

Best Communication Practices for Preparation of Exceptional Event Demonstrations

OAQPS developed this document of Best Practices based on input received from EPA regional offices and selected state/local air agencies who submitted Exceptional Event Demonstrations under the 2007 version of the Exceptional Events Rule (EE Rule). After promulgation of revisions to the 2007 EE Rule, this document will be updated to conform to the revised Exceptional Events Rule.

EPA regional offices and state air agencies may find that using the following communication practices between all staff involved in such work will provide for efficient preparation and review of Exceptional Events demonstrations (demonstrations). This document is not intended to reflect the best practices for technical analyses specifically, as we include those in the guidance documents for each event type.

On a regular and mutually agreed upon frequency, EPA regional offices and their air agencies should communicate at the following stages of demonstration development and submission.

Before the air agency begins work to develop its next exceptional event demonstration(s):

- Discuss and document which flagged monitoring sites and days will become the subject of demonstrations based on summary information for each event.
- Discuss and document the current or potential regulatory significance of these days, including when their regulatory significance or non-significance will become clear – if not already known.
- Discuss the level of effort and types of analyses to be included in each demonstration.
- Discuss the timing of the submissions and the expected response times from the EPA regional office in light of the office's prioritization of work.
- Verify a shared understanding of rule and guidance provisions applicable to the event type(s) under consideration.
- Understand key data and analyses that were successful in obtaining EPA approval of previous demonstrations for those event type(s).

During development of demonstrations:

- Share early drafts of data, analysis, and narrative in time to provide the EPA regional office with time for review and feedback.

After submission:

- Confirm how the EPA regional office will keep the state air agency informed of the progress of EPA's review.
- Discuss and confirm which demonstrations still have regulatory significance, and which ones have "aged out".
- Discuss and understand the policy and technical reasons for the EPA regional office not being able to act on a submission.

After EPA action on Exceptional Event demonstrations:

- Discuss elements of the process that should be continued and those that need to be improved.
- Understand which information was useful for EPA's action and which information was extraneous.