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**From:** Atkinson, Emily [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BB2155ADEF6A44AEA9410741F0C01D27-ATKINSON, EMILY]  
**Sent:** 2/22/2018 9:05:15 PM  
**To:** Bryan Shaw [Bryan.Shaw@tceq.texas.gov]; Andrew Oldham [Andrew.Oldham@gov.texas.gov]; Jerry Strickland [Jerry.Strickland@gov.texas.gov]; steve.hagle@tceq.texas.gov  
**CC:** Gunasekara, Mandy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=53d1a3caa8bb4ebab8a2d28ca59b6f45-Gunasekara,]; Dominguez, Alexander [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5ced433b4ef54171864ed98a36cb7a5f-Dominguez,]; 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]  
**Subject:** New Start Time of 9:30am - Confirmed 2/23 Title V Discussion  
**Importance:** High

Hi Bryan and Andrew,

We are moving the start time for tomorrow's meeting to 9:30am.

Feel free to contact me should you need any additional information or assistance.

Emily

Emily Atkinson  
Management Analyst/Office Manager  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5412B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: atkinson.emily@epa.gov

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**From:** Atkinson, Emily  
**Sent:** Thursday, February 15, 2018 2:05 PM  
**To:** Bryan Shaw <Bryan.Shaw@tceq.texas.gov>; Andrew Oldham <Andrew.Oldham@gov.texas.gov>; Jerry Strickland <Jerry.Strickland@gov.texas.gov>  
**Cc:** Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Dominguez, Alexander <dominguez.alexander@epa.gov>; Wehrum, Bill <Wehrum.Bill@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>  
**Subject:** Confirmed 2/23 at 9am: Title V Discussion

Hi Bryan and Andrew,

You are confirmed for a meeting on Friday, February 23, 2018 starting at 9am with Bill Wehrum and Mandy Gunasekara.

Directions and procedures to 1200 Pennsylvania Avenue NW:

Metro: If you come by Metro get off at the Federal Triangle metro stop. Exit the metro station and go up two sets of escalators to the surface level and turn right. You will see a short staircase and wheelchair ramp leading to a set of glass doors with the EPA logo - that is the William Jefferson Clinton Federal Building, North Entrance.

Taxi: Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12<sup>th</sup> Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left – that is the North Lobby of the William Jefferson Clinton building.

Security Procedures: A government issued photo id is required to enter the building and it is suggested you arrive 15 minutes early in order to be cleared and arrive at the meeting room on time. Upon entering the lobby, the meeting attendees will be asked to pass through security and provide a photo ID for entrance. Let the guards know that you were instructed to call 202-564-7404 for a security escort.

Thank you both for providing the attendee lists and feel free to contact me should you need any additional information.

Emily

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Immediate Office of the Assistant Administrator  
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**From:** Gunasekara, Mandy  
**Sent:** Thursday, February 15, 2018 1:11 PM  
**To:** Bryan Shaw <[Bryan.Shaw@tceq.texas.gov](mailto:Bryan.Shaw@tceq.texas.gov)>  
**Cc:** Andrew Oldham <[Andrew.Oldham@gov.texas.gov](mailto:Andrew.Oldham@gov.texas.gov)>; Wehrum, Bill <[Wehrum.Bill@epa.gov](mailto:Wehrum.Bill@epa.gov)>; Lewis, Josh <[Lewis.Josh@epa.gov](mailto:Lewis.Josh@epa.gov)>; Jerry Strickland <[Jerry.Strickland@gov.texas.gov](mailto:Jerry.Strickland@gov.texas.gov)>; Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** Re: Title V Discussion

Great- thank you and looking forward to seeing you all.

Sent from my iPhone

On Feb 15, 2018, at 1:08 PM, Bryan Shaw <[Bryan.Shaw@tceq.texas.gov](mailto:Bryan.Shaw@tceq.texas.gov)> wrote:

The TCEQ is planning to have Steve Hagle, Terry Salem, Mike Wilson, Steve Sun, and me attend the meeting on the 23rd.

Looking forward to the visit.

Bryan

Sent from my iPhone

On Feb 15, 2018, at 11:53 AM, 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.

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**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>.

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**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](mailto:Wehrum.Bill@epa.gov)>; Lewis, Josh <[Lewis.Josh@epa.gov](mailto: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 23<sup>rd</sup>?

On Jan 31, 2018, at 6:35 PM, Gunasekara, Mandy <[Gunasekara.Mandy@epa.gov](mailto: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. **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. **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. **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. **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