From: Glenn, Trey
To: Heard, Anne
Cc: Ashbee, Blake; Jenkins, Brandi; Jones-Johnson, Shea
Subject: Re: R2P2 Selection Recommendation (Time Sensitive)
Date: Friday, March 2, 2018 10:29:04 AM
Attachments: image001.png

Let's discuss if we need to. I will defer to your judgement on this as the past two days have been very hectic and I have not had a chance to get briefed on this yet. Please let me know if there's anything we need to discuss about this or if you feel I would not concur with your decision.

On Mar 2, 2018, at 8:56 AM, Heard, Anne <Heard.Anne@epa.gov> wrote:

> Trey/Blake,
>
> Just following up because the decision is due today…
>
> ---
>
> **From:** Heard, Anne
> **Sent:** Wednesday, February 28, 2018 7:17 PM
> **To:** Glenn, Trey <Glenn.Trey@epa.gov>
> **Cc:** Ashbee, Blake <ashbee.blake@epa.gov>; Jenkins, Brandi; Jones-Johnson, Shea
> **Subject:** R2P2 Selection Recommendation (Time Sensitive)
>
> Trey,
>
> Region 4's 2018 Regional Research Partnership Program (R2P2) applicant selection is due to HQs-OSP by **Friday March 2.** Please let me know ***if you agree with selecting*** [redacted] ***as R4's candidate***.
>
> You will recall that R2P2 provides short-term (up to six months) training/developmental opportunities for regional technical staff to travel to ORD laboratories or centers and work with ORD scientists on top regional priorities. (Additional information can be found at http://intranet.ord.epa.gov/regional-science/regional-research-partnership-program-r2p2.)
>
> For the 2018 R2P2 solicitation, five R4 staff members submitted applications. The Regional Science Council (RSC) reviewed and ranked the applications based on four criteria:
>
> 1. Alignment with Administrator's priorities and the Strategic Plan
> 2. Benefit to the Region (addresses a Regional science priority)
> 3. Benefit to and/or partnership with state, tribal or local entity
> 4. Clearly defined outcome/output

[redacted]

[redacted]

#1 – [redacted] (WPD)
Project Title: "Utilizing 1-meter land cover to increase accuracy of watershed models used in the development of TMDLs for source water protection"
State Partner: GA EPD
Timeline: 3 months (to be completed by end of CY 2018)
Budget: ~ $5175

Attached are the RSC's ranking and the 5 applications. Let me know if you have questions. VAH

V. Anne Heard ¦ Deputy Regional Administrator, Region 4
U.S. Environmental Protection Agency ¦ 61 Forsyth Street, SW ¦ Atlanta, GA 30303
<!--[if !vml]--><!--[endif]--
>
(404-562-8357) heard.anne@epa.gov : www.epa.gov

NOTICE: This communication may contain privileged or other confidential information. If you are not the intended recipient, or believe that you have received this communication in error, please do not print, copy, retransmit, disseminate, or otherwise use the information. Also, please indicate to the sender that you have received this communication in error, and delete the copy you received.

I AM Diversity!

<RSC Ranking R2P2 Selection Criteria 2018 for Trey.docx>

<[redacted]r2p2 complete final Application.pdf>

<[redacted]r2p2_amended_final.pdf>

(b) (6) _2018_R2P2_completed Application.pdf>

(b) (6) complete application R2P2 2018.pdf>

(b) (6) R2P2_complete_application_package_WD.pdf>

From:	Glenn, Trey
To:	Mendez, Gayla
Cc:	Hudson, Wanda
Subject:	FW: List of Companies for Recusal
Date:	Friday, June 15, 2018 11:27:48 AM

Per FOIA 6781

From: Glenn, Trey
Sent: Tuesday, September 5, 2017 6:52 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: List of Companies for Recusal

Privileged and confidential list sent for your staff to prepare my recusal letter.

