoring and implementation issues associated with revising the lead NAAQS.

<sup>1</sup> Under EPA's new NAAQS review process, the EPA staff paper is eliminated and CASAC is not given an opportunity to present its views on the level of the standard until after EPA releases an Advanced Notice of Proposed Rulemaking.

## Health Effects

Lead is linked to a broad array of serious adverse health effects in adults and children. As noted by CASAC, “[d]espite dramatic decreases in amounts of airborne lead exposures and human-population blood-lead concentrations following the phase-out of leaded gasoline, lead toxicity remains a major public health problem.”<sup>2</sup> EPA has identified “[n]eurological, hematological and immune effects in children and neurological, hematological, cardiovascular and renal effects in adults” at blood lead levels near or below 10 micrograms per deciliter ( $\mu\text{g}/\text{dL}$ ).<sup>3</sup> Epidemiological studies in children exposed to lead have shown decreases in IQ levels and effects on attention, executive functions, language, memory, learning and visuospatial processing.<sup>4</sup> As indicated in the Final EPA Staff Paper and supported by the Criteria Document, “there is now no recognized safe level of Pb [(lead)] in children’s blood and studies appear to show adverse effects at mean concurrent blood Pb levels as low as 2  $\mu\text{g}/\text{dL}$ .”<sup>5</sup> The greatest benefit to public health in terms of reducing exposure and the effects of lead on human health “will be realized by broad decreases in airborne lead concentrations across the U.S. population,” according to CASAC.<sup>6</sup> This is because lead exposure is cumulative, airborne lead exposure is widespread and the adverse consequences of lead are proportionately greater at the lowest increment of lead exposure (so the lower the level, the greater the improvement in public health proportionally).<sup>7</sup>

## EPA’s Proposal

### Proposed Level for the Primary Lead NAAQS

EPA is proposing to lower the lead NAAQS, which was set in 1978, from 1.5 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) to between 0.10-0.30  $\mu\text{g}/\text{m}^3$ . EPA’s proposal differs from CASAC’s recommendation, in that CASAC recommended that the standard be significantly lowered, with an upper bound of 0.2  $\mu\text{g}/\text{m}^3$ .<sup>8</sup> Given CASAC’s role as expert scientific advisers in setting the NAAQS, we question why EPA has once again deviated from CASAC’s recommendations on the level of the NAAQS.

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<sup>2</sup> Letter from Dr. Rogene Henderson, CASAC Chair, to the Honorable Stephen L. Johnson regarding CASAC’s Review of the 1<sup>st</sup> Draft Lead Staff Paper and Draft Lead Exposure and Risk Assessments, (EPA-CASAC-07-003) (Mar. 27, 2007) at 5.

<sup>3</sup> Lead NAAQS Proposal at 29198.

<sup>4</sup> Id.

<sup>5</sup> EPA Final OAQPS Lead Staff Paper, (EPA-452/R-07-013) (November 2007) at 5-17 and EPA Air Quality Criteria for Lead, (EPA/600/R-5/144aF) (2006) at 6-31 to 6-32.

<sup>6</sup> Henderson letter of Mar. 27, 2007, *supra* note 2, at 5.

<sup>7</sup> Id.

<sup>8</sup> Letter from Dr. Rogene Henderson, CASAC Chair, to the Honorable Stephen L. Johnson regarding CASAC’s Review of the Advanced Notice of Proposed Rulemaking (ANPR) for the NAAQS for Lead, (EPA-CASAC-08-007) (Jan. 22, 2008) at 1. This recommendation was tied to a monthly averaging time, which will be addressed later.

