Message

From: Lusky, Katy [Lusky.Kathleen@epa.gov]
Sent: 6/10/2019 5:16:04 PM
To: Kler, Denis [Kler.Denis@epa.gov]; Groendyke, Todd [Groendyke.Todd@epa.gov]; Carpenter, Jacob [Carpenter.Jacob@epa.gov]; McNeal, Dave [Mcneal.Dave@epa.gov]
CC: Davis, Amber [Davis.Amber@epa.gov]; Anderson, Seneca [Anderson.Seneca@epa.gov]; Radford, Nicole [Radford.Nicole@epa.gov]; Taylor, Kevin [Taylor.Kevin@epa.gov]; Russo, Todd [Russo.Todd@epa.gov]; Dressler, Jason [Dressler.Jason@epa.gov]
Subject: RE: Meeting to discuss OOOOa issue

I let Elisabeth Munsey at GEPD know about the meeting. She wasn't overly concerned but was going to pass on the info to the permitting/monitoring folks.

On a side note, she said GA should have delegation of NSPS Subpart OOOOa by about September. It is going in front of the Board in August and once the rule is IBRed into their regulations as final, then they will have delegation.

Thanks,
Katy

From: Kler, Denis
Sent: Monday, June 10, 2019 11:58 AM
To: Lusky, Katy <Lusky.Kathleen@epa.gov>; Groendyke, Todd <Groendyke.Todd@epa.gov>; Carpenter, Jacob <Carpenter.Jacob@epa.gov>; McNeal, Dave <Mcneal.Dave@epa.gov>
Cc: Davis, Amber <Davis.Amber@epa.gov>; Anderson, Seneca <Anderson.Seneca@epa.gov>; Radford, Nicole <Radford.Nicole@epa.gov>; Taylor, Kevin <Taylor.Kevin@epa.gov>; Russo, Todd <Russo.Todd@epa.gov>; Dressler, Jason <Dressler.Jason@epa.gov>
Subject: RE: Meeting to discuss OOOOa issue

I would say the program side, since we are not sure what information they are going to provide and we don't know if it is an enforcement issue at this time.

Good catch on the location. I missed that in the email below.

Denis B. Kler
Office of the Regional Administrator R4
Enforcement and Compliance Assurance Division
Air Enforcement Branch
Air Section 1
Phone: 404-562-9199

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From: Lusky, Katy
Sent: Monday, June 10, 2019 11:47 AM
To: Kler, Denis <Kler.Denis@epa.gov>; Groendyke, Todd <Groendyke.Todd@epa.gov>; Carpenter, Jacob <Carpenter.Jacob@epa.gov>; McNeal, Dave <Mcneal.Dave@epa.gov>
Cc: Davis, Amber <Davis.Amber@epa.gov>; Anderson, Seneca <Anderson.Seneca@epa.gov>; Radford, Nicole

<Radford.Nicole@epa.gov>; Taylor, Kevin <Taylor.Kevin@epa.gov>; Russo, Todd <Russo.Todd@epa.gov>; Dressler, Jason <Dressler.Jason@epa.gov>
Subject: RE: Meeting to discuss OOOOa issue

Ok that is fine with me. Do you want to contact a GEPD compliance person or should I contact someone on the program side?

I did find this in a previous email from them... *Southern Natural Gas (SNG) Thomaston Compressor Station*

From: Kler, Denis
Sent: Monday, June 10, 2019 11:37 AM
To: Lusky, Katy <Lusky.Kathleen@epa.gov>; Groendyke, Todd <Groendyke.Todd@epa.gov>; Carpenter, Jacob <Carpenter.Jacob@epa.gov>; McNeal, Dave <Mcneal.Dave@epa.gov>
Cc: Davis, Amber <Davis.Amber@epa.gov>; Anderson, Seneca <Anderson.Seneca@epa.gov>; Radford, Nicole <Radford.Nicole@epa.gov>; Taylor, Kevin <Taylor.Kevin@epa.gov>; Russo, Todd <Russo.Todd@epa.gov>; Dressler, Jason <Dressler.Jason@epa.gov>
Subject: RE: Meeting to discuss OOOOa issue

Thank you for the additional information, especially on the delegation of NSPS OOOOa (I did not know that). My understanding is the leak is coming from a component that is not subject to NSPS OOOO, so I was thinking it may potentially fall in the GA SIP regulations arena.

