To: North, Alexis [North.Alexis@epa.gov]; Witt, Jon [Witt.Jon@epa.gov]; Witosky, Matthew [Witosky.Matthew@epa.gov]; Wilwerding, Joseph [Wilwerding.Joseph@epa.gov]; Vyas, Himanshu [vyas.himanshu@epa.gov]; Vazquez, Natalia [Vazquez.Natalia@epa.gov]; Topinka, Natalie [topinka.natalie@epa.gov]; Thompson, Lisa [Thompson.Lisa@epa.gov]; Tates, Samuel [Tates.Samuel@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Shine, Brenda [Shine.Brenda@epa.gov]; Patel, Shilpa [patel.shilpa@epa.gov]; Ostrand, Laurie [Ostrand.Laurie@epa.gov]; Mia, Marcia [Mia.Marcia@epa.gov]; Marsh, Karen [Marsh.Karen@epa.gov]; Magyar, Raymond [Magyar.Raymond@epa.gov]; Loukeris, Constantinos [loukeris.constantinos@epa.gov]; Lischinsky, Robert [Lischinsky.Robert@epa.gov]; Lindsey, William [Lindsey.William@epa.gov]; Kler, Denis [Kler.Denis@epa.gov]; Kenney, James [Kenney.James@epa.gov]; Kaleri, Cynthia [kaleri.cynthia@epa.gov]; Johnson, Steffan [johnson.steffan@epa.gov]; Hoyt, Daniel [Hoyt.Daniel@epa.gov]; Howard, Jodi [Howard.Jodi@epa.gov]; Hambrick, Amy [Hambrick.Amy@epa.gov]; Goff, Keith [Goff.Keith@epa.gov]; Garwood, Gerri [Garwood.Gerri@epa.gov]; Eisele, Adam [Eisele.Adam@epa.gov]; Cheever, Robert [cheever.robert@epa.gov]; Chapman, Apple [Chapman.Apple@epa.gov]; Carey, Angela [carey.angela@epa.gov]; Buenning, Hans [Buenning.Hans@epa.gov]; augustine, bruce [augustine.bruce@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Kler, Denis [Kler.Denis@epa.gov]; Augustine, Bruce [augustine.bruce@epa.gov]; Buenning, Hans [Buenning.Hans@epa.gov]; Carey, Angela [carey.angela@epa.gov]; Chapman, Apple [Chapman.Apple@epa.gov]; Cheever, Robert [cheever.robert@epa.gov]; Eisele, Adam [Eisele.Adam@epa.gov]; Garwood, Gerri [Garwood.Gerri@epa.gov]; Goff, Keith [Goff.Keith@epa.gov]; Hambrick, Amy [Hambrick.Amy@epa.gov]; Howard, Jodi [Howard.Jodi@epa.gov]; Hoyt, Daniel [Hoyt.Daniel@epa.gov]; Johnson, Steffan [johnson.steffan@epa.gov]; Kaleri, Cynthia [kaleri.cynthia@epa.gov]; Kenney, James [Kenney.James@epa.gov]; Lindsey, William [Lindsey.William@epa.gov]; Lischinsky, Robert [Lischinsky.Robert@epa.gov]; Loukeris, Constantinos [loukeris.constantinos@epa.gov]; Magyar, Raymond [Magyar.Raymond@epa.gov]; Marsh, Karen [Marsh.Karen@epa.gov]; Mia, Marcia [Mia.Marcia@epa.gov]; Ostrand, Laurie [Ostrand.Laurie@epa.gov]; Patel, Shilpa [patel.shilpa@epa.gov]; Pavitt, John [Pavitt.John@epa.gov]; Shine, Brenda [Shine.Brenda@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Tates, Samuel [Tates.Samuel@epa.gov]; Thompson, Lisa [Thompson.Lisa@epa.gov]; Topinka, Natalie [topinka.natalie@epa.gov]; Vazquez, Natalia [Vazquez.Natalia@epa.gov]; Vyas, Himanshu [vyas.himanshu@epa.gov]; Willard, Erin [Willard.ErinM@epa.gov]; Wilwerding, Joseph [Wilwerding.Joseph@epa.gov]; Witosky, Matthew [Witosky.Matthew@epa.gov]; Witt, Jon [Witt.Jon@epa.gov]; North, Alexis [North.Alexis@epa.gov]

CC: Williams, Christopher [Williams.Christopher@epa.gov]; Loiacono, Sara [loiacono.sara@epa.gov]; Loiacono, Sara [loiacono.sara@epa.gov]; Williams, Christopher [Williams.Christopher@epa.gov]

Location: Skype Meeting

Start: 4/17/2019 7:00:00 PM
End: 4/17/2019 8:00:00 PM

Recurrence: (none)

AGENDA: Any other items?

1) **From NATALIA VAZQUEZ, R3**
From: Jarrett, James F <James.F.Jarrett@wv.gov>
Sent: Thursday, March 28, 2019 10:53 AM
To: Vazquez, Natalia <Vazquez.Natalia@epa.gov>
Cc: Augustine, Bruce <augustine.bruce@epa.gov>; Adamiec, James <Adamiec.James@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>
Subject: NSPS OOOO/OOOOa LDAR pump exemption

Natalia,

Could you tell me what you think about this type of pump for the dual mechanical seal exemption from monthly M21 monitoring under OOOO/OOOOa? **See attached pump diagram**. If the pump has a flush connection would

the pump still be required to monthly M21 monitor or should it be treated as a connector for M21 monitoring?

Williams Oak Grove reported this type of pump as leaking and did not identify it as a connector. It was identified as the pump was leaking. This brought up the question should it be changed to a connector? The pump is not monthly M21 monitored since Oak Grove claimed the DMS exemption. The flush portion of the pump is in contact with the process fluid.

Sincerely,
James F. Jarrett
WVDEP –DAQ

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