Message

From: Nam, Ed [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A2653F1DDD59470688BA557DD84D9690-NAM, ED]
Sent: 6/21/2019 4:28:36 PM
To: Genevieve Damico (damico.genevieve@epa.gov) [damico.genevieve@epa.gov]; Douglas Aburano (aburano.douglas@epa.gov) [aburano.douglas@epa.gov]
CC: John Mooney (Mooney.John@epa.gov) [Mooney.John@epa.gov]; Eileen Furey (furey.eileen@epa.gov) [furey.eileen@epa.gov]
Subject: FW: Revised NSPS OOOOa Technical Reconsideration Options Selection

Doug,

I'm not sure who is covering for Genevieve today but we have a permit/applicability/Option selection comment issue that we may need help on. This is a new process so we are still working out some kinks.

Below are the comments that Natalie has made to the workgroup before and wants us to make at an agency level. Can you have someone do a review and give me their assessment? If we don't have the expertise, please let me know that too. I don't need someone learning a new issue from the zero today. Someone can reach out to Natalie too.

Thanks,
-Ed

From: Dickens, Brian
Sent: Thursday, June 20, 2019 4:00 PM
To: Newton, Cheryl <Newton.Cheryl@epa.gov>; Harris, Michael <harris.michael@epa.gov>
Cc: Nam, Ed <nam.ed@epa.gov>; Furey, Eileen <furey.eileen@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Breneman, Sara <breneman.sara@epa.gov>; Mooney, John <Mooney.John@epa.gov>; Thiede, Kurt <thiede.kurt@epa.gov>
Subject: RE: Revised NSPS OOOOa Technical Reconsideration Options Selection

From Natalie:

Ex. 5 Deliberative Process (DP)

From: Newton, Cheryl
Sent: Thursday, June 20, 2019 3:43 PM
To: Harris, Michael <harris.michael@epa.gov>
Cc: Nam, Ed <nam.ed@epa.gov>; Furey, Eileen <furey.eileen@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Dickens, Brian <dickens.brian@epa.gov>; Breneman, Sara <breneman.sara@epa.gov>; Mooney, John <Mooney.John@epa.gov>; Thiede, Kurt <thiede.kurt@epa.gov>
Subject: RE: Revised NSPS OOOOa Technical Reconsideration Options Selection

Thanks Mike – I will read closer on the train. What are our options for tomorrow given the timing of all this. Also, do we know how other workgroup members/regions view these issues and/or what they are planning to indicate tomorrow? Thanks

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From: Harris, Michael
Sent: Thursday, June 20, 2019 3:31 PM
To: Newton, Cheryl <Newton.Cheryl@epa.gov>
Cc: Nam, Ed <nam.ed@epa.gov>; Furey, Eileen <furey.eileen@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Dickens, Brian <dickens.brian@epa.gov>; Breneman, Sara <breneman.sara@epa.gov>; Mooney, John <Mooney.John@epa.gov>
Subject: RE: Revised NSPS OOOOa Technical Reconsideration Options Selection

Hi Cheryl,

I wanted to let you know that ECAD and ARD has concerns with some of the options recommended by OAQPS for inclusion in the final technical amendments to the 2016 New Source Performance Standard for Crude Oil and Natural Gas Facilities, Subpart OOOOa. The Options Selection is scheduled for Friday, June 21 at 11:00 Central. ECAD staff have participated on the national workgroup on this rule.

Background: On October 15, 2018, EPA proposed technical amendments to the 2016 NSPS OOOOa, with the comment period closing on December 17, 2018. The Agency is proposing its general positions on a variety of different rule components. Below are ECAD's comments on the major issues.

Storage vessels: The proposed option is to exempt storage vessels from NSPS OOOOa requirements if the source has a "legally and practically enforceable" state permit that requires 95% control of VOC emissions. These storage vessels would only be subject to fugitive emissions monitoring.

Region 5 ECAD and ARD has concerns with this approach for the following reasons:

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Fugitive Emissions Monitoring: The proposal includes different frequency of fugitive emissions monitoring for different types of well sites: "low-production" well sites (defined on a 12-month average production of <15 barrels of oil equivalent (BOE) per day), and all others. For wells that start out with production above 15 BOE per day, but drop below at some point, there may be considered an "off-ramp" for these sites.

Region 5 ECAD and ARD has concerns with this approach for the following reasons:

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Alternative Means of Emissions Limitation (AMEL): The proposal includes state-specific fugitives emissions monitoring programs that are determined to be equivalent to the fugitive emissions monitoring requirements in NSPS OOOOa. If deemed equivalent by this rule, a source could comply with the state standard in lieu of NSPS OOOOa fugitives monitoring standards.

Region 5 ECAD and ARD has concerns with this approach for the following reasons:

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Michael D. Harris
Acting Director
Enforcement and Compliance Assurance Division
U. S. Environmental Protection Agency, Region 5
77 West Jackson Blvd.
Chicago, IL 60604
(312) 886-0760

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