Message

From: Garvey, Megan [garvey.megan@epa.gov]
Sent: 3/8/2019 4:48:43 PM
To: Laumann, Sara [Laumann.Sara@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]; Matsumoto, Kimi [Matsumoto.Kimi@epa.gov]
Subject: FW: [EXTERNAL] STRONGER Air Quality Guidelines Workgroup
Attachments: STR AQG Methane Update - Post-Comment Draft - RS - 3-7-19.docx

Good morning,

Attached are the draft Guidelines that incorporate our comments. Some of our broader R8 comments (w/o specific suggested text) were not included as redlines, but discussed among the Workgroup this morning. We might have identified 5-6 additional (minor) changes on the call – that aren't reflected in the attachment. This document will get cleaned up and go before the STRONGER Board for approval.

Contact me if you make time to review this document and identify any serious missteps.

Thanks again for your time on this, Megan

Megan E. Garvey
Senior Counselor to the Regional Administrator
US EPA, Region 8
Work: 303.312.6192 | Cell: 720.376.9870

From: Ryan Steadley <steadley@strongerinc.org>
Sent: Thursday, March 7, 2019 9:14 PM
To: rrouth@cleanair.org; David McCabe <dmccabe@catf.us>; Greg Johnston <greg.johnston@chk.com>; mdearing@enervest.net; Jarrett, James F <James.F.Jarrett@wv.gov>; Alkadi, Nasr (BHGE) <Nasr.Alkadi@bhge.com>; Tony St Clair <tstclair@hess.com>; Pratt, Karen <Karen_Pratt@xtoenergy.com>; Ryan, Vanessa A <Vanessa.Ryan@chevron.com>; Penny Seipel <penny@ooga.org>; Garvey, Megan <garvey.megan@epa.gov>; SubraCom@aol.com; Marsh, Karen <Marsh.Karen@epa.gov>; elizabeth paranhos <elizabethparanhos@delonelaw.com>; leah.martland@state.co.us; Grover Campbell <Grover.Campbell@dvn.com>
Subject: Re: [EXTERNAL] STRONGER Air Quality Guidelines Workgroup

Hi All,

To help move things along tomorrow I've done some editorial work to the draft as well as made some changes to address Grover's and the others' comments.

Ryan Steadley
Executive Director
STRONGER
405.249.6131

On Mar 5, 2019, at 8:03 AM, Campbell, Grover <Grover.Campbell@dvn.com> wrote:

All, I will miss next Friday's conference call. I sent the comments below to Ryan and he suggested that I send them out to the group prior to Friday's call. These are just my suggestions for consideration.

Ryan,

I will be off work Friday. I reviewed the two sets of comments. In general, I thought EPA and Boulder County had many good comments that should be addressed in the Stronger draft document. If any work group member has a strong objection to any of the comments, I'm ok with that.

In general, I am not as favorable for some of the EarthWorks comments:

10.2.1 Goes too much into state authorities which are many times established per state laws; such as Texas's restriction on municipalities regulating oil and gas operations.
10.22 Seems ok
10.2.3 Seems more of an enforcement issue that doesn't need to be addressed in Stronger document. I would oppose any language that restricts the use of permit exemptions and permits by rule.
10.2.4 Seems ok.
10.2.5 I would oppose Stronger recommending that state agencies use third party advisory groups, citizen groups or any other non-official group for compliance enforcement. I would be ok with a state agency hiring a professional contractor firm. Again, it is up to state legislative bodies to decide how much citizen judicial review should be allowed.
10.2.6 Seems ok.
10.2.8 I am pretty neutral; whatever the work group thinks.
10.3.1 Seems ok. The issue of abandoned wells may be outside the Stronger charge.
10.3.2 I do not think Stronger should tell states that they should or should not regulate existing sources.
10.3.3 I think the state agencies know their budget needs and places that might require ozone monitors.
10.3.4 Seems ok.
10.3.6 Again, streamlined permitting programs and permits by rule can be very effective and Stronger should not discourage their use.

