Message

From: Dykes, Teresa [Dykes.Teresa@epa.gov]
Sent: 5/3/2018 3:57:43 PM
To: Chapman, Apple [Chapman.Apple@epa.gov]; Fried, Gregory [Fried.Gregory@epa.gov]
Subject: I just pitched a Webinar for "Enforceable Limits" Needed for MM2A

MACT Major to Area (MM2A) aka OIAI Reversal. Based on yesterday's NSR/Title V Call and permits that are starting to circulate where sources are requesting revisions to Title V based on Wehrum's OIAI Reversal Memo- I realized we need to go back and explain why blanket emission limits e.g., Source may not emit more than 10 tpy of any one HAP or 25 tpy of any collection of HAPS- are not enforceable as a practical matter. I asked Cheryl Vetter if OAQPS would support this. The sooner we get this out, the better.

1.) Will you guys and Phill support this effort?
2.) Do we have any contract funds if I need them (probably less than $5k) to help with the prep, etc.?

Terri Dykes
Senior Attorney
Office of Enforcement and Compliance Assurance
1200 Pennsylvania Ave. NW
Washington, DC 20460
202.564.9883

CONFIDENTIAL: This transmission may contain deliberative and/or enforcement confidential, attorney-client, or otherwise privileged material. Do not release under FOIA without appropriate review. If you have received this message in error, you are asked to notify the sender and to delete this message.