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INDEX OF TOZZI PAPERS

VOLUME THREE

VOLUME THREE

<u>Volume</u>	<u>Document</u>	<u>Page</u>	<u>Notes</u>
III	1	1-3	Page 1 -- Memorandum from Jim J. Tozzi to Mr. Paul H. O'Neill _____, dated 3/7/75, subj: Sen. Muskie's request 'that you address the degree to which OMB becomes involved in the regulatory process of other Federal agencies. Mr. Leon Billings, Chief Legislative Assistant to Muskie, called Tozzi to repeat request. cc: Official File NRD/En.Br. Mr. Hill Mr. Crabill Mr. Tozzi
		2&3	Page 2&3 -- (These documents appear to be minutes from the Senate confirmation hearings for Mr. O'Neill) Discussion focuses on OMB's role on the agencies' regulatory practice.
III	2	1	Page 1 -- Conversation between Senator Ribicoff and Secretary Lynn _____, dated 1/29/75, subj: Sen. Ribicoff asks Sec. Lynn for a full report on his feelings about OMB's role in drafting regulations.

<u>Volume</u>	<u>Document</u>	<u>Page</u>	<u>Notes</u>
III	3	1-4	<p>Page 1 -- Memorandum from Acting Asst. Adm., for Enforcement, EPA to Administrator, EPA. <u>Not dated</u>, subj: Final regulations for Temporary Suspension and Compliance Date Extensions under the Energy Supply & Environmental Coordination Act of 1974 -- <u>Action Memorandum</u>.</p> <p>Issue 1 -- Should the final regulations provide for compliance data extensions to be granted to coal burning sources which have agreed to or are subject to State (Federally approved) or federal enforcement orders requiring them to convert to oil or natural gas in order to comply with SIP requirements but which are prevented from converting because of an FEA order prohibiting use of petroleum products or natural gas?</p>
		2	Page 2 -- Pros/Cons
		3	<p>Page 3 -- Recommendation for Issue 1</p> <p>Issue 2 -- should additional time be provided for the submittal of an application when plan revision is contemplated or expected?</p>
		4	Page 4 -- Recommendation.

<u>Volume</u>	<u>Document</u>	<u>Page</u>	<u>Notes</u>
III	4	1-2	Page 1 -- Letter from Roger W. Sant, Asst. Adm., Energy Conservation & Environment, FEA to Roger Strelow, Asst. Adm., for Air & Waste Management, EPA, dated 2/27/75, subj: Recent EPA hearings on suspension of the automobile emission standards. FEA concerned about potential health problems related to sulfuric acid emissions from catalyst equipped vehicles. Sant continues, "If EPA plans to recommend a strategy which alters the expected use of catalysts or availability of alternative power systems for the next 5 years, FEA would plan to reevaluate the 40 percent economy goal..."
III	5	1	Letter from Theodore Cooper, MD, Acting Asst. Secretary for Health to Russell E. Train, Adm., EPA, dated 2/25/75, subj: Health significance of sulfuric acid emissions. (Document is difficult to read) "In conclusion, I must observe that we are deeply disturbed by the information that has been provided to us thus far... and continued introduction of the oxidation catalytic converters without effective counterveiling measures to control sulfuric acid emissions should be viewed with concern."

<u>Volume</u>	<u>Document</u>	<u>Page</u>	<u>Notes</u>
III	6	1-3	Memo from President Gerald Ford to all Cabinet-level officials, dated: 2/13/75, subj: Domestic Council. OMB's role is defined by saying, "Establish guidelines in conjunction with OMB for formulation of department and agency administrative regulations to ensure consistency with administrative policy objectives and legislative intent."
III	7	1-5	Page 1 -- Letter to Mr. Hill _____ from \jim Tozzi, Chief Environmental Branch, Natural Resources Div., OMB, dated: 1/6/75, subj: Interagency Review of EPA Regulations. Tozzi refers to attached memorandum from Al Alm recommending changes in the manner EPA regulations are reviewed by other agencies. Tozzi lists recommendations and then comments on advantages, shortcomings and recommendations.
		3	Page 3 -- Memo from Alvin L. Alm, Asst. Adm., for Planning & Management, EPA to John Hill, Acting Assoc. Dir., OMB, dated: 1/3/75, subj: Interagency review process for Standards & Regulations. Alm outlines past OMB role in regulatory review and then recommends changes.
		4	Page 4 -- Proposed Procedures.
		5	Page 5 -- Implementation.

