

Message

From: Will Hupman [HupmanW@api.org]
Sent: 10/26/2017 4:42:25 PM
To: Lyons, Troy [/o=ExchangeLabs/ou=Exchange Administrative Group
(FYDIBOHF23SPDLT)/cn=Recipients/cn=15e4881c95044ab49c6c35a0f5eef67e-Lyons, Troy]
Subject: Pro Refining Senate RFS Letter
Attachments: Senate letter in re RFS.pdf

See attached

Will Hupman
Director - Federal Relations | American Petroleum Institute
desk: [Personal Phone / Ex. 6] | cell: [Personal Phone / Ex. 6] | hupmanw@api.org

Mr. Kevin S. Minoli
Designated Agency Ethics Official
U.S. EPA (2310A)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Minoli:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Assistant Administrator for the Office of Air and Radiation of the United States Environmental Protection Agency.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Upon confirmation, I will resign from my position with the law firm of with Hunton & Williams LLP. I currently have a capital account with the firm, and I will receive a refund of that account after my resignation. Until I have received this refund, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the ability or willingness of the firm to pay this refund, unless I first obtain a written waiver, pursuant to 18 U.S.C. 208(b)(1). I will continue to receive my monthly draw at the current rate until I resign from the law firm. I will not qualify for any additional partnership payments. If the law firm decides to pay me a discretionary partnership distribution for work I performed during the firm's fiscal year ending March 31, 2018, I will not accept that distribution and will forfeit it, unless I receive it before I assume the duties of the position of Assistant Administrator for the Office of Air and Radiation. If I receive the discretionary partnership distribution, I will not participate personally and substantially in any particular matter involving specific parties in which I know the law firm is a party or represents a party for a period of two years from the date on which I receive the distribution. If I do not receive the distribution, I will not participate personally and substantially in any particular matter involving specific parties in which I know the firm is a party or represents a party for a period of one year from the date of my resignation, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). In addition, I will not participate personally and substantially in any particular matter involving specific parties in which I know a former client of mine is a party or represents a party for a period of one year after I last provided service to that client, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

I will meet in person with you during the first week of my service in the position of Assistant Administrator in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'W L Wehrum', with a long horizontal flourish extending to the right.

William L. Wehrum

8-28-17

UNITED STATES SENATE
COMMITTEE ON ENVIRONMENT AND PUBLIC WORKS
STATEMENT FOR COMPLETION BY PRESIDENTIAL NOMINEES

UNITED STATES SENATE

COMMITTEE ON ENVIRONMENT
AND PUBLIC WORKS

ROOM 410 DIRKSEN SENATE OFFICE BUILDING
WASHINGTON, DC 20510

INFORMATION

REQUESTED OF PRESIDENTIAL
NOMINEES

In order to assist the Committee in its consideration of nominations, each nominee is requested to complete the attached Statement for completion by Presidential Nominees. The Statement is intended to be publicly available. In the event that a nominee asks that a specific answer be kept confidential, he or she should notify the Chairman and Ranking Member.

The original and forty (40) copies of the requested information should be made available to the Honorable John Barrasso, Chairman, Committee on Environment and Public Works, U.S. Senate, Washington, DC 20510 (Attn: Matt Leggett) as soon as possible.

Name of Nominee: William L. Wehrum, Jr.

Position to which nominated: Assistant Administrator for the Office of Air and Radiation, U.S. Environmental Protection Agency

Date of Nomination:

Business Name: Hunton & Williams LLP

Business Address: 2200 Pennsylvania Ave., NW

UNITED STATES SENATE
COMMITTEE ON ENVIRONMENT AND PUBLIC WORKS
STATEMENT FOR COMPLETION BY PRESIDENTIAL NOMINEES

City, State & Zip: Washington, DC 20037

Business E-mail: wwehrum@hunton.com

Business Phone: 202-955-1637

Full Legal Name: William Ludwig Wehrum, Jr.

Date of birth: **DOB / Ex. 6**

State of residency: Delaware

Education:

Institution	Dates Attended	Degrees Received	Dates of Degrees
Widener University School of Law	1991-1993	JD	December 1993
Purdue University	1982-1986	BS Chem. Engr.	May 1986

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Employment Record

List all positions held since college, including the title and description of job, name of employer, location, and dates. If you were terminated involuntarily from any position(s), please note the circumstances. Attach additional pages if necessary.

Position Title	Employer	Address	Dates	Terminated (Y/N)
Partner	Hunton & Williams LLP	2200 Pennsylvania Ave., NW Washington, DC 20037	Sept. 2007 to present	N/A
Acting Assistant Administrator, OAR	U.S. Environmental Protection Agency	1200 Pennsylvania Ave., NW Washington, DC 20460	2005 to 2007	N
Counsel to the Assistant Administrator, OAR	U.S. Environmental Protection Agency	1200 Pennsylvania Ave., NW Washington, DC 20460	2001 to 2005	N
Associate	Latham & Watkins	555 11 th Street, NW Washington, DC 20004	1998 to 2001	N
Associate	Swidler & Berlin Chtd.	3000 K Street, NW Washington, DC	1994 to 1998	N
BF3 Production Team Leader	Allied Signal Inc.	Philadelphia Pike Wilmington, DE	1993 to 1994	N
Supervisor, HS&E	Allied Signal Inc.	Philadelphia Pike Wilmington, DE	1988 to 1993	N
Environmental Engineer	Allied Signal Inc.	Morristown, NJ	1986 to 1988	N

Honors and Awards:

List significant scholarships, fellowships, honorary degrees, military medals, honorary society memberships, and any other special recognition for outstanding service or achievement. Attach additional pages if necessary.

