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From: Osborne, William
To: Syed, Rizwan (he/him/his)
Cc: Meyer, Dan
Subject: RE: Opportunity to review pre-draft part 71 permit materials for Pace International, LLC
Date: Tuesday, March 21, 2023 7:09:41 AM

Good Morning Rizwan,

Yes, he is the Wapato plant manager. His title includes this and additional responsibilities including supply chain.

Thanks - Bill

William Osborne
Sr. EHS Manager

Pace International
5661 BRANCH ROAD WAPATO, WA 98951 | USA
Tel: +1 (925) 357-6754
Cell: +1 (509) 829-1446
www.paceint.com

A Subsidiary of Valent BioSciences
A Sumitomo Chemical Company

From: Syed, Rizwan (he/him/his) <Syed.Rizwan@epa.gov>
Sent: Tuesday, March 21, 2023 6:12 AM
To: Osborne, William <William.Osborne@paceint.com>
Cc: Meyer, Dan <Meyer.Dan@epa.gov>
Subject: [EXTERNAL] RE: Opportunity to review pre-draft part 71 permit materials for Pace International, LLC

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Hi Bill, can you please clarify if Mr. Shepard's title is the same as the "Plant Manager". If Mr. Shepard is not the plant manager, I'd like to know more about his responsibilities to become eligible Responsible Official.
Thanks

Rizwan Syed, Permit Writer
Air Permits & Toxic Branch, Air & Radiation Division

Region 10 U.S.EPA
1200 Sixth Avenue
Seattle, WA 98101
(206) 553-6345 (desk)
(217) 414-8983 (cell)
(He/Him/His)

From: Osborne, William <William.Osborne@paceint.com>
Sent: Friday, March 10, 2023 7:55 AM
To: Syed, Rizwan (he/him/his) <Syed.Rizwan@epa.gov>
Cc: Katie Swan <katie_swan@yakama.com>; Meyer, Dan <Meyer.Dan@epa.gov>; Shepard, Luke <Luke.Shepard@paceint.com>; Osborne, William <William.Osborne@paceint.com>
Subject: RE: Opportunity to review pre-draft part 71 permit materials for Pace International, LLC

Good Morning Rizwan,

Thank you for the pre-draft part 71 permit and SoB. Also, thanks for arranging the group meetings to answer my questions. As a result of these meetings, please consider the following comments when finalizing the draft permit. Please let me know if you have any questions. Thanks - Bill

1. The parent company is correct as stated.
2. Please change the responsible official to:
   Mr. Luke Shepard,
   Sr. Manager of Operations
   5661 Branch Road
   Wapato, WA 98951
   Phone: (224) 589-6942
   Email: luke.shepard@paceint.com
3. Sections 1.11 and 1.24.2 – please add "or by email" to the Yakama Nation contact information.
4. Section 1.14 – to add clarity, please modify the last sentence to state that October 24th is the anniversary date of the initial fee and fee calculation sheet.
5. Section 2.1 – please change the date from April 1 to October 24 to align with our anniversary date.
6. Section 5 – The term "incineration" has a negative connotation. Please replace "incineration" with "combustion" in the Section 5 title and the table of contents.
7. Section 5.3.1 – we currently record each run time operation on a log. There may be none or several runs each day/week/month. For clarity, please remove the monthly recording requirement. The condition should read, "Records of runtime operation"
8. Propane Fired Hotbox – the propane fired hotbox (insignificant source) has failed and is being replaced with an electrically heated hotbox. Attached is the specification sheet.

William Osborne
Sr. EHS Manager

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www.paceint.com

A Subsidiary of Valent BioSciences
A Sumitomo Chemical Company

From: Syed, Rizwan (he/him/his) <Syed.Rizwan@epa.gov>
Sent: Thursday, February 2, 2023 2:21 PM
To: Osborne, William <William.Osborne@paceint.com>
Cc: Pepple, Karl <Pepple.Karl@epa.gov>
Subject: [EXTERNAL] Opportunity to review pre-draft part 71 permit materials for Pace International, LLC

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Hello Mr. Osborne,
EPA Region 10 has prepared for your review a pre-draft part 71 permit and statement of basis for Pace International, LLC on the Yakama Reservation. The documents are attached. The deadline for submitting your written comments to me via email is Friday, February 17, 2023. To facilitate your understanding of the materials, Region 10 will make itself available to you between now and the 17th to provide explanations and answer questions.

There are some information that you could clarify and provide information for. They are:
Parent company information – Does the company goes by Pace International, LLC or Valent Biosciences Corporation
Responsible Official – Please provide the email ID for the responsible official.

Region 10 will consider your written comments before finalizing the draft permit materials. The draft permit (and entire administrative record) will be available for public review and comment for at least 30 days at https://www.epa.gov/publicnotices/notices-search/location/washington. Thus, you'll have another opportunity to provide input after the February 17 pre-draft review deadline.

I look forward to hearing from you.

Rizwan Syed, Permit Writer

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Region 10 U.S.EPA
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Seattle, WA 98101
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(217) 414-8983 (cell)
(He/Him/His)