I think it may be a good idea to reach out to the state in some capacity, and of course let the state know that we are not quite sure what information the company is going to share with us.

Denis

Denis B. Kler
Office of the Regional Administrator R4
Enforcement and Compliance Assurance Division
Air Enforcement Branch
Air Section 1
Phone: 404-562-9199

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From: Lusky, Katy
Sent: Monday, June 10, 2019 11:10 AM
To: Kler, Denis <Kler.Denis@epa.gov>; Groendyke, Todd <Groendyke.Todd@epa.gov>; Carpenter, Jacob <Carpenter.Jacob@epa.gov>; McNeal, Dave <Mcneal.Dave@epa.gov>
Cc: Davis, Amber <Davis.Amber@epa.gov>; Anderson, Seneca <Anderson.Seneca@epa.gov>; Radford, Nicole <Radford.Nicole@epa.gov>; Taylor, Kevin <Taylor.Kevin@epa.gov>; Russo, Todd <Russo.Todd@epa.gov>; Dressler, Jason <Dressler.Jason@epa.gov>
Subject: RE: Meeting to discuss OOOOa issue

Hey Denis,

Unfortunately, the answer to most questions is No. What we do know is that right now, b/c of the way the delegation with GA works, GEPD hasn't taken delegation of this particular standard yet, which is why I believe they contacted us instead of GA.

Until Friday, we weren't clear on the "event" details and it wasn't even clear until Friday that it may involve a compliance type activity. The facility has already made plans to come see us. I am not sure at this time if you want us to contact GA and just let them know or not. It is my understanding that the facility is planning to give us a lot more detail when they get here in person.

What would you suggest at this time. I assumed that we would mostly listen and ask questions at this meeting and offer no real conclusions, etc... since they haven't been very forthcoming with the details.

Let me know what you think
Katy

From: Kler, Denis
Sent: Monday, June 10, 2019 8:10 AM
To: Lusky, Katy <Lusky.Kathleen@epa.gov>; Groendyke, Todd <Groendyke.Todd@epa.gov>; Carpenter, Jacob <Carpenter.Jacob@epa.gov>; McNeal, Dave <Mcneal.Dave@epa.gov>
Cc: Davis, Amber <Davis.Amber@epa.gov>; Anderson, Seneca <Anderson.Seneca@epa.gov>; Radford, Nicole <Radford.Nicole@epa.gov>; Taylor, Kevin <Taylor.Kevin@epa.gov>; Russo, Todd <Russo.Todd@epa.gov>; Dressler, Jason <Dressler.Jason@epa.gov>
Subject: RE: Meeting to discuss OOOOa issue

I may have missed some of the previous emails which may have contained the answers to my questions below. So I apologize in advance if I am repeating the questions.

Where in GA is the facility located?
Does the facility have an operating permit?
Has the company contacted GA EPD about the leaking component?
What is GA EPDs position on this event?
Have we asked someone from GA EPD to attend the meeting?

Best,
Denis

Denis B. Kler
Office of the Regional Administrator R4
Enforcement and Compliance Assurance Division
Air Enforcement Branch
Air Section 1
Phone: 404-562-9199

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From: Lusky, Katy
Sent: Friday, June 7, 2019 3:56 PM
To: Groendyke, Todd <Groendyke.Todd@epa.gov>; Carpenter, Jacob <Carpenter.Jacob@epa.gov>; McNeal, Dave <Mcneal.Dave@epa.gov>

Cc: Davis, Amber <Davis.Amber@epa.gov>; Anderson, Seneca <Anderson.Seneca@epa.gov>; Kler, Denis <Kler.Denis@epa.gov>; Radford, Nicole <Radford.Nicole@epa.gov>; Taylor, Kevin <Taylor.Kevin@epa.gov>
Subject: RE: Meeting to discuss OOOOa issue

So I talked to Zainab… We should probably have someone from Compliance/Enforcement in the room (she thought it would be helpful). My assessment was correct, that they are basically trying to figure out what to do about a leaking valve they found during a OOOOa inspection that, as it turns out, isn't even part of the "compressor", but they didn't want to ignore the fact that a valve was leaking. It sounds like the issue is that the effort it would take to shutdown the pipe, vent the pipe and fix the leak would be significantly more than the current NG lead rate and they don't know what to do.

