

January 25, 2024

Joseph Goffman  
Principal Deputy Assistant Administrator  
Office of Air and Radiation  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Subject: Request for 30-Day Extension of Comment Period on EPA's Draft New Exceptional Events Implementation Tools (EPA Docket ID No. EPA-HQ-OAR-2023-0586)

Dear Mr. Goffman:

The National Association of Clean Air Agencies (NACAA)<sup>1</sup> respectfully requests a 30-day extension – until Monday, March 4, 2024 – of the deadline for submitting comments to EPA on the agency's recently released draft new exceptional events (EE) implementation tools: 1) a series of data visualization tools to help agencies identify event-influenced PM<sub>2.5</sub> data most likely to have regulatory significance and 2) a "tiering" document to assist agencies in determining how much evidence is appropriate to support the 2016 EE Rule's "clear causal relationship" criterion for an EE demonstration related to wildland fires and PM<sub>2.5</sub>. This additional time is necessary to allow state and local air agencies to thoroughly review the draft tools and develop informed comments.

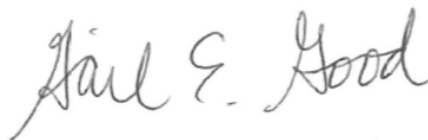
EPA released the draft tools online on Thursday, January 11, 2024, for presentation on a one-hour informational webinar held that day, and requested comments be submitted by February 2, 2024 (22 days later). Effectively addressing EEs is an important issue for state and local air agencies. We are hopeful EPA's new tools will be helpful to our efforts. In order to assess the draft tools and provide input to EPA on their usefulness, however, our members require adequate time.

Thank you for your consideration of this request for 30 additional days to comment. If you have any questions, please contact either of us or Nancy Kruger, NACAA's Deputy Director.

Sincerely,



Wayne Natri  
(Los Angeles, CA)  
Co-Chair  
NACAA Criteria Pollutants Committee



Gail Good  
(Wisconsin)  
Co-Chair  
NACAA Criteria Pollutants Committee

cc: Tomás Carbonell (EPA OAR)  
Peter Tsigotis (EPA OAR OAQPS)  
Scott Mathias (EPA OAR OAQPS AQPD)  
Richard Wayland (EPA OAR OAQPS AQAD)

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<sup>1</sup> NACAA is the national, nonpartisan, nonprofit association of 157 air pollution control agencies in 40 states, including 117 local air agencies, the District of Columbia and five territories.