

Message

From: Kelly, Albert [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=08576E43795149E5A3F9669726DD044C-KELLY, ALBE]
Sent: 7/20/2017 5:35:05 PM
To: Rashid G. Hallaway [rhallaway@hhqventures.com]; Falvo, Nicholas [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=424ac90ea7d8494a93209d14d37f2946-Falvo, Nich]
CC: Dewey, Amy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fc3a7e01b12f4aeba5d34b813df8112a-Dewey, Amy]; Benjamin E. Quayle [bquayle@hhqventures.com]
Subject: RE: Troy-Region 2 Follow Up

Thanks Rashid, I am speaking with the Region today at 4. I may have more information after that call. I do not necessarily control the letter process but will see what I can do.

Albert Kelly
Senior Advisor to the Administrator
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Ex. 6

-----Original Message-----

From: Rashid G. Hallaway [mailto:rhallaway@hhqventures.com]
Sent: Thursday, July 20, 2017 1:23 PM
To: Kelly, Albert <kelly.albert@epa.gov>; Falvo, Nicholas <falvo.nicholas@epa.gov>
Cc: Dewey, Amy <Dewey.Amy@epa.gov>; Benjamin E. Quayle <bquayle@hhqventures.com>
Subject: Troy-Region 2 Follow Up

Albert/Nick,

I want to let you know that Troy's counsel had a call with Region 2 Assistant Regional Counsel Amelia Wagner about the Troy Chemical Newark Manufacturing Plant site. The discussion focused on Troy's June 23 letter to Region 2, which outlined Troy's principal concerns with EPA's proposed AOC.

During the call, Ms. Wagner said that Region 2 most likely would not agree to most of Troy's requests. She also stated that Region 2 management asked her to formally respond to our letter and we should expect that written response next week.

We are concerned that what we will receive from Region 2 is a "take it or leave it" AOC that rigidly adheres to the Model AOC terms and offers no flexibility in response to Troy's unique situation. Given Region 2's inflexibility, we request that Ms. Wagner refrain from sending a formal response, and that you elevate the AOC to EPA HQ so you have sufficient time to review Troy's proposal.

We recognize the lack of appointees at OLEM and Region 2 is challenging on a number of levels and are grateful for your thoughtful consideration. Please do not hesitate to call me at Ex. 6 if you have any questions.

Thank you for your help.

Rashid