From: Luis Vasquez

Sent: Tuesday, September 24, 2019 06:18 PM

To: Garwood, Gerri

CC: Mia, Marcia; Ayres, Sara; Patel, Ketan; Haiden McCurry

Subject: RE: OOOOa submission question - CEDRI

Attachments: ATT00001.txt

Ok, thank you Gerri.

I appreciate the quick response.

We will reach out to state regulators.

Respectfully,

http://otacompression.com/emailsignatures/luisvasquez.png

From: Garwood, Gerri [mailto:Garwood.Gerri@epa.gov]

Sent: Tuesday, September 24, 2019 1:17 PM

To: Luis Vasquez <lvasquez@otacompression.com>

Cc: Mia, Marcia <Mia.Marcia@epa.gov>; Ayres, Sara <Ayres.Sara@epa.gov>; Patel, Ketan <Patel.Ketan@epa.gov>; Haiden McCurry <hmccurry@otacompression.com>

Subject: RE: OOOOa submission question - CEDRI

Hi Luis,

CEDRI will send notices of submissions to state regulators, if the state regulator is registered in CEDRI and signed up for notifications. The state regulators do have access to reports in CEDRI as soon as they are submitted, as long as they are a registered user.

It is really up to your state regulator as to how they want to receive the report. We have not required state regulators to accept the reports in CEDRI as their official submissions. You may want to touch base with the state and see what they would be willing to accept.

Sincerely,

Gerri G. Garwood, P.E.

U.S. Environmental Protection Agency

OAR/OAQPS/SPPD

Measurement Policy Group

Ph: 919-541-2406 Fax: 919-541-4991

From: Luis Vasquez <lvasquez@otacompression.com>

Sent: Tuesday, September 24, 2019 2:07 PM

To: Garwood, Gerri <Garwood.Gerri@epa.gov>

Cc: Mia, Marcia <Mia.Marcia@epa.gov>; Ayres, Sara <Ayres.Sara@epa.gov>; Patel, Ketan <Patel.Ketan@epa.gov>; Haiden McCurry <hmccurry@otacompression.com>

Subject: OOOOa submission question - CEDRI

Gerri,

We have a question regarding OOOOa compliance spreadsheet submission.

We read on the CEDRI user guide, page 142, the guide lists that CEDRI would send the submissions directly to state regulators. Is it possible for us to submit the OOOOa Fugitive spreadsheet into CEDRI and then have the spreadsheet distributed by CEDRI to the applicable state regulators? Or do we have to send the state regulators with jurisdiction a copy of the reports as well?

Any assistance would be helpful.

Thank you.

Respectfully,

Image removed by sender. http://otacompression.com/emailsignatures/luisvasquez.png

From: Garwood, Gerri [mailto:Garwood.Gerri@epa.gov]

Sent: Wednesday, September 11, 2019 8:52 AM

To: Luis Vasquez <lvasquez@otacompression.com>

Cc: Mia, Marcia <Mia.Marcia@epa.gov>; Ayres, Sara <Ayres.Sara@epa.gov>; Patel, Ketan <Patel.Ketan@epa.gov>

Subject: RE: OOOOa - LDAR Can you please provide annual submission guidance or a referral?

Hi Luis,

We do not have specific instructions on how to upload the OOOOa spreadsheet via CEDRI; we do have a generic CEDRI users guide on the CEDRI website.

https://www.epa.gov/electronic-reporting-air-emissions/cedri

If you submitted last year, this should be fairly easy this year, as you would already be registered in CDX and the facility would be in your profile. You would just need to create a new submission package for this year. If you have more detailed questions on the submissions process (not specific to filling out the spreadsheet), I'm happy to help or you can contact Ketan Patel (copied on this email), who is our CEDRI contact.

Sincerely,

Gerri G. Garwood, P.E.

U.S. Environmental Protection Agency

OAR/OAQPS/SPPD

Measurement Policy Group

Ph: 919-541-2406 Fax: 919-541-4991

From: Luis Vasquez <lvasquez@otacompression.com>

Sent: Monday, September 09, 2019 6:09 PM

To: Mia, Marcia <Mia.Marcia@epa.gov>; Ayres, Sara <Ayres.Sara@epa.gov>

Cc: Garwood, Gerri <Garwood.Gerri@epa.gov>

Subject: RE: OOOOa - LDAR Can you please provide annual submission guidance or a referral?

Excellent!

Ok. We completed the spreadsheet last year I am unsure if we uploaded via the CEDRI but I just searched for some of the facilities we submitted for and found them in the system.

I believe the spreadsheet has instructions on how to complete the spreadsheet, but is there a set of instructions on how to submit the spreadsheet online via CEDRI? If so may I have a copy and/or be sent a link on where to obtain them?

