

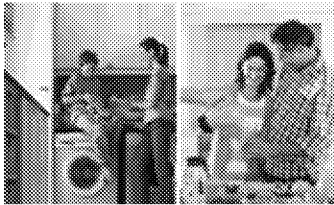
Message

**From:** Messner, Kevin [KMessner@AHAM.org]  
**Sent:** 8/7/2018 8:17:24 PM  
**To:** Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Gunasekara, Mandy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=53d1a3caa8bb4ebab8a2d28ca59b6f45-Gunasekara,]; Dunham, Sarah [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a9444681441e4521ad92ae7d42919223-SDUNHAM]; Newberg, Cindy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b951e525a8a3457ebfb51fa7d8b06bfb-Newberg, Cindy]  
**Subject:** Charge Size Rule -- THANKS

Thank you all so much for getting the charge size increase rule to the Federal Register. I saw on their web page it will be published in tomorrow's issue. This is a huge need that you all acted on and it is very much appreciated. Thanks again!

Kevin Messner  
Senior Vice President, Policy & Government Relations  
Association of Home Appliance Manufacturers  
1512 Willow Lane, Davis, CA 95616  
1111 19th Street NW, Suite 402, Washington, DC 20036  
f Ex. 6 m Ex. 6 f 202.872.9354 e [kmessner@aham.org](mailto:kmessner@aham.org)

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Message



**From:** Messner, Kevin [KMessner@AHAM.org]  
**Sent:** 5/31/2018 1:51:59 PM  
**To:** Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Gunasekara, Mandy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=53d1a3caa8bb4ebab8a2d28ca59b6f45-Gunasekara,]  
**Subject:** AHAM Letter to President Trump Regarding Energy Star  
**Attachments:** AHAM CEO Letter to President 2018 (00074016).pdf

So you are aware, I wanted to send you the letter that our CEOs sent to the President regarding ENERGY STAR moving back to DOE for home appliances. For us, it is a culmination of an effort that started as far back as 2016. Our plan is that we will be requesting meetings with our CEOs and the White House and also with Administrator Pruitt and Secretary Perry on June 20/21.

For home appliances, however, the continued success of the ENERGY STAR program is an essential part of our industry's business. That is why you are seeing so much energy behind this effort from us. At our recent Board meeting, our members discussed how important the future success of the ENERGY STAR program was to the appliance industry's business, and after a year and a half of inaction, they decided to ramp it all the way up to our CEOs and the White House, Administrator Pruitt and Secretary Perry. Our view is that the current bifurcated structure of the Appliance Standard Program being at DOE and the ENERGY STAR program being at EPA creates inefficiencies for our member companies and for the government. Appliance manufacturers financial expenditures are redundantly made to DOE and EPA activities, such as responding to multiple agency analysis, reporting and disclosure, consultants, certification/verification, etc.

If you are agreeable and feel it would be helpful, we would welcome the chance to meet with you again on this at any time. Thank you for your time on this. I understand we are not in alignment quite yet, but remain hopeful we can continue to discuss. Thanks again.

Kevin Messner  
Senior Vice President, Policy & Government Relations  
Association of Home Appliance Manufacturers  
1512 Willow Lane, Davis, CA 95616  
1111 19th Street NW, Suite 402, Washington, DC 20036  
Ex. 6 | m | Ex. 6 | 202.872.9354 e [kmessner@aham.org](mailto:kmessner@aham.org)

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May 30, 2018

The Honorable Donald J. Trump  
President of the United States  
The White House  
1600 Pennsylvania Avenue, NW  
Washington, DC 20500

Dear Mr. President,

The appliance manufacturing industry is being negatively impacted by the EPA's management of the ENERGY STAR® program. Under President Obama's administration, management of this program for home appliances was transferred to the EPA. For the following reasons, innovation and consumer choice would be best served by transferring management of this program for home appliances back to the Department of Energy.

Appliance manufacturers support an improved and modernized ENERGY STAR® program. The administration of the ENERGY STAR program for home appliances should return to the Department of Energy (DOE) where the program originated. Returning home appliances to DOE would reduce financial burdens on both EPA and DOE by streamlining government oversight through the existing DOE Appliance Standards Program. This move would also reduce appliance manufacturers' cumulative regulatory burden from dual agency activities, such as responding to multiple agency analyses, reporting and disclosure requests. Ending dual-agency management of this program would help reduce unnecessary bureaucracy, enhance manufacturers productivity and, ultimately, refocus the program. DOE oversight would also ensure a continued focus on core efficiency attributes and avoid performance requirements that should be left to market forces to determine.


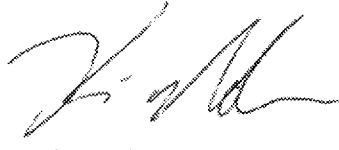
Home appliances enhance consumer convenience, safety and flexibility. During the past 25 years alone, domestic chores have been reduced more than 14 hours per week, which enables greater household time for more productive activities. Further, through its technology, employees and economic productivity, the industry contributes significantly to U.S. jobs and economic security. In the U.S., the Association of Home Appliance Manufacturers (AHAM) member companies employ tens of thousands of people with an annual shipment value of more than \$40 billion. Home appliances also are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy consumption and costs.

The undersigned senior executives from the home appliance industry urge your Administration to address this issue to help create a more efficient home appliance sector. Thank you for your consideration of these views and we look forward to discussing these issues in more detail.

Sincerely,



Joseph M. McGuire  
President & CEO  
AHAM

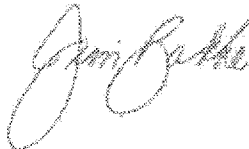


Kevin Nolan  
President & CEO  
GE Appliances, a Haier Co.

Alan Shaw  
President & CEO  
Electrolux MA NA



Joseph T. Liotine  
President  
Whirlpool North America



James J. Bakke  
President & CEO  
Sub-Zero Group



Mike Prager  
President & CEO  
DeLonghi America



Andy Doberstein  
President  
U-Line Corp./AGA Marvel



Kurt Jovais  
President  
Midea America Corp.

Message

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**From:** Michael K. Henry [mhenry@alpinegroup.com]  
**Sent:** 5/3/2018 9:40:16 PM  
**To:** Gunasekara, Mandy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=53d1a3caa8bb4ebab8a2d28ca59b6f45-Gunasekara,]  
**CC:** Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Katherine Ambrose [kambrose@alpinegroup.com]  
**Subject:** RE: Meeting Request - Honeywell

Thank you – sorry to be a pest!

---

**From:** Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>  
**Sent:** Thursday, May 3, 2018 5:35 PM  
**To:** Michael K. Henry <mhenry@alpinegroup.com>  
**Cc:** Wehrum, Bill <Wehrum.Bill@epa.gov>; Katherine Ambrose <kambrose@alpinegroup.com>  
**Subject:** Re: Meeting Request - Honeywell

Hey Michael,

Thank you for the note. We are following up with or scheduling team to figure what we can make work. You'll get a follow up on that soon.

Hope all is well,  
Mandy

Sent from my iPhone

On May 3, 2018, at 3:47 PM, Michael K. Henry <mhenry@alpinegroup.com> wrote:

Just following up. I know you are both busy, but hoping we can get a meeting scheduled.

Thank you!

Mike

Ex. 6 cell

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**From:** Michael K. Henry  
**Sent:** Wednesday, May 2, 2018 5:23 PM  
**To:** 'Gunasekara.mandy@Epa.gov' <Gunasekara.mandy@Epa.gov>; 'Wehrum.bill@epa.gov' <Wehrum.bill@epa.gov>  
**Cc:** Katherine Ambrose (kambrose@alpinegroup.com) <kambrose@alpinegroup.com>  
**Subject:** Meeting Request - Honeywell

I originally intended to reach out to you this week to request a premeeting in preparation for the meeting Honeywell is having with the Administrator (5/18), but with everything happening with respect to fuel efficiency the last 36 hours, we would love to discuss that too.