- Birmingham Jefferson County Transit Authority (government entity)
- City of Birmingham (government entity)
- Stream Restoration Services
- Balch & Bingham, LLP
    - Drummond Company/ABC Coke
- Big Sky Environmental
- Black Mesa Energy (its subsidiaries are Red Mesa Energy and Ridgeholm Energy Partners)
- MAP Development, LLC
- Matrix, LLC
- Windom-Galliher
    - ARC Terminal
- City of Bessemer (government entity)
- STRADA-AECOM JV
- Maynard, Cooper & Gale, PC
    - Alabama Department of Economic and Community Affairs (government entity)
- Business Council of Alabama
- Conservatives with Courage
- Regional Environmental Solutions
- STRADA Professional Services, LLC
- Blue Ridge Partners, LLC (BRP's affiliated companies include Southeast Engineering and Consulting, Southeast Utility Management, BRP Management and Leasing, and Blue Ridge Management, LLC)
- Blue Ridge Consulting, Inc.
- Blue Ridge Consultants, Inc.

From:	Glenn, Trey
To:	Mendez, Gayla
Cc:	Hudson, Wanda
Subject:	FW: Nov 16 presentation to Manufacture Alabama
Date:	Friday, June 15, 2018 11:43:46 AM
Attachments:	MA Enviro Comm 11-16-17.pptx

Per FOIA 6781

From: Trey Glenn [redacted]
Sent: Friday, November 10, 2017 2:31 PM
To: Jenkins, Brandi <Jenkins.Brandi@epa.gov>; Glenn, Trey <Glenn.Trey@epa.gov>
Subject: Fwd: Nov 16 presentation to Manufacture Alabama

Lance called and said he accidentally sent this to my gmail account, so here it is.

Sent from my iPhone

Begin forwarded message:

> **From:** "LeFleur, Lance R" <llefleur@adem.alabama.gov>
> **Date:** November 7, 2017 at 12:44:41 PM CST
> **To:** "Trey Glenn [redacted]
> **Subject: Nov 16 presentation to Manufacture Alabama**
>
> Trey
> This is a current draft of my slides for my portion of the program.
> The first two or three slides titled “EPA Strategic Plan” may be what you are planning to speak about.
> If so, I will eliminate them from my portion. I will plan to keep the one saying that in ADEM’s view the plan is good, execution is the difficult piece, etc.
> Call me and we can discuss.
> Lance

Alabama Department Of Environmental Management

ADEM Update

to

Manufacture Alabama Environmental Committee

November 16, 2017

adem.alabama.gov

Alabama Department Of Environmental Management

Mission

Assure for all citizens of the State a safe, healthful and productive environment.

Alabama Department of Environmental Management

Today's Topics

- EPA Strategic Plan
- Environmental Management Commission
- ADEM Personnel Changes
- ADEM Funding Issues
- ADEM Non-discrimination Issues
- ADEM North Birmingham Activities

EPA Strategic Plan

- 3 Goals:
  - Core Mission vs Political / Social Agenda
  - Cooperative Federalism vs Federal Control
  - Rule of Law and Process vs Circumventing
- All 8 Region 4 States Supportive

EPA Strategic Plan

- Measure results:
  - Reduce non-attainment
  - Increase funding water infrastructure
  - Remediate brownfields & Superfund sites
  - Complete TASCA evaluations, management, determinations timely
  - Increase non-EPA infrastructure funding
  - Accelerate permitting- related decisions

EPA Strategic Plan

- Region 4 State Issues:
  - Timeliness of EPA action
  - Emphasis on compliance vs punishment
  - Balance of Cooperative Federalism
  - Locally led community relationships

EPA Strategic Plan

- ADEM view:
  - Plan is good
  - Execution is the difficult piece
  - EPA mind-set change is required

Environmental Management Commission

- Turnover since 2010:
  - Richardson, Miller, Laier, Davis 2010
  - Davis to Merritt 2012
  - Lester to Carson 2013
  - Carson to Martin 2015
  - Phillips to Promer 2017
  - Promer to Geologist? 2018

ADEM Personnel Changes

- Land Division:
  - Chief: (P. Davis) to **Steve Cobb**
  - Gov. Haz.: (S. Cobb) to **Jason Wilson**
  - Gov. Haz. Fac.: (J. Wilson) to **Daniel Arthur**
  - Ind. Haz.: (B. Espy) to **Clay Messer**
  - UST Compliance: (L. Davis) to **LaToya Hall**

ADEM Personnel Changes

- Water Division –Drinking Water Branch:
  - Chief: (D. Harrison) to **Aubrey White**
  - Ground: (G. Cox) to Interviewing
- Water Division –Water Quality Branch:
  - Standard & Plan.: **Jennifer Haslbauer**

