Message

From: Dickens, Brian [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=416CD582A67D44AAB91D3BEFF56B892D-BDICKENS]
Sent: 7/11/2019 9:29:35 PM
To: Furey, Eileen [furey.eileen@epa.gov]; Breneman, Sara [breneman.sara@epa.gov]
CC: Topinka, Natalie [topinka.natalie@epa.gov]
Subject: FW: Oil and Gas Reconsideration - request for expedited FAR
Attachments: OAR - Request Expedited FAR Form R5.pdf

Eileen:

If you agree, please send this email and the attachment on to Ed. It relates to the Quad-Oa workgroup Natalie is on. OAQPS sent out this little questionnaire for us to fill out and return.
Let us know if you have questions,

Brian

From: Topinka, Natalie
Sent: Thursday, July 11, 2019 3:00 PM
To: Dickens, Brian <dickens.brian@epa.gov>
Cc: Breneman, Sara <breneman.sara@epa.gov>
Subject: Oil and Gas Reconsideration - request for expedited FAR

Brian,

See the attached form from OAR requesting an expedited FAR review period for the Final NSPS OOOOa Technical reconsideration package. I am requesting Ed's concurrence that we should disagree with an expedited review period. See the detailed reasons below:

- This is a final rulemaking on a host of complicated issues. 10 days is not enough time to review the package, compile comments, and brief upper management on the Region's FAR position.
- EPA's own Action Development Process guidance for rulemakings states: *"The FAR meeting should be scheduled no sooner than 15 working days after the FAR package is distributed to the participating AAs and RAs. In rare cases, it may be necessary to schedule the FAR meeting sooner, if a full 15-day review period is not possible."* This action is not subject to any external, internal, or court-ordered deadline, so a 15-day FAR review period is possible, reasonable and beneficial to the rulemaking process.
- At the last workgroup meeting, the workgroup agreed that at least 15 days would be necessary to prepare for FAR (see highlight in e-mail below).
- Historically, materials on this rulemaking action have been in flux during the FAR review period, and even after FAR meetings. We don't expect that to be different for this action and request at least 15 days to be able to review and comment on any last-minute changes.

Let me know if we have Ed's concurrence to send the attached form to the workgroup chair. I expect other workgroup members to disagree also.

Natalie

Natalie M. Topinka
Environmental Scientist
U.S. Environmental Protection Agency, Region 5

Air Enforcement and Compliance Assurance Branch
77 West Jackson Boulevard (ECA-18J)
Chicago, IL 60604
ph: (312) 886-3853

From: Hambrick, Amy
Sent: Thursday, July 11, 2019 8:21 AM
To: DeFigueiredo, Mark <DeFigueiredo.Mark@epa.gov>; Weitz, Melissa <Weitz.Melissa@epa.gov>; Waltzer, Suzanne <Waltzer.Suzanne@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Hoffman, Howard <hoffman.howard@epa.gov>; Gilbreath, Jan <Gilbreath.Jan@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>; Marsh, Karen <Marsh.Karen@epa.gov>; Witosky, Matthew <Witosky.Matthew@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>; Garwood, Gerri <Garwood.Gerri@epa.gov>; Shappley, Ned <Shappley.Ned@epa.gov>; Miller, Elizabeth <Miller.Elizabeth@epa.gov>; Alsalam, Jameel <Alsalam.Jameel@epa.gov>; Sorrell, Virginia <Sorrell.Virginia@epa.gov>; Gregory, John <Gregory.John@epa.gov>; Kopits, Elizabeth <Kopits.Elizabeth@epa.gov>; Marten, Alex <Marten.Alex@epa.gov>; Branning, Amy <Branning.Amy@epa.gov>; Roberts, Cindy <Roberts.Cindy@epa.gov>; Sarofim, Marcus <Sarofim.Marcus@epa.gov>; Kaleri, Cynthia <kaleri.cynthia@epa.gov>; Eisele, Adam <Eisele.Adam@epa.gov>; Macpherson, Alex <Macpherson.Alex@epa.gov>; Marks, Matthew <Marks.Matthew@epa.gov>; Mills, Derek <Mills.Derek@epa.gov>; Bielen, David <bielen.david@epa.gov>; Burden, Susan <Burden.Susan@epa.gov>; Crowley, Kate <crowley.kate@epa.gov>; Ferguson, Gregory <ferguson.gregory@epa.gov>
Subject: RE: Oil and Gas Reconsideration Workgroup Re-Start

TODAY'S MEETING IS CANCELLED.

General Status Information:

Technical (contact Karen with questions)

Current schedule targets based on conversations with OAQPS management:

- Package to workgroup for FAR: 7/26
- FAR Meeting: 8/19 (assumes 15 day FAR)
- OMB Package to OAR: 8/26
- Signature (tentative): 9/11

The above schedule assumes a 15 day FAR based on our last workgroup meeting. However, OAQPS management is still requesting expedited FAR of 10 days. Attached is the request. Please complete, whether you approve or disapprove of the expedited request.

Draft reg text is planned to be available early next week (hopefully by COB Monday). If that happens, we can discuss the text at next week's call.

Policy (contact Amy with questions)

(1) Sent to OMB June 6; Accepted on June 10; still at OMB
(2) OMB holding statement:

EPA has sent a draft proposal updating to the 2016 New Source Performance Standards (NSPS) for the oil and natural gas industry to the Office of Management and Budget for Interagency Review. The updates would address broad policy issues in the 2016 rule. EPA will make the proposal available for public review and comment after interagency review is complete. The draft proposal is separate from the targeted improvements to the NSPS that EPA proposed in October 2018. The Agency continues to consider public comments on that proposal and anticipates taking final action later this year.

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