Are you both available this week or early next?

Thanks!

mike

Message

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**From:** Lauren Wilk [lwilk@aluminum.org]  
**Sent:** 1/31/2018 3:17:45 PM  
**To:** Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]  
**Subject:** Aluminum Association / Meeting Request

Mr. Wehrum:

I wanted to take a moment to introduce myself, and to request a meeting with you in the coming weeks.

I recently joined the Aluminum Association from the NAM, and the Association is active with EPA on a number of issues – as an energy-intensive industry with growing demand and a strong story on innovation and sustainability, we have a stake in a range of EPA regulations. Specifically, the members of our [Aluminum Transportation Group \(ATG\)](#) would very much like to hear directly from you about the Administration’s priorities related to automotive GHG emissions and fuel economy regulations. The ATG represents companies that make aluminum for use in cars and trucks, including Alcoa, Arconic, Novelis, Rio Tinto and others.

As you might know, the aluminum industry plays a significant role in the automotive supply chain. Pounds of aluminum content per vehicle has grown by more than 30 percent over the past decade, and the aluminum industry has announced or completed U.S. plant expansion investments of more than \$2.6 billion since 2013 to support this growth. Just this month, Novelis announced that it was investing \$300 million in a new greenfield automotive finishing facility in Guthrie, Kentucky, to support the growth in the auto sector. As a key supplier to the auto sector, the industry is acutely interested in the outcome of the midterm review on vehicle fuel economy.

The ATG has met previously with the White House, OMB, NHTSA, CARB and others on this topic, and we’d propose a meeting with you on one of the following dates: February 16, 20, 21, 23, 26, 27, 28 or March 1. We can certainly be flexible if an alternative date is available, though.

Thanks so much,

Lauren



Lauren Wilk  
Vice President, Policy & International Trade  
The Aluminum Association  
1400 Crystal Drive, Suite 430  
Arlington, VA 22202

T [Ex. 6] C [Ex. 6] F 703.358.2961

JOIN THE CONVERSATION:

Message

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**From:** Paul Balserek [pbalserek@steel.org]  
**Sent:** 1/19/2018 1:11:36 PM  
**To:** Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]  
**CC:** Gunasekara, Mandy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=53d1a3caa8bb4ebab8a2d28ca59b6f45-Gunasekara,]  
**Subject:** AISI Energy/Environment Committee Meeting

Hi Bill,

I want to invite you to speak at AISI's Energy and Environment Committee meeting on February 28, 2018 at our offices in Washington DC. Three times a year, approximately 40 federal representatives and environmental managers from my member companies meet together to discuss a range of energy and environmental topics. Our biggest meeting is always the first one of the year, which is held in Washington DC at our offices near Capitol Hill. We would love to hear from you, and at this point could accommodate pretty much any hour time slot during that day that works for you. You would have significant discretion as to what topics you discuss with us -- I would be happy, of course, to suggest some of the key issues members would have on their minds. Our meeting actually runs through noon on March 1, so if Feb 28 is not convenient for you, please consider coming the morning of March 1. Thank you in advance for your consideration of this invite, Bill. As always, you can reach me on the numbers below should you want to discuss any matter.

Best,  
Paul

**Paul Balserek**  
Vice President, Environment

American Iron and Steel Institute  
25 Massachusetts Ave. NW, Suite 800  
Washington, DC 20001

**Ex. 6** (office)  
(mobile)



Message

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**From:** Messner, Kevin [KMessner@AHAM.org]  
**Sent:** 2/2/2018 4:23:07 PM  
**To:** Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]  
**CC:** Gunasekara, Mandy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=53d1a3caa8bb4ebab8a2d28ca59b6f45-Gunasekara,]; Loving, Shanita [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=439ce9c2d2104080a1b5908d3402bf20-Loving, Shanita]  
**Subject:** Invitation

I would like to invite you to speak during a lunch break (or another time if needed) of an AHAM industry-wide meeting on refrigerants and refrigerator/freezers. The meeting attendees will consist of 10+ appliance refrigeration engineers and 10 or so industry regulatory compliance directors. On March 7, the group will be meeting in-person at AHAM for its second day of a three day meeting. If you could join us for the lunch break on Wednesday, that would be ideal. However, we could find time on March 6 or March 8, too. Having the entire industry's refrigeration engineers in a room at the same time is not a frequent event, and I think it would be beneficial for them to hear from you and for you to ask any questions you may have as it relates to refrigerant policies, such as the SNAP rules.

Thank you for considering this invitation. I am hopeful it will work out. Please let me know if there is anything I can do to help on this. Thanks again.

Kevin Messner  
Senior Vice President, Policy & Government Relations  
Association of Home Appliance Manufacturers  
1512 Willow Lane, Davis, CA 95616  
1111 19th Street NW, Suite 402, Washington, DC 20036  
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**From:** Ross Eisenberg [REisenberg@nam.org]  
**Sent:** 1/29/2018 8:29:20 PM  
**To:** Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]  
**Subject:** Speaker invitation: Feb 5 NAM energy/environment committee meeting

Bill,

I hope all is well. I'd like to invite you to speak at the NAM's upcoming meeting of its energy and environment committees. The meeting is scheduled for Feb. 5 from 2-4 pm at NAM headquarters and would be off-the-record. Audience would be member companies and trade associations, all of whom are NAM members. We usually get 100 in the room and another 70-80 by phone. We have flexibility on time, so if you are able to attend at any point during the 2-4 pm window, we will carve out a 30-45 minute spot on the agenda for you.

As you know, your portfolio at EPA is far and away the most requested issue area from our committee members. If you have time to provide an update I'm sure the members would love it.

**Ross Eisenberg**  
Vice President, Energy and Resources Policy  
National Association of Manufacturers  
Direct: **Ex. 6**  
Mobile:  
Email: [reisenberg@nam.org](mailto:reisenberg@nam.org)

Message

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**From:** Messner, Kevin [KMessner@AHAM.org]  
**Sent:** 1/18/2018 10:36:31 PM  
**To:** Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Gunasekara, Mandy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=53d1a3caa8bb4ebab8a2d28ca59b6f45-Gunasekara,]  
**Subject:** FW: Association of Home Appliance Manufacturers Petition to SNAP Program on Refrigerant Transition for Household Refrigeration Products  
**Attachments:** EPA Petition to SNAP Program on Refrigerant Transition for Household Refrigeration Products (00069424-4).docx; ENERGY STAR Overlap (00069437-2).docx

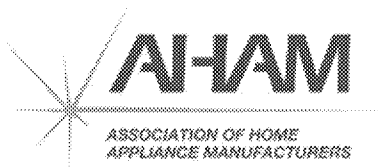
I wanted to follow up with you both from our last meeting on the ENERGY STAR program and the SNAP program. On the SNAP program, I wanted to highlight the petition below we just submitted to formally start the discussion (and hopefully process) to change the dates for prohibiting refrigerant and foam in residential refrigerator/freezers. I'll be in DC the week of February 5 and would welcome a meeting with you to continue to discuss this in more detail. Are you free anytime that week? Thanks for considering.

Regarding ENERGY STAR, we appreciate the effort with today's meeting to try to discuss some of the issues we have been raising for the past several years. During the meeting, we indicated that our primary goal in seeking to move the program from EPA to DOE for home appliances is to ensure the ENERGY STAR brand is consistent with federal minimum standards upon which it is built and to maximize resources instead of duplicating them within the federal government and among stakeholders. We discussed a number of areas in which AHAM sees duplication or inconsistencies, which are detailed in the attached document. We also discussed ways DOE, EPA, and we could work together now to try to minimize burden, including centralizing reporting and using the certification process at DOE for products that would also be subject to verification – a more robust process and less redundant. We also expressed our view that the program should be more transparent and should leverage DOE's analysis instead of duplicating or reevaluating it.

