

MEETING SUMMARY

Community Environmental Working Group

“Striving for Continuous Environmental Improvements at Intel”

Date: January 16, 2013
Time: 5:00–7:00 p.m.
Location: Corrales Senior Center

Members Attending

John Bartlit, NM Citizens for Clean Air & Water
 Mike Williams, NM Citizens for Clean Air & Water

Hugh Church, American Lung Assc. in NM
 Sarah Chavez, Intel

Non-Members Attending

Lynne Kinis, Corrales resident
 Roberta King, Corrales resident
 Liz Shipley, Intel

Natasha Martell, Intel
 Brian Rashap, Intel
 Dennis O’Mara, Corrales resident

Facilitator

Stephen Littlejohn, Facilitator

CJ Ondek, Recorder

HANDOUTS

- Draft Agenda
- Draft Meeting Summary November 28, 2012
- Action-Item Progress Report
- EHS Activity Reports
- Media reports and articles, as available
- Invitation to NMED to attend meetings and reply
- Notes on HF Project
- Action Goals for 2013

PROPOSED AGENDA

- Welcome, Introductions, Announcements and Brief Items
- EHS Report, EPA 114 and Permit Updates
- Membership Discussion
- Security, Emergencies, and Accidents and Response
- HF Spikes Modeling Update
- Weather Station and Related Issues
- Additional Business
- Adjourn

<p>Filename: CEWG_Draft Meeting_Summary_01-17-13, v. 4 Approved: March 6, 2013* Prepared or presented by: CJ Ondek & Stephen Littlejohn Prepared for: CEWG Date prepared or presented: March 12, 2013 *Final corrections approved by email</p>

WELCOME, INTRODUCTIONS, ANNOUNCEMENTS, AND BRIEF ITEMS

John Bartlit opened the meeting by stating the CEWG mission, which was to work towards continuous environmental improvements at Intel and improved community dialogue. Introductions were made.

Agenda—Revisions and Approval

No comments.

November 28, 2012 Meeting Summary—Revisions and Approval

No comments.

Intel CEWG Membership

- Brian Rashap said that Thom Little was no longer working at Intel and had moved out of the state. Mr. Rashap had decided that Mr. Little's CEWG responsibilities would now be consolidated under Sarah Chavez. Moving forward, Ms. Chavez would be the single point of contact for the CEWG.
- John Bartlit suggested the CEWG send Thom Little a card wishing him well.

ACTION ITEM: Stephen Littlejohn will organize sending something to Mr. Little from the CEWG.

Survey Update

Lane Kirkpatrick was absent, so there was no update on his neighborhood survey project.

Other Announcements

None.

Public Comments

Lynne Kinis requested that the December 15 *Corrales Comment* article entitled "Federal Report on Intel Air Pollution Promise" be printed and distributed to the CEWG due its rich content around ATSDR and EPA recommendations.

ACTION ITEM: Stephen Littlejohn will search for and distribute this article.

EHS REPORT, OTHER ANNOUNCEMENTS, EPA 114 UPDATE

Sarah Chavez reviewed the EHS report. Intel had completed its quarterly thermal oxidizer testing, and there was onsite crane activity as well as several regulatory submittals, both routine and non-routine. One neighbor emailed a complaint, and Frank Gallegos responded and informed the neighbor about Intel's odor response protocol, which would trigger a security checking process. There were no unusual occurrences affiliated with the call.

