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**From:** matthew.kuryla@bakerbotts.com [matthew.kuryla@bakerbotts.com]  
**Sent:** 11/30/2017 10:35:52 PM  
**To:** Gunasekara, Mandy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=53d1a3caa8bb4ebab8a2d28ca59b6f45-Gunasekara,]  
**CC:** Yamada, Richard (Yujiro) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4c34a1e0345e4d26b361b5031430639d-Yamada, Yuj]  
**Subject:** RE: CAAAC

Thanks. Richard, it's good to meet you!

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**From:** Gunasekara, Mandy [mailto:Gunasekara.Mandy@epa.gov]  
**Sent:** Thursday, November 30, 2017 4:33 PM  
**To:** Kuryla, Matthew  
**Cc:** Yamada, Richard (Yujiro)  
**Subject:** RE: CAAAC

Hi Matt,

Thank you for the information. I'm looping in and also e-connecting you with Richard Yamada from our Office of Research and Development who is also involved in advisory committee developments and staffing.

Best,  
Mandy

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**From:** matthew.kuryla@bakerbotts.com [mailto:matthew.kuryla@bakerbotts.com]  
**Sent:** Thursday, November 30, 2017 1:09 PM  
**To:** Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>  
**Subject:** CAAAC

Mandy, following up on the Clean Air Act Advisory Committee. I would love to serve in any capacity. Below is a brief rundown on my work on issues that may be relevant to the Committee's work. Please let me know if something more formal would be helpful.

My career has been framed around organizing and advising Texas industry coalitions in efforts to craft air rules that promote clean air and a strong economy.

Examples follow. Each is an illustration how effective environmental programs can be when they follow the guideposts of sound science, cooperative federalism and the rule of law.

1. **Houston Ozone**

- a. Through an innovative set of regulatory programs, the Houston area attained both the 125 ppb one-hour and 84 ppb eight-hour ozone standards, despite unprecedented economic growth and a large industrial sector.
- b. Key to the area's success is a unique and innovative program targeting industrial reductions of highly reactive volatile organic compounds ("HRVOCs"), in exchange for lesser reductions of nitrogen oxides ("NOx").
- c. Before industry stepped forward, the regulatory agencies were looking primarily to NOx reductions on existing source categories, which would have brought crippling costs with no environmental benefit.
- d. Industry coalitions crafted an innovative strategy integrating regional market-based programs for both NOx and HRVOC, allowing industry to apportion controls cost-effectively.
- e. As a result, Houston attained the ozone standards for which the relevant attainment demonstrations were crafted. Houston recently approached attainment of the 75 ppb standard.

- f. The **BCCA Appeal Group** and the **8-Hour Ozone Coalition** led these efforts, and continue to lead work on innovative strategies to drive further ozone reductions.
2. **Exceptional Events**
    - a. Our industry coalitions in Houston and El Paso have worked with TCEQ and EPA to craft compelling demonstrations where wildfires and other exceptional events drive discrete ozone exceedances.
    - b. The **8-Hour Ozone Coalition** continues to pursue scientific research on better tools to identify and demonstrate the causal connection between exceptional events and ozone exceedances.
  3. **Texas Flexible Air Permits**
    - a. The **Texas Industry Project** pursued a successful Texas program integrating flexible new source review (“NSR”) permits framed around an emissions cap, rather than point-by-point limits.
    - b. The BCCA Appeal Group pursued litigation that overturned an EPA disapproval of Texas flexible permits.
    - c. In the wake of the disapproval, our industry coalitions worked with TCEQ and EPA to negotiate targeted revisions that would support SIP-approval.
    - d. The Texas flexible permits program was fully and finally approved by EPA during the Obama administration.
  4. **Plantwide Applicability Limit (“PAL”) Permits**
    - a. The **Texas Industry Project** pursued the integration of relevant NSR reforms in Texas, including PALs.
    - b. The group worked with TCEQ and EPA to negotiate targeted revisions that would support SIP-approval.
    - c. The Texas PAL program is now an effective component of the Texas air permits program.
    - d. The **Texas Industry Project** will be pursuing targeted revisions to the PAL rules to make them more flexible, including a more effective approach to baselines.
  5. **Maintenance, Startup and Shutdown (“MSS”) Initiative**
    - a. The **Texas Industry Project** pursued the integration of effective and protective MSS provisions into the Texas SIP.
    - b. In the wake of EPA’s 2015 SIP call, the **Texas MSS Working Group** was formed to seek the reconsideration of EPA’s action.
    - c. The **BCCA Appeal Group**, along with the State of Texas, brought forward several compelling reasons for reconsideration as to Texas.
    - d. Texas industry coalitions have maintained a consistent focus on the preservation of this important component of Texas’ effective and protective SIP control strategy.
  6. **Title V Permit Program Integrity**
    - a. The **Texas Industry Project** worked with TCEQ and EPA to help craft the effective and protective Texas Title V program.
    - b. **TIP** is currently working with state and federal agencies in responding to efforts to expand the Title V program to become a “second-bite” at prior SIP-approval and NSR permit decisions.

**Matt Kuryla**

Partner

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