EPA says it selected the range of 0.10-0.30  $\mu\text{g}/\text{m}^3$  because it is “consistent with [the Administrator’s] target for protection from air-related IQ loss in children.”<sup>9</sup> In its proposal, EPA concludes that “an air-related population mean IQ loss within the range of 1 to 2 points could be significant from a public health perspective, and that a standard level should be selected to provide protection from air-related population mean IQ loss in excess of this range.”<sup>10</sup> However, CASAC said that it considers a population loss of 1-2 IQ points “highly significant” and thus “the primary lead standard should be set so as to protect 99.5% of the population from exceeding that IQ loss.”<sup>11</sup> In other words, CASAC did not recommend selecting a NAAQS that would *achieve* a mean IQ loss of 1-2 points; rather, it said that such a substantial IQ loss should be avoided.<sup>12</sup> Yet EPA appears to believe such an IQ loss across the entire U.S. population is acceptable because the agency says the NAAQS level “should be selected to provide protection from air-related population *mean* IQ loss *in excess of*’ 1-2 IQ points.”<sup>13</sup> Even using EPA’s own faulty metric, EPA’s estimates of air-related population mean IQ loss for children showed more than a 1-2 IQ point loss at a standard of 0.30  $\mu\text{g}/\text{m}^3$ .<sup>14</sup> Furthermore, as CASAC highlighted, if a loss of one IQ point in mean IQ levels were to be considered a significant loss to be prevented, EPA’s analysis would point to a range of proposed standards between 0.05 and 0.2  $\mu\text{g}/\text{m}^3$ .<sup>15</sup>

Furthermore, EPA’s upper bound for the lead NAAQS is only justified if one relies on outdated assumptions and information. In the Lead NAAQS Proposal, EPA states that the upper bound of the proposed range for the lead NAAQS is justified if one places “more weight on a [concentration-response (C-R)] function with a *shallower* slope” or on a *lower* air-to-blood ratio.<sup>16</sup> CASAC notes that the shallow-slope C-R functions and lower air-to-blood ratios are “based on analyses of populations exposed to much higher air Pb concentrations and exhibiting much higher blood Pb levels than is appropriate for current U.S. populations and the levels under consideration for a revised Lead NAAQS.”<sup>17</sup> With respect to the slope of the C-R function, CASAC recommended using a *steeper* slope because this better reflects the current, lower blood lead levels for children in the U.S.<sup>18</sup> EPA’s own proposal also supports use of a steeper slope: “The current epidemiological evidence indicates a steeper slope of the blood [lead] concentration-response relationship at lower blood [lead] levels, particularly those below 10  $\mu\text{g}/\text{dL}$ .”<sup>19</sup> With respect to air-to-blood ratios, EPA’s analysis assumed air-to-blood ratios of 1:3

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<sup>9</sup> Lead NAAQS Proposal at 29243.

<sup>10</sup> *Id.* at 29242.

<sup>11</sup> Henderson letter of Mar. 27, 2007, *supra* note 2, at 6.

<sup>12</sup> Letter from Dr. Rogene Henderson, CASAC Chair, to the Honorable Stephen L. Johnson, “CASAC Comments and Recommendations Concerning the Proposed Rule for the Revision of the National Ambient Air Quality Standards for Lead,” (EPA-CASAC-08-016) (July 18, 2008), at 6.

<sup>13</sup> Lead NAAQS Proposal at 29242 (emphasis supplied).

<sup>14</sup> *Id.* at 29239.

<sup>15</sup> Henderson letter of July 18, 2008, *supra* note 12, at 6.

<sup>16</sup> Lead NAAQS Proposal at 29243 (emphasis supplied).

<sup>17</sup> Henderson letter of July 18, 2008, *supra* note 12, at 5.

<sup>18</sup> *Id.* at 6.

<sup>19</sup> Lead NAAQS Proposal at 29206, quoting the Criteria Document.

to 1:7, yet CASAC recommends that EPA use an air-to-blood ratio of 1:9 or 1:10 “as being most reflective of current conditions.”<sup>20</sup> Furthermore, the Children’s Health Protection Advisory Committee advised using a higher air-to-blood ratio as well, noting that “a higher ratio of blood lead to air lead has been observed in children at lower air lead concentrations.”<sup>21</sup>

Accordingly, as with previous NAAQS, NACAA urges EPA to set the primary NAAQS within CASAC’s recommended range, with an upper bound no higher than 0.2  $\mu\text{g}/\text{m}^3$ .