<u>Volume</u>	<u>Document</u>	<u>Page</u>	<u>Notes</u>
III	8	1-6	Page 1 -- OMB route slip from Dave Gibbons _____ to J. Tozzi, dated: 1/27/75, subj: Gibbons Comments on Train's letter to John Nassikas, FPC (Federal Power Commission) <u>attached</u>
		2	Page 2 -- Letter from Russell E. Train, Adm., EPA, to John N. Nassikas, Chairman, Federal Power Commission, dated: 1/9/75, subj: "Train states, "I read with some dismay, your letter of 12/24/74, and the attached letter to Rogers Morton which commented on the Energy Resources Council (ERC) decision and recommended the establishment of a task force to analyze alternative policies for the use of permanent controls and supplementary control systems (SCS).
		3	Page 3 -- Train criticizes FPC's analysis.
		4	Page 4 -- " "
		5	Page 5 -- "I do not feel much can be accomplished by preparing and distributing analyses such as that transmitted by your letter without interagency review and discussion." cc: John Hill, OMB; Frank Zarb, FEA.
		6	Page 6 -- Summary of Incremental Investment for Sulfur Dioxide (SO ₂) Control.
III	9	1-3	Page 1 -- Memo for <u>see list</u> from Stanley E. Morris, Dep. Assoc. Dir., OMB, dated: _____, subj: Presidential letters to Governors, Mayors, and State legislators.

<u>Volume</u>	<u>Document</u>	<u>Page</u>	<u>Notes</u>
		2	Page 2 -- Letter from President Gerald R. Ford to Governor George C. Wallace, Alabama, dated: 12/4/74, subj: Ford is writing to enlist Wallace's aid in the nation's current efforts to fight inflation.
		3	Page 3 -- continued Ford asks Congress to "create a National Commission on Regulatory Reform to Review... Federal independent regulatory commissions..."
III	10	1	Memorandum from Frank G. Zarb, OMB to Michael Dural _____, dated: _____, subj: Request for information concerning a general provision in the most recent (10/10/74) House Appropriations Bill for EPA (Parking facilities); cc: Zarb, Carbill, Tozzi, Gibbons.
III	11	1-2	Page 1 -- <u>Explanation of the Milestones in the Standard-Setting Process</u> From: _____ TO: _____ Date: _____

<u>Volume</u>	<u>Document</u>	<u>Page</u>	<u>Notes</u>
III	12	1	Letter from Frank G. Zarb, Assoc. Dir., NRD, OMB to Hon. Frederick B. Dent, Sec. of Commerce, dated: 10/22/74, subj: Zarb replies to Dent's concern over the implementation of Section 304 of the Federal Water Pollution Control Act Amendments of 1972. Zarb acknowledges EPA's authority to implement regulations, despite Quality of Life Review. cc: Official File; Mr. Zarb, Mr. Crabill, Mr. Tozzi, Mr. Gibbons.
III	13	1	Letter from Jim Tozzi, Chief, Env. Branch, NRD, OMB to Frank Zarb, OMB, dated 10/23/74, subj: Tozzi discusses possibility of Commerce Dept.'s role in environmental regulations. cc: Official File, Mr. Crabill, Mr. Tozzi.
III	14	1-12	Pages 12 -- Federal Agency comments on New Medium and Heavy Duty Trucks: NPRM and Project Report and EPA responses thereto.

<u>Volume</u>	<u>Document</u>	<u>Page</u>	<u>Notes</u>
III	15	1-2	Pages 1-2 -- Letter from Edward J. Schack, Assoc. Dir., Interstate Commerce Committee, to Alvin L. Alm, Asst. Adm., for Planning & Management, EPA, dated: 9/18/74, subj: ICC's concern over EPA's Notice of Proposed Rulemaking for Medium and Heavy Duty Trucks, pursuant to the Noise Control Act of 1972. (Also mentioned, Michael Erenberg, Asst. Dept. Dir., Section of Operating Rights and Peter Fatula, Civil Engineer.
III	16	1-6	Page 1 -- Letter from William H. Close, Acting Dir., Office of Noise Abatement, Dept. of Transportation to Alvin L. Alm, Asst. Adm., for Planning & Management, EPA, dated: 9/20/74, subj: Enclosed comments from DOT on Notice of Proposed Rulemaking for Noise Emissions.
		2	Page 2 -- Summary comments on EPA draft NPRM (Notice of Proposed Rule Making) <u>Transportation Equipment Noise Emission Medium and Heavy Duty Trucks.</u>
		3	" "
		4	" "
		5	" "
		6	" "

