Message

From: Fortin, Boyd [Boyd.Fortin@energytransfer.com]
Sent: 10/25/2018 4:06:47 PM
To: Lundelius, Diana [Lundelius.Diana@epa.gov]
CC: Hennessy, David [David.Hennessy@energytransfer.com]
Subject: RE: NSPS OOOOa Reporing - Inquiry Via Phone Call

Diana

Thanks for your clarification.

Boyd Fortin
W (214) 840-5859
C (806-664-6291

From: Lundelius, Diana <Lundelius.Diana@epa.gov>
Sent: Thursday, October 25, 2018 11:01 AM
To: Fortin, Boyd <Boyd.Fortin@energytransfer.com>
Cc: Hennessy, David <David.Hennessy@energytransfer.com>
Subject: RE: NSPS OOOOa Reporing - Inquiry Via Phone Call

You can save a phone call…I have gotten a lot of inquiries about our mail and document reduction efforts and have clarifications.

Yes. We are under a mandate to reduce our paper file records and storage space.
The letter sent out means exactly what it says.
If the State in Region 6 is delegated for a Part 60 NSPS, Part 61 NESHAP or Part 63 MACT, please discontinue sending courtesy copies to EPA Region 6 for periodic reports under those rules.
Do report to the state, and if a rule requires reporting via CEDRI, do continue to submit that way also.

In addition to TX, this applies to facilities in all other states in Region 6 only, owned by your company and subsidiaries.
You can check the rule delegations for each state by following the instructions in the letter, or going to the EPA Region 6 web site and clicking on a state in the upper right corner, then clicking the links for compliance assurance and enforcement, then air enforcement.

EPA Region 6 must continue to accept notifications and reporting for the following:

- **paper** copies of Title V compliance certifications and deviation reports (the rule currently does not have a provision for allowing electronic submission);
- first time only performance testing and RATA for new electric generation units (ORIS) under Part 75 acid rain (emailed to R6Part75@epa.gov);
- NSPS OOOO notifications and reports for **NM only** and NSPS OOOOa notifications and reports (**all states**), sent to R6WellCompletion@epa.gov; See also my other email about the CEDRI portal.
- test reports and notifications for NSPS JJJJ and MACT ZZZZ **(OK and AR only),** sent to R6EngineRules@epa.gov;
- any rule the state is not delegated**;** and,
- ection 608/609 refrigerant notifications (Part 82).

Except for general delivery email addresses furnished, we do not have the capability to receive courtesy copy reports via email for all of the rules.
We receive too many documents to acknowledge email receipt for individual submissions.

If you want an electronic confirmation, please select the options to receive Delivery and Read receipts in your email program.

This should answer your questions, and save you some time and expense in the future not having to send compliance documents to Region 6.
This does **NOT** apply to air permit applications – you should continue to send copies of permit applications to parties that the state specifies in its application instructions.

Diana L Lundelius CHMM
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"Courage is the willingness to proceed with positive change, even if the outcome is uncertain."
Connect with me on Linked In, https://secure-web.cisco.com/1xfAKtqNskJbt10DpA8OO7Qj_BM7sDWbEAXHtkB9Vts38HT9GKven0ZSWJMforwJBmYcNgXwExoJJq1ZoeyvjExlIK0Ov_smnkojDux4l_zlELvnW9oiRGZuNkY3ogrB4UBDjISgpcAZRjxVQLbLgxwP_bpo5bzSLfS7Svv81gLgN9QtH_gh9-IXYGcSzQbyHPbayIZbTgBfRJYU0SYknHCaYEfwWgtdvssGRbDxV2_kMj_wqQrYWPM21WSN0wBYDz03Uq3gVB_I-Eo19VFWqtQ/https%3A%2F%2Fwww.linkedin.com%2Fin%2Fdiana-l-lundelius-chmm-a6b98917%2F.

From: Fortin, Boyd [mailto:Boyd.Fortin@energytransfer.com]
Sent: Thursday, October 25, 2018 10:19 AM
To: Lundelius, Diana <Lundelius.Diana@epa.gov>
Cc: Hennessy, David <David.Hennessy@energytransfer.com>
Subject: RE: NSPS OOOOa Reporing - Inquiry Via Phone Call

Diana

This is the correspondence letter sent to Regency Field Services (acquired by ETC Texas Pipeline in 2104), that I sent Margaret Osbourne. My question goes beyond just the OOOOa reports. The attached letter, if we read it correctly, is asking Sunray Gas Plant stop submitting courtesy letters to the EPA for all NSPS reports. I am trying to find out if this is what the letter says, as well as find out if EPA wants Energy Transfer to stop submitting the same reports for other facilities, under the same ownership, that are applicable to the same requirements.

When you get this email with the attached letter, please contact me either by office or cell phone.

