Message

From: Self, Terry [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E7CF4480BD964B94BB7706E8DB48C2BA-SELF, TERRY]
Sent: 6/8/2018 5:02:04 PM
To: Cruise, Michael [mcruise@adem.alabama.gov]; Singh, Ben [Singh.Ben@epa.gov]; Truman, Bill [truman.bill@epa.gov]; Buso, Roberto X [Buso.Roberto@epa.gov]
CC: Massey, Sonja [SSM@adem.alabama.gov]; Stallworth, Clethes [CS@adem.alabama.gov]; Malaier, Dorothy [DSM@adem.alabama.gov]; Hall, Latoya A [LAHall@adem.alabama.gov]; Batchelor, David [david.batchelor@adem.alabama.gov]; Thrash, Jim [JThrash@adem.alabama.gov]; Roper, Lynn T [LTR@adem.alabama.gov]; Alexander, Tiffani L [tiffani.alexander@adem.alabama.gov]
Subject: RE: ADEM Division 6 (UST) Authorization SPA Package - Interim Draft
Attachments: Adequate Enforcement Procedures.pdf; Program Description OK.PDF

Afternoon Mike,

Our preliminary review found no major issues precluding you from moving forward in your SPA process.

Only a few minor issues were found, which are:

1. AG Certification
    a. AG Statement ("no less stringent criteria" evaluation) not submitted, and not reviewed.

2. MOA
    a. On page 1, 1st paragraph & line 14, there is a typo where '(1991 MOA)' is written, and it should be (1996 MOA).
    b. Please specify why the public participation sentence in the MOA was highlighted. States must provide for public participation using one of the three options in 40 C.F.R. 281.42(a)-(c).

3. Program Description
    a. From the submittal, it is unclear in what ways the state program is more stringent or broader in scope than the federal program. A copy of Oklahoma's Program Description is included as an example. To the extent any areas of the program are more stringent or broader in scope, please identify those areas in the Program Description.

4. Adequate Enforcement
    a. No page numbers were included.
    b. On page 5, 2nd paragraph & line 5, there is a typo where 'files' is misspelled as 'flies'.
    c. Where it states that the Department or ADEM has the authority to perform a function throughout the document, the appropriate State statute/rule should be cited. A copy of Oklahoma's Application for Approval is included as an example. For example on page 3, it states the Compliance Monitoring procedure is divided into four areas, so ADEM's regulatory authority should be cited for each of the areas.

5. Crosswalk
    a. Previously reviewed & comments provided

Terry

From: Cruise, Michael [mailto:mcruise@adem.alabama.gov]
Sent: Friday, May 18, 2018 9:23 AM
To: Self, Terry <Self.Terry@epa.gov>; Singh, Ben <Singh.Ben@epa.gov>
Cc: Massey, Sonja <SSM@adem.alabama.gov>; Stallworth, Clethes <CS@adem.alabama.gov>; Malaier, Dorothy <DSM@adem.alabama.gov>; Hall, Latoya A <LAHall@adem.alabama.gov>; Batchelor, David <david.batchelor@adem.alabama.gov>; Thrash, Jim <JThrash@adem.alabama.gov>; Roper, Lynn T <LTR@adem.alabama.gov>; Alexander, Tiffani L <tiffani.alexander@adem.alabama.gov>
Subject: ADEM Division 6 (UST) Authorization SPA Package - Interim Draft
Importance: High

Mr. Self, as per our phone conversation last week, we are sending you an interim draft of five of the six required components of the UST SPA package for your preliminary review and comment (see attached). The components included are:

1. AG Letter,
2. Memorandum of Agreement,
3. Program Description,
4. Demonstration of Procedures for Adequate Enforcement, and
5. SPA Regulations Crosswalk.

If possible, we would like to have your comments by June 8, 2018 as we plan to send the package to the Governor's office shortly thereafter. If you have any questions or comments please do not hesitate to contact either me or Ms. Tiffani Alexander.

Thank you and have a great weekend.

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