Date	Honor/Award
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None	

Memberships:

List significant memberships and offices held in professional, fraternal, business, scholarly, civic, charitable and other organizations. Attach additional pages if necessary.

Organization	Office held (if any)	Dates
None		

Qualifications:

State fully your qualifications to serve in the position to which you have been nominated.

I am an expert in air quality law, regulations, and policy. I have practiced law at various firms for a total of about 17 years. My practice has been almost exclusively focused on Clean Air Act matters. I have been involved in countless regulatory development efforts. I also have litigated numerous administrative law cases, primarily in the DC Circuit. I have counseled numerous clients on compliance and enforcement matters related to Clean Air Act requirements. Perhaps most importantly, I previously served for two years as the Acting Assistant Administrator for OAR at the US Environmental Protection Agency. As a result, I have a deep understanding of the position for which I have been nominated.

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Future employment relationships:

1. Indicate whether you will sever all connections with your present employer, business firm, association or organization if you are confirmed by the Senate.

Yes.

No. If not, please explain:

2. As far as can be foreseen, state whether you have any plans after completing government service to resume employment, affiliation or practice with your current or any previous employer, business firm, association or organization.

Yes. If so, please explain: I have no agreement with Hunton & Williams with regard to possible future employment with the firm. But, it is a fine firm and I would hope to be considered for readmission to the partnership in the future.

No.

3. Has anybody made a commitment to you for a job after you leave government?

Yes. If so, please explain:

No.

4. (a) If you have been appointed for a fixed term, do you expect to serve the full term?

N/A Yes.

No.

(b) If you have been appointed for an indefinite term, do you have any known limitations on your willingness or ability to serve for the foreseeable future?

Yes. If so, please explain:

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No

(c) If you have previously held any Schedule C or other appointive position in the Executive branch, irrespective of whether the position required Congressional confirmation, please state the circumstances of your departure and its timing.

I was a political appointee at the US Environmental Protection Agency from 2001 to 2007. I voluntarily resigned my position in 2007.

Financial Statement:

Note: The Office of Government Ethics will provide the Committee with a copy of your Executive Personnel Financial Disclosure Report (SF-278).

1. List sources, amounts and dates of all anticipated receipts from deferred income arrangements, stock options, uncompleted contracts and other future benefits which you expect to derive from previous business relationships, professional services and firm memberships or from former employers, clients, and customers. Amounts should be indicated by the categories established for reporting income on Form SF-278, Schedule A.

None.

2. Are any assets pledged?

Yes. If so, please explain:

No

3. Are you currently a party to any legal action?

Yes. If so, please explain:

No

4. Have you filed a Federal income tax return for each of the last 10 years?
If not, please explain the circumstances.

Yes

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 No. If not, please explain:

5. Has the Internal Revenue Service ever audited your Federal tax return?

 Yes. If so, what resulted from the audit?

 X No

Potential conflicts of interest:

1. Describe any financial or deferred compensation agreements or other continuing of interest: dealings with business associates, clients or customers who will be affected by policies which you will influence in the position to which you have been nominated.

None.

2. List any investments, obligations, liabilities, or other relationships which might involve potential conflicts of interest, or the appearance of conflicts of interest, with the position to which you have been nominated.

I have represented numerous clients on litigation, regulatory, and policy matters before the US Environmental Protection Agency. I will work with the EPA Designated Agency Ethics Official to identify potential conflicts that would require my recusal if confirmed as AA for OAR.

3. Describe any business relationship, dealing or financial transaction (other than taxpaying) which you have had during the last 10 years with the Federal Government, whether for yourself or relatives, on behalf of a client, or acting as an agent, that might in any way constitute or result in a possible conflict of interest, or an appearance of conflict of interest, with the position to which you have been nominated.

None.

4. Explain how you will resolve any potential conflict of interest, or appearance of a conflict of interest, that may be disclosed by your responses to the above items.

I will work with the EPA Designated Agency Ethics Official to identify potential conflicts that would require my recusal if confirmed as AA for OAR.

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5. Explain how you will comply with conflict of interest laws and regulations applicable to the position for which you have been nominated. Attach a statement from the appropriate agency official indicating what those laws and regulations are and how you will comply with them. For this purpose, you may utilize a statement by the relevant agency Ethics Officer.

I will work with the EPA Designated Agency Ethics Official to identify potential conflicts that would require my recusal if confirmed as AA for OAR. Attached is a statement from the EPA Designated Agency Ethics Official identifying applicable laws and regulations and explaining how I will comply with them.

