Message

From: Topinka, Natalie [topinka.natalie@epa.gov]
Sent: 1/24/2018 5:01:18 PM
To: Breneman, Sara [breneman.sara@epa.gov]
CC: Frank, Nathan [frank.nathan@epa.gov]
Subject: FW: Request to Waive Early Guidance (Technical Package) SAN 5719.8 "Oil and Natural Gas Sector: Emission Standards for New, Reconstructed and Modified Sources Reconsideration"
Attachments: Draft OG Overview Briefing (note outdated scheduled).docx; NSPS OOOOa Technical Early Guidance waiver 1.24.18 Region 5.pdf

Sara,

Attached is a waiver form documenting that as a workgroup member on this Tier 2 rulemaking, R5 agrees to waive the Early Guidance step of the rulemaking process for the Technical Portion of the NSPS OOOOa reconsideration.

Early Guidance is the step in the rulemaking process where background info is presented and the issues to be considered by the rulemaking workgroup are teed up. Since the technical issues have been discussed previously during workgroup meetings and the workgroup members have been provided with the attached briefing document, we are already familiar with the information that would be presented at a formal Early Guidance meeting and therefore agree that it is appropriate to waive this step.

Region 5 previously agreed to waive the Analytic Blueprint step for this same rulemaking, and Ed Nam was our signatory (there is not an actual document for him to sign, but the waiver went out under his name). I recommend the same procedure here, with Cathy cc'd as an FYI as necessary.

If Ed concurs, I can send the waiver to the workgroup chair. Deadline is Monday 1/29 at noon.

Thanks,

Natalie

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From: Thompson, Lisa
Sent: Tuesday, January 23, 2018 5:05 PM
To: Mia, Marcia <Mia.Marcia@epa.gov>; Branning, Amy <Branning.Amy@epa.gov>; Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Durkee, Stanley <Durkee.Stan@epa.gov>; Vyas, Himanshu <vyas.himanshu@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Lawrence, Rob <Lawrence.Rob@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>
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Subject: Request to Waive Early Guidance (Technical Package) SAN 5719.8 "Oil and Natural Gas Sector: Emission Standards for New, Reconstructed and Modified Sources Reconsideration"

All,

You should have all received an invite to Options Selection with Bill Wehrum on 2/1. Please let me know if you don't have the invite on your calendar. I recognize that we have discussed OAR's desire to move as expeditiously as possible on this technical package and many of you may not have been expecting the Options Selection so soon. However, due to the accelerated schedule of this briefing / rulemaking and the desire to keep the process moving ahead, we're requesting that you submit an Early Guidance waiver by 1/29 12:00 PM.

Title: Oil and Natural Gas Sector: Emission Standards for New, Reconstructed and Modified Sources Reconsideration
SAN: 5719.8
Request: Waive
Milestone: Early Guidance
Stage: Proposal

Suggested rationale: The EPA is working on an expedited schedule to propose the rule titled, "Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Reconsideration", Tier 2, 5719.8. This action is a reconsideration of subpart OOOOa and will propose focused options and alternatives on specific topics which EPA has granted reconsideration on and identify opportunities to streamline implementation and improve cost-effectiveness of compliance. We believe that Early Guidance would be duplicative and unnecessary given the aggressive NPRM schedule.

Please submit your waiver by 1/29, 12:00 PM
http://intranet.epa.gov/adplibrary/documents/workgrouppollform_2015-10-19.pdf

For your reference, I've attached the pager that was pre-briefed to Bill Wehrum for Early Guidance.

Lisa Thompson
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U.S. Environmental Protection Agency
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