We look forward to continuing to work with you to discuss these two issues. They are both extremely important to the appliance industry and appreciate your time on them. Again, I hope you may have some time the week of February 5 to continue this work and discussion. Thanks again.

Kevin Messner  
Senior Vice President, Policy & Government Relations  
Association of Home Appliance Manufacturers  
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**From:** Skidmore, Charlotte  
**Sent:** Thursday, January 18, 2018 4:55 PM  
**To:** 'wehrum.william@epa.gov' <wehrum.william@epa.gov>  
**Cc:** 'Gunasekara.Mandy@epa.gov' <Gunasekara.Mandy@epa.gov>; 'Dunham.Sarah@epamail.gov' <Dunham.Sarah@epamail.gov>; 'Newberg, Cindy' <Newberg.Cindy@epa.gov>; Messner, Kevin <KMessner@AHAM.org>  
**Subject:** Association of Home Appliance Manufacturers Petition to SNAP Program on Refrigerant Transition for Household Refrigeration Products

Dear Assistant Administrator Wehrum:

Hope all is well there. Please find attached the Association of Home Appliance Manufacturers' (AHAM) Petition to the Significant New Alternatives Policy Program (SNAP) on Refrigerant Transition for Household Refrigeration Products. AHAM is requesting EPA's Office of Stratospheric Protection Division, SNAP program amend two rules to modify the transition deadlines for alternative substances for refrigerants and foam blowing agents in household refrigerators and freezers products consistent with the industry's agreement.

Please let me know if you have any questions.  
Thank you,  
Charlotte

**Charlotte Skidmore**  
Senior Director, Environmental & Sustainability Policy  
**Association of Home Appliance Manufacturers**  
1111 19th Street NW, Suite 402, Washington, DC 20036  
t: [Ex. 6] f: 202.872.9354 [www.aham.org](http://www.aham.org)

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**Duplicative and Overlapping Federal Resources Due to ENERGY STAR Being Administered by EPA instead of DOE for Home Appliances**

Function	EPA	DOE	Redundancy or Conflict
Information Collection	Through Certification Bodies	Through CCMS	Different information collected and/or same information collected twice for the same product
Database	Qualified Products List (QPL)	CCMS	Same products listed on two separate Federal databases
Certification	QPL	CCMS	Two separate certifications to the Federal government required for the same product
Verification	Third party certification bodies do verification tests, EPA makes enforcement decisions, sometimes in consultation with DOE	DOE Supports technical aspects of enforcement decisions for ESTAR; makes enforcement decisions for appliance standards program	Both EPA and DOE working on enforcement
Consultants	ICF	Navigant	Federal government wasting resources developing the same expertise on the same products at two different consultants
Definitions	Specifications	Rulemaking; 10 CFR 430	DOE already has definitions, but EPA relitigates
Product Coverage	Specifications	Rulemaking; 10 CFR 430	DOE already defines covered products, but EPA relitigates
Product Class Determinations	Specifications	Rulemaking; 10 CFR 430	DOE already defines product classes, but EPA relitigates
Analysis	Model counts; No examination of incremental costs to reach proposed criteria; Sometimes uses	Thorough analysis in Technical Support Documents and proposed and final rules	Different analysis to examine energy savings potential and viability of levels

	DOE's technical documents, but not always		
Test Procedure	Cites to DOE test procedure; sometimes requires additional tests	Rulemaking; 10 CFR 430	DOE sets test procedures, but EPA sometimes adds to them (e.g., drying time requirement)
Effective Dates	Specifications	Final Rules, based on EPCA	DOE sets effective dates, but EPA relitigates
Performance	Believes should be performance minimums	Develops tests for performance assessment at request of EPA for ENERGY STAR; For appliance standards, evaluates performance during the standards setting process	Federal government has two different fundamental approaches to evaluating the intersection between stringency of energy requirements and product performance



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January 18, 2018

The Honorable William Wehrum  
Assistant Administrator  
Office of Air and Radiation  
Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington DC, 20460

Dear Assistant Administrator Wehrum:

The Association of Home Appliance Manufacturers (AHAM) is requesting EPA's Office of Stratospheric Protection Division, Significant New Alternatives Policy Program (SNAP) to amend two rules to modify the transition deadlines for alternative substances for refrigerants and foam blowing agents in household refrigerators and freezers products. SNAP Rule 20 banned the use of certain high Global Warming Potential (GWP) foam blowing agents in rigid polyurethane appliance insulating foam as of January 1, 2020. SNAP Rule 21 banned the use of certain high GWP refrigerants in new household refrigerators and freezers as of January 1, 2021. We write to urge your office to amend these two SNAP rules to ensure an orderly transition to acceptable alternative refrigerants.

The appliance industry is pleased to submit to EPA its consensus agreement to transition out of high-GWP refrigerants and foam blowing agents. This approach will help realize the policy goals of the two SNAP rules in a cost effective manner without detracting from the rules' environmental goals. Our plan is a tiered approach that recognizes different product categories based on technical feasibility. Our members have agreed to transition beginning with a transition out of high-GWP refrigerant and foam blowing agents beginning on January 1, 2021 in certain refrigeration products and completing phase-out in all other refrigerator/freezer categories by January 1, 2023.

Below is AHAM's petition to EPA to amend the two SNAP rules consistent with this industry agreement, the SNAP Program's policy objectives, and protection of the environment. We look forward to working with the SNAP program to advance the recommendations contained in this petition.

Please do not hesitate to contact me if you have any questions or need any further information.

Sincerely,

Charlotte Skidmore  
Senior Director, Environmental & Sustainability Policy

# **Petition to EPA's Significant New Alternatives Policy (SNAP) Program to Amend Regulations to Change Transition Deadlines for Acceptable Substitutes for Household Refrigeration Products for Refrigerants and Foam Blowing Agents**

January 18, 2018

## **Introduction and Overview**

The Association of Home Appliance Manufacturers (AHAM) petitions the U. S. Environmental Protection Agency's (EPA) Significant New Alternatives Policy Program to amend its regulations to allow for the home appliance manufacturing industry's consensus voluntary commitment to transition out of high global warming potential refrigerants and foam blowing agents for all household refrigerators and freezers products (see below). The petition applies to household consumer refrigeration products, including refrigerators, refrigerator-freezers, freezers, coolers and combination coolers.

The home appliance manufacturing industry has committed to voluntarily transition away from the use of high Global Warming Potential (GWP) refrigerants and foam blowing agents in residential consumer refrigeration products. This commitment synchronizes the insulating foam-blowing agent and refrigerant transition timing to reduce repetitive redesign and retooling costs, thereby also reducing consumer product cost. This is an aggressive, environmentally responsible, cost-effective, and tiered transition beginning in 2021 and concluding by 2023.

Over the last 30 years, the appliance industry in the US and globally has undergone several transitions of cooling and insulation systems in ways that have enhanced environmental protection. Since the mid-1980s, the industry has made costly, but environmentally beneficial, transitions from CFCs to HCFCs and to non-ozone-depleting and very energy efficient compounds such as HFCs and, more recently, to hydrocarbons HFOs. Our industry has already largely transitioned out of HFC foam blowing agents. For example, less than 30% of current household refrigerators sold contain HFCs as a foam-blowing agent.

**PRODUCT SCOPE:** Residential Consumer Refrigeration Products are within the scope of this petition (as defined in the Federal Code of Regulations at in 10 CFR 430.2), which include Refrigerators, Refrigerator-Freezers, Freezers, Coolers, Combination Coolers.