So based on that… I will leave it up to you guys who can or will be able to join our meeting next week. I will send the invite to all 3 of you and let you decide. ☺

Thanks for helping out. I know we set the meeting up without consultation of your schedules since we didn't know we needed to include you all. Based on who is going, feel free to FYI your section chief as well.

Thanks
Katy

From: Groendyke, Todd
Sent: Friday, June 7, 2019 2:11 PM
To: Lusky, Katy <Lusky.Kathleen@epa.gov>; Carpenter, Jacob <Carpenter.Jacob@epa.gov>; McNeal, Dave <Mcneal.Dave@epa.gov>
Cc: Davis, Amber <Davis.Amber@epa.gov>; Anderson, Seneca <Anderson.Seneca@epa.gov>; Kler, Denis <Kler.Denis@epa.gov>; Radford, Nicole <Radford.Nicole@epa.gov>; Taylor, Kevin <Taylor.Kevin@epa.gov>
Subject: Re: Meeting to discuss OOOOa issue

I would ask some more questions and figure out if you really need a meeting. I think someone from enforcement should be there. I'm happy to do it, but giving Denis (Energy Extraction/OOOOa) or Nikki (Compliance Assistance ☺) first dibs.

Sincerely,

Todd Groendyke
U.S. EPA, Region 4
Enforcement and Compliance Assurance Division
Air Enforcement Branch/Air Section 2
Tel: (404) 562-8262

Fax: (404) 562-9163

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From: Lusky, Katy
Sent: Friday, June 7, 2019 2:00:09 PM
To: Groendyke, Todd; Carpenter, Jacob; McNeal, Dave
Cc: Davis, Amber; Anderson, Seneca; Kler, Denis; Radford, Nicole; Taylor, Kevin
Subject: RE: Meeting to discuss OOOOa issue

Would one of you enforcement folks like to come to our meeting? Does that mean I have to tell them?

I can call her (Zainab is a woman) and try to figure out if they feel like they really want to talk to "compliance assistance". I don't feel like they are asking for a waiver of some kind, right?

From: Groendyke, Todd
Sent: Friday, June 7, 2019 1:42 PM
To: Carpenter, Jacob <Carpenter.Jacob@epa.gov>; Lusky, Katy <Lusky.Kathleen@epa.gov>; McNeal, Dave <Mcneal.Dave@epa.gov>
Cc: Davis, Amber <Davis.Amber@epa.gov>; Anderson, Seneca <Anderson.Seneca@epa.gov>; Kler, Denis <Kler.Denis@epa.gov>; Radford, Nicole <Radford.Nicole@epa.gov>; Taylor, Kevin <Taylor.Kevin@epa.gov>
Subject: Re: Meeting to discuss OOOOa issue

He isn't really giving enough information to know what he is talking about. The contractor monitored a valve he wasn't supposed to. So what? Was it leaking and they didn't repair it? Who is the owner of the MLV?

OOOOa/Energy Extraction is Denis' wheelhouse.

Sincerely,

Todd Groendyke
U.S. EPA, Region 4
Enforcement and Compliance Assurance Division
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Tel: (404) 562-8262

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From: Carpenter, Jacob
Sent: Friday, June 7, 2019 1:02:12 PM
To: Lusky, Katy; McNeal, Dave
Cc: Davis, Amber; Anderson, Seneca; Kler, Denis; Radford, Nicole; Groendyke, Todd; Taylor, Kevin
Subject: RE: Meeting to discuss OOOOa issue

I'm not sure off the top of my head, but can look at it later this afternoon and Monday. I'm cc'ing a few enforcement folks that may have some knowledge on this –

This is the issue – they are wanting to know about the monitoring and repair schedule for a valve in a main natural gas line that isn't indicated to be a part of the compressor station. Are there any implications for OOOOa? Are there other rules that may apply?