Political affiliation and activities:

List all memberships and offices held in, or financial contributions (in excess of \$1,000), and services rendered to any political party or election committee during the last 10 years.

Membership/Office/Political Party	Dates	Amount (if applicable)
None.		

Published writings:

List the titles, publishers and dates of any books, articles, or reports you have written.

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(Please list first any publications and/or speeches that involve environmental or related matters.)

Op Ed: The Animas River disaster in Colorado is looking worse and worse for the Environmental Protection Agency. Wall Street Journal. Sept. 10, 2015.

Additional Matters:

1. If there is any additional information which you believe may be pertinent to the Members of the Committee in reaching their decisions, you may include that here.

None.

2. Do you agree to appear before all Congressional Committees which seek your testimony?

X Yes

 No. If not, please explain:

3. Having completed this form, are there any additional questions which you believe the Committee should ask of future nominees?

 Yes. If so, please explain:

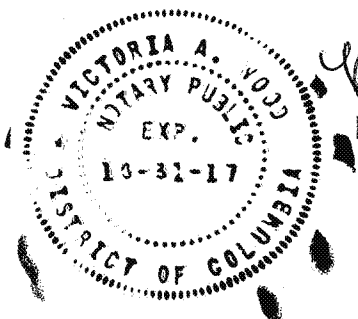
X No

W L Wehrum _____ 9-7-17

AFFIDAVIT

William L. Wehrum) ss, being duly sworn, hereby states that he/she has read and signed the foregoing Statement for Completion by Presidential Nominees including the Financial Statement and that the information provided therein is, to the best of his/her knowledge and belief, current, accurate, and complete.

Subscribed and sworn before me this *7th* day of *September*, 2017.



Victoria A. Wood
Notary Public

VICTORIA A. WOOD
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires October 31, 2017

Message

From: Bowman, Liz [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C3D4D94D3E4B4B1F80904056703EBC80-BOWMAN, ELI]
Sent: 9/15/2017 10:22:29 PM
To: Sean Reilly [sreilly@eenews.net]
CC: wwehrum@hunton.com; Lyons, Troy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=15e4881c95044ab49c6c35a0f5eef67e-Lyons, Troy]
Subject: Re: OGE financial disclosure report-following up on vm

Thank you. Please see our press release for additional support statements

Sent from my iPhone

On Sep 15, 2017, at 6:16 PM, Sean Reilly <sreilly@eenews.net> wrote:

Received, Liz. I'll work this into a preview story we're running Monday on the upcoming confirmation hearing.

Thanks,
Sean Reilly

Reporter
E&E News

Ph: Personal Phone / Ex. 6 (Desk)
Ph: Personal Phone / Ex. 6 (Cell)
sreilly@eenews.net

From: Bowman, Liz [<mailto:Bowman.Liz@epa.gov>]
Sent: Friday, September 15, 2017 5:33 PM
To: Sean Reilly <sreilly@eenews.net>
Cc: wwehrum@hunton.com; Lyons, Troy <lyons.troy@epa.gov>
Subject: FW: OGE financial disclosure report-following up on vm

Hi Sean -- Mr. Wehrum has a long history of public service, and previously served as EPA's acting assistant administrator for Air and Radiation from 2005 to 2007 and as EPA's principal deputy assistant administrator and counsel to the assistant administrator. Mr. Wehrum's career includes over 31 years working in the environmental field through engineering, legal practice, and administrative duties. Thank you -- Liz

From: Sean Reilly [<mailto:sreilly@eenews.net>]
Sent: Friday, September 15, 2017 2:45 PM
To: Wehrum, William L.
Subject: OGE financial disclosure report-following up on vm

Mr. Wehrum:

As noted in my voicemail, I'm writing a story this afternoon on the attached disclosure document. Two questions:

1. Has anything changed (particularly in terms of your client list) since you filled out the disclosure report?
2. Given that your clients include entities with members either regulated by EPA and/or that lobby on environmental legislation, do you have any comment on criticism from environmentalists that this would affect your ability to serve impartially as head of OAR?

My deadline (apologies that it's so tight) is 3:45 this afternoon.

Thanks very much,
Sean Reilly

Reporter

E&E News

Ph: [Redacted] (Desk)

Ph: [Redacted] (Cell)

sreilly@eenews.net

<Financialdisclosure-c.pdf>

Message

From: Wehrum, William L. [wwehrum@hunton.com]
Sent: 9/19/2017 9:07:22 PM
To: Lyons, Troy [/o=ExchangeLabs/ou=Exchange Administrative Group
(FYDIBOHF23SPDLT)/cn=Recipients/cn=15e4881c95044ab49c6c35a0f5eef67e-Lyons, Troy]
Subject: Late Request

Personal Matters / Ex. 6



Bill Wehrum

Partner

wwehrum@hunton.com

p 202.955.1637

bio | vCard | blog | LinkedIn

Hunton & Williams LLP
2200 Pennsylvania Avenue, NW
Washington, DC 20037

hunton.com