### Averaging Time and Form

EPA presents two options for averaging time: retaining the current form of maximum quarterly average or shifting to a monthly averaging time and using the second highest monthly average over 3 years. CASAC recommended a monthly averaging time because monthly averaging is “more protective of human health [than quarterly averaging] in light of the response of blood lead concentrations that occur at sub-quarterly time scales.”<sup>22</sup> With regard to the form, CASAC believes that a monthly or “rolling” 30-day averaging time with a “not to be exceeded” form would be more protective against adverse short-term effects than a form, such as a “second-highest month in three years,” that periodically allows a month of exposures to much higher concentrations.<sup>23</sup>

NACAA again urges EPA to follow CASAC’s recommendation and use a monthly averaging time, and to consider promulgating a rolling 30-day averaging time with a “not to be exceeded” form.

### Indicator

In its proposal, EPA retains the current indicator of Pb-TSP, but expands the measurements accepted for determining attainment or nonattainment of the Pb NAAQS to allow Pb-PM<sub>10</sub> data, with application of scaling factors.<sup>24</sup> NACAA disagrees, and instead recommends that EPA revise the lead NAAQS indicator to rely on low-volume PM<sub>10</sub> samplers, which measure far more accurately than high-volume TSP samplers.<sup>25</sup> A majority of the members of

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<sup>20</sup> Henderson letter of July 18, 2008, *supra* note 12, at 5.

<sup>21</sup> Letter from Melanie A. Marty, Chair of the Children’s Health Protection Advisory Committee, to Administrator Stephen Johnson (June 16, 2008) at pp 1-2. The Committee also said “there is a steeper dose-response curve for children’s neurological effects at lower levels of exposure.”

<sup>22</sup> *Id.*

<sup>23</sup> Henderson letter of July 18, 2008, *supra* note 12, at 8.

<sup>24</sup> Lead NAAQS Proposal at 29234.

<sup>25</sup> EPA itself notes the difficulties with Pb-TSP samplers, stating in the Lead NAAQS Proposal, “...the agency recognizes the body of evidence indicating that the high-volume Pb-TSP sampling methodology contributes to imprecision in resultant Pb measurements... [and] the measured values from a high-volume TSP sampler may differ substantially, depending on wind speed and direction, for the same actual ambient concentration of Pb-TSP” (Lead NAAQS Proposal at 29231).

CASAC's Ambient Air Monitoring and Methods Subcommittee (AAMM) has also supported low-volume PM<sub>10</sub> sampling for lead.<sup>26</sup> Although we continue to believe that a PM<sub>10</sub> indicator should replace the TSP indicator, our previous position must be modified in light of the levels of the standard set by EPA in the Lead NAAQS Proposal. Specifically, we support CASAC's conclusion in its July 8, 2008 letter, which stated:

“...these recommendations [of a PM<sub>10</sub> indicator] were based, in part, on an *assumption* that the level of the primary Pb NAAQS would be ‘substantially’ lowered to the EPA Staff-recommended range (with a TSP indicator) of between 0.1 to 0.2 µg/m<sup>3</sup> as an upper bound and 0.02 to 0.05 µg/m<sup>3</sup> as a lower bound... However, since with the publication of this proposed rule for the revision of the Lead NAAQS, the Agency now appears to disagree with previous staff recommendations—as well as those of the CASAC and the ‘overwhelming majority’ of the public—and is considering an upper bound of 0.3 µg/m<sup>3</sup> and possibly as high as 0.5 µg/m<sup>3</sup>, a transition from TSP to PM<sub>10</sub> at these much less protective upper levels of the proposed range could represent a critical weakening of the health protection afforded at the level of the standard that the CASAC proposed.”(Emphasis in original)<sup>27</sup>

