Message

From: Hambrick, Amy [Hambrick.Amy@epa.gov]
Sent: 11/15/2018 7:35:32 PM
To: Wright - CDPHE, Joseph [joseph.wright@state.co.us]; Beeler, Cindy [Beeler.Cindy@epa.gov]
Subject: RE: NSPS OOOOa Question - Annual Report Response on CEDRI vs. Paper

Joseph—

This is a response we recently gave to this question "Yes, one company can submit a NSPS OOOOa report via CEDRI in a single spreadsheet that contains multiple facilities in multiple states. " Below is a standard answer I've been giving when asked about how /where to submit the report:

"While the CEDRI template is still considered draft, the reports are required to be submitted- this can be done by submitting it to your delegated authority or through CEDRI. CEDRI is available to accept the 60.5420a(b) and 60.5422a(a) and (b) reports. Because EPA's template on the website you referenced is still considered "draft", the requirement to submit only through CEDRI is not triggered. Once the report is "final" then CEDRI reporting is mandatory. Hence, in the meantime, the report still must be submitted, but the vehicle to do that is either submit to delegated authority or through CEDRI. Make sense?

So from the reg text, once the [**final**] form has been available in CEDRI for 90 days, submittal through CEDRI is required. Up to this 90 day marker, submittal can be either CEDRI or the delegated authority. Excerpt from the reg text FYI:

"You must submit reports to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX (*https://cdx.epa.gov/)*.) You must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI Web site (*https://www3.epa.gov/ttn/chief/cedri/*). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, you must submit the report to the Administrator at the appropriate address listed in §60.4. Once the form has been available in CEDRI for at least 90 calendar days, you must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted."

Furthermore, as you may know, after OOOOa was finalized in 2016, EPA received administrative petitions seeking reconsideration of various aspects of the 2016 NSPS. EPA sent letters to petitioners granting reconsideration on April 18, 2017 and on June 5, 2017, EPA issued a *Federal Register* notice granting reconsidering on additional requirements. See proposal here: https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/proposed-improvements-2016-new-source . The public will have an opportunity to comment on the template to help make it better. Be sure to stay plugged in and submit your comments."

Generally, we have been getting various questions on reporting, hopefully we understood question and provided clear answers. Let me know if you want to discuss further.

Regards,

Amy

Amy Hambrick
U.S. Environmental Protection Agency

(919)541-0964

From: Wright - CDPHE, Joseph <joseph.wright@state.co.us>
Sent: Thursday, November 15, 2018 10:55 AM
To: Beeler, Cindy <Beeler.Cindy@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>
Subject: Re: NSPS OOOOa Question

Amy/Cindy

We are seeing companies send in annual OOOOa reports per facility and not company wide. I spoke with one company and they told me "EPA told us to do it this way". I found the annual reporting form for OOOOa online and it looks to be company wide. The only thing I can think of is to report under CEDRI do companies have to report this way?

Let me know your thoughts. If I haven't made my question clear or you have any questions please let me know.

Joseph Wright
Environmental Protection Specialist
Stationary Sources Program
Air Pollution Control Division

P 303.692.3145
4300 Cherry Creek Drive South, Denver, CO 80246-1530
joseph.wright@state.co.us | www.colorado.gov/cdphe/apcd

Are you curious about ground-level ozone in Colorado? Visit our ozone webpage to learn more.

On Thu, Nov 8, 2018 at 7:35 AM Beeler, Cindy <Beeler.Cindy@epa.gov> wrote:

Joseph –

You could contact Amy Hambrick (cc'd here) who leads EPA's NSPS OOOO/OOOOa rulemaking to see if she could answer your questions on reporting requirements. I'd be interested in hearing what CO's concerns are as well.

Thanks,

Cindy Beeler
US EPA Region 8
Tel: 303-312-6204
Beeler.Cindy@epa.gov

CONFIDENTIALITY NOTICE: This e-mail, including all attachments, is for the sole use of the intended recipients and may contain Confidential and privileged information. Any unauthorized use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender and destroy all copies of this message.

From: Wright - CDPHE, Joseph <joseph.wright@state.co.us>
Sent: Tuesday, November 6, 2018 1:40 PM
To: Beeler, Cindy <Beeler.Cindy@epa.gov>
Subject: NSPS OOOOa Question

Cindy

Do you know who is the best contact at the EPA to discuss NSPS OOOOa reporting? We have some questions based on some of the reports we have been receiving.

Thanks

Joseph Wright
Environmental Protection Specialist
Stationary Sources Program
Air Pollution Control Division

P 303.692.3145
4300 Cherry Creek Drive South, Denver, CO 80246-1530
joseph.wright@state.co.us | www.colorado.gov/cdphe/apcd

Are you curious about ground-level ozone in Colorado? Visit our ozone webpage to learn more.