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- John Bartlit asked Ms. Chavez if she would handle Thom Little's former role of responding to complaints. Ms. Chavez said Intel still had to rewrite the protocol. As for middle of the night complaint calls, Intel always had a procedure to respond to complaints at the caller's request, and that would not change.
- Sarah Chavez discussed Intel permitting for 2013. She referred to a slide deck called "Intel Permit Update". First she reviewed the Title V timeline. Title V was Intel's new major source operating permit. Intel completed the application and submitted it to NMED in early 2012. NMED deemed that application complete on June 19, 2012, and had 18 months after this date to issue the permit.
- Sarah Chavez continued that in January 2013, Intel would submit an amendment to the Title V permit called a PAL update (Plantwide Applicability Limits). NMED was responsible for all other actions on the timeline. First, NMED began drafting the Title V permit in January 2013. Once the draft permit was completed, NMED had to issue it for a 30-day public comment period. During this period, NMED might hold a public meeting, as previously suggested by NMED's Coleman Smith. Next, NMED must send the draft permit to the EPA, who had 45-days to comment. Lastly, NMED had until December 2013—18 months from when they deemed the application complete in June 2012—to complete and issue the permit.
- Sarah Chavez explained the Title V permit. A Title V permit contained all air pollution control requirements consolidated into a single, comprehensive "operating permit" that would cover all aspects of Intel's operations in a single permit. NMED had a Title V permit template that was broken into several parts. Part A concerned specific facility requirements such as applicable regulations, regulated sources and control equipment, allowable emissions, and the reporting schedule. This template was in a format that simplified reporting on compliance requirements. Part B covered submitting reports: general monitoring recordkeeping and reporting requirements. John Barlit asked if units were specified in the permit. Ms. Chavez responded that it referenced methods and not outcomes. Part C contained miscellaneous information such as definitions and acronyms. Ms. Chavez said that Parts B and C concerned the general aspects of NMED's Title V process that applied to the whole state. Everyone followed the same recordkeeping and monitoring requirements. Part A concerned specific conditions and equipment within Intel, such as boilers and thermal oxidizers.
- Ms. Chavez said that Title V was a major source permit for greenhouse gases. Intel would continue to remain a minor source for pollutants except greenhouse gases. However, all pollutants would be regulated as per major source thresholds. The permit would contain additional requirements. For example, Intel would have to annually submit certification saying that they were in compliance with all permit requirements. The Title V permit expired after five years and would have to be renewed every five years. Thus, at the end of 2013, Intel would have two permits: 1. The new Title V permit; and 2. Their existing permit, the NSR/construction permit.

- Lynne Kinis asked how Intel would test for greenhouse gases under the Title V permit. Ms. Chavez replied that federal regulations dictated how to calculate and monitor for greenhouse gases based on emissions factors in EPA regulations. John Bartlit asked if there was a supporting EPA document. Sarah Chavez said no but the Title V template, which was about 30 to 40 pages, could be made available to the CEWG. Stephen Littlejohn offered to upload the template to the CEWG Web site as well as attach it to the CEWG newsletter. Sarah Chavez reminded that sometimes NMED modified the template, so each version was dated.

ACTION ITEMS:

- Sarah Chavez will send Stephen Littlejohn the NMED Title V permit as a word document.
 - Stephen Littlejohn will post the template on the CEWG Web site and send out in the CEWG newsletter.
- Sarah Chavez defined the plant-wide applicability limit (PAL). PAL was an EPA emission cap program for major sources. Intel would apply for PAL. The EPA updated PAL language to include greenhouse gases in July of 2012. NMED is currently in the process of changing state regulations to conform to EPA PAL changes. The EPA defined how to calculate PAL limits and provided details on the required monitoring methods. However, NMED was considered the regulatory authority and would write the conditions. The annual emissions cap would be for carbon dioxide (CO₂) and carbon dioxide equivalents. The PAL permit expired after 10 years. Intel would request a PAL permit for greenhouse gases and submit it as an update to the Title V application in January 2013. Intel Oregon and Arizona sites would be getting the same type of permit. This would be the first PAL permit for NMED to write, but they were becoming more common.
 - John Bartlit suggested that the CEWG make comments to NMED during the public comment period. He suggested NMED have their “public meeting” during a CEWG meeting, which was always open to the public, since the same people went to both. Sarah Chavez said she mentioned this to NMED as an option, and that Coleman Smith still wanted to have some kind of public information permit meeting earlier in year rather than later. As for advertising the meeting, Stephen Littlejohn said he placed ads in publications the last week of month. It was important to keep this time frame in mind, as CEWG would like enough advance notice to publicize the meeting. John Bartlit suggested telling NMED’s Richard Goodyear about the CEWG’s invitation now rather than waiting for later.
 - Stephen Littlejohn asked the group whether they wanted to offer CEWG meeting space and time to NMED or wait until later. Mike Williams said he was inclined to be proactive and offer now. There were no objections from members or nonmembers.