NACAA urges EPA to adopt CASAC's recommendations in its final rule. If EPA selects a level of the standard within CASAC's (and NACAA's) recommended range (i.e., below 0.2 µg/m<sup>3</sup>), the rule should require a transition to a PM<sub>10</sub> indicator. If, however, EPA ignores these recommendations and sets a standard at the upper range of its proposal (e.g., 0.2 µg/m<sup>3</sup> or higher, the association urges that the current TSP indicator not be changed, since a weaker standard measured by low-volume PM<sub>10</sub> sampling would likely result in ultra-coarse lead escaping measurement and control. For the next review, NACAA encourages EPA to develop datasets that will improve understanding of the relationship between Pb-PM<sub>10</sub> emissions that have been collected by low-volume samplers and Pb-TSP.

If EPA keys the indicator to the level of the standard, as suggested above, NACAA believes no scaling factors will be necessary. As emphasized in CASAC's January 22, 2008 letter, a scaling is equivalent to fitting “good data to bad.”<sup>28</sup> Moreover, the members of the AAMM who addressed this issue in their comments also did not support scaling factors.

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<sup>26</sup> Dr. Armisted (Ted) Russell, Chair CASAC AAMM Subcommittee, transmitting the individual views of AAMM members to the Honorable Stephen L. Johnson in response to EPA's request for a consultation on ambient air monitoring issues related to the lead NAAQS (April 14, 2008); also, in a March 25, 2008 teleconference consultation, the majority of the AAMM supported a transition from TSP to low-volume PM<sub>10</sub> sampling for lead.

<sup>27</sup> Henderson letter of July 18, 2008, *supra* note 12, at 7.

<sup>28</sup> Henderson letter of Jan. 22, 2008, *supra* note 8, at 11. *See also* Russell letter, April 14, 2008, *supra* note 26; comments of Dr. Barbara Zielinska at B-57 (“I am not in favor of scaling.”); Mr. George Allen at B-3; (“I am not in favor of any ‘scaling’ approach.”); Mr. Dirk Felton at B-27 (“Scaling PM10 data is not necessary.”); Dr. Phil Hopke at B-34 (“It is always risky to ‘scale’ data when it is possible to directly measure a quantity of interest.”); Dr. Kazuhiko Ito at B-38 (“I feel a bit uncomfortable using scaling factors [for non-source monitoring]”); Dr. Donna Kenski at B-42 (“I don't think the data should be scaled...the standard should be set for Pb-Pm10 at a level that is sufficiently protective...”); and Dr. Armisted Russell at B-45 (“...along with a tighter standard, scaling is not needed.”).

NACAA believes that using scaling factors to designate areas as attainment or nonattainment would be difficult to defend, both to the general public and to the regulated community.

### Funding Issues

NACAA urges EPA to provide adequate federal funding for the expanded monitoring network that is likely to be necessary to support the revised lead NAAQS. As noted by CASAC, the current lead monitoring network consists of 189 sites.<sup>29</sup> EPA's preliminary planning indicates that the agency envisions deployment of approximately 533 additional source- and population-oriented monitors at a total cost of approximately \$9.5 million.<sup>30</sup> Our assessment, however, is that actual costs are apt to be significantly higher. States and localities utilizing lead emissions data from the Toxics Release Inventory—which has a reporting threshold of 100 lb/year—are identifying far greater numbers of lead sources than are identified using the National Emissions Inventory, which has a reporting threshold of 5 tons per year. Moreover, the ongoing expenditures necessary to operate and maintain the new network have been seriously underestimated. At any rate, one thing is clear: An expanded lead monitoring network must be federally funded at requisite levels. State and local air agency budgets have been generally flat for a number of years, with some agencies struggling to match funds to support core programs. Without additional funding for lead monitoring, provided under Section 103 of the Clean Air Act so that matching funds are not required, many agencies will be unable to fulfill this new responsibility. And, without an adequate monitoring network to determine compliance, the new standards will be meaningless.

