Message

From: Osbahr, Bill [osbahr.william@epa.gov]
Sent: 1/30/2013 3:37:18 PM
To: Steve Piper [spiper@mjbradley.com]
CC: anthony stratton (astratton@eastmount.com) [astratton@eastmount.com]; Kudarauskas, Elizabeth A. [Kudarauskas.Beth@epa.gov]; Bruce Yates (BYates@globalp.com) [BYates@globalp.com]; Sansevero, Christine [Sansevero.Christine@epa.gov]; Ron Kenny(RKenny@Globalp.com) [RKenny@Globalp.com]; Rapp, Steve [Rapp.Steve@epa.gov]; Tom Keefe (tkeefe@globalp.com) [tkeefe@globalp.com]; Olivier, Tom [olivier.tom@epa.gov]
Subject: RE: Global South Portland Residual Tank Air Testing
Attachments: DIB0001

Steve:

I have received this message. I will shoot for coming up to the terminal on Feb 4 and likely again on Feb 5.

Please keep me posted on any delivery date or test date changes.

Thanks

Bill Osbahr

From: Steve Piper <spiper@mjbradley.com>

To: Beth Kudarauskas/R1/USEPA/US@EPA
Cc: "anthony stratton (astratton@eastmount.com)" <astratton@eastmount.com>, "Tom Keefe (tkeefe@globalp.com)" <tkeefe@globalp.com>, William Osbahr/R1/USEPA/US@EPA, Tom Olivier/R1/USEPA/US@EPA, Steve Rapp/R1/USEPA/US@EPA, Christine Sansevero/R1/USEPA/US@EPA, "Bruce Yates (BYates@globalp.com)" <BYates@globalp.com>, "Ron Kenny(RKenny@Globalp.com)" <RKenny@Globalp.com>
Date: 01/29/2013 02:12 PM
Subject: RE: Global South Portland Residual Tank Air Testing

On behalf of Global, this e-mail is to notify EPA that a load of residual oil will be arriving at the South Portland Terminal next week (anticipated ~Feb 5-6). Eastmount intends to set up over the next couple of days with a target to begin testing on the Tank No. 3 vents Friday Feb 4th. We will notify you of the exact delivery day once Global receives the shipping schedule.

From: Kudarauskas.Beth@epamail.epa.gov [mailto:Kudarauskas.Beth@epamail.epa.gov]
Sent: Thursday, January 10, 2013 10:46 AM
To: Steve Piper
Cc: anthony stratton (astratton@eastmount.com); Tom Keefe (tkeefe@globalp.com); osbahr.william@epamail.epa.gov; olivier.tom@epamail.epa.gov; Rapp.Steve@epamail.epa.gov; Sansevero.Christine@epamail.epa.gov
Subject: Re: Global South Portland Residual Tank Air Testing

Dear Steve,

As requested in your email on November 20, 2012, EPA grants an extension for Global to conduct VOC and HAP emission testing of #6 oil until the next vessel delivery of #6 oil at the South Portland, ME terminal. Global must conduct tank headspace monitoring of VOC and HAP during the next vessel delivery of #6 oil at the South Portland, ME terminal.

As a condition of the extension, starting on February 1, 2013, Global must report to EPA on a monthly basis the status of the next projected or scheduled #6 oil vessel delivery at the South Portland, ME facility. In addition, Global shall report to EPA within 24 hours of learning the date of the next scheduled #6 oil delivery.

These reports may be made to me with a copy to Bill Osbahr via phone, fax, email or letter and are meant to facilitate coordination of testing activities.

Beth

Elizabeth A. Kudarauskas

Environmental Engineer

US EPA - Region 1

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Steve Piper ---11/20/2012 02:37:54 PM---After our conversation this morning I discussed the air testing program schedule with Global and wi

From: Steve Piper <spiper@mjbradley.com>

To: Beth Kudarauskas/R1/USEPA/US@EPA, William Osbahr/R1/USEPA/US@EPA

Cc: "Tom Keefe (tkeefe@globalp.com)" <tkeefe@globalp.com>, "anthony stratton (astratton@eastmount.com)" <astratton@eastmount.com>

Date: 11/20/2012 02:37 PM

Subject: Global South Portland Residual Tank Air Testing

After our conversation this morning I discussed the air testing program schedule with Global and with Eastmount. At this point, we feel that it would be in the best interest of the program to take a step back and fully review and digest the report recently submitted containing results from the asphalt testing phase before moving forward with the No. 6 oil testing phase. Like Sprague, Global has concerns that the past strategy to utilize a capture chamber over the natural draft tank vent (and conforming with EPA Method 204 vacuum levels) may have resulted in drawing VOC emissions from the headspace of the tank into the exhaust vent that may not be an accurate simulation of the normal tank breathing. Because of the unique challenge of measuring flow rate for "storage tank breathing", we feel that the first round of testing may be just a stepping stone toward developing a better way to characterize tank flow for the second phase of the air test program.

Global understands that there is a current obligation is to complete the second phase of the air test program by December 31, 2012. On behalf of Global, I would like to respectfully request an extension of that deadline. Additionally, Global would like to request an opportunity to meet with EPA (either together with Sprague or separately) to discuss the test protocol going forward.

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