From: Mia, Marcia

Sent: Wednesday, August 30, 2017 01:39 PM

To: 'Ethan McMahon'

Subject: RE: NSPS OOOOa Clarification

The rule is in effect and sources should be in compliance with the applicable requirements.

Please refer to the EPA Penalty Policy and most recent penalty inflation adjustment:

https://www.epa.gov/enforcement/clean-air-act-stationary-source-civil-penalty-policy-october-25-1991

https://www.epa.gov/enforcement/transmittal-2017-annual-civil-monetary-penalty-inflation-adjustment-rule

Sources should work with their delegated authority (state or region) regarding specific questions about a particular sources' ability to comply.

Marcia B Mia

Office of Compliance/Air Branch

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

From: Ethan McMahon [mailto:ermcmahon@commengineering.com]

Sent: Tuesday, August 29, 2017 3:07 PM

To: Mia, Marcia <Mia.Marcia@epa.gov>

Subject: NSPS OOOOa Clarification

Hello Ms. Mia,

With the uncertainty surrounding NSPS OOOOa regulation, we have noticed many oil and gas companies are opting to not report the annual OOOOa report by October 31,2017.

Can you please clarify what the potential penalty for not reporting is?

Thanks,

Ethan McMahon | Environmental Engineer

COMM Engineering

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