**CONTINGENCY:** The voluntary agreement to transition from high-GWP refrigerants and foam is contingent on EPA's final rule authorizing an increase in the allowance for the use of R600a refrigerant charge size to 150 grams. Without this final rule, many products will not be able to transition.

**TRANSITION DATES:** Residential Consumer Refrigeration Products will be fully transitioned out of high-GWP foam blowing agents and



refrigerants based on the below schedule. Many refrigeration products will transition prior to these timeframes.

January 1, 2021: **Compact Refrigeration Products (Not Built-Ins)**  
*Refrigerators, Refrigerator-Freezers, Freezers, Freestanding Compact Cooler, Compact Combination Coolers*

January 1, 2022: **Full-Size Refrigeration Products (Not Built-ins)**  
*Refrigerators, Refrigerator-Freezers, Freezers, Freestanding Cooler, Combination Coolers*

January 1, 2023: **Built-In Refrigeration Products**  
*Refrigerators, Refrigerator-Freezers, Freezers, Built-in Compact Cooler, Built-in Cooler, Built-in Combination Coolers*

### **SNAP Regulations**

Current SNAP regulations designate certain substitutes for refrigerants as unacceptable for new household refrigerators and freezers as of January 1, 2021 (SNAP 21) and certain substitutes for foam blowing agents as unacceptable as of January 1, 2020 (SNAP 20). The transition to alternative chemicals, some of which are flammable, is a feasible but complex technical undertaking for manufacturers, particularly domestic manufacturers requiring substantial capital and product investments at numerous stages of the production process.

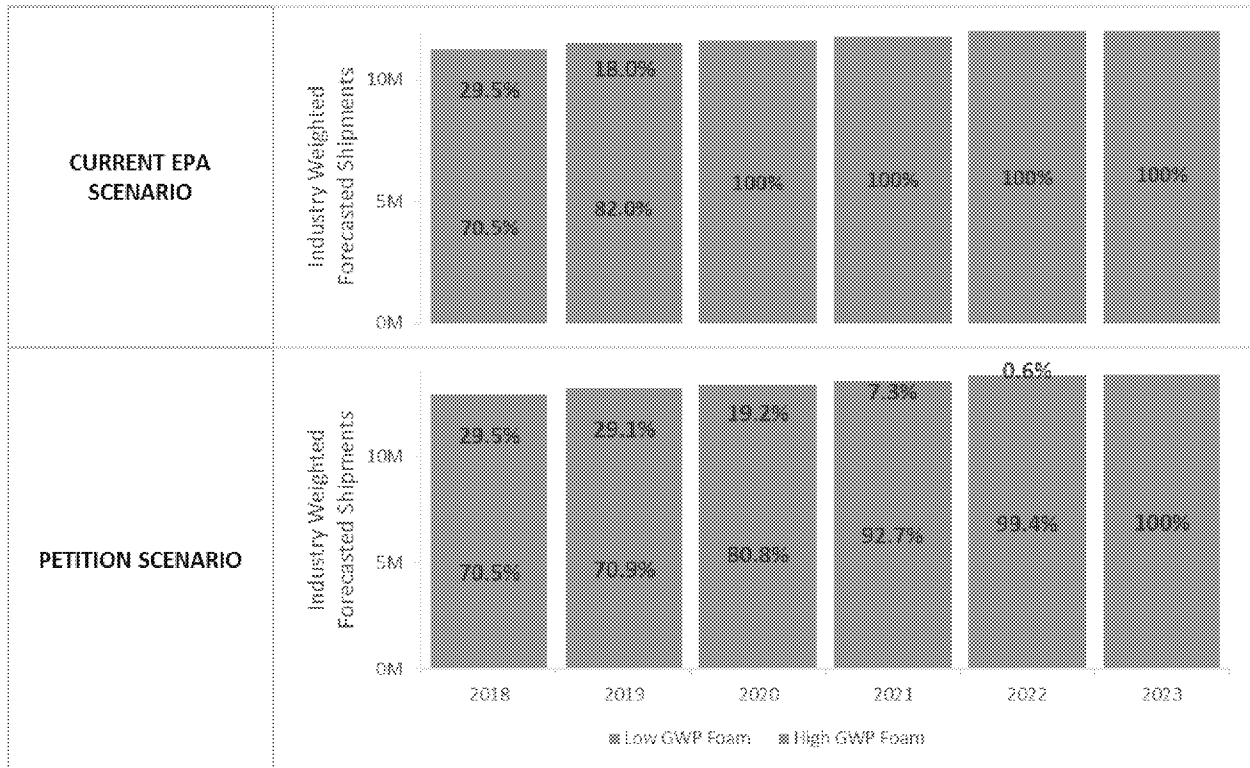
AHAM is requesting EPA to amend the two SNAP regulations to change the applicable deadlines to ensure a smooth transition from high-GWP HFCs in refrigerants and foam in accordance with the transition dates in this petition. This approach will provide manufacturers additional time to transition to flammable refrigerants in all covered products. A phased approach is necessary to ensure the safe use of these alternative refrigerants in all covered products.

Our Petition seeks to modify slightly the current SNAP rule transition dates. Our voluntary plan, however, is reasonable, has no material environmental impact and provides certainty to stakeholders.

### **Foam Blowing Agents - Comparison of Dates for Transition to Lower GWP**

Based on AHAM analysis of industry data, the chart below compares the percentage of products shipped with low GWP foam blowing agents under the current EPA SNAP regulatory requirements compared to the dates recommended in this petition. It shows that just 19.2% of the remaining estimated shipments will transition to low GWP foam blowing agents after 2019 with most of the final transition occurring just one year later in 2020.

