

To: Dave Flannery[Dave.Flannery@Steptoe-Johnson.com]
From: Gunasekara, Mandy
Sent: Mon 6/26/2017 5:59:10 PM
Subject: RE: Midwest Ozone Group

Hi Dave,

Sorry for the delayed response and thank you for the information. Happy to help facilitate a meeting with the Administrator. I'll pass this request on to his new scheduler, Madeleine Morris.

I'll suggest the July dates listed below so long as they are still good on your end. Please let me know if your availability has changed.

Best,

Mandy

From: Dave Flannery [mailto:Dave.Flannery@Steptoe-Johnson.com]
Sent: Monday, June 26, 2017 11:25 AM
To: Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>
Subject: Midwest Ozone Group

Mandy

Given the Administrator's letter of June 7, 2017 extending the deadline for making nonattainment designations related to the 2015 ozone NAAQS and calling for an assessment of international transport and other considerations related to the 2015 ozone NAAQS, I am providing a link and an attachment involving both a white paper and PowerPoint presentation prepared by the Midwest Ozone Group which assess the significance of international transport impact in 2017 and provide an overall assessment of improvements in ozone air quality:

White paper:

http://www.midwestozongroup.com/files/Assessment_of_International_Transport_and_Improved_Ozone_Air

PowerPoint:

http://www.midwestozonegroup.com/files/Assessment_of_International_Transport_and_Improved_Ozone_Air

We would be pleased to comment on these in a meeting with the Administrator. In the meantime, if you have any questions about these documents, please contact me.

Dave Flannery

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From: Dave Flannery
Sent: Friday, June 02, 2017 2:54 PM
To: 'Mandy Gunasekara (Gunasekara.mandy@epa.gov)'
Subject: Midwest Ozone Group

Mandy

Thanks for taking some time with me on May 31, 2017, to discuss the Midwest Ozone Group (MOG) and its interest in meeting with Administrator Pruitt to discuss both its Petition to Reconsider the CSAPR Update filed on December 23, 2016, and its Regulatory Reform comments filed on May 15, 2017. These documents (both of which are attached) describe MOG's concerns about the technical and legal issues associated with the modeling and development of the CSAPR Update and the general implementation of the ozone NAAQS. Among these concerns are the failure to have considered existing on-the-books control programs, the failure to have accounted for the effects of international emissions and the imposition of control requirements solely on electric generating units, resulting in prohibited "over control" of sources in many states.

MOG members and participants operate some 80,000 MW of coal-fired and coal-refuse fired generation in more than ten states. The members of and participants in the MOG include: American Coalition for Clean Coal Electricity, American Electric Power, American Forest & Paper Association, Ameren, Alcoa, ARIPPA, Associated Electric Cooperative, Citizens Energy

Group, Council of Industrial Boiler Owners, Duke Energy, East Kentucky Power Cooperative, FirstEnergy, Indiana Energy Association, Indiana Utility Group, LGE / KU, Ohio Utility Group, Olympus Power, and the Springfield (IL) City Water, Light & Power.

Dates that are available for a meeting with the Administrator include:

June 12, 13, 14, 15, 19, and 20.

July 11, 12, 13, 14, 24, 25, 26, and 27.

If need anything more from us related to the scheduling of this meeting, please let me know.

Dave Flannery

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