<u>Volume</u>	<u>Document</u>	<u>Page</u>	<u>Notes</u>
III	17	1-5	Pages 1-5 -- NBS Technical comments on New Medium and Heavy-Duty Truck Noise. (These are not official comments from DOC.)
III	18	1	OMB note from Don Crabill to Jim Tozzi, dated: 10/2/74, subj: handwritten note saying "Frank is setting up an interagency meeting on this subject." Subject not identified.
III	19	1	Memo from Frank Zarb to Don Crabill, dated: _____, subj: "Prepare a response for the signature of me." Attachments.
III	20	1	Memo from Glenn Schleede, White House, _____ to Mike Duval & Jim Cavanaugh, dated: 10/1/74, subj: Vinyl chloride standards. OSHA is proceeding to issue standards for vinyl chloride concentrations... without going through the kind of interagency coordination and review process that EPA is typically put through. OSHA & EPA seem to have different procedures. cc: Warren Hendricks, Roger Semerad.

<u>Volume</u>	<u>Document</u>	<u>Page</u>	<u>Notes</u>
III	21	1	Note from Mike Duval, White House to Frank Zarb, OMB, dated: 10/1/74, subj: "Can't somebody get a handle on OSHA"?
III	22	1-4	Page 1 -- OMB route slip from Jim tozzi to Mr. Crabill and Mr. Zarb, dated: 10/2/74, subj: Tozzi raises the issue of OSHA promulgating standards over EPA objections. He asks for Crabill and Zarb to raise the issue with the Director. Tozzi also refers to attached memo.
		2	Page 2 -- Letter from Jim Tozzi, Chief, Env. Branch, NRD, OMB to Frank Zarb, OMB, dated: 6/5/74, subj: Quality of Life Review purpose of memo is to call to Zarb's attention increasingly greater complaints from EPA that they are not getting an opportunity to review regulations of other departments. 1) OSHA-vinyl chloride standards.
		3	Page 3 -- 2) Occupational Noise Regulation 1910.95. Federal Aviation Administration Noise Standards.
		4	Page 4 -- Tozzi recommends that Zarb, Mr. O'Neill, & Mr. Scott address the degree to which other agencies are to participate in the Quality of Life Review process.

<u>Volume</u>	<u>Document</u>	<u>Page</u>	<u>Notes</u>
III	23	1-2	Page 1 -- Letter included in EPA's briefing paper for the Administrator, dated: 6/21/74. Two issues were raised: 1) Should the OMB sponsored "interagency review" of our regulatory rulemaking be dropped for those actions on which we will prepare an EIS?
		2	Page 2 -- II) Should these procedures be published in the <u>Federal Register</u> as a notice of administrative procedure?
III	24	1-3	Page 1 -- Letter from Joseph Hezir, Env. Branch, NRD, OMB to Frank Zarb, OMB, dated: 8/9/74, subj: Formal vs. Informal Public Hearings on Toxic Effluent Standards -- Should EPA be permitted to propose a legislative amendment which would provide for informal rulemaking on Toxic Effluent Standards?
		2	Page 2 -- Options -- formal, informal.
		3	Page 3 -- Recommendation. EPA -- informal hearings Commerce -- formal hearings OMB (NRD) -- formal hearings cc: Mr. Tozzi, Mr. Hezir, Official File
III	25	1-3	Page 1 -- Letter from Alvin F. Meyer, Dep. Asst. Adm., for Noise Control Programs, EPA to Dr. Daniel Boyd, Dir, Office of Standards Development, Dept. of Labor, OSHA, dated: 7/3/74, subj: OSHA's proposed standard for occupational exposure to noise.

<u>Volume</u>	<u>Document</u>	<u>Page</u>	<u>Notes</u>
		2	Page 2 -- "one important issue that remains to be finalized is the time-intensity tradeoff."
		3	Page 3 -- "OSHA & ONAC staff--have been cordial and productive."
III	26	1	Letter from James G. O'Hara, Representative from Michigan to Roy L. Ash, OMB, dated: 8/9/74, subj: 'concerns potential conflict between safety & environmental standards for motor vehicles and need for maximizing fuel economy.' cc: Michigan Delegation.
III	27	1-2	Page 1 -- Letter from Walter D. Scott, Assoc., Dir., for Economics & Government, OMB to Hon. Claude S. Brinegan, Secretary of Transportation, dated: 6/27/74, subj: concern over interagency coordination for noise regulatory activities between EPA & FAA.
		2	Page 2 -- Wish to emphasize again the importance of assuring that interagency comments have been considered prior to agency actions.