DECISION: CEWG will invite NMED now to hold their public Intel permit meeting at a

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CEWG meeting.

ACTION ITEM: Sarah Chavez will extend the offer to Mr. Smith to have the public meeting at a CEWG meeting.

MEMBERSHIP DISCUSSION

Stephen Littlejohn asked if the group would like to discuss growing CEWG membership. All members and nonmembers present extended thanks to Edward Pineda for considerately staying home tonight and not spreading the flu.

- John Bartlit offered that Intel would bring to meetings certain experts to discuss an issue that required particular expertise.
- Sarah Chavez reminded that she or Frank Gallegos would continue to respond to complaints. Dennis O'Mara asked if they would continue to come anytime, even the middle of the night, as Thom Little did. Brian Rashap responded that Intel's intention was to respond 24 hours a day. Ms. Chavez said that the Intel response process always existed, even before Thom Little.
- John Bartlit said that Thom Little was certified to conduct certain limited testing. Brian Rashap said Intel did not have that capability now that Thom Little had left, so he was unsure whether they would be able to continue to offer that service. Intel still needed to figure out strategy on how to handle that and learn how to train someone to conduct limited testing.
- Mike Williams asked Dennis O'Mara if the odors were more of a summer problem. Mr. O'Mara responded that it was more likely to be noticed in the summer because of open windows, but he was uncertain about the science behind seasonal differences. Mr. Williams said that emissions tended to sit longer and in higher concentrations in winter than in summer.
- Stephen Littlejohn said he would bring up potential CEWG membership invitations with the agenda committee. He asked Sarah Chavez and John Bartlit to think about recommendations.
- John Bartlit said they went through this process with membership every couple years. It was always difficult to find new members. Mr. Littlejohn said he had some ideas that he would bring up at the agenda meeting.

SECURITY ISSUES, EMERGENCIES, ACCIDENTS AND RESPONSES

- Brian Rashap reviewed how Intel handled security, which covered everything from terrorism to accidents. He said the Department of Homeland Security (DOHS) regulated facilities that handled chemicals, and thus the Intel facility was regulated. Based on Homeland Security regulations and procedures that was all he could say. For security and protection purposes, the government kept this information confidential. DOHS did regulate and audit Intel to determine their compliancy with requirements. In addition, Intel worked regularly with regional first responders, local law enforcement, and the fire departments of Corrales, Rio Rancho, and Albuquerque. They conducted joint drills around scenarios that may adversely impact the facility and/or surrounding community. Intel took input on procedures and how to maintain the procedures from local first responders and law enforcement, who provided security suggestions and comments. As much as Mr. Rashap would like to go into detail, he was required to limit information to share.
- John Bartlit asked if they could learn what kinds of information the Homeland Security asked about. Mr. Rashap said that he could not provide an answer to that question.
- John Bartlit asked if the CEWG brought Rio Rancho first responders and the fire department to a CEWG meeting, what kind of information would they be able to share about their security collaboration with Intel. Mr. Rashap said they could talk about joint drills with Intel, for example, tours of the Intel site to gain knowledge of equipment locations. Almost a year ago, Intel had a fire on the compressor, and the fire dept responded appropriately, which showed the drills worked well.
- Stephen Littlejohn asked if Intel had a fire department. Mr. Rashap responded no. Intel relied on the Rio Rancho fire department, which was just a couple of miles away. Their response time was six minutes.
- John Bartlit asked if it was worthwhile having Rio Rancho and Corrales emergency leaders attend a CEWG meeting. Stephen Littlejohn added that the last time first responders attended a CEWG meeting; the Rio Rancho fire chief learned for the first time that Intel used serious chemicals onsite, which triggered his getting a tour of the Intel site. Brian Rashap said that in the last year and a half, Intel held 2 to 3 drills with local emergency responders. During the drills they used simulations and role plays.
- Lynne Kinis asked if Intel had any line items/procedures about when to warn the community based on threat severity. As she lived downhill from Intel, she was anxious about this issue. Someone had to make the decision about the scope of the threat and how and when to notify the public. Brian Rashap said Intel conducted drills on what to do in the event of a situation that impacted the community, and they had line items on how to deal with notifying the community. Ms. Kinis asked if Intel or first responders made that decision. Mr. Rashap responded that sometimes Intel was in control of a situation, and other times local agencies