Grover

Devon - internal

From: Ryan Steadley <steadley@strongerinc.org>
Sent: Tuesday, February 26, 2019 4:17 PM
To: rrouth@cleanair.org; David McCabe <dmccabe@catf.us>; Greg Johnston <greg.johnston@chk.com>; mdearing@enervest.net; James F Jarrett <james.f.jarrett@wv.gov>; Alkadi, Nasr (BHGE) <Nasr.Alkadi@bhge.com>; Tony St Clair <tstclair@hess.com>; Pratt, Karen <Karen_Pratt@xtoenergy.com>; Ryan, Vanessa A <Vanessa.Ryan@chevron.com>; Penny Seipel <penny@ooga.org>; Campbell, Grover <Grover.Campbell@dvn.com>; Megan Garvey <garvey.megan@epa.gov>; Wilma Subra <subracom@aol.com>; Karen Marsh <marsh.karen@epa.gov>; elizabeth paranhos <elizabethparanhos@delonelaw.com>; leah.martland@state.co.us
Subject: [EXTERNAL] Re: STRONGER Air Quality Guidelines Workgroup

All,

Apologies, I missed one comment document in my earlier message. Please see the attached.

Ryan Steadley
Executive Director
STRONGER
405.249.6131

On Feb 26, 2019, at 12:02 PM, Ryan Steadley <steadley@strongerinc.org> wrote:

All,

Here are the consolidated comments received on the air quality guidelines. The majority of the substantive comments on the content came from EPA and Boulder County Public Health Dept. Please review in advance of our call next Friday. We will need to finish the draft on this call.

Thank you,

Ryan Steadley
Executive Director
STRONGER
405.249.6131

<All Comments - STR AQG Update.docx>

On Feb 20, 2019, at 10:51 AM, Ryan Steadley <steadley@strongerinc.org> wrote:

Hi All,

We will hold our comment review call on March 8 at 10am central. The call-in number is Ex. 6 Personal Privacy (PP) o PIN is required.

AQ Guidelines Comment Review
Scheduled: Mar 8, 2019 at 10:00 AM to 11:30 AM
Location: 405-548-5148

<iCal-20190220-104846.ics>

Best,

Ryan Steadley
Executive Director
STRONGER
405.249.6131

On Jan 31, 2019, at 4:17 PM, Ryan Steadley <steadley@strongerinc.org> wrote:

Hi All,

As you know, the draft air quality guidelines have been out for a public comment period that was scheduled to end tomorrow. Now that the government is back open, EPA has requested an extension of the comment period until February 22. We will leave the draft open for comments from all stakeholders until that time. Here is a poll to schedule a call during the week of March 4 to review the comments, make any revisions, and approve the final draft for the Board:

https://doodle.com/poll/6iwh48dg6yum5zi7

I will send out a draft with all of the comments received in advance. Thanks for your patience and continuing participation on this effort.

Have a great weekend,

Ryan Steadley
Executive Director
STRONGER
405.249.6131

On Nov 26, 2018, at 12:41 PM, Ryan Steadley <steadley@strongerinc.org> wrote:

Hi All,

I hope you enjoyed a wonderful Thanksgiving holiday. The latest version of the draft is attached with edits from our previous call. Based on our discussion last time I think we are close to tying this up. Our next call will be on **Tuesday, December 4 at 10:00am central time**. Look forward to talking with you then.

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oupCall3 Scheduled:Dec4,2018at10:00AMto11:30AMLocation:40

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Ryan Steadley
Executive Director
STRONGER
405.249.6131

<STRONGER Air Quality Guidelines - 2018 Update Draft - 12-4-18.docx>

> On Nov 7, 2018, at 3:38 PM, Ryan Steadley <steadley@strongerinc.org> wrote:
>
> Thanks to all who were able to join the call this afternoon, good progress. The draft with today's changes is attached. Here is a poll to schedule our next call for the week of December 3-7: https://doodle.com/poll/vw87rk4m4kx7yuzb.
>
> Editors, if you could please send me your revisions by November 27 that would be great.
>
> Ryan Steadley
> Executive Director
> STRONGER
> 405.249.6131
>
> <STRONGER Air Quality Guidelines - 2018 Update Draft - 11-7-18.docx>

On Oct 31, 2018, at 6:13 PM, Ryan Steadley <steadley@strongerinc.org> wrote:

Happy Halloween,

Apologies for the delay on getting this out. Our next call will be Wednesday, November 7 from 2-3:30pm central. The conference number

Ex. 6 Personal Privacy (PP)

no PIN is required to join. Attached is an updated draft

with Grover and Greg's edits as well as Leah's comments.

Look forward to talking with you then.

Ryan Steadley
Executive Director
STRONGER
405.249.6131

<STRONGER Air Quality Guidelines - 2018 Update Draft - 10-31-18.docx>

On Oct 26, 2018, a

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