ADEM Personnel Changes

- Air Division – Chemical Branch:
  - Chief: (A. White) to **Wes Thornhill**
  - Ind. Chem.: (W. Thornhill) to **Samantha Sims**
- Permits & Services Div. – SRF Branch:
  - Chief: (D. Hutchinson) to **Brian Espy**

ADEM Personnel Changes

- Field Operations Division:
  - Decatur FO Chief: (E. Poolos) to **Bruce Freeman**
  - B'ham FO Lab: (R. Griffin) to **Carla Snow**
- Director's Office:
  - (V. Barnett) to **Schuyler Espy**

ADEM Funding

- Three Funding Sources:
  - Federal “Grants”
  - State General Fund Appropriations
  - State Fee Revenue

ADEM Funding

- Lowest in the nation (and is adequate)
- Federal funding = 35% of ADEM budget
- President 44.5% proposed **FY 2018** cut
- Congress sets budget

Possible responses to budget cuts

- Risk based inspections
- Press for increased e-applications
- Reducing background monitoring and testing
- Reducing monitoring of emerging contaminants

Possible responses to budget cuts

- Delaying UST inspections, TMDL development, and permit renewals
- Scaling back or eliminating optional programs
- Renegotiating EPA work plans

Title VI

- Complaints - Landfills:
  - Tallassee 14 yrs. (dismissed / re-filed)
  - Uniontown 4 yrs.
  - Dothan 2 yrs.
- Non-discrimination program audits:
  - 2nd Time
  - Initiated by EPA not by complaint
  - Initiated under “old” EPA

Title VI

- ADEM aggressively engaging EPA
- Seeking to change worn out perception of Alabama
- Appears to be best program in the nation
- Expecting continuing complaints as tactic by those resisting “new” EPA

North Birmingham Activities

- Go where the data and science lead us
- Based on ATSDR, Jeff Co cancer studies, incomplete EPA data disclosures ADEM could not concur in NPL listing
- If there are parties on both sides one usually disappointed

North Birmingham Activities

- If EPA had willing parties to cleanup ADEM would not oppose
- NPL listing not final
- Extensive file on ADEM website under eFile "35th Avenue, Birmingham"

From:	Glenn, Trey
To:	Mendez, Gayla
Cc:	Hudson, Wanda
Subject:	FW: Trey Glenn Promissory Note Update
Date:	Friday, June 15, 2018 12:10:51 PM

From: Glenn, Trey
Sent: Wednesday, January 3, 2018 12:04 PM
To: Ross, Margaret <Ross.Margaret@epa.gov>; Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Trey Glenn Promissory Note Update

I just wanted to drop you a note to let you know that Alison received full payment for the STRADA promissory note and deposited it last week.

I will update my 278 when the funds go into our brokerage account.

Please let me know if I need to do anything other than this email for notification about the promissory note.

Thanks and Happy New Year

Trey

From: Nitsch, Chad
To: Glenn, Trey
Cc: Aarons, Kyle; Richardson, RobinH; Lyons, Troy
Subject: Recusal statement scheduled to go to Congress
Date: Thursday, January 18, 2018 4:56:22 PM
Attachments: Trey Glenn"s Recusal Statement.pdf

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

January 10, 2018

MEMORANDUM

SUBJECT: Recusal Statement

FROM: Onis "Trey" Glenn, III
Regional Administrator
Region 4

TO: E. Scott Pruitt
Administrator

I have previously consulted with the Office of General Counsel/Ethics (OGC/Ethics) and been advised about my ethics obligations. This memorandum formally notifies you of my continuing obligation to recuse myself from participating personally and substantially in certain matters in which I have a financial interest, or a personal or business relationship. I also understand that I have obligations pursuant to Executive Order 13770 and the Trump Ethics Pledge that I signed.

FINANCIAL CONFLICTS OF INTEREST

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.

I have consulted with OGC/Ethics and been advised that I do not currently have any significant financial conflicts of interest but will remain vigilant and notify OGC/Ethics immediately should my financial situation change.

OBLIGATIONS UNDER EXECUTIVE ORDER 13770

Pursuant to Section 1, Paragraph 6 of the Executive Order, I understand that I am prohibited from participating in any particular matter involving specific parties in which my former employers, **Blue Ridge Consulting, Inc.** and **STRADA Professional Services, LLC**, or any former client to whom I provided services during the past two years is a party or represents a party. I understand that my recusal lasts for two years from the date that I joined federal service.