EPA's proposed source monitoring for lead facilities emitting above a certain threshold will pose particular funding problems for state and local air agencies. Permitting authorities will be required by this rule to monitor facilities that emit lead at levels proposed to be between 200 and 600 kilograms (kg) per year. NACAA believes that particular challenges will be posed by the fact that the vast majority of the lead monitoring network will measure emissions from lead sources. This will not be a static network. Rather, facilities' lead emissions will invariably fluctuate in response to production levels, market conditions, and other variables. It will be necessary to initiate monitoring when new sources are constructed, and when sources that had been below the emissions threshold step up production or add new units. Under these circumstances, it is crucial that funding levels take into account the fact that states and localities will need to track startups and shutdowns, and to deploy and maintain lead monitors on an ongoing, as-needed basis for new or expanding sources of lead emissions.

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<sup>29</sup> Letter from Dr. Rogene Henderson, CASAC, Chair, to the Honorable Stephen L. Johnson, "CASAC Review of the 2nd Lead Human Exposure and Health Risk Assessments Document," (September 27, 2007) at 3.

<sup>30</sup> Kevin Cavender, Memorandum to the Lead NAAQS Review Docket, EPA-HQ-OAR-2006-0735, "Corrected Cost Estimates for the Lead Monitoring Network Associated with the Proposed Revisions to the Lead NAAQS and Monitoring Requirements" (May 16, 2008). This figure is based on a 0.1µg/m<sup>3</sup> level.

## Proposed Level for the Secondary NAAQS

CASAC unanimously recommended that the secondary standard be “substantially lowered to a level at least as low as the recommended primary NAAQS for Lead.”<sup>31</sup> While CASAC notes that EPA’s staff paper and risk/exposure assessments do not provide a quantitative basis for a specific number for the secondary NAAQS, CASAC stated that “there are no reasons to expect that humans are uniquely sensitive to lead pollution among the millions of animal and plant species” and so the secondary standard should be at least as low as the lowest-recommended primary standard.<sup>32</sup> Therefore NACAA recommends, consistent with CASAC, that the secondary standard be lowered significantly, to a level at least as low as CASAC’s recommended primary NAAQS for lead.

## Implementation

The usual agency practice for revising the NAAQS has been to first promulgate a rule setting the health- and welfare-based standards, and then to promulgate a rule that addresses the numerous implementation issues relating to the rule, including network design and cost, monitoring methods, sampling frequencies and other technical and cost-related matters. The Lead NAAQS Proposal, however, lumps together these two rules into one compressed rule. Although, theoretically, this two-in-one rule approach could benefit states and localities – preventing the frustrating delays of the PM<sub>2.5</sub> and 8-hour ozone implementation rules – the lead implementation provisions in the proposed rule are insufficient to give state and local agencies adequate guidance. It is not evident that an attempt has been made to update lead control strategy documents. Those documents referenced in the proposed rule date to the early 1990s; and no guidance on lead emissions inventory development is included. EPA must provide, in a timely manner, further details on how the new lead NAAQS are to be implemented. Otherwise, states and localities will be left with little meaningful guidance on how to achieve the new standards.

Furthermore, once the lead NAAQS are promulgated, we will need EPA to work closely with states and localities to help regulate the major sources of lead, including leaded aviation gas; industrial, commercial, institutional, and process boilers; utility boilers; iron and steel foundries; and primary lead smelting.<sup>33</sup> One source in particular – leaded aviation gasoline – can only be regulated by the federal government.

In addition, we urge that EPA allow considerable flexibility in implementing the standard. EPA has proposed that monitoring be required “near Pb emission sources such as Pb

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<sup>31</sup> Henderson letter of Jan. 22, 2008, *supra* note 8, at 1.

<sup>32</sup> Henderson letter of Mar. 27, 2007, *supra* note 2, at 9.

