Message

From: Lundelius, Diana [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=998193F6F9904EA4AB438772B62DD7EA-LUNDELIUS, DIANA]
Sent: 6/4/2018 6:49:39 PM
To: Kotrlik, Christopher C [CCKotrlik@dcpmidstream.com]
Subject: RE: NSPS OOOO/OOOOa Reporting

Now I have your questions that I can add to the FAQs I have compiled. Diana

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From: Kotrlik, Christopher C [mailto:CCKotrlik@dcpmidstream.com]
Sent: Monday, June 4, 2018 1:45 PM
To: Lundelius, Diana <Lundelius.Diana@epa.gov>
Subject: RE: NSPS OOOO/OOOOa Reporting

Fair enough. I just wasn't sure if I had missed something between reviewing the delegation and the rule. We will submit our NSPS OOOOa reports and notifications to EPA R6 due to the below, but only submit NSPS OOOO reports to TCEQ. There shouldn't be any new notifications under NSPS OOOO, as new sources would be subject to NSPS OOOOa.

Thanks for your help clarifying.

Chris

From: Lundelius, Diana [mailto:Lundelius.Diana@epa.gov]
Sent: Monday, June 04, 2018 1:41 PM
To: Kotrlik, Christopher C <CCKotrlik@dcpmidstream.com>
Subject: RE: NSPS OOOO/OOOOa Reporting

Because a significant portion of NSPS OOOOa is currently under reconsideration for significant revision, and any changes will require incorporation by reference of the revised rule into each state's SIP, even those with automatic delegation like Texas.

From: Kotrlik, Christopher C [mailto:CCKotrlik@dcpmidstream.com]
Sent: Monday, June 4, 2018 1:19 PM
To: Lundelius, Diana <Lundelius.Diana@epa.gov>
Subject: RE: NSPS OOOO/OOOOa Reporting

Diana,

Thanks for the reply. This has answered most of my questions with the exception of NSPS OOOOa reports and notifications. You mention that, "…we are accepting NSPS OOOOa reports and notifications for all R6 states." Are these considered to be courtesy copies, or does EPA consider these to be required submittals? I note that NSPS OOOOa is delegated to TCEQ and am wondering why reports and notifications would be submitted for this subpart but not others.

Thanks,

Chris Kotrlik
Sr. Environmental Specialist
DCP Midstream
Office: (361) 584-8515
Cell: (361) 446-3383

From: Lundelius, Diana [mailto:Lundelius.Diana@epa.gov]
Sent: Monday, June 04, 2018 10:52 AM
To: Kotrlik, Christopher C <CCKotrlik@dcpmidstream.com>
Subject: RE: NSPS OOOO/OOOOa Reporting

Hi Chris,
NSPS OOOO/OOOOa well notifications and annual reports should be emailed to R6WELLCOMPLETION@epa.gov. If the state is delegated, you do not need to send a courtesy copy to EPA Region 6. At this time, only AR and NM are not delegated NSPS OOOO, and we are accepting NSPS OOOOa reports and notifications for all R6 states. Please do NOT also send paper copies, CDs, or other submittals by regular mail. If you need a confirmation, please select Delivery and Read Receipt options in your email program. We receive too many submittals to acknowledge individual reports and notifications received. If your report or attachments exceed 15 MB, you will need to break it up into several emails. We will accept Adobe pdf, the CEDRI Excel spreadsheet workbooks, and Microsoft Word document formats. If photos are included, these should be combined into one or more Adobe pdf files for email transmittal. Please do not include confidential business information or mark documents/attachments as Confidential. Please also DO continue to report through CEDRI if the rule requires it.

Engine testing reports submitted for NSPS JJJJ or MACT ZZZZ may be submitted to R6EngineRules@epa.gov. At this time, only AR and OK need to be submitted to EPA Region 6.

Region 6 will continue to receive PAPER copy submissions of Title V deviation reports and certifications. The way Part 70 is written does not allow EPA to receive electronic submittals at this time.

For other air programs or rules where the state is not delegated (e.g. RMP, Part 82, non-delegated MACT subparts), we will continue to receive those documents, as they will not be courtesy copies.

Your inquiry and cooperation with our paper reduction effort is greatly appreciated. I think this covers most of the questions I've received that would affect oil and gas facilities. If you have additional questions, please EMAIL them to me so I can furnish answers consistent with what has been communicated to other companies.

Diana L Lundelius CHMM
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Lean Six Sigma Black Belt
NSPS OOOO/OOOOa Coordinator
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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://www.linkedin.com/in/diana-l-lundelius-chmm-a6b98917/.

From: Kotrlik, Christopher C [mailto:CCKotrlik@dcpmidstream.com]
Sent: Monday, June 4, 2018 10:26 AM
To: Lundelius, Diana <Lundelius.Diana@epa.gov>
Subject: NSPS OOOO/OOOOa Reporting

Ms. Lundelius:

I have been trying to reach you regarding the recent wave of communication from EPA to regulated entities concerning reporting. Specifically, EPA's desire to receive less reports. My questions pertain to NSPS OOOO and OOOOa, and whether EPA wishes to continue receiving these reports for Texas facilities even though both subparts are delegated to TCEQ. When you get a chance, please give me a call so we can discuss.

Thanks!

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