

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NATURAL RESOURCES DEFENSE COUNCIL
and ENVIRONMENTAL DEFENSE FUND,

Plaintiffs,

-v-

UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY,

Defendant.

18 Civ. 11227 (PKC) (DCF)

SUPPLEMENTAL DECLARATION OF WILLIAM CHARMLEY

I, William Charmley, declare pursuant to 28 U.S.C. § 1746 that the following statements are true and correct to the best of my knowledge and belief, that they are based upon information acquired by me in the course of performing my duties, information contained in the records of the United States Environmental Protection Agency (EPA), and information supplied to me by current and former EPA employees including employees under my direction.

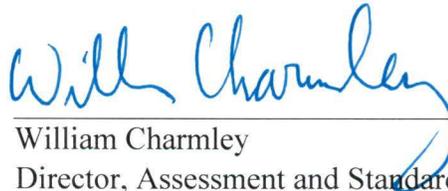
1. The core model for OMEGA version 1.4.59 includes both its source code, written as plain text in the programming language C#, and an executable package consisting of “compiled” code. On its own, a reading of the executable package generally cannot be understood by humans because the compiling process has interpreted the source code files from plain text into a language that can be processed only by a computer.

2. However, there are numerous free “decompiler” programs available online that can convert the machine-readable code of the executable package back into the original textual source code. My staff has run such a “decompiler” program on the executable package for

OMEGA version 1.4.59 and was able to create a functionally identical version of the OMEGA version 1.4.59 source code.

I declare, under penalty of perjury, that the foregoing is true and correct.

Dated: May 23, 2019
Ann Arbor, MI



William Charmley
Director, Assessment and Standards Division
Office of Transportation and Air Quality
U.S. Environmental Protection Agency