

To: Morris, Madeline[morris.madeline@epa.gov]
Cc: Gunasekara, Mandy[Gunasekara.Mandy@epa.gov]
From: Dave Flannery
Sent: Tue 7/25/2017 12:25:57 PM
Subject: Midwest Ozone Group

Madeline

Since it does not appear that any of the July dates we previously offered remain available, I offer the following as possible dates for a meeting of the Midwest Ozone Group with the Administrator:

August 10, 14, 15, 16, 18, 21, 22, 28, 29, 31 or September 1.

In addition to the opportunity to introduce the members of the Midwest Ozone Group, there are several important issues we would like to discuss with him including:

1. Our assessment of the impact of international emissions on ozone concentrations in the US;
2. Implications of the extension of the deadline for making ozone nonattainment designations particularly with respect to state obligations to submit Good Neighbor SIPs by the original deadline of October 2018; and
3. Our petition for reconsideration of several aspects of the CSAPR Update.

I look forward to the opportunity to speak with you about the possibility of this meeting.

Dave Flannery

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From: Dave Flannery
Sent: Tuesday, July 18, 2017 11:54 AM
To: Morris, Madeline
Cc: Gunasekara, Mandy
Subject: Re: Midwest Ozone Group

Madeline

As you are looking at the Administrators schedule, please let me know what dates would be convenient with him and we will do our best to accommodate. I believe there are likely to be several electric utilities that are interested in attending the meeting. Please call my cell phone anytime to discuss.

David M. Flannery

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On Jul 18, 2017, at 11:05 AM, Gunasekara, Mandy <Gunasekara.Mandy@epa.gov> wrote:

Hi Madeline,

I'm following up to the below note regarding a meeting request and cc'ing Dave Flannery so you can respond directly. Please let me know if I can help.

Best,

Mandy

From: Gunasekara, Mandy
Sent: Monday, June 26, 2017 2:02 PM

To: Morris, Madeline <morris.madeline@epa.gov>

Subject: FW: Midwest Ozone Group

Below is a meeting request from the Midwest Ozone Group (MOG). They'd like to come in and talk about ozone issues, especially in light of the recent announcement to delay designations. The dates they've requested and a little more about the organization is listed below. The main POC is Dave Flannery: Dave.Flannery@Steptoe-Johnson.com Let me know if you have any additional questions.

Mandy

Additional Info:

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:

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

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.midwestozonegroup.com/files/Assessment_of_International_Transport_and_Improved_Ozone_Air_Quality.pdf

PowerPoint:

http://www.midwestozonegroup.com/files/Assessment_of_International_Transport_and_Improved_Ozone_Air_Quality.pptx

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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