Boyd Fortin
W (214) 840-5859
C (806-664-6291

From: Lundelius, Diana <Lundelius.Diana@epa.gov>
Sent: Thursday, October 25, 2018 9:42 AM
To: Fortin, Boyd <Boyd.Fortin@energytransfer.com>
Subject: NSPS OOOOa Reporing - Inquiry Via Phone Call

Re: Your call to Margaret Osbourne from 214-840-5859

Hi Boyd,
I understand you had a question regarding submission of NSPS OOOO/OOOOa reports.
Here is the guidance I have been giving folks. This is for EPA Region 6 states only. For states in other EPA regions, please contact the rule coordinators in those regions.
Hopefully your question(s) will be answered here.

At this time, the CEDRI report templates **for NSPS OOOOa** are draft only, and the reporting portal interface is not active yet because of the rule reconsideration.
I'm sorry that this is not made clear on the CEDRI web page.
Until the rule changes are final, you can use the CEDRI template or another company template, and submit the reports electronically by email in native Excel or pdf format.
You must still also report to the state via whatever submission options they require.

When the CEDRI portal becomes active after the rule reconsideration changes are final, then you must submit via CEDRI, and can discontinue separate email transmittals (except for AR), as both EPA and the states (except AR) will have access to CEDRI.
At this time, I do not know when this will be.

The CEDRI portal **for NSPS OOOO** is ACTIVE, so if you submit reports via CEDRI, then follow these guidelines:
AR is delegated for NSPS OOOO for major sources only. All other states are delegated for NSPS OOOO.
Region 6 will continue to accept NSPS OOOO notifications/reports for NM and AR. Since all other states are delegated, please discontinue courtesy copies for TX, OK, LA.

You must continue to send NSPS OOOOa reports and notifications to EPA for Region 6 states until the revisions to the rule become final, as well as to the states.
Once a state is delegated for NSPS OOOOa, you may discontinue sending courtesy copy submissions to EPA Region 6, except continue sending for AR, and report via CEDRI.

Here are the guidelines for electronic submittal I have been sending other companies:

- Due to downsizing of paper file room storage space, EPA Region 6 no longer accepts paper copy reports, notifications, or other correspondence/communication for reporting under NSPS OOOO and OOOOa.
- Additionally, please do not send compact disks or USB (flash) drives in lieu of paper copies.
- In the future, please submit all required correspondence electronically by email to R6WellCompletion@epa.gov. (Please do not send reports to my personal EPA email address.)

Use the following instructions to submit your reports and data by email:

1. Acceptable file formats are limited to Adobe pdf files, or, any combination of Microsoft Word, Excel, JPG, or Adobe documents. NO ZIP FILES OR OTHER FILE FORMATS can be accepted due to security restrictions of our mail server firewall.
2. Required regulatory report submissions become public record. NO CONFIDENTIAL BUSINESS INFORMATION (CBI) will be accepted via email.
3. Please be sure that your scanned submissions include a copy of the signature by your responsible official, as appropriate.
4. Photos should be embedded in Word or Adobe documents wherever possible. As an alternative, a large number of photo records may be submitted in a pdf file with labels for each photo.
5. Pdf or other file attachments should not exceed 10 MB total per email. Several email transmissions may be necessary in this regard.
6. In the Subject line of your email, please use the following format: NSPS OOOO/OOOOa-Company Name-Facility Name(s)-State or Tribal Land-Name of Report(s)-Time Period Covered.
7. Please segregate report transmittals and submissions BY STATE. You may submit several reports together for multiple sites operated by the same company with one cover letter for each state (e.g. 20 reports and one cover letter for sites in TX).

8. In the body of the email, please include the contact name, company name, mailing address, phone number and email address for the person who can answer technical questions regarding the submission.
9. Because of the volume of reports and notifications received, EPA cannot provide confirmation for receipt of each individual report. If a delivery confirmation is desired, please use your email program to exercise the option to receive a Delivery and/or Read receipt for your email submissions.

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Connect with me on Linked In, https://secure-web.cisco.com/1ZLlcyiX-iry7QUAKQZPs8P-Rv6LHL0e80XwSfw5QetJZJ0SNPn-jTnVY1ECYHYBp6Ney9YR52izZVqwHKtS6sMTil5_8Mud6o-Lp8U3WzohK7CDSrqzWD0K_q5T44m5QFGtRJ2FZE8-wDXHU5zqlvhh8lEouzkl2MRU8EtDXw2Dkog6ilQxWHqTQf6_681rA39QJ5h8UqY4vAfqyHTA7aBsuMwJL1uobfavDxLBsGRtF7xasy2RLFipzEq2PflgcCWIzZVLcKrsuYHnrRe159w/https%3A%2F%2Fwww.linkedin.com%2Fin%2Fdiana-l-lundelius-chmm-a6b98917%2F.

Private and confidential as detailed here. If you cannot access hyperlink, please e-mail sender.