had jurisdiction based on the law and whether law enforcement needed to take control of a scene. Ms. Kinis said folks living downhill should add their numbers to the code red system. Mr. Rashap said he did not know about that system. Ms. Kinis asked if Corrales first responders participated in drills. Mr. Rashap said they had been invited but he couldn't say whether they actively participated.

- Lynne Kinis said she was not looking for secret information but wanted to make sure she was protected. Brian Rashap said he was limited by the amount of information he could share. Dennis O'Mara suggested directly checking with Corrales to learn how they have collaborated with Intel to make sure there was a link. Stephen Littlejohn said that last time they checked, Sandoval County managed the code red system. Lynne Kinis said the town of Bernalillo managed it, and there were specific guidelines around what triggered a code red call.
- Hugh Church asked if there was a state Department of Homeland Security. Brian Rashap said he didn't know; Intel was regulated by the federal DOHS.
- Stephen Littlejohn asked what action the group wanted to take on the topic. Dennis O'Mara said he wanted to know if there was a link between code red, Intel and the Corrales community. John Bartlit suggested Dennis O'Mara and Lynne Kinis meet with Corrales and report back to CEWG. Alternatively, they could invite Corrales to speak at a CEWG meeting.
- Roberta King asked if everyone was automatically included in the code red distribution list or if people had to sign up. Several people responded that a person had to sign up for it.
- John Bartlit suggested advertising on the Web site how to be included in code red.
- Stephen Littlejohn said more research was needed on the topic, and they should put together a small committee to research the issue and report back to the CEWG. Based on what they learned, the CEWG would decide next steps. Dennis O'Mara and Lynne Kinis agreed to work together on the committee, and they would contact Lane Fitzpatrick to participate and report back to the CEWG in February. No one objected to this suggestion.

DECISION: The CEWG will form a committee to investigate code red possibilities and Corrales's first responder involvement with Intel drills.

ACTION ITEM: Dennis O'Mara and Lynne Kinis will research code red, Corrales first responders and Intel and report back to the CEWG.

HYDROGEN FLUORIDE (HF) SPIKES MEETING UPDATE

- Mike Williams gave an update on his HF modeling project and used a slide deck for reference. He said his objective was to estimate and compare short-term concentrations of HF

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associated with emissions from Intel's Rio Rancho facility to the Texas Commission on Environmental Quality (TCEQ) short-term Environmental Screening Level (ESL) for Hydrogen Fluoride. The screening level was developed by TCEQ based on studies by Lund in 1999 (see:

www.tceq.state.tx.us/assets/public/implementation/tox/dsd/final/october09/hydrogen_fluoride.pdf). Stephen Littlejohn said he would add this link to the CEWG Web site and newsletter.

ACTION ITEM: Stephen Littlejohn will add the above link to the CEWG Web site and newsletter.

- Mr. Williams said the screening level was used as a planning tool to decide if further studies or different options were required for a new facility. If modeled levels were below the screening level, no further studies or options were necessary. Peter Kowalski of ATSDR suggested using the TCEQ ESL level for this project.
- Sarah Chavez asked if there was guidance on how Texas applied the screening level or if they used it with a certain model. Mr. Williams responded that he did not research that deeply into how they used it so he did not know. There were charts on the above TCEQ Web site that showed how it was evaluated. Mr. Williams said he chose this level because it was based on an hourly level and was more stringent than a level based on a daily, 24-hour average.
- Mr. Williams proposed running the model with the most readily available data for the simplest set of circumstances. He would examine concentrations at the receptors—points at which concentrations were calculated—and revise the receptor locations to adequately define the highest concentrations. He would space the receptors 50 meters apart, which is the measurement Intel used in their modeling. He expected concentrations to be more uniformly distributed. Then he would examine the data on HF emissions and revise the emission estimates to cover plausible emissions scenarios and rerun the AERMOD model.
- Sarah Chavez asked Mr. Williams to document the modeling process. John Bartlit suggested Ms. Chavez show Mr. Williams' slide presentation to Class One to have more of her questions answered. All the information would eventually become part of the report.
- Mike Williams said that calculations would be based on median emissions, and that number would remain fixed for the first set run; weather data was variable. Mr. Williams would use the AERMOD model, which was EPA recommended and mostly used to look at impacts at industrial sources rather than for urban areas. Mr. Williams said scrubbers had a much colder plume, so they did not have buoyancy. All this was calculated into Intel emissions, Mr. Williams said; however, HF emissions were not calculated into Intel emissions.
- Sarah Chavez said Intel used the AERMOD model for permit modeling, and NMED had a protocol on how to run the model. She asked if Mr. Williams would document how to set up