<u>Volume</u>	<u>Document</u>	<u>Page</u>	<u>Notes</u>
III	28	1	Note from Jim Tozzi to Mr. Crabill. Tozzi states, "Mr. Young called me and stated that you had called him in regard to EPA's review of a proposed FAA rulemaking on noise." Tozzi notes Mr. Crabill's concern that EPA was not given opportunity to review proposed regulations. Tozzi continues, Jack (Young) did state that if the rulemaking had been set out that he would be willing to take a letter, drafted by us ... to DOT & FAA... cc: Norman Ross, dated: 2/5/73.
III	29	1	Letter from R.P. Skully, Dir. of Environmental Quality, FAA/DOT to Alvin F. Meyer, Jr., Dept. Asst. Adm., for Noise Control Programs, EPA, dated: 10/12/73, subj: enclosed copy of Notice of Proposed Rulemaking on Noise Standards for Propeller Driven Small Airplanes."
III	30	1	Letter from Alvin F. Meyer, Jr., Dep. Asst. Adm., for Noise Control Programs, EPA to Office of General Council, FAA, dated: 12/13/73; subj: Docket No. 13243: Notice #73-26. Propeller Driven Small Airplanes. 'We do not concur with the subject proposal.' CC: ABN Official Files; ABN Reading File; S&RD File; NCTB File.

<u>Volume</u>	<u>Document</u>	<u>Page</u>	<u>Notes</u>
III	31	1	Letter from Alvin F. Meyer, Jr., Dep. Asst. Adm., for Noise Control Programs, EPA to Richard P. Skully, FAA, dated: 12/13/73, subj: NPRM 73-26, Propeller Driven Small Airplanes. We expect any further action by the FAA on Propeller Driven Small Airplanes will be coordinated through the EPA.
III	32	1	Letter from Alvin F. Meyer, Jr., Dep. Asst. Admin., for Noise Control Programs, EPA to Office of the General Council, FAA, dated: 12/20/73, subj: Docket No. 13243, Notice No. 73-26 Propeller Driven Small Airplanes.
III	33	1	Letter from Alvin F. Meyer, EPA to Richard P. Skully, FAA, dated: 12/20/73, subj: Draft Project Report on "Aircraft Noise Certification Rule for Propeller Driven Small Airplanes."
III	34	1	Letter from Charles R. Foster, Dir., Noise Abatement, DOT to William C. Sperry, Chief, Noise Control Technology Branch, EPA, dated: 2/1/74, subj: Cooperation between EPA & DOT in regard to the Aircraft Noise Certification Rule for Propeller Driven Small Airplanes.

<u>Volume</u>	<u>Document</u>	<u>Page</u>	<u>Notes</u>
III	35	1	Note from W.C. Sperry granting Jim Tozzi certain documents relating to NPRM 73-26 and comments on ANPRM 74-12, NPRM 74-14. No date.
III	36	1-2	Page 1 -- Public Law 92-574, dated: 10/27/72.
		2	Page 2 -- Public Law 92-574, 86 Stat. 1236. -- Standards or Regulations. -- Revision report request, publication in Federal Register. -- Report, publication in Federal Register. -- Status report.
III	37	1-2	Page 1 -- <u>Wall Street Journal</u> editorial about overly burdensome regulations.
		2	Page 2 -- Article entitled, "One-armed scientist."
III	38	1-3	Pages 1-3 -- Handwritten notes from Tozzi (refer to Tozzi for details)
III	39	1	Weekly schedule for Frank G. Zarb, 10/7 - 10/11/74.

<u>Volume</u>	<u>Document</u>	<u>Page</u>	<u>Notes</u>
III	40	1-2	Handwritten notes from Tozzi (refer to Tozzi for details)
III	41	1-3	Talking points for telephone conversation on toxic pollutants. (Formal vs. Informal Hearings). No date. -- EPA -- Commerce -- OMB
III	42	1-5	Pages 1-5 -- Handwritten notes from Tozzi (refer to Tozzi for details)

BEFORE ANYONE STARTS TO TYPE AT THIS POINT, ARROW BACK TO THE LAST CHARACTER AND AT THAT POINT, TURN COLUMNS "ON."