To: Augustine, Bruce [augustine.bruce@epa.gov]; Buenning, Hans [Buenning.Hans@epa.gov]; Carey, Angela [Carey.Angela@epa.gov]; Chapman, Apple [Chapman.Apple@epa.gov]; Eisele, Adam [Eisele.Adam@epa.gov]; Garwood, Gerri [Garwood.Gerri@epa.gov]; Hambrick, Amy [Hambrick.Amy@epa.gov]; Howard, Jodi [Howard.Jodi@epa.gov]; Hoyt, Daniel [Hoyt.Daniel@epa.gov]; Johnson, Steffan [johnson.steffan@epa.gov]; Kaleri, Cynthia [kaleri.cynthia@epa.gov]; Kenney, James [Kenney.James@epa.gov]; Lindsey, William [Lindsey.William@epa.gov]; Lischinsky, Robert [Lischinsky.Robert@epa.gov]; Loukeris, Constantinos [loukeris.constantinos@epa.gov]; Magyar, Raymond [Magyar.Raymond@epa.gov]; Marsh, Karen [Marsh.Karen@epa.gov]; Mia, Marcia [Mia.Marcia@epa.gov]; Ostrand, Laurie [Ostrand.Laurie@epa.gov]; Patel, Shilpa [patel.shilpa@epa.gov]; Pavitt, John [Pavitt.John@epa.gov]; Shine, Brenda [Shine.Brenda@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Tates, Samuel [Tates.Samuel@epa.gov]; Thompson, Lisa [Thompson.Lisa@epa.gov]; Topinka, Natalie [topinka.natalie@epa.gov]; Vazquez, Natalia [Vazquez.Natalia@epa.gov]; Vyas, Himanshu [vyas.himanshu@epa.gov]; Wilwerding, Joseph [Wilwerding.Joseph@epa.gov]; Witosky, Matthew [Witosky.Matthew@epa.gov]; Witt, Jon [Witt.Jon@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Augustine, Bruce [augustine.bruce@epa.gov]; Buenning, Hans [Buenning.Hans@epa.gov]; Carey, Angela [Carey.Angela@epa.gov]; Chapman, Apple [Chapman.Apple@epa.gov]; Cheever, Robert [cheever.robert@epa.gov]; Eisele, Adam [Eisele.Adam@epa.gov]; Garwood, Gerri [Garwood.Gerri@epa.gov]; Goff, Keith [Goff.Keith@epa.gov]; Hambrick, Amy [Hambrick.Amy@epa.gov]; Howard, Jodi [Howard.Jodi@epa.gov]; Hoyt, Daniel [Hoyt.Daniel@epa.gov]; Johnson, Steffan [johnson.steffan@epa.gov]; Kaleri, Cynthia [kaleri.cynthia@epa.gov]; Kenney, James [Kenney.James@epa.gov]; Lindsey, William [Lindsey.William@epa.gov]; Lischinsky, Robert [Lischinsky.Robert@epa.gov]; Loukeris, Constantinos [loukeris.constantinos@epa.gov]; Magyar, Raymond [Magyar.Raymond@epa.gov]; Marsh, Karen [Marsh.Karen@epa.gov]; Mia, Marcia [Mia.Marcia@epa.gov]; Ostrand, Laurie [Ostrand.Laurie@epa.gov]; Patel, Shilpa [patel.shilpa@epa.gov]; Pavitt, John [Pavitt.John@epa.gov]; Shine, Brenda [Shine.Brenda@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Tates, Samuel [Tates.Samuel@epa.gov]; Thompson, Lisa [Thompson.Lisa@epa.gov]; Topinka, Natalie [topinka.natalie@epa.gov]; Vazquez, Natalia [Vazquez.Natalia@epa.gov]; Vyas, Himanshu [vyas.himanshu@epa.gov]; Wilwerding, Joseph [Wilwerding.Joseph@epa.gov]; Witosky, Matthew [Witosky.Matthew@epa.gov]; Witt, Jon [Witt.Jon@epa.gov]; Kler, Denis [Kler.Denis@epa.gov]; Willard, Erin [Willard.ErinM@epa.gov]

CC: Loiacono, Sara [loiacono.sara@epa.gov]; Loiacono, Sara [loiacono.sara@epa.gov]; North, Alexis [North.Alexis@epa.gov]

Location: Skype Meeting

Start: 12/19/2018 8:00:00 PM
End: 12/19/2018 9:00:00 PM

Recurrence: (none)

AGENDA (carried over from 11/21 meeting):

1. NORTH questions – Annual Reports

2. TOPINKA question – Michigan 'Permit-To-Install' – federally enforceable?

1. NORTH Questions

From: North, Alexis
Sent: Tuesday, October 30, 2018 2:24 PM
To: Beeler, Cindy <Beeler.Cindy@epa.gov>
Subject: NSPS OOOO National Call Topics

1. Lots of calls/questions from industry regarding an email from Diana L to industry asking for emailed reports only? Region 8's preference is reports be submitted through CEDRI, if that doesn't work then paper then email.
2. Company asked for an extension to the October deadline for NSPS OOOOa annual reports, checked with Amy Hambrick and Marcia Mia and we agreed this deadline is subject to the "adjustment" language in 60.19(f) and by mutual agreement an extension could be granted.
3. Duplicative reports to delegated States and to EPA?

2. TOPINKA Question

From: Topinka, Natalie
Sent: Monday, October 22, 2018 1:17 PM
To: Beeler, Cindy <Beeler.Cindy@epa.gov>
Subject: Michigan OOOO/a opt-out draft permit

For discussion on our OOOO/a group call:

Michigan has developed a template permit (a Permit-to-Install, not a General Permit) that it plans to use for oil and gas facilities wanting to "opt-out" of the OOOO/a storage vessel provisions. They gave me a preview, attached ["Oil and Gas template.docx"].

I believe this permit does not have a "legally and practically enforceable limit" necessary to consider the facility's storage vessel PTE restricted to 6 tpy. For starters, the permit has no provisions requiring any standard or LDAR for the storage vessel covers and CVS, and the only requirement for a flare is to be operated in a "satisfactory manner" and with a lit pilot flame.

I was wondering if anyone else has any states in their region that have permits specifically designed to "opt-out" of OOOO/a for storage vessels, and would like your thoughts on what else would be necessary to be sufficient to meet the "legally and practically enforceable limit" standard.

Natalie M. Topinka

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