the model and check with Class One for consistency, for example, for variables on different elements in the model that were site specific. Mr. Williams said he copied Class One protocol.

- Mr. Williams described Phase One tasks. These included preparing meteorological inputs, receptor grids and emission source characteristics inputs. Class One would need to provide the latest information. Sometimes emissions varied by stack; and ERM would provide this information. He would choose the appropriate emission levels for each stack, run the AERMOD model, and report the 20 highest 1-hour averaged concentrations.
- Mr. Williams said he would use most current meteorological data from the Intel weather tower and upper air sounding data from the Albuquerque Sunport to prepare inputs for the years 2010, 2011 and 2012. Ms. Chavez added that because the CEWG was paying for their services, Mike Williams would need to directly request the data from Class One. Ms. Chavez could coordinate the meeting. Mr. Williams said he would use information from most recent permit application to describe the scrubber stacks source characteristics. Also, he would use the median emissions from Intel scrubbers to estimate median emissions and standard deviations of emissions.
- Mr. Williams described phase two. Here he would examine the spatial variation of concentrations to see that nearby receptors closely approached the concentrations of the highest receptors. If there were significant variations, he would reduce spacing between receptors and rerun the AERMOD model.
- In phase three, Mr. Williams said he would look at standard deviations. He asked where they might start seeing nondetects. Ms. Chavez said certain scrubber stacks were always nondetects, and this would need to be addressed in the model. Ms. Chavez said that this had to do with how the factory ducting system was set up. A certain section of the factory fed into this group of equipment. She said ERM would provide hourly averages to use for testing, and they could set up a meeting with ERM to see how they came up with values and talk about how to treat nondetects. She asked Mr. Williams to document this information and how it was used in the model.
- Mike Williams said that if higher emissions were likely, he would use techniques for estimating plausible combinations of scrubber emission levels that could be used to describe circumstances that would be likely (measured as higher than 50% probability) to produce the highest concentrations in a 10-year period. He would continue to use weather data from 2010 to 2012. He said he would present an approach plan and rationale to the CEWG before beginning phase three.
- Sarah Chavez asked that since there was no task force involved with this project, if there was a plan to work closely with Class One on the model. Mike Williams said he would

communicate with Class One as well as ERM, since emissions were a critical to his project.

- Ms. Chavez asked how Mr. Williams would approach the 10-year period. He said he would use the same three-year weather data and investigate the probability of emissions being 20% greater, for example, to get a better estimate of how meteorology varied over 10 years. Although 10-years of weather data was available, the CEWG could only afford using three years of weather data.
- Mr. Williams said that once the highest plausible concentrations (one-hour average) have been estimated, the final step was to compare the results to the TCEQ ESL screening levels—22 parts per billion—adjusted for altitude, which was expressed as 15 micrograms per cubic meter.
- Sarah Chavez asked how running the AERMOD model and reporting the 20 highest concentrations related to the final steps. Mr. Williams said that this was to account for emissions varying over time. This was the complicated part that he would address in phase three. He was trying to get the expected highest number over 10 years of running with three years of weather data.
- John Bartlit asked about the availability of CEWG funds. Stephen Littlejohn said there was about \$5,000 available. He said there was flexibility if cost was a little higher.

