

Message

---

**From:** Gunasekara, Mandy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=53D1A3CAA8BB4EBAB8A2D28CA59B6F45-GUNASEKARA,]  
**Sent:** 2/15/2018 6:09:39 PM  
**To:** Andrew Oldham [Andrew.Oldham@gov.texas.gov]  
**CC:** Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Bryan Shaw [Bryan.Shaw@tceq.texas.gov]; Jerry Strickland [Jerry.Strickland@gov.texas.gov]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]  
**Subject:** Re: Title V Discussion

Thank you, Andy. We are looking forward to seeing you and the rest of the Texas team.

Also adding in Emily.

We will send around an agenda once fully developed.

Best,  
Mandy

Sent from my iPhone

On Feb 15, 2018, at 12:53 PM, Andrew Oldham <[Andrew.Oldham@gov.texas.gov](mailto:Andrew.Oldham@gov.texas.gov)> wrote:

Mandy – we’re looking forward to seeing you next week. From our office, it’ll be me, Reed Clay, and one of our state-fed folks (either Jerry Strickland or Wes Hambrick).

Chairman Shaw – can you please send Mandy a roster of the TCEQ folks who’ll be in attendance on the 23<sup>rd</sup>?

Thank you.

---

**From:** Andrew Oldham  
**Sent:** Wednesday, January 31, 2018 7:21 PM  
**To:** Gunasekara, Mandy <[Gunasekara.Mandy@epa.gov](mailto:Gunasekara.Mandy@epa.gov)>  
**Cc:** Wehrum, Bill <[Wehrum.Bill@epa.gov](mailto:Wehrum.Bill@epa.gov)>; Lewis, Josh <[Lewis.Josh@epa.gov](mailto:Lewis.Josh@epa.gov)>  
**Subject:** Re: Title V Discussion

Thank you so much. If y’all can make that work, the extra time will make the Texas team more productive.

On Jan 31, 2018, at 7:15 PM, Gunasekara, Mandy <[Gunasekara.Mandy@epa.gov](mailto:Gunasekara.Mandy@epa.gov)> wrote:

We will definitely work with your schedule. I’ll touch base with the group tomorrow and follow-up on the 23<sup>rd</sup>.

---

**From:** Andrew Oldham [<mailto:Andrew.Oldham@gov.texas.gov>]  
**Sent:** Wednesday, January 31, 2018 8:09 PM  
**To:** Gunasekara, Mandy <[Gunasekara.Mandy@epa.gov](mailto:Gunasekara.Mandy@epa.gov)>

Cc: Wehrum, Bill <Wehrum.Bill@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>

Subject: Re: Title V Discussion

Thank you Mandy. I've started running traps here too. But I'm already worried we won't have enough time to get folks together here and get to DC on the 9th. Is there any way we can meet in DC on the 23rd?

On Jan 31, 2018, at 6:35 PM, Gunasekara, Mandy <Gunasekara.Mandy@epa.gov> wrote:

Hey Andy,

Following up from our conversation, we'd like to set up a meeting in DC with you and your team to work through a range of Title V specific issues with OAR leadership, the Office of General Counsel and our senior technical team. I'll continue to run the traps here, but we will develop a schedule for February 9<sup>th</sup> as a tentative date to meet for a few hours. To help inform who best to bring from your end, the discussions will focus on the following:

1. <!--[if !supportLists]--><!--[endif]-->**Source-Specific Emission Limits:** The title V permits do not include or incorporate by reference (IBR) all applicable source-specific emission limits established through registered Permits-by-Rule (PBRs).
2. <!--[if !supportLists]--><!--[endif]-->**Problems with IBR of PBRs:** When TCEQ IBRs PBRs, certain issues arise frequently: 1) permits do not identify specific emission units for some PBRs; 2) permits are unclear as to whether the general PBR emission limits—e.g., 25 tons per year—apply to *individual* emission units or to multiple units *collectively* authorized by one PBR; and 3) permits do not identify what pollutants are authorized by a PBR.
3. <!--[if !supportLists]--><!--[endif]-->**Unclear (non-specific) Monitoring for PBRs:** The permits do not specify enforceable monitoring requirements associated with numerous PBR requirements, but rather provide the sources with a non-exhaustive list of general monitoring and recordkeeping options.
4. <!--[if !supportLists]--><!--[endif]-->**Lack of Monitoring in NSR Permits:** Neither the title V permits, the incorporated minor NSR permits, nor the minor NSR permit applications (incorporated by reference in Texas) contain any monitoring for various emission limits contained in some of the minor NSR permits.

In addition to Bill, I've cc'd Josh Lewis who is OAR's Chief of Staff and can help facilitate the organization of this meeting. Please let me know if you have any questions and whether Friday, February 9<sup>th</sup> will indeed work.

Best,  
Mandy

**Mandy M. Gunasekara**  
Principal Deputy Assistant Administrator  
Office of Air and Radiation  
US Environmental Protection Agency