It would be great to have a call with one or both of you. What day and time this week would you be available for a conference call with my team and I? This will help us get prepared and start gathering all the data for the annual submissions.

Kindly let me know.

Thank you.

Respectfully,

Image removed by sender. http://otacompression.com/emailsignatures/luisvasquez.png

From: Mia, Marcia [mailto:Mia.Marcia@epa.gov]

Sent: Monday, September 9, 2019 5:01 PM

To: Luis Vasquez <lvasquez@otacompression.com>; Ayres, Sara <Ayres.Sara@epa.gov>

Cc: Garwood, Gerri <Garwood.Gerri@epa.gov>

Subject: RE: OOOOa - LDAR Can you please provide annual submission guidance or a referral?

Hi Luis. That is Gerri or me that can assist you. We are happy to have a call with you. The template for NSPS OOOOa is available in draft form. It is not yet required, but may be used. We have about 800+ reports currently submitted that way. We hope to have a final version soon, after which it will be required to report in CEDRI.

Marcia B Mia

Air Branch

Office of Compliance

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

This message may contain deliberative, attorney-client or otherwise privileged material. Do not release this message without the appropriate review. If you are not the intended recipient, kindly advise and delete this message/attachments.

From: Luis Vasquez <lvasquez@otacompression.com>

Sent: Monday, September 09, 2019 5:57 PM

To: Ayres, Sara <Ayres.Sara@epa.gov>

Cc: Mia, Marcia <Mia.Marcia@epa.gov>; Garwood, Gerri <Garwood.Gerri@epa.gov>

Subject: OOOOa - LDAR Can you please provide annual submission guidance or a referral?

Good day Sara,

Could you kindly refer me to who I could obtain some guidance regarding OOOOa-LDAR annual reporting ?

I would like to know if CEDRI is up and running to receive spreadsheets for OOOOa LDAR annual submissions and to see if I could obtain some guidance regarding the current standard operating procedure for submitting annual reports for OOOOa LDAR.

Any assistance or a referral to who could assist would be great.

Thank you in advance.

Respectfully,

Image removed by sender. http://otacompression.com/emailsignatures/luisvasquez.png

From: Ayres, Sara [mailto:Ayres.Sara@epa.gov]

Sent: Monday, August 19, 2019 3:24 PM

To: Luis Vasquez <lvasquez@otacompression.com>

Cc: Mia, Marcia <Mia.Marcia@epa.gov>; Garwood, Gerri <Garwood.Gerri@epa.gov>

Subject: RE: Combustor manufacturer performance testing question.

Luis,

Part 60 Subpart OOOOa provides an exemption from the performance testing requirements for control devices in 60.5413a(a)(7) that manufacturers have tested that meet the requirements of 60.5412a(a)(1) or (d)(1). If a facility does not choose to use one of those manufacturer-tested control devices, then the facility would be required to demonstrate compliance per the requirements in 60.5413a. If the facility conducts their own performance testing for such a control device, that testing would only demonstrate compliance for that particular device. If the facility purchased subsequent control devices similar to the tested unit, they could submit documentation to their delegated authority of the prior testing as evidence of compliance by other means, assuming the facility could demonstrate that the new control devices were operated in a similar/identical manner. However, any decision made by the delegated authority would be a case-by-case and control device-by-control device decision, not like the exemption from testing provided by 60.5413a(a)(7) for control devices tested by a manufacturer. Please let me know if you have further questions or need more information. Thanks.

Sara Ayres

Air Branch

USEPA / OECA / OC / MAMPD

ayres.sara@epa.gov

(312) 353-6266

From: Luis Vasquez <lvasquez@otacompression.com>

Sent: Friday, August 16, 2019 1:42 PM

To: Ayres, Sara <Ayres.Sara@epa.gov>

Subject: Combustor manufacturer performance testing question.

Good day Sara,

I am following up on a voicemail l I left you this morning. I was seeking confirmation or guidance regarding a performance testing question.

I have a customer who believes they can purchase a combustor that is not EPA approved and conduct the performance testing on it and use that performance test in order to exempt themselves on conducting any other performance testing on similar combustors they purchase. I read the rule and am under the impression that the manufacturer performance testing exemption only applies to manufacturers and not to individual oil and gas companies who are not manufacturers of combustors.

Could you kindly confirm my assumption is correct that the manufacturer performance testing exemption only applies to manufacturers or provide guidance if this assumption is incorrect?

I would like to make sure we are assisting our customers with accurate and up to date information and knowledge.

Thank you.

Respectfully,

Image removed by sender. http://otacompression.com/emailsignatures/luisvasquez.png

---

This email has been scanned for spam & viruses. If you believe this email should have been stopped by our filters, click here to report it.