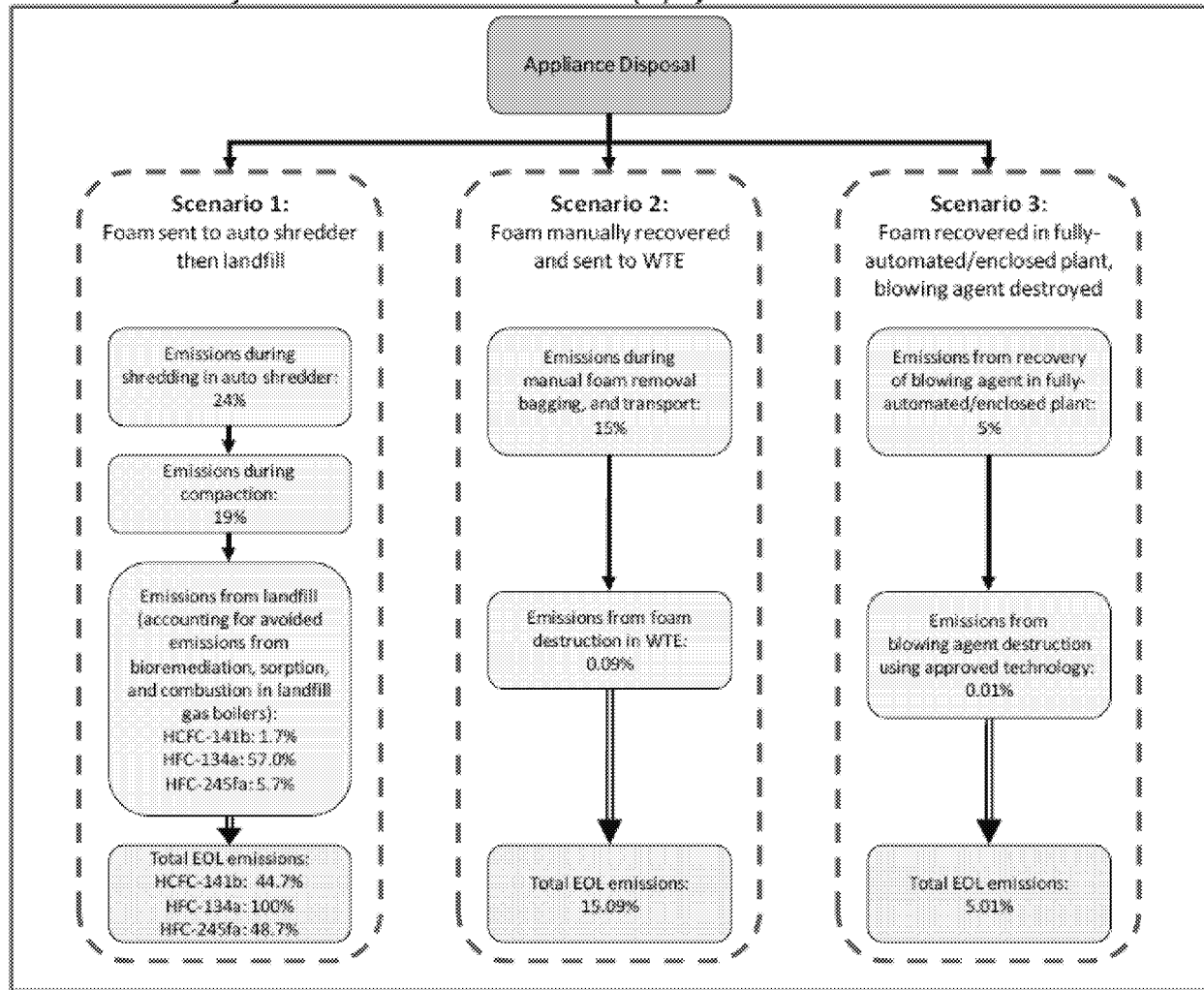
## Comparison of Forecasted Shipments between Current EPA Rule and Petition Dates for Transition to Lower GWP Foam Blowing Agents



This petition, therefore, would have a negligible impact on GHG emissions as it relates to foam blowing agents. During the recycling of these products, much of the foam blowing agent is captured. There are a few studies in this area, but ICF International completed research for the Appliance Research Corporation and found that about half (48.7%) of the most commonly used foam blowing agent in the landfill scenario (see scenario 1 in Exhibit 1) is emitted, and even less for the other scenarios (15.09% and 5.01%).<sup>1</sup>

<sup>1</sup> ICF International, *Assessment of Refrigerator/Freezer Foam End-of-Life Management Options*, December 2010.

**Exhibit 1: Summary of BA Emission Profiles at EOL (%) by Scenario**



In addition, the California Air Resources Board (CARB) funded a study in 2016 that showed waste appliance insulation foam, once landfilled, is not a very significant source of GHG emissions.<sup>2</sup> The research results show that with bioremediation and in modern landfills with methane collection and combustion systems, the blowing agent emissions are quite low, ranging as low as 0.06% (see Table 1.9 from CARB study below).

<sup>2</sup> Yesiller et al, *Emissions of Potent Greenhouse Gases from Appliance and Building Waste in Landfills*, CARB Agreement Number 11-308, May 31, 2016.

Table 1.9 – Summary of Predicted BA Emissions from the Landfill Environment at End of Life

Reference	Modeling Period (years)	Blowing Agent	Initial Release	Short-Term Release	Fraction Microbially Degraded (%) <sup>4</sup>	Fraction Remaining in Landfill (%)	Fraction of Long Term Release with LFG (%)	Fraction of Release with Leachate (%)	Fraction Released to Atmosphere (%) <sup>1</sup>	Fraction Released after Combustion by Gas System (%) <sup>2</sup>	Total Emissions from Landfill at End of Life (%)
			Compaction (%)	Microbiol Inactive Period (%)							
Scheutz et al. (2003a)	2	CFC-11	N/A	N/A	0 to 99.7	0.3 to 8.8	0.2 to 32	<0.01 to 0.08	0.05 to 6	0.01 to 1.4	0.06 to 9.4
	20		N/A	N/A	0 to 99.7	0.1 to 8.8	0.2 to 91	<0.01 to 0.24	0.05 to 23	0.01 to 4	0.06 to 27
	2	HCFC-141b	N/A	N/A	0 to 89.7	8 to 89	2.2 to 11	0.83 to 0.12	0.8 to 2.8	0.1 to 0.5	0.7 to 3.3
	20		N/A	N/A	0 to 97	0.5 to 35.3	2.4 to 64	0.83 to 0.75	0.8 to 18.3	0.11 to 3	0.71 to 18.3
Fredenslund et al. (2005)	20	CFC-11	15	3 to 39	7 to 36	5 to 21	0 to 2	N/A	0 to 0.5	0 to 0.1	0 to 6.5
	20		5	0	40 to 80	10 to 29	1 to 4	N/A	0.25 to 1	0.05 to 0.2	5.7 to 6.3
Scheutz et al. (2007c)	20	CFC-11	N/A	N/A	94 to 99	0.5 to 1	0.5 to 5	N/A	0.13 to 1.25	0.02 to 0.23	0.15 to 1.5
		HCFC-141b			46 to 92	2 to 33	6 to 29	N/A	1.5 to 7.25	0.3 to 1.3	2 to 9
		CFC-12			80 to 92	0 to 2	6 to 40	N/A	1.5 to 10	0.3 to 2	2 to 12
		HCFC-22			43 to 88	0	12 to 57	N/A	3 to 14.3	0.5 to 3	3.5 to 17.3
ICF (2011) <sup>3</sup>	1	HCFC-141b	19	N/A	46	23	29	N/A	3	2.35	5.35
		HFC-134a			0	0	100	N/A	100	0	100
		HFC-245fa			0	0	100	N/A	10	8.1	18.1

<sup>1</sup> Calculated from long term LFG release assuming a collection efficiency of 75% (SCS 2008)  
<sup>2</sup> Calculated from long term LFG release assuming a destruction efficiency of 94% (Cianciarelli and Bourgeau 2002, Greer and Cianciarelli 2005)  
<sup>3</sup> Study assumed a collection efficiency of 90%, and destruction efficiency of 91% (ICF 2011)  
<sup>4</sup> Fraction microbially degraded includes the oxidation in the cover soil and anaerobic degradation in the waste layers  
 N/A: Not applicable to study

The CARB funded study also found that only 0.08% of CO<sub>2</sub> equivalent emissions were attributable to HFC-245fa, which is the predominantly used foam blowing agent in residential refrigerator/freezers prior to transitioning to low GWP alternatives (see Table 3.52 below).

