



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JAN 3 2008

DEPUTY ADMINISTRATOR

**MEMORANDUM**

**SUBJECT:** Policy Assessment

**FROM:** Marcus Peacock

A handwritten signature in black ink that reads "Marcus Peacock".

**TO:** Dr. Rogene Henderson

I wanted to follow-up on the meeting you hosted with myself and members of the Clean Air Scientific Advisory Committee (CASAC) on December 12, 2007. At that meeting I understood that some of the members of CASAC felt that the recent Advanced Notice of Proposed Rulemaking (ANPR) regarding the Lead National Ambient Air Quality Standards (NAAQS) provided less science, information and transparency than they had expected. They were concerned, in particular, that this indicated future Policy Assessments released as ANPRs would have similar problems.

I share this concern. The ANPRs are supposed to provide greater transparency regarding the options being considered by EPA policymakers and should certainly not be perceived as offering less scientific data or information than is necessary for the Administrator to make a decision or for the CASAC to provide a recommendation. I am pleased to note that the other changes we have made to the NAAQS process such as initiating scientific workshops earlier in the process and producing an integrated science assessment seem to be going well. That means we can focus more attention on this one remaining issue.

As noted at the meeting, the juxtaposition of the lead Staff Paper and ANPR provide an opportunity for us to make sure future Policy Assessments are better than this one. In particular, I would like your assistance in having CASAC answer the following four questions:

1. What scientific information or data that was in the Staff Paper were missing or not explained in the ANPR or Exposure/Risk Assessment?
2. Were CASAC's comments and recommendations inadequately presented in the ANPR? If so, how could this be remedied?
3. Are there any specific changes to the organization or form of the ANPR that would make it better?

4. Should the ANPR only present options that are within a range of options the majority of CASAC members have recommended?

Thanks for your attention to this matter. I look forward to providing more specific direction on how we produce future Policy Assessments.

cc: Vanessa Vu  
Robert Meyers  
George Gray