I have been advised by OGC/Ethics that, for the purposes of this pledge obligation, the term "particular matters involving specific parties" is broadened to include any meetings or other communication relating to the performance of my official duties, unless the communication applies to a particular matter of general applicability and participation in the meeting or other event is open to all interested parties. I am further advised that the term "open to all interested parties" means five or more parties.

RECUSAL LIST In effect until August 27, 2019	
FORMER EMPLOYERS: Blue Ridge Consulting, Inc. STRADA Professional Services, LLC	
FORMER CLIENTS:	
Balch & Bingham, LLP Big Sky Environmental Black Mesa Energy Blue Ridge Partners, LLC Business Council of Alabama Conservatives with Courage Drummond Company	MAP Development, LLC Matrix, LLC Maynard, Cooper & Gale, PC Regional Environmental Solutions STRADA-AECOM Joint Venture Stream Restoration Services Windom-Galliher

OBLIGATIONS UNDER THE IMPARTIALITY PROVISIONS

I am advised by OGC/Ethics that Executive Order 13770 defines "former employer" to exclude state or local government entities,[1] and the Office of Government Ethics has determined that the same exclusion applies to the definition of "former client."[2] But as an executive branch

[1] *See* Exec. Order 13770, Section 2(j), which provides that "'former employer' does not include … State or local government."

[2] *See* Office of Government Ethics Legal Advisory 17-02 (February 6, 2017), which states that, "[w]ith respect to Executive Order 13770, ethics officials and employees may continue to rely on OGE's prior guidance regarding Executive Order 13490 to the extent that such guidance addresses language common to both orders," and Office of Government Ethics Legal Advisory DO-09-011 (March 26, 2009), which states that "based on discussions with the White House Counsel's office, OGE has determined that the definition of former client is intended to exclude the same governmental entities as those excluded from the definition of former employer."

employee, I understand that I am also subject to the federal impartiality standards and have a one-year cooling off period with any former client who is a state or local government. Therefore, I will not participate personally and substantially in any particular matter involving specific parties in which **the Birmingham Jefferson County Transit Authority (BJCTA)** or **the City of Birmingham, Alabama** is a party or represents a party, unless I am first authorized by OGC/Ethics to participate, pursuant to 5 C.F.R. § 2635.502(d). For federal ethics purposes, I understand that my recusal remains in effect for one year from the date that I last provided services to that client, and this federal ethics limitation does not extend to particular matters of general applicability, such as rulemaking. My recusal will end with regard to the city of Birmingham and BJCTA on March 8, 2018 and August 29, 2018 respectively. I will consult with OGC/Ethics should a situation arise in which I seek an impartiality determination to authorize my participation in a specific party matter involving the Birmingham Jefferson County Transit Authority or the City of Birmingham.

SCREENING ARRANGEMENT

In order to ensure that I do not participate in matters relating to any of the entities listed above, I will instruct Blake Ashbee, Region 4 Chief of Staff, to assist in screening EPA matters directed to my attention that involve these entities. All inquiries and comments involving the entities on my recusal list should be directed to Blake Ashbee without my knowledge or involvement until after my recusal period ends.

If Blake Ashbee determines that a particular matter will directly involve any of the entities listed on my "specific party" recusal list, then he/she will refer it for action or assignment to another, without my knowledge or involvement. In the event that he/she is unsure whether an issue is a particular matter from which I am recused, then he/she will consult with OGC/Ethics for a determination. I will provide a copy of this memorandum to my principal subordinates with a copy to Justina Fugh, Senior Counsel for Ethics.

UPDATE AS NECESSARY

In consultation with OGC/Ethics, I will revise and update my recusal statement whenever warranted by changed circumstances, including changes in my financial interests, changes in my personal or business relationships, or any changes to my EPA duties. In the event of any changes to my recusal or screening arrangement, I will provide a copy of the revised recusal statement to you and OGC, including OGC/Ethics.

cc: Ryan Jackson, Chief of Staff
V. Anne Heard, Deputy Regional Administrator, Region 4
Blake Ashbee, Chief of Staff, Region 4
Suzanne Rubini, Acting Regional Counsel, Region 4
Leif Palmer, Acting Deputy Regional Counsel, Region 4
John Sheesly, Regional Ethics Counsel, Region 4
Justina Fugh, Senior Counsel for Ethics