Table 3.51 – Total CO<sub>2</sub> Equivalent Emissions of the Test Gases (Annual) with CO<sub>2</sub>

Compound	Surface Emissions (CO <sub>2</sub> eq Tonnes)			
	Minimum	%	Maximum	%
CFC-11	6.23E+02	2.52	2.40E+03	2.40
CFC-12	5.53E+01	0.22	1.56E+02	0.16
CFC-113	1.20E+00	0.00	2.29E+00	0.00
CFC-114	1.68E+01	0.07	3.45E+01	0.03
HCFC-21	2.30E+01	0.09	9.26E+01	0.09
HCFC-22	1.11E+01	0.04	2.37E+01	0.02
HCFC-141b	1.91E+02	0.77	4.21E+02	0.42
HCFC-142b	1.28E+01	0.05	1.86E+01	0.02
HCFC-151a	N/A	N/A	N/A	N/A
HFC-134a	4.52E+01	0.18	1.10E+02	0.11
HFC-152a	4.51E+00	0.02	1.68E+01	0.02
HFC-245fa	2.17E+01	0.09	8.41E+01	0.08
<b>Total F-Gas Emissions</b>	<b>1.01E+03</b>	<b>4.06</b>	<b>3.36E+03</b>	<b>3.35</b>
CH <sub>4</sub>	1.69E+04	68.31	7.74E+04	77.34
CO <sub>2</sub>	6.84E+03	27.63	1.93E+04	19.30
<b>Total Surface Emissions (F-Gases + CH<sub>4</sub> + CO<sub>2</sub>)</b>	<b>2.47E+04</b>	<b>100.00</b>	<b>1.00E+05</b>	<b>100.00</b>

As a result, the table below shows that the total estimated additional GHG emissions attributable to the petition’s timing versus the current regulations related to foam blowing agents is only 1.33 MMTCO<sub>2</sub>. These emissions estimates use EPA’s Vintage Model rates for loss at manufacturing (4%) and leakage (3.75%). We assumed that 25% of the foam blowing agent would be emitted during recycling. According to EPA’s 2015 U.S. Greenhouse Gas Emissions, of the total GHG emissions of 6,587 MMTCO<sub>2</sub>, fluorinated gasses were just 3% of that total or 197.6 MMTCO<sub>2</sub>.<sup>3</sup> Therefore, this petition’s impact of 1.33 MMTCO<sub>2</sub> does not even represent a rounding error at only 0.02% of the total GHG emissions or 0.67% of fluorinated emissions. However, importantly, it provides much needed flexibility to manufacturers in an industry already experiencing extensive cumulative regulatory burden.

**Additional Carbon Emissions For Petition Scenario for Foam (MMTCO<sub>2</sub>)**

<b>Product</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Refrigerators / Freezers Total	0.97	0.29	0.08
<b>Cumulative Total (all years)</b>	<b>1.33</b>	<b>MMTCO<sub>2</sub></b>	

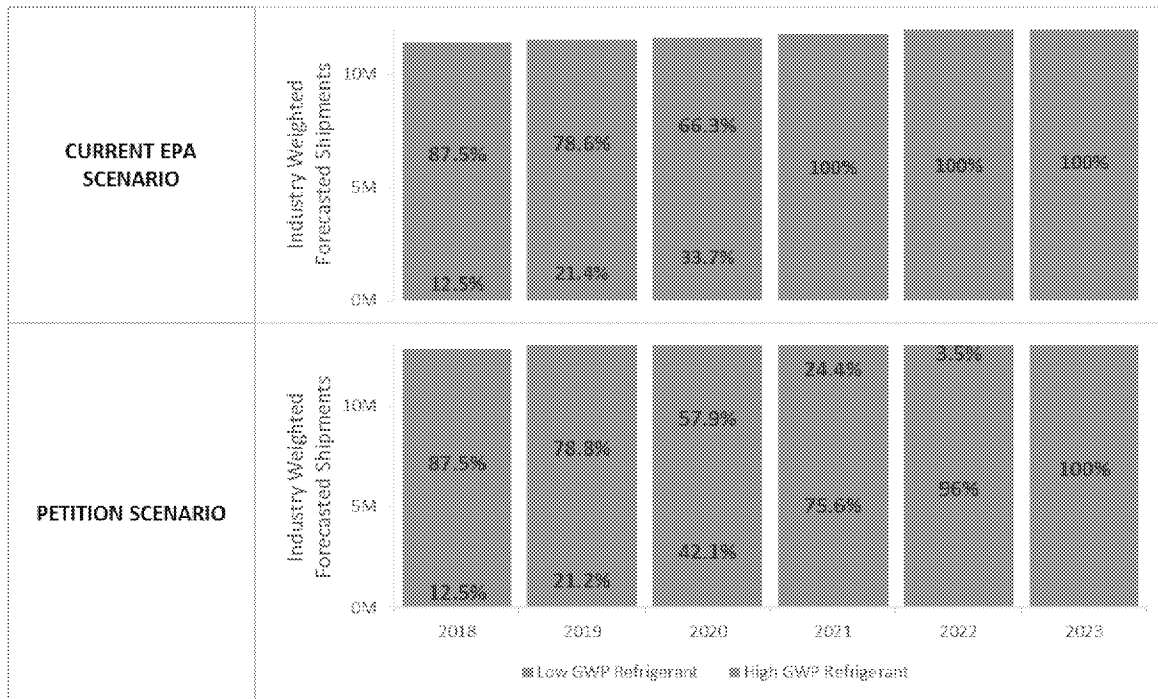
**Refrigerants - Comparison of Dates for Transition to Lower GWP**

Based on AHAM analysis of industry data, the chart below compares the percentage of products shipped with low GWP refrigerants under the current EPA SNAP regulatory requirements and under the dates recommended in this petition. It shows that the just 24.4% of the remaining estimated shipments will transition to low GWP refrigerant after 2020 with most of the final transition occurring just one year later in 2021.

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<sup>3</sup> EPA, *Overview of Greenhouse Gases*, <https://www.epa.gov/ghgemissions/overview-greenhouse-gases>, accessed January 9, 2018.

## Comparison of Forecasted Shipments between Current EPA Rule and Petition Dates for Transition to Lower GWP Refrigerants



This petition also would have a negligible impact in greenhouse gas (GHG) emissions as it relates to refrigerants. Venting high GWP refrigerants into the atmosphere is illegal under EPA’s regulations. Therefore, no emissions should be occurring when the product is recycled.

Nevertheless, as the table below shows, the total estimated additional GHG emissions attributable to the petition’s timing versus the current regulations related to refrigerants is only 1.65 MMTCO<sub>2</sub>. These emission estimates use EPA’s Vintage Model rates for loss at servicing, which includes leakage (0.6%). We also assumed that 60% of the refrigerant is improperly vented into the atmosphere during recycling even though it is illegal. According to EPA’s 2015 U.S. Greenhouse Gas Emissions, total GHG emissions were 6,587 MMTCO<sub>2</sub> and fluorinated gasses were just 3% of that total or 197.6 MMTCO<sub>2</sub>.<sup>4</sup> Therefore, this petition’s impact of 1.65 MMTCO<sub>2</sub> does not even represent a rounding error at only 0.025% of the total GHG emissions or 0.84% of fluorinated emissions. However, importantly, it provides much needed flexibility to manufacturers in an industry already experiencing extensive cumulative regulatory burden.