WEATHER STATION AND RELATED ISSUES

Stephen Littlejohn asked what they wanted to do on the weather station issue. Did the group want to make recommendations about placing a new station at Intel or repositioning the current station? Did they want to do something with the NMED trailer?

- Sarah Chavez asked what was the purpose of putting in another weather station at Intel, and what kind of station would it be. What would they do with the data?
- Hugh Church said that current 10-meter tower might not be representative because it may be too close to the buildings. He identified a barren area on Intel property below the water towers that would be an ideal location for a 10-meter weather tower. Also, there was a power line nearby.
- Mr. Church said the current nearby NMED trailer was a standard air quality trailer with a tripod with an inlet for air sampling. It sucked down and analyzed air, and monitored air quality continuously. This trailer had been there for two years. The 10-meter number was an international standard. Mr. Church suggested measuring wind at the 10-meter level and then at two or three meters from the ground to get different wind speed, direction and temperature.

- Mr. Church said the current Intel weather station was located just off the street on the south end of the campus. He thought it would be useful to compare data collected between the two towers. He suspected it would be quite different. The suggested new location would be more representative of community members being affected by odors and emissions.
- Stephen Littlejohn said that one possibility was to make a recommendation to Intel to add a new tower. A second issue was to make use of particulate matter measurements from the trailer. John Bartlit added that they wanted to compare the numbers between the two towers. He suggested looking into renting a tower for a period of time.
- Sarah Chavez asked what would be done with the data. Intel used the weather data for permit modeling and odor complaints. How many years would they need to collect the data? Hugh Church said it would take a couple of years to put in a tower.
- Lynne Kinis said they didn't know how long NMED would leave the trailer in the same location. Also, very rarely was the wind coming from north to south. Also, the stacks emitted most often from the west to east. The south end weather station was irrelevant and not well situated to pick up information. Sarah Chavez asked irrelevant for what, picking up information to use in Mr. William's modeling project or for addressing odor complaints. Even if the wind weren't blowing from a particular direction, this would be accounted for in the modeling. While it might not be accurate at a certain point in time, it was accounted for in the modeling piece because he was looking over all the years of data and all the weather conditions over that period of time. Mike Williams said that it would be accounted for in the modeling.
- Lynne Kinis said that the current station would not measure wind information. Mr. Williams said that they were looking at the combination of emissions, wind speed and wind direction but not frequency. If the situation were more stable, it would give higher concentration or the same wind direction. He said he might not be picking that up in his modeling because he might not have gotten the combination right.
- Roberta King asked what the tower near Chalmers measured. Sarah Chavez said it was a weather station and not an emissions station. She asked what that had to do with the emissions and where they were settling. Mr. Williams said the wind direction would tell where the emissions were going. Mr. Littlejohn said the temperature would show the lift.
- Dennis O'Mara said when he reported the odor incident a year ago, he was told the Intel weather monitoring station recorded the wind blowing from the North. Yet a neighbor

had his own weather monitoring station that said the wind in his neighborhood was calm, and Thom Little dismissed that weather data. Mr. O'Mara said he was interested in knowing about the differential between air movement and wind that affected the settling of emissions. It seemed to him that a second weather station situated at a lower altitude might illuminate the situation more.

- Stephen Littlejohn summarized the issue as: 1. Whether the existing weather tower was sufficiently representative to get accurate data along the whole property, including the area around residences, and that would include wind speed and direction and temperature. 2. Whether it would be useful to do some particulate emissions measurements similar to the NMED trailer, which may or may not remain in its current location. They needed to further discuss the issue and make a reasoned determination on potential recommendations to Intel. John Bartlit said they could also work to influence NMED to keep their trailer. Another option was to rent a trailer for comparison purposes. Sarah Chavez said that they could also evaluate the data from the NMED trailer.

MEETING ADJOURNED

NEXT MEETING

February 20, 2013, 5 to 7 p.m.

Corrales Senior Center in Corrales

DECISION SUMMARY

1. CEWG will invite NMED to hold their public Intel permit meeting at a CEWG meeting.
2. The CEWG will form a committee to investigate code red possibilities and Corrales's first responder involvement with Intel drills.

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