Message

From: Hambrick, Amy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=787B0A3376944FCABAED4F018432CF44-AHAMBRIC]
Sent: 10/9/2018 4:58:01 PM
To: Gordon Moore [gordon.moore@c-ka.com]
Subject: RE: Form submission from: Controlling Air Pollution from the Oil and Natural Gas Industry Contact Us about Controlling Air Pollution from Oil and Natural Gas Production form

Gordon-

Yes, one company can submit a NSPS OOOOa report via CEDRI in a single spreadsheet that contains multiple facilities in multiple states.

Amy

Amy Hambrick
U.S. Environmental Protection Agency
(919)541-0964

From: Gordon Moore [mailto:gordon.moore@c-ka.com]
Sent: Wednesday, October 03, 2018 3:55 PM
To: Hambrick, Amy <Hambrick.Amy@epa.gov>
Subject: RE: Form submission from: Controlling Air Pollution from the Oil and Natural Gas Industry Contact Us about Controlling Air Pollution from Oil and Natural Gas Production form

Amy,

I suppose the best way to ask is "Can we submit a NSPS OOOOa report via CEDRI in a single spreadsheet that contains multiple facilities in multiple states?"

Gordon

From: Hambrick, Amy <Hambrick.Amy@epa.gov>
Sent: Wednesday, October 3, 2018 9:33 AM
To: Gordon Moore <gordon.moore@c-ka.com>
Subject: RE: Form submission from: Controlling Air Pollution from the Oil and Natural Gas Industry Contact Us about Controlling Air Pollution from Oil and Natural Gas Production form

Gordon- Is there one facility/or the same group of facilities or two+ facilities/ different groups of facilities?

So for example:

State A – Facility A report
State B – Facility A report

OR

State A – Facility A report
State B – Facility B report

Amy

Amy Hambrick
U.S. Environmental Protection Agency
(919)541-0964

From: Gordon Moore [mailto:gordon.moore@c-ka.com]
Sent: Tuesday, October 02, 2018 5:03 PM
To: Hambrick, Amy <Hambrick.Amy@epa.gov>
Subject: RE: Form submission from: Controlling Air Pollution from the Oil and Natural Gas Industry Contact Us about Controlling Air Pollution from Oil and Natural Gas Production form

If one company has two states that require OOOOa reporting (non-gas plant), is that one spreadsheet or two spreadsheets to upload to CEDRI?

From: Hambrick, Amy <Hambrick.Amy@epa.gov>
Sent: Tuesday, September 18, 2018 11:13 AM
To: Gordon Moore <gordon.moore@c-ka.com>
Subject: RE: Form submission from: Controlling Air Pollution from the Oil and Natural Gas Industry Contact Us about Controlling Air Pollution from Oil and Natural Gas Production form

HI Gordon- Yes, it is highly preferable. The template includes cells for reporting deviations. E.g. reciprocating compressor tab cell F-12.

Regards,

Amy Hambrick
U.S. Environmental Protection Agency
(919)541-0964

From: Gordon Moore [mailto:gordon.moore@c-ka.com]
Sent: Monday, September 17, 2018 4:36 PM
To: Hambrick, Amy <Hambrick.Amy@epa.gov>
Subject: RE: Form submission from: Controlling Air Pollution from the Oil and Natural Gas Industry Contact Us about Controlling Air Pollution from Oil and Natural Gas Production form

Thanks Amy,

I understand it is optional but is also probably preferable.

Another question, are deviations to be included in the spreadsheet or is that to be handed in another manner? For example, if you miss a Leak Detection OGI monitoring event...is that reported in the spreadsheet? Or is it handled some other way?

Gordon Moore

From: Hambrick, Amy <Hambrick.Amy@epa.gov>
Sent: Wednesday, September 12, 2018 12:13 PM

To: Gordon Moore <gordon.moore@c-ka.com>
Subject: FW: Form submission from: Controlling Air Pollution from the Oil and Natural Gas Industry Contact Us about Controlling Air Pollution from Oil and Natural Gas Production form

HI Gordon-

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: 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.

I hope this helps.

Amy Hambrick
U.S. Environmental Protection Agency
(919)541-0964

From: drupal_admin@epa.gov <drupal_admin@epa.gov> on behalf of Gordon Moore via EPA <no-reply@epa.gov>
Sent: Wednesday, September 5, 2018 11:13 AM
To: AirAction
Subject: Form submission from: Controlling Air Pollution from the Oil and Natural Gas Industry Contact Us about Controlling Air Pollution from Oil and Natural Gas Production form

Submitted on 09/05/2018 11:13AM
Submitted values are:

Name: Gordon Moore
Email Address: gordon.moore@c-ka.com
Comments: Am I correct that NSPS OOOOa Annual Report for all facilities
(except gas plant fugitives) is not yet required in CEDRI?