### Additional Carbon Emissions For Petition Scenario for Refrigerant (MMTCO<sub>2</sub>)

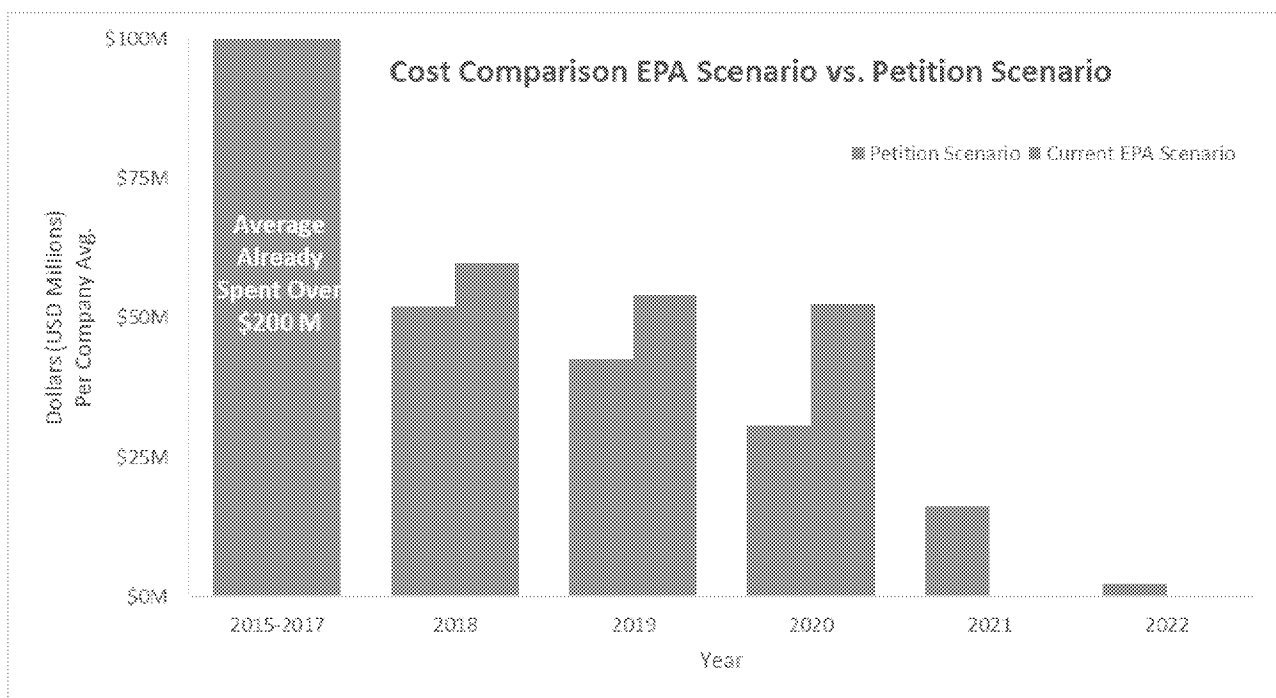
Product	2020	2021	2022
Refrigerators / Freezers Total	1.08	0.48	0.10
<b>Cumulative Total (all years)</b>	<b>1.65</b>	<b>MMTCO<sub>2</sub></b>	

<sup>4</sup> EPA, *Overview of Greenhouse Gases*, <https://www.epa.gov/ghgemissions/overview-greenhouse-gases>, accessed January 9, 2018.

### **Costs for Many Previous Transitions**

The appliance industry has been at the forefront of taking progressive actions with respect to the environment. We already have transitioned our refrigeration products from CFCs to HCFCs to HFCs. There have been double investments for foam and refrigerant. Now our industry is dedicated to moving beyond high GWP HFCs. As noted in AHAM comments to the previous SNAP rule, substantial progress in that area in refrigerator foam occurred well before EPA required it. While the appliance industry is moving to replace HFC refrigerants in our products and has in fact produced and sold hundreds of millions of units safely around the world using hydrocarbon (HC) alternatives, this transition process is expensive and time-consuming, and in the United States carries additional safety requirements. The industry's experience in Europe, Asia and elsewhere has shown that HC refrigerants can and have been used safely for years. Similarly, in the U.S., substantial numbers (around 80%) of compact refrigerators (7.75 cubic feet in volume or less) are currently sold with hydrocarbon refrigerant. Full size models are also in transition. Compacts represent 15% of total refrigerator shipments. The industry's voluntary progress on these products should be recognized and considered when amending the SNAP regulations for a full transition of the sector away from HFCs.

The chart below indicates the substantial transition costs (\$200 million) the industry has already incurred to transition to lower GWP foam blowing agents and refrigerants and compares costs between the current EPA scenario and the recommended petition scenario. The total savings, based on industry data, attributable to a more rational phase-out period is approximately \$23 million.



### **EPA SNAP Appeal Status and Timing**

Due to the recent DC Circuit Court decision on August 8, 2017, there is increased uncertainty how the SNAP program will be implemented. Despite the request by intervenors for a rehearing by the original panel and a rehearing en banc in September 2017, there is no court rule requiring

a deadline for the court to respond or act on the request further adding to the uncertainty for manufacturers. As of this petition, the Court has not acted upon the request for further review of its decision. Manufacturers must move forward and prepare for the upcoming deadlines and need EPA consideration and action on the AHAM petition to amend the regulations to accommodate the industry agreement. It is critical that EPA act quickly to change these dates so that manufacturers can properly plan their investments.





Message

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**From:** Messner, Kevin [KMessner@AHAM.org]  
**Sent:** 11/13/2017 5:39:42 PM  
**To:** Wehrum, William [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]  
**Subject:** Congrats & Meeting Request

I wanted to first congratulate you on your confirmation, but also request a meeting with you to discuss the issues impacting the appliance industry within OAR. The SNAP program and the ENERGY STAR have significant impacts on our industry and we have some very important and urgent matters that are impacting manufacturing of appliances. I will be in DC on December 5 & 7 if you are available on either of those days. Thanks for considering and look forward to meeting with you. I may have some AHAM member companies join me because that week is also our Board meeting in DC.

Kevin Messner  
Senior Vice President, Policy & Government Relations  
Association of Home Appliance Manufacturers  
1512 Willow Lane, Davis, CA 95616  
1111 19th Street NW, Suite 402, Washington, DC 20036  
Ex. 6 /m Ex. 6 / 202.872.9354 e [kmessner@aham.org](mailto:kmessner@aham.org)

Connect with us:  



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Message

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**From:** ASHKEBOUSSI, Nima [nxa@nei.org]  
**Sent:** 11/16/2017 12:55:05 PM  
**To:** Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]  
**Subject:** Invitation to Speak at NEI's Fuel Supply Forum

Mr. Wehrum,

Congratulations on your recent confirmation as the Assistant Administrator for EPA's Office of Air and Radiation. I'm organizing the Nuclear Energy Institute's Fuel Supply Forum on January 17 in Washington (Mayflower Hotel) and would like to invite you to speak about current EPA activities, reforms, the direction of the agency, and on the status of the 40 CFR 190 and 192 rulemakings. Earlier this week, Deputy General Counsel Bernard McNamee met with NEI's Legal Advisory Committee. The Fuel Supply Forum provides the opportunity to hear from key government agencies and organizations on current and emerging policies related to fuel supply and demand and discussions on the state of the nuclear fuel industry. The attendees of this meeting are the folks from the global fuel supply chain (uranium miners through fuel fabricators) and U.S. utility fuel buyers. We typically have 125 attendees for this meeting.

The speaking role would be for about 20-25 minutes plus Q&A. The conference time is from 10-12 and 1:30-3:30, with lunch and reception after the conclusion of the meeting. We are flexible with the speaking time to accommodate your schedule.

Please let me know if you have any questions. We look forward to having you speak.

Thanks,



**Nima Ashkeboussi** | Director, Fuel Cycle Programs  
1201 F Street, NW, Suite 1100 | Washington, DC 20004  
P: **Ex. 6** | M: **Ex. 6**  
nxa@nei.org  
nei.org



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Message

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**From:** Jay Timmons [Jay.W.Timmons@nam.org]  
**Sent:** 11/15/2017 6:41:03 PM  
**To:** Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group  
(FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]  
**Subject:** Please Join Us for the NAM Holiday Party

Can't see the invitation? [View it online.](#)

# CREATORS WANTED

Jay Timmons and the National Association of  
Manufacturers invite you to the official  
holiday celebration for manufacturers in  
America. Join us to toast the people who are  
creating the future.

**DECEMBER 14**  
**5:00 - 8:00 P.M.**

NAM HEADQUARTERS  
733 10TH STREET NW, SUITE 700  
WASHINGTON, D.C. 20001

**RSVP NOW ▶**

**Please RSVP by December 4**

This event has been designed to meet the "reception exception" as  
stated by the Senate Select Ethics and House Ethics Committees.  
Invitation is non-transferable.



