Appointment

From: Hambrick, Amy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=787B0A3376944FCABAED4F018432CF44-AHAMBRIC]
Sent: 9/21/2018 1:37:27 PM
To: Swanson, Nicholas [Swanson.Nicholas@epa.gov]; Jon Witt (Witt.Jon@epa.gov) [Witt.Jon@epa.gov]; Witosky, Matthew [Witosky.Matthew@epa.gov]; Marsh, Karen [Marsh.Karen@epa.gov]; Garwood, Gerri [Garwood.Gerri@epa.gov]; Hoffmann, Jucilene [hoffmann.jucilene@epa.gov]; Miller, Elizabeth [Miller.Elizabeth@epa.gov]; Macpherson, Alex [Macpherson.Alex@epa.gov]; Mia, Marcia [Mia.Marcia@epa.gov]; Waltzer, Suzanne [Waltzer.Suzanne@epa.gov]; DeFigueiredo, Mark [DeFigueiredo.Mark@epa.gov]; Weitz, Melissa [Weitz.Melissa@epa.gov]; Alsalam, Jameel [Alsalam.Jameel@epa.gov]; Fruh, Steve [Fruh.Steve@epa.gov]; Hutson, Nick [Hutson.Nick@epa.gov]; Thompson, Lisa [Thompson.Lisa@epa.gov]; Woods, Clint [woods.Clint@epa.gov]; Koerber, Mike [Koerber.Mike@epa.gov]; Cozzie, David [Cozzie.David@epa.gov]; Santiago, Juan [Santiago.Juan@epa.gov]
CC: Adam Eisele (Eisele.Adam@epa.gov); Fellner, Christian [Fellner.Christian@epa.gov]; Culligan, Kevin [Culligan.Kevin@epa.gov]
BCC: RTP-Line-Ex. 6 Personal Privacy (PP)/Phone-Line/RTP-Conf-Bridge [RTP-LineEx. 6 Personal Privacy (PP)@epa.gov]; RTP-C300A-Max40/RTP-Bldg-C [RTP-C300A-Max40@epa.gov]

Subject: Confirmed: Meeting with Theresa Pugh Consulting, LLC on OOOOa and ACE
Attachments: EPA gas-electric Sept 2017 presentation
Location: RTP-Line-Ex. 6 Personal Privacy (PP)/Phone-Line/RTP-Conf-Bridge; RTP-C300A-Max40/RTP-Bldg-C

Start: 9/25/2018 2:30:00 PM
End: 9/25/2018 4:00:00 PM
Show Time As: Tentative

Ex. 5 Deliberative Process (DP)

From: Theresa Pugh [mailto:Pugh@theresapughconsulting.com]
Sent: Thursday, August 23, 2018 6:07 PM
To: Rakosnik, Delaney <rakosnik.delaney@epa.gov>

Cc: Hambrick, Amy <Hambrick.Amy@epa.gov>
Subject: Request for appointment: September 17 or 18 (or 19) in Raleigh re EPA-HQ-OAR-2017-0355

Dear Ms Rakosnick:
Bill gave me your e mail
address. (I know him or would not refer to him with his first name). He seemed interested to learn more about the cross-cutting issues between the two rulemakings.

If you scroll down to see other e mail correspondence, I would like to coordinate a meeting with the staff at headquarters and RTP working on BOTH the
proposed ACE rulemaking and the upcoming methane OOOOa reconsideration on new sources (or preparations for existing source rule) for gas compressors and pipelines. (I believe Amy is the lead on that project).

Below you will see my reach out to Amy H and Nick S to see if they are available on Sept 17 (after 2) or on Sept 18-19 in RTP. If that doesnt work- happy to do at another Sept date but in DC and perhaps the RTP staff can join by conference call/camera. I am not in RTP that often.

I would need 30 Minutes and whatever time for Q and A to cover what is relevant for both rulemakings. And I would like to use a power point slide deck to show some NERC slides and maps.

Thank you,

Theresa Pugh
Owner
Theresa Pugh Consulting, LLC
pugh@theresapughconsulting.com
703-507-6843
www.theresapughconsulting.com

Begin forwarded message:

From: Theresa Pugh <Pugh@theresapughconsulting.com>
Date: August 23, 2018 at 5:52:52 PM EDT
To: Clint Woods <woods.clint@epa.gov>, "swanson.nicholas@epa.gov" <swanson.nicholas@epa.gov>
Cc: Amy Hambrick <hambrick.amy@epa.gov>
Subject: Request for appointment: September 17 or 18 (or 19) EPA-HQ-OAR-2017-0355

Dear Clint (and Nick),

It dawned on me that you would probably be at the AAPCA meeting in Sept or perhaps be in RTP that week. Please see the note below requesting an appointment. It is my hope to meet with you, Amy and Nick's groups together. Please scroll down.