<sup>33</sup> These are the major sources of lead as listed in EPA’s 2002 National Emissions Inventory. Lead NAAQS Proposal at 29190.

smelters, metallurgical operations, battery manufacturing, and other source categories that emit Pb...[at levels of] 200 kg—600 kg per year total, including point, area, and fugitive emissions...”<sup>34</sup> The agency has acknowledged that “the health evidence indicates that Pb in all particle size fractions, not just respirable Pb, contributes to Pb in blood and to associated health effects.”<sup>35</sup> NACAA strongly supports CASAC in advocating a standard below 0.2 µg/m<sup>3</sup> coupled with Pb-PM<sub>10</sub> monitoring. EPA should, however, allow permitting authorities to make sampler decisions that best capture and measure the particle fraction of concern in a given area if a higher level is promulgated. If, for example, a TSP indicator accompanying a higher-end standard is chosen, permitting authorities may nonetheless be able to demonstrate that a PM<sub>10</sub> sampler is most accurate and appropriate for population-based monitoring in an area having no lead sources of concern—and no ultra-coarse particles. Moreover, if a TSP indicator accompanied by a higher-end standard is chosen, many parts of the country can be anticipated to be significantly below such a standard. In areas where monitored levels of lead will be 50- to 60-percent of a standard of 0.2 µg/m<sup>3</sup> or above, state and local agencies should have the flexibility to utilize other sampling methodologies, such as PM<sub>10</sub>, for screening purposes. In sum, NACAA urges EPA to provide for regulatory flexibility in implementing the monitoring provisions of the standard so as to best measure lead and protect public health.<sup>36</sup>

#### New NAAQS Review Process

NACAA is also concerned about flaws in EPA’s new NAAQS review process, which eliminates development of EPA staff papers that historically contained useful, policy-relevant analyses of the science and presented options for revising the standard. The new process fails to solicit CASAC’s views until publication of the Advance Notice of Proposed Rulemaking (ANPR) – seriously undermining CASAC’s role in the process. In addition, without the EPA staff paper, CASAC “would not have had the data and supporting analyses *necessary* to make scientifically-informed recommendations to the EPA Administrator concerning the adequacy and basis of the Lead NAAQS, as required by the Clean Air Act.”<sup>37</sup> We agree with CASAC that the ANPR for the lead NAAQS represented “a remarkable weakening of the scientific foundation of the NAAQS review process.”<sup>38</sup> NACAA strongly urges that EPA reinstate the former process.

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<sup>34</sup> Id. at 29263.

<sup>35</sup> Id. at 29231.

<sup>36</sup> A presentation given by NACAA/EPA Monitoring Steering Committee members Dirk Felton, Charles Pietarinen and MaryAnn Heindorf titled “Sensible Lead Monitoring,” (June 19, 2008), which advocates flexibility in lead monitoring is available on NACAA’s web site, [www.4cleanair.org](http://www.4cleanair.org).

<sup>37</sup> Henderson letter of Jan. 22, 2008, *supra* note 8, at 3.

<sup>38</sup> Id. CASAC also criticized the new process in its entirety, stating that it appears to be “ever-shifting” and tends to conceal the Agency’s underlying scientific analyses from its own, statutorily-mandated scientific advisory body.” Henderson letter of July 18, 2008, *supra* note 12, at 3.

## Conclusion

NACAA supports CASAC's recommendation that the primary lead NAAQS be set in a range with an upper bound no higher than  $0.2 \mu\text{g}/\text{m}^3$ , utilizing a monthly averaging period. In addition, we recommend that the secondary lead standard be set at a level no less stringent than the primary standard. As to an indicator, if EPA chooses a standard towards the upper end of its range, NACAA recommends using TSP; if, however, the level chosen is below  $0.2 \mu\text{g}/\text{m}^3$ , the rule should require a transition to a  $\text{PM}_{10}$  indicator. Adequate federal funding must be provided for the new lead monitoring network that will be required and enhanced implementation guidance must be developed expeditiously by EPA.

If you have questions or desire additional information, please do not hesitate to contact us.

Sincerely,



Andrew Ginsburg  
Oregon  
Co-President of NACAA



Ursula Kramer  
Pima County, Arizona  
Co-President of NACAA