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**From:** Foley, Allison D. [ADFoley@Venable.com]  
**Sent:** 3/2/2018 9:18:36 PM  
**To:** Lovell, Will (William) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3b150bb6ade640f68d744fadcb83a73e-Lovell, Wil]; Kime, Robin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7ef7b76087a6475b80fc984ac2dd4497-RKime]  
**CC:** jim.roewer@uswag.org; Peter E. Harley [peter.harley@nationalgrid.com]  
**Subject:** RE: Following up: Request to meet regarding EO 13777 comments -- PCB regulatory reform and burden reduction  
**Attachments:** USWAG PCB mtg request\_Dravis\_12.05.2017.pdf

**Flag:** Follow up

Hello Will,

We have no additional materials beyond the original meeting material request letter, attached hereto. The cover letter describes in summary fashion the two issues we would like to focus Tuesday's discussion on; these issues are discussed in greater detail on pages 13-14 of the attached pdf. Note that USWAG's original EO 13777 comments (which begin at page 4 of the pdf) raise additional burden reduction/regulatory reform issues related to the federal PCB program, discussed on pages 15-16 of the pdf. We are happy to also discuss these additional issues, time permitting, if Ms. Dravis would like.

James Roewer (Executive Director, USWAG), Peter Harley (USWAG PCB Committee Chair/National Grid), and I will be in attendance. Jim and Pete are both copied on this email.

Thank you, and please let us know if you need additional information. We look forward to next week's meeting.

Best,

Allison D. Foley, Esq. | Venable LLP

☎ Ex. 6 ☎ 202.344.8300 ☎ Ex. 6  
600 Massachusetts Avenue, NW, Washington, DC 20001

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**From:** Lovell, Will (William) [mailto:lovell.william@epa.gov]  
**Sent:** Friday, March 02, 2018 9:47 AM  
**To:** Foley, Allison D. <ADFoley@Venable.com>; Kime, Robin <Kime.Robin@epa.gov>  
**Cc:** jim.roewer@uswag.org; Peter E. Harley <peter.harley@nationalgrid.com>  
**Subject:** RE: Following up: Request to meet regarding EO 13777 comments -- PCB regulatory reform and burden reduction

Hello, all,

I wanted to check-in to see if you had a list of attendees for this meeting and/or any materials you could provide us with ahead of the meeting.

Thank you,  
Will

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**From:** Foley, Allison D. [mailto:ADFoley@Venable.com]  
**Sent:** Tuesday, February 13, 2018 12:46 PM

**To:** Kime, Robin <Kime.Robin@epa.gov>  
**Cc:** Lovell, Will (William) <lovell.william@epa.gov>; jim.roewer@uswag.org; Peter E. Harley <peter.harley@nationalgrid.com>  
**Subject:** RE: Following up: Request to meet regarding EO 13777 comments -- PCB regulatory reform and burden reduction

Thanks very much, Robin.

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**From:** Kime, Robin [mailto:Kime.Robin@epa.gov]  
**Sent:** Tuesday, February 13, 2018 12:45 PM  
**To:** Foley, Allison D. <ADFoley@Venable.com>  
**Cc:** Lovell, Will (William) <lovell.william@epa.gov>; jim.roewer@uswag.org; Peter E. Harley <peter.harley@nationalgrid.com>  
**Subject:** RE: Following up: Request to meet regarding EO 13777 comments -- PCB regulatory reform and burden reduction

Hi,  
Thank you. This is confirmed for 3/6 at 3:00 p.m. – a meeting invitation was just sent to you all. We have the initial information you sent along in your request, if you'd like to add anything or have any questions, just send me an email. Thanks and take care.

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**From:** Foley, Allison D. [mailto:ADFoley@Venable.com]  
**Sent:** Tuesday, February 13, 2018 10:52 AM  
**To:** Kime, Robin <Kime.Robin@epa.gov>  
**Cc:** Lovell, Will (William) <lovell.william@epa.gov>; jim.roewer@uswag.org; Peter E. Harley <peter.harley@nationalgrid.com>  
**Subject:** RE: Following up: Request to meet regarding EO 13777 comments -- PCB regulatory reform and burden reduction

Hello Robin,

We are available to meet with Samantha at 3:00 pm on March 6. If that date is no longer available, we can also meet on March 2 (either time). I will be joined by Jim Roewer, Executive Director of USWAG, and Peter Harley (National Grid), chair of the USWAG PCB Committee. Both are copied here.

Please confirm meeting details and please let me know if you need any additional information from us in advance of the meeting. Thank you.

Best,

Allison  
O: 202-344-4416  
C: Ex. 6

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**From:** "Kime, Robin" <Kime.Robin@epa.gov>  
**Sent:** Feb 12, 2018 12:52 PM  
**To:** "Foley, Allison D." <ADFoley@Venable.com>  
**Cc:** "Lovell, Will (William)" <lovell.william@epa.gov>  
**Subject:** FW: Following up: Request to meet regarding EO 13777 comments -- PCB regulatory reform and burden reduction

Hi Allison,

I hope you are well. Samantha would be glad to meet with you. Would any of the following dates/times work for your schedule?

2/22 at 1:30 or 2:00 or 2:30 or 3:00

2/23 at 2:00 or 2:30 or 3:00

3/2 at 11:00 or 11:30

3/6 at 3:00

If it helps, I can propose additional dates. Thanks and take care.

Robin

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**From:** Foley, Allison D. [mailto:]

**Sent:** Monday, January 29, 2018 2:34 PM

**To:** Kime, Robin <Kime.Robin@epa.gov>

**Subject:** Following up: Request to meet regarding EO 13777 comments -- PCB regulatory reform and burden reduction

Dear Ms. Kime:

I'm writing on behalf of the Utility Solid Waste Activities Group (USWAG) to follow up on a letter sent to Ms. Samantha Dravis in December regarding USWAG's comments on Executive Order 13777 (copy of December letter attached). In particular, we request a meeting with Ms. Dravis to discuss specific comments regarding regulatory reform and burden reduction in the context of the federal PCB program administered by EPA under TSCA, and the corresponding regulations set forth at 40 C.F.R. Part 761.

Of particular urgency are requests for:

- Clarification of the PCB disposal regulations at 40 C.F.R. § 761.50 to expressly allow for the disposal of all PCB remediation wastes with as-found concentrations of <50 ppm PCB in non-TSCA landfills (see Exhibit A at 10-11); and
- Modification of the PCB analytical rules throughout 40 C.F.R. Part 761 to expressly authorize the use of the most recent EPA-approved extraction method available for the chemical extraction of PCBs from individual and composite samples (currently the automated soxhlet extraction method, Method 3541, though these methods are constantly evolving and the regulatory text should therefore allow for use of whatever the most current method is at any particular time).

We are requesting a meeting to discuss these regulatory amendments which would eliminate unnecessary and costly regulatory burdens and logistical challenges that significantly delay PCB cleanup projects, without any risk-based justification. The requested regulatory changes are consistent with EO 13777 and the objectives of EPA's Smart Sector Initiative as they would not only reduce unnecessary regulatory burden but will improve environmental outcomes by streamlining and accelerating PCB cleanup projects and associated compliance efforts by electric and gas utilities.

Please advise if Ms. Dravis has availability for a meeting in the second half of February. Please let me know if you have any questions or need more information from me. Thank you for your attention to this.

Best,

Allison D. Foley, Esq. | Venable LLP

Ex. 6 | 202.344.8300 | Ex. 6

600 Massachusetts Avenue, NW, Washington, DC 20001

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