Message

**From**: Mili Patel [mili_patel@transcanada.com]
**Sent**: 9/14/2018 3:03:08 PM
**To**: Hambrick, Amy [Hambrick.Amy@epa.gov]
**Subject**: RE: OOOOa CEDRI

Yes referring to if the OOOOa report from CEDRI can be included in the Title V Annual Certification.

Virginia
Kentucky
New York
New Jersey
Maryland
North Carolina
Ohio
Pennsylvania
West Virginia
Tennessee
Louisiana

Thanks.

Mili Patel
Office: 832-320-5895
Cell: 832-954-4875
Fax: 713-386-3456
mili_patel@transcanada.com

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**From:** Hambrick, Amy [mailto:Hambrick.Amy@epa.gov]
**Sent:** Thursday, September 13, 2018 3:05 PM
**To:** Mili Patel <mili_patel@transcanada.com>
**Subject:** [EXTERNAL] Re: OOOOa CEDRI

Mili- It may be easiest if you tell me what state(s) you are interested in, then I can get you in touch with the EPA Regional contact for that area who will have the most current information on which of their states does or doesn't have delegation. I am not sure I am following your question... are you asking if the OOOOa report can be submitted along with the annual title V (ie same reporting schedule) or are you asking is it instead of? I am guessing the former, but let me know.

Regards,

Amy

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**From:** Mili Patel <mili_patel@transcanada.com>
**Sent:** Thursday, September 13, 2018 3:23:17 PM

**To:** Hambrick, Amy
**Subject:** RE: OOOOa CEDRI

Thank you for this information. Do you have a list of delegated authorities? I know not all states accept authority for OOOOa. For states that do accept authority – would the OOOOa report be accepted with the Title V Annual Certification?

Thanks.

Mili Patel
Office: 832-320-5895
Cell: 832-954-4875
Fax: 713-386-3456
mili_patel@transcanada.com

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**From:** Hambrick, Amy [mailto:Hambrick.Amy@epa.gov]
**Sent:** Thursday, September 13, 2018 1:59 PM
**To:** Mili Patel <mili_patel@transcanada.com>
**Subject:** [EXTERNAL] re: OOOOa CEDRI

Hi Mili-

Thank you for your email.

While the CEDRI template is still considered draft, the reports are required to be submitted- this can be done by submitting it to your delegated authority or through CEDRI. CEDRI is available to accept the 60.5420a(b) and 60.5422a(a) and (b) reports. Because EPA's template on the website you referenced is still considered "draft", the requirement to submit only through CEDRI is not triggered. Once the report is "final" then CEDRI reporting is mandatory. Hence, in the meantime, the report still must be submitted, but the vehicle to do that is either submit to delegated authority or through CEDRI. Make sense?

So from the reg text, once the [**final**] form has been available in CEDRI for 90 days, submittal through CEDRI is required. Up to this 90 day marker, submittal can be either CEDRI or the delegated authority. Excerpt from the reg text FYI:

> "You must submit reports to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX (*https://cdx.epa.gov/)*.) You must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI Web site (*https://www3.epa.gov/ttn/chief/cedri/*). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, you must submit the report to the Administrator at the appropriate address listed in §60.4. Once the form has been available in CEDRI for at least 90 calendar days, you must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted."

Furthermore, as you may know, after OOOOa was finalized in 2016, EPA received administrative petitions seeking reconsideration of various aspects of the 2016 NSPS. EPA sent letters to petitioners granting reconsideration on April 18, 2017 and on June 5, 2017, EPA issued a *Federal Register* notice granting reconsidering on additional requirements. See proposal here signed September 11, 2018: https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/proposed-improvements-2016-new-source . The public will have an opportunity to comment on the template to help make it better. Be sure to stay plugged in and submit your comments.

## Proposed Improvements 2016 New Source Performance Standards | US EPA

www.epa.gov

Oil and gas reconsideration proposal

I hope this helps.

Amy

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**From:** Mili Patel [mailto:mili_patel@transcanada.com]
**Sent:** Thursday, September 13, 2018 12:29 PM
**To:** Thompson, Lisa <Thompson.Lisa@epa.gov>
**Subject:** OOOOa CEDRI

Has the OOOOa final template been posted in CEDRI for annual reports?

Thanks.

**Mili Patel**
**USGO Environmental – Air Permitting & Compliance**
Mili_Patel@transcanada.com

700 Louisiana Street, Suite 14104E
Houston, TX 77002-2700

Tel: 832.320.5895
Cell: 832.954.4875
Fax: 832.320.6665

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