From: Mia, Marcia

Sent: Tuesday, October 15, 2019 09:36 PM

To: Luis Vasquez; Garwood, Gerri

CC: Ayres, Sara; Patel, Ketan

Subject: RE: CEDRI report is still in "draft" form and is therefore not required.

Hi Luis,

Thank you for some very helpful ideas to relay this information. Regarding your idea to keep "state" pages - while seemingly simple enough, we don't have a good mechanism to do this or keep it up to date. We are constrained by our Paperwork Reduction Act in what information we can request on behalf of the Agency - and we would have to request this information from the state in order to create the pages and then request on a recurring basis to keep it updated. The regions are the best resource here, after the state. I wish it were easier, but it will be once the CEDRI form is finalized and all reports come in through CEDRI.

For your two questions - we don't have a good mechanism for providing extensions to reporting. We do allow "adjustment to postmarks" but that is typically used to move up a report to coincide with another report.

The rule does reference our GP at 60.4 for non-CEDRI reports, which anticipates snail mail. I would reach out to the appropriate region and see if they will accept an email version (and to what mailbox you should send). Another option might be to have the company have someone on the mainland print it and snail-mail it for them?

Marcia B Mia

Air Branch

Office of Compliance

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

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From: Luis Vasquez <lvasquez@otacompression.com>

Sent: Tuesday, October 15, 2019 11:33 AM

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

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

Subject: RE: CEDRI report is still in "draft" form and is therefore not required.

Good day Marcia,

The scuttlebutt I heard made me second guess our process. I reached out to the state regulatory agency for Texas , TCEQ. They advised reporting should be to TCEQ and the EPA. They cited the requirements laid out in the OOOOa rule where it states the EPA should also be included in the reporting process.

I have sat in conferences with small, medium, and large oil and gas companies and discussed OOOO and OOOOa requirements and reporting. A lot are not clear on the reporting. Some, like me, believe it is correct to report to both the state regulators and the EPA, others state they believe it is correct to only report to the state regulators, and others state they believe it is correct to only report to the EPA. But state regulators are not always up to speed on federal regulations. It is also challenging when each state regional regulatory office has its own manner of doing things.

I feel better reaching out to the regulating agencies directly to obtain current and correct information.

In my humble opinion, my suggestion to better communicate this to the regulated community would be to possibly provide the process in layman's terms for each state on a document and env reg web post. Maybe have the one document include the process for each state, if the processes are different. This would help those consultants who work on OOOOa reporting for clients located across different states.

Then maybe have each state's regulatory agency post it on their website each year a month or two prior to the reporting deadline. Also a large email blast sent out like the EPA did with the CAER email recently providing details about the deadline and the reporting process. I would request state regulatory agencies include this information in their annual conferences so that the regulated community has a chance to hear it and/or view it on PowerPoint presentation. Then be able to ask questions as well.

I just received a phone call from a client. Which created two last questions:

Is there an option to have an extension on the LDAR reporting? The client will be in the middle of the ocean near Micronesia and will not have solid internet service from Oct 17 to Oct 31. If so, what would be the process to obtain the extension?

If there is not an option for an extension, would sending the completed EPA spreadsheet and a cover letter to the EPA's Regional office via email satisfy the reporting requirements?

Kindly let me know.

I truly appreciate the assistance and the quick responses you and your team provide.

Thank you!.

Respectfully,

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

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

Sent: Tuesday, October 15, 2019 7:42 AM

To: Garwood, Gerri <Garwood.Gerri@epa.gov>; Luis Vasquez <lvasquez@otacompression.com>

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

Subject: RE: CEDRI report is still in "draft" form and is therefore not required.

Hi Luis,

I am interested in how we might communicate the requirements to the regulated community, if there is confusion on this point.

Marcia B Mia

Air Branch

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

Sent: Tuesday, October 15, 2019 8:04 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: CEDRI report is still in "draft" form and is therefore not required.

Hi Luis,

Until the final template is available, owners and operators are not required to report through CEDRI. However, they must still submit a report (not necessarily in the spreadsheet format) to the appropriate delegated authority. If this authority is held by the state or local agency, you may still be required to copy the report the EPA regional office, depending upon the state or local agency's delegation agreement with the regional office. Your delegated authority should be able to answer any specific questions on where to report.

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, October 15, 2019 7:58 AM

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>

Subject: Re: CEDRI report is still in "draft" form and is therefore not required.

Good morning Gerri,

Sorry long day yesterday, I don't believe I asked the question clearly: Does the template being in draft form and CEDRI being optional, exempt reporting having to be made to the EPA?

This is what I'm hearing from a few companies and their consultants.

I don't believe this is the case from how the rule reads but wanted to confirm.

Thank you!

Respectfully,

Luis Vasquez

Environmental Department Manager

OTA Compression

469-704-4149

On Oct 15, 2019, at 05:58, Garwood, Gerri <Garwood.Gerri@epa.gov> wrote:

CAUTION: This email originated from outside of the organization. Do not click links or

open attachments unless you recognize the sender and know the content is safe.

Hi Luis,

Yes, this is what Marcia was trying to convey a few weeks ago. The spreadsheets are the template/form. 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.

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, October 14, 2019 6:41 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>

Subject: CEDRI report is still in "draft" form and is therefore not required.

Good day all,

Regarding OOOOa LDAR reporting. I have run across some companies and consultants that advise that it is their understanding that the CEDRI report is still in "draft" form and is therefore not required.

Can you kindly provide any additional info on this? We will be submitting the EPA spreadsheets via CEDRI, but would like to know if this "draft" form is something different than the spreadsheet or if there is any truth to this "draft" form therefore not required statement listed above.

Thank you for your time and attention.

Respectfully,

<image001.jpg>

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,

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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

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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,

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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,

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