Kinder Morgan has requested this meeting to discuss 40 CFR 60 Subpart OOOOa compliance at Southern Natural Gas (SNG) Thomaston Compressor Station. The facility has been applicable to OOOOa since 2017. During initial monitoring

at the site, a mainline valve (MLV), which is not a part of the compressor station, was inadvertently monitored by the third party LDAR contractor. The purpose of this meeting is to discuss the monitoring and repair schedule for this MLV.

From: Lusky, Katy
Sent: Friday, June 7, 2019 11:22 AM
To: McNeal, Dave <Mcneal.Dave@epa.gov>
Cc: Davis, Amber <Davis.Amber@epa.gov>; Anderson, Seneca <Anderson.Seneca@epa.gov>; Carpenter, Jacob <Carpenter.Jacob@epa.gov>
Subject: RE: Meeting to discuss OOOOa issue

Thoughts on this brief explanations?

From: Naqvi, Zainab <zainab_naqvi@kindermorgan.com>
Sent: Thursday, June 6, 2019 5:06 PM
To: Lusky, Katy <Lusky.Kathleen@epa.gov>
Cc: McNeal, Dave <Mcneal.Dave@epa.gov>; Davis, Amber <Davis.Amber@epa.gov>; Anderson, Seneca <Anderson.Seneca@epa.gov>; Carpenter, Jacob <Carpenter.Jacob@epa.gov>; Mehdizadeh, Fariba <Fariba_Mehdizadeh@kindermorgan.com>
Subject: RE: Meeting to discuss OOOOa issue

Katy,

Kinder Morgan has requested this meeting to discuss 40 CFR 60 Subpart OOOOa compliance at Southern Natural Gas (SNG) Thomaston Compressor Station. The facility has been applicable to OOOOa since 2017. During initial monitoring at the site, a mainline valve (MLV), which is not a part of the compressor station, was inadvertently monitored by the third party LDAR contractor. The purpose of this meeting is to discuss the monitoring and repair schedule for this MLV.

We will not be bringing any Legal counsel to this meeting.

Please let me know if you have any additional questions.

Thanks,
-Zainab

From: Lusky, Katy [mailto:Lusky.Kathleen@epa.gov]
Sent: Thursday, June 6, 2019 10:30 AM
To: Naqvi, Zainab
Cc: McNeal, Dave; Davis, Amber; Anderson, Seneca; Carpenter, Jacob
Subject: RE: Meeting to discuss OOOOa issue

[This email message was received from the Internet and came from outside of Kinder Morgan]

Hi Zainab

I wanted to check in again on when you might be able to provide more information on your questions or concerns regarding 63 Subpart OOOOa (Oil and NG facilities). It will make the meeting much more productive if we can be familiar with the specific topics before you get here on Tuesday.

Just so you are aware, I have invited additional members of our Stationary Source Team to participate. Also, I wanted to confirm that you would not be bringing any legal counsel to the meeting, correct?

Thanks,
Katy

From: Naqvi, Zainab <zainab_naqvi@kindermorgan.com>
Sent: Monday, May 20, 2019 5:51 PM

To: mcneal.david@epa.gov; Lusky, Katy <Lusky.Kathleen@epa.gov>
Subject: Meeting to discuss OOOOa issue

David,

As I mentioned on the phone, I was hoping to schedule a face-to-face meeting with you (and Katie) to discuss OOOOa at a Southern Natural Gas compressor station that is located in Georgia. If you have some time the week of May 28, I would appreciate it. If that does not work, please let me know what date and time will accommodate your schedules, and we will coordinate something.

Thanks in advance,
-Zainab

Zainab Naqvi
Air Permitting and Compliance
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Zainab_Naqvi@kindermorgan.com