




## Document Details

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## Submitter Info

**Comment:** 2009 December EPA published its Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act. BUT scientific basis for EPAs finding, assessments was conducted by other organizations. EPA reliance on the IPCC is an international body outside the jurisdiction and oversight of the United States Congress. is A VIOLATION of the Data Quality Act. Flawed reports that created regulation cost in the Billions on Middle Americas Children, the poor, the Elderly, money that could have been spent on Healthcare, schools, infrastructure, Dams, Roads. EPA Inspector Generals investigating DATA QUALITY PROCESSES (2011), Conclusions the endangerment finding Technical support document is a highly influential scientific assessment that should have been peer reviewed as outlined in Section III of Office of Management and Budget Final Information Quality Bulletin for Peer Review. EPA Office of Air and Radiation NEVER formally designated the document as either influential scientific information or as a highly influential scientific assessment in the preamble to the proposed and final endangerment findings or in its internal documentation. EPA did NOT consider the Technical support document to be a highly influential scientific assessment. EPA Office of Air and Radiation did not adhere to some of its internal processes established to guide Tier 1 actions. EPA did NOT complete some of these key requirements and recommended actions. EPA relied upon descriptions of other organizations information quality processes. NO contemporaneous documentation was available to show what analyses EPA conducted prior to dissemination of the information in its advance notice and proposed action. EPA guidance for assessing outside sources of data does NOT include procedures for conducting these assessments or require the Agency to document its assessments. EPA document does NOT identify specific steps or procedures EPA personnel should use in determining whether scientific and technical information is of acceptable quality, EPA does NOT identify the documentation requirements for these determinations. EPA did not contemporaneously document how it applied and considered the assessment factors in determining whether the IPCC and other assessment reports were of sufficient quality, objectivity, utility, and integrity. EPA did NOT conduct any independent evaluations of IPCCs compliance with IPCC procedures, EPA Did NOT document any specific processes it employed to evaluate the scientific and technical information included in IPCCs AR4 prior to EPA disseminating that information. With respect to EPA accepting and disseminating data produced by other organizations,; Office of Management and Budget SAID If an agency uses another organizations data or analysis to support their policy, they are disseminating that information. As such, that information becomes subject to the Agencys Information Quality Guidelines and the Bulletin for Peer Review. Therefore, in evaluating whether to disseminate the

information; EPA MUST determine whether the information complies with the Agency's Information Quality Guidelines. EPA determined that the IPCC assessment and other outside reports met EPA's information quality guidelines and were sufficiently peer reviewed. EPA's reasoning was described in its response to comments on the proposed rule. However; NO supporting analytical information was available to show how EPA made its determination PRIOR to disseminating the information. EPA's guidance for assessing the quality of externally generated information does NOT provide procedures or steps for assessing outside data or requirements for documenting such analysis. Since issuing its final findings in December 2009, EPA received 10 petitions requesting that EPA reconsider its findings. As part of their request for reconsideration, petitioners claimed that IPCC suppressed dissenting views during the development of its AR4, and some of the petitioners provided e-mails from University of East Anglia Climatic Research Unit (CRU) scientists as part of the evidence to support this claim. EPA provided in its response to comments document for the proposed findings, by referring to the IPCC procedures as a means of ensuring that all scientific views were considered during the development of the AR4. EPA's response to petitions document: EPA Office of Air and Radiation manager noted that a concern was raised about improper edits being made to the second IPCC assessment report in 1995. \*🌐

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