I would make time to meet with all of you but hope your schedules make you available on Sept 17 after 2 or on Sept 18. I could make it Sept 19 if that is the only available time.

My note to Nick and Amy is below. I accidentally mis-keyed Nick's email below.

Thank you,

Theresa Pugh
Owner

Theresa Pugh Consulting, LLC
pugh@theresapughconsulting.com
703-507-6843

From: <Pugh@theresapughconsulting.com>
Date: August 23, 2018 at 4:53:43 PM EDT
To: Amy Hambrick <hambrick.amy@epa.gov>, <nick.swanson@epa.gov>
Subject: Request for appointment: September 17 or 18

Dear Amy and Nick

Good afternoon. I will be in RTP in Sept for the AAPCA meeting and wondered if there is an opportunity to meet with your staff regarding natural gas issues that are relevant for NSPS 111(d) (new ACE proposed rule) and the EPA's next steps on section OOOOa on methane for new (or existing) pipelines and compressor stations serving power sector and LDCs.

My clients are electric utilities and I have expertise with pipelines/compressor stations. I am active with NERC (unpaid advisor).

If possible, I would like to come in and see your staff (both 111d team and OOOOa) in the next month on some issues relevant to the "remaining useful life of the plant" and NERC's Nov 2017 study. I served on a NERC study in the last year as an unpaid advisor on natural gas issues. There are 23 areas in the US where more than one gas-fired power plants are served by only one pipeline with no redundancy in transmission pipelines or the underground gas storage. That places some risk for force majeure for power plants.

NERC recommends that EPA and state agencies allow for a dual fuel approval in Title V permits when voltage support or force majeure events occur- even if during ozone season. This shouldn't mean a carte blanche to run oil units or create significant new ozone problems without justification. But NERC does find 23 area (some geographically small) with electricity reliability problems - at least until more gas storage and pipelines are built. This issue is both relevant to ACE and 111(d)). It is also important that those oil- fired or alternative fuel fired units meet all other relevant regulations including SPCC (RCRA). Many dual fuel plants in the US outside of New England have not maintained the tanks or lack sufficient footprint space to have more than 1-2 days of oil onsite.

I will be at AAPCA meeting and will request to talk to Amy and Nick's group(s)- preferably together since the issues meet for gas generators.

The link to the NERC study is
https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_SPOD_11142017_Final.pdf

I look forward to seeing you- either in RTP on Sept 17-18 or via camera phone at a call in headquarters. I can easily go down to headquarters for a combination meeting. (I reached out to Wehrum earlier today asking if he could join in).

I am available on Sept. 17 at 3-5 (following a drive down from DC) or on Sept 18

Thank you,

Theresa Pugh
Owner

Theresa Pugh Consulting, LLC
pugh@theresapughconsulting.com
703-507-6843
www.theresapughconsulting.com

~ a woman owned small business~

Sent from mobile device, please excuse typos.

ADDITIONAL BACKGROUND FROM OOOOa MEETING LAST YEAR

See attachment

-----Original Appointment-----
From: Hambrick, Amy
Sent: Thursday, September 14, 2017 4:23 PM
To: Hambrick, Amy; RTP-Line-541-1595/Phone-Line/RTP-Conf-Bridge; Witosky, Matthew; Cozzie, David; Marsh, Karen; Witt, Jon; Thompson, Lisa; Garwood, Gerri; Howard, Jodi; Dewees, Jason; Macpherson, Alex; Mills, Kathy; Miller, Elizabeth; Davis, Alison; Weitz, Melissa; DeFigueiredo, Mark; Waltzer, Suzanne; Mia, Marcia; Carey, Angela
Cc: Swanson, Nicholas; Culligan, Kevin; Ayres, Sara; Lischinsky, Robert
Subject: CONFIRMED: meeting with Theresa Pugh Consulting (D201/ X4332)
When: Wednesday, September 20, 2017 1:00 PM-2:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: RTP-D201-Max40/RTP-Bldg-D; RTP-OAQPS-919-541-4332-SPPD/Phone-Line/RTP-OAQPS-BLDG-C

Ex. 5 Deliberative Process (DP)