Message

From: Guzzo, Lindsay [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8643D3D6703A4886B13C5548D22307A0-GUZZO, LINDSAY]
Sent: 2/13/2019 10:28:38 PM
To: STURDEVANT Debra [Debra.STURDEVANT@state.or.us]; Burgess, Karen [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9085a27e8d724564890f33d47c72d9d1-Burgess, Karen]
CC: Labiosa, Rochelle [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ded3654216c9461d95cd5a3ceec507ef-Labiosa, Rochelle]
Subject: RE: permit limit procedure for mercury variances

Thursday afternoon from 2-3 I'm open.

Lindsay Guzzo

Lindsay Guzzo
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guzzo.lindsay@epa.gov

From: STURDEVANT Debra <Debra.STURDEVANT@state.or.us>
Sent: Wednesday, February 13, 2019 2:01 PM
To: Burgess, Karen <Burgess.Karen@epa.gov>; Guzzo, Lindsay <Guzzo.Lindsay@epa.gov>
Cc: STURDEVANT Debra <Debra.STURDEVANT@state.or.us>; Labiosa, Rochelle <labiosa.rochelle@epa.gov>
Subject: RE: permit limit procedure for mercury variances

Thanks Karen, will Thursday afternoon work for you Lindsay?

From: Burgess, Karen <Burgess.Karen@epa.gov>
Sent: Wednesday, February 13, 2019 8:52 AM
To: STURDEVANT Debra <Debra.STURDEVANT@state.or.us>
Subject: RE: permit limit procedure for mercury variances

Thursday afternoon works best for me.

KAREN BURGESS, P.E.
State Oversight Lead
NPDES Permits Unit - EPA Region 10

206-553-1644 | Burgess.Karen@epa.gov

From: STURDEVANT Debra <Debra.STURDEVANT@state.or.us>
Sent: Wednesday, February 13, 2019 8:43 AM
To: Guzzo, Lindsay <Guzzo.Lindsay@epa.gov>; 'STURDEVANT Debra' <Debra.STURDEVANT@state.or.us>; Labiosa,

Rochelle <labiosa.rochelle@epa.gov>; Burgess, Karen <Burgess.Karen@epa.gov>
Cc: 'BOROK Aron' <Aron.BOROK@state.or.us>; 'HYNSON Mark' <Mark.Hynson@state.or.us>; 'BOHABOY Spencer' <Spencer.BOHABOY@state.or.us>
Subject: RE: permit limit procedure for mercury variances

Hello, next week we are available Wednesday between 10 and noon, or Thursday between 2 and 5. Or Thursday 9-10.

Will one of those times work?

Thank you,
Debra

From: STURDEVANT Debra
Sent: Tuesday, February 12, 2019 5:49 PM
To: 'Guzzo, Lindsay' <Guzzo.Lindsay@epa.gov>; STURDEVANT Debra <Debra.STURDEVANT@state.or.us>; Labiosa, Rochelle <labiosa.rochelle@epa.gov>
Cc: BOROK Aron <Aron.BOROK@state.or.us>; HYNSON Mark <Mark.Hynson@state.or.us>; BOHABOY Spencer <Spencer.BOHABOY@state.or.us>
Subject: RE: permit limit procedure for mercury variances

Lindsay, If you could help us get a call set up for next week, that would be great. The comments on the last draft were that the permit limit was not part of the variance, so we didn't really get into it. So, we stepped back and used multiple statistics to describe the level currently achievable based on recent data from the facility, which you will see in the more recent draft we sent.

We do need to include a permit limit based on the LCA in the permit modification. But there are some different objectives in this case than there are in a WQBEL. So that's why I think it will be helpful to discuss with standards/variance and permitting staff together.

Thanks for getting back to me. I'm sure you've had many demands on your time this week!
Debra

From: Guzzo, Lindsay <Guzzo.Lindsay@epa.gov>
Sent: Tuesday, February 12, 2019 5:13 PM
To: STURDEVANT Debra <Debra.STURDEVANT@state.or.us>; Labiosa, Rochelle <labiosa.rochelle@epa.gov>
Cc: BOROK Aron <Aron.BOROK@state.or.us>; HYNSON Mark <Mark.Hynson@state.or.us>; BOHABOY Spencer <Spencer.BOHABOY@state.or.us>
Subject: RE: permit limit procedure for mercury variances

Hi Debra,
Unfortunately for me this week is completely packed with back to back meeting. I think many people thought we might shut down again and I got booked out. I'm also thinking that this discussion should have some HQ input as none of us have ever done a variance (or LCA) and it seems like you need a fairly definitive answer ASAP. If I remember right, on our calls with them last year they were the best at being able to explain the LCA information. I can try to find 30 minutes next week to bring them into the conversation, if that is what we want. I would think any issues they have would also be found in their comments on this draft that we are working to get to you by 2/28. I heard that Karen might be sending something to Spencer today or tomorrow, but I'm not sure what she is sending (as I haven't read it).

I apologize that my schedule is so full this week, and I have to admit that next week is pretty full too. If you would like to me to set up a meeting with R10 or R10 and HQ let me know and I will try to find some times. Thanks for your understanding!

Lindsay Guzzo

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From: STURDEVANT Debra <Debra.STURDEVANT@state.or.us>
Sent: Tuesday, February 12, 2019 4:10 PM
To: Labiosa, Rochelle <labiosa.rochelle@epa.gov>; Guzzo, Lindsay <Guzzo.Lindsay@epa.gov>
Cc: BOROK Aron <Aron.BOROK@state.or.us>; 'STURDEVANT Debra' <Debra.STURDEVANT@state.or.us>; HYNSON Mark <Mark.Hynson@state.or.us>; BOHABOY Spencer <Spencer.BOHABOY@state.or.us>
Subject: permit limit procedure for mercury variances

Hello, I guess I neglected to include Lindsay in the email below.

Any chance we can talk tomorrow? We have a meeting with CWS Thursday and would to have a conversation with you about this first.
We are open 9-10, 11-12 and 1:00 and 3:30.

Even if we could get ½ hour of your time that would be a helpful start. I would like the standards and permitting folks both to discuss together the objectives and procedures for a permit limit based on the LCA (or highest attainable effluent condition) under a variance versus setting a WQBEL to meet a wq criterion.

Thank you,
Debra

From: STURDEVANT Debra
Sent: Thursday, February 07, 2019 2:18 PM
To: Labiosa, Rochelle <labiosa.rochelle@epa.gov>
Cc: STURDEVANT Debra <Debra.STURDEVANT@state.or.us>; BOHABOY Spencer <BOHABOY.Spencer@deq.state.or.us>; BOROK Aron <Borok.Aron@deq.state.or.us>
Subject: RE: Monday

Hi Rochelle, I'm hoping you, Lindsay and Karen can talk on Tuesday or Wednesday of next week about our procedure for setting permit limits based on the level currently achievable, based on available data from the last 3-5 years.

Spencer and I are both available on Tuesday from 11:30 – 3:00 and from 3:30 – 5:00. And we are both available on Wednesday 9-10 or 11-12.
If we can get ½ hour in there somewhere, that would be helpful, but hopefully we can find 1 hour so we can hash through this.

If you let me know what might work, I can send the invite and we can use my conference call number.

Thanks!
Debra

From: STURDEVANT Debra
Sent: Thursday, February 07, 2019 1:56 PM
To: Labiosa, Rochelle <labiosa.rochelle@epa.gov>
Subject: Monday

Darn, Spencer is out on Monday!

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