Message

From: Groendyke, Todd [Groendyke.Todd@epa.gov]
Sent: 6/7/2019 6:11:16 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
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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
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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

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