Message

---

**From:** Jay Timmons [Jay.W.Timmons@nam.org]  
**Sent:** 11/30/2017 4:20:24 PM  
**To:** Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]  
**Subject:** Reminder | Please Join Us for the NAM Holiday Party

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Jay Timmons and the National Association of Manufacturers invite you to the official holiday celebration for manufacturers in America.

Join us to toast the people who are creating the future.

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**CREATORS  
WANTED**



Message

---

**From:** Wehrum, Bill [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=33D96AE800CF43A3911D94A7130B6C41-WEHRUM, WIL]  
**Sent:** 3/9/2018 11:49:53 PM  
**To:** Paul Balserek [pbalserek@steel.org]  
**Subject:** Re: Thank you

Thanks Paul. I appreciate the opportunity to speak with your group.

---

Bill Wehrum  
Assistant Administrator  
Office of Air and Radiation  
U.S. Environmental Protection Agency  
(202) 564-7404

On Mar 9, 2018, at 10:57 AM, Paul Balserek <[pbalserek@steel.org](mailto:pbalserek@steel.org)> wrote:

Dear Bill,

Thank you very much for speaking to our AISI Energy and Environment committee last week. I genuinely appreciate the time you took out of your very busy schedule to come by here. I received a large number of comments from my members who really appreciated it as well. I hope things continue well for you there. EPA is fortunate to have you heading up OAR.

Have a great weekend, Bill,  
Paul

**Paul Balserek**  
Vice President, Environment

American Iron and Steel Institute  
25 Massachusetts Ave. NW, Suite 800  
Washington, DC 20001

**Ex. 6** (office)  
(mobile)

Appointment

---

**From:** Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]  
**Sent:** 8/28/2018 9:21:46 PM  
**To:** Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Tsirigotis, Peter [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d19c179f3ccb4fadb48e3ae85563f132-PTSIRIGO]; Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]; South, Peter [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1ead249df78840c9928874ec2ec4f9a6-PSouth]; Sasser, Erika [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=477638fe84004800bfd8e62fe3cafc8-ESASSER]; Wesson, Karen [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8f3d5329d4ac4b6a9a424c9759c927d1-KWESSON]; Hagan, Nicole [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a71599824685456c8f035020ad857eb0-Hagan, Nicole]  
**CC:** Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beadda2affa44-Harlow, Dav]  
**Subject:** Meeting with Aluminum Association re: SO2 NAAQS (Confirmed)  
**Attachments:** RE: Meeting Request; Confirmed 9/17 at 3:30pm: Meeting Request; RE: Confirmed 9/17 at 3:30pm: Meeting Request  
**Location:** WJC-N 5400 + Video with RTP +  Participant Code   
**Start:** 9/17/2018 7:30:00 PM  
**End:** 9/17/2018 8:15:00 PM  
**Show Time As:** Busy

**To:** Bill Wehrum, Clint Woods, Peter Tsirigotis, Mike Koerber

**Outside Attendees (in person):**

- Curt Wells (Aluminum Association)
- Kathy Martin (Alcoa)
- Sonya Harden (Alcoa)
- Mark DeLaquil (Baker & Hostetler)



RE: Meeting Request



Confirmed 9/17 at 3:30pm: Meeting...



RE: Confirmed 9/17 at 3:30pm: ...



Message

---

**From:** Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]  
**Sent:** 8/29/2018 7:16:28 PM  
**To:** DeLaquil, Mark [mdelaquil@bakerlaw.com]; 'Curt Wells (cwells@aluminum.org)' [cwells@aluminum.org]  
**CC:** Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]  
**Subject:** Confirmed 9/17 at 3:30pm: Meeting Request

Hi Mark,

You are confirmed for a 45 minute meeting on Monday, September 17, 2018 at 3:30pm with Bill Wehrum. 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.

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Upon arrival, let the guards know that you were instructed to call 202-564-7404 for a security escort. Please send me a list of participants in advance of the meeting and feel free to contact me should you need any additional information.

Emily

Emily Atkinson  
Special Assistant  
Management Analyst  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406E, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: atkinson.emily@epa.gov

---

**From:** DeLaquil, Mark [mailto:mdelaquil@bakerlaw.com]  
**Sent:** Wednesday, August 29, 2018 9:32 AM  
**To:** Rakosnik, Delaney <rakosnik.delaney@epa.gov>

**Cc:** Atkinson, Emily <Atkinson.Emily@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>; 'Curt Wells (cwalls@aluminum.org)' <cwalls@aluminum.org>

**Subject:** RE: Meeting Request

Dear Delaney,

3:30 pm on September 17 works well. Thank you for your assistance scheduling the meeting. Please let me know if you need any information from me in advance of the meeting, such as names of attendees, etc.

Best regards,

Mark

**Mark DeLaquil**  
Partner

---

**BakerHostetler**

Washington Square  
1050 Connecticut Ave, N.W. | Suite 1100  
Washington, DC 20036-5403

T Ex. 6

mdelaquil@bakerlaw.com  
bakerlaw.com



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**From:** Rakosnik, Delaney <[rakosnik.delaney@epa.gov](mailto:rakosnik.delaney@epa.gov)>

**Sent:** Tuesday, August 28, 2018 5:24 PM

**To:** DeLaquil, Mark <[mdelaquil@bakerlaw.com](mailto:mdelaquil@bakerlaw.com)>

**Cc:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>; Lewis, Josh <[Lewis.Josh@epa.gov](mailto:Lewis.Josh@epa.gov)>

**Subject:** RE: Meeting Request

Dear Mark,

Bill Wehrum is available for a 45 min meeting the afternoon of Sept 17<sup>th</sup>, at 3:30pm. How does that work for your schedules?

Many thanks,

Delaney Rakosnik  
Staff Assistant  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406A, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-0935  
Email: [rakosnik.delaney@epa.gov](mailto:rakosnik.delaney@epa.gov)

---

**From:** DeLaquil, Mark [<mailto:mdelaquil@bakerlaw.com>]

**Sent:** Tuesday, August 21, 2018 12:44 PM

**To:** Wehrum, Bill <[Wehrum.Bill@epa.gov](mailto:Wehrum.Bill@epa.gov)>; Woods, Clint <[woods.clint@epa.gov](mailto:woods.clint@epa.gov)>

Cc: 'Curt Wells (cwells@aluminum.org)' <cwells@aluminum.org>

Subject: Meeting Request

Dear Bill and Clint,

I am reaching out on behalf of the Aluminum Association. We are hoping to meet with you concerning the SO2 NAAQS rulemaking. The Aluminum Association previously met with Clint to discuss the SO2 NAAQS and we hope to have an opportunity to continue those productive discussions with both of you now that we have had an opportunity to submit our comments on the proposal.

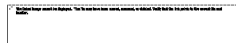
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Message

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**From:** DeLaquil, Mark [mdelaquil@bakerlaw.com]  
**Sent:** 8/29/2018 8:16:09 PM  
**To:** Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]; 'Curt Wells (cwells@aluminum.org)' [cwells@aluminum.org]  
**CC:** Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]  
**Subject:** RE: Confirmed 9/17 at 3:30pm: Meeting Request  
**Attachments:** ATT00001.txt

Thank you, Emily. The participants will be Curt Wells (Aluminum Association), Kathy Martin (Alcoa), Sonya Harden (Alcoa), and me (Baker & Hostetler).

---

**From:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Sent:** Wednesday, August 29, 2018 3:16 PM  
**To:** DeLaquil, Mark <mdelaquil@bakerlaw.com>; 'Curt Wells (cwells@aluminum.org)' <cwells@aluminum.org>  
**Cc:** Lewis, Josh <Lewis.Josh@epa.gov>; Rakosnik, Delaney <rakosnik.delaney@epa.gov>  
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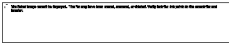
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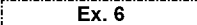
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