Message

From: Johnstone, Jeremy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C34BA58E609141488E4B4D27B5EDCD3B-JJOHNS04]
Sent: 9/20/2018 10:03:21 PM
To: Tim Parker [tparker@allencoca.com]
CC: Michael E. Gallagher [mgallagher@behblaw.com]; Reynolds, Rebekah [Reynolds.Rebekah@epa.gov]
Subject: RE: ALLENCO ENERGY L.A.
Attachments: AllenCo AOC 24Apr14.pdf

Tim –

This is in follow-up to your email and our phone conversation of earlier today.

It is EPA's understanding that AllenCo is hoping to be able to restart operations on 10/15. As I mentioned, please be advised that it is our position that several submittals remain outstanding as agreed to in the April 2014 Administrative Order on Consent (copy attached for your convenience). In general, under Sections V.C & V.D of the AOC AllenCo is required to provide certifications relating to the completion of required work as well as related substantiating documentation, no less than 15 days prior to restart. Over the course of the past four years AllenCo has made several submittals documenting required work activities. However, it is not clear to EPA that in all instance all of the required work has been completed, nor has all of the required substantiating documentation been received, and in no instance have the required certifications been made. The following is a review of our understanding of the submittals made by AllenCo to date and what we believe to be outstanding.

Paragraph 51 -
On 4/24/14 Logan Allen submitted via email Methane Detector Inspection results. It is worth noting that the submitted inspection report indicates an expiration date of 7/31/16. Also, no submittals have been made to date with respect to the facility's flame detectors or larger fire suppression system. Please provide the certification required by Paragraph 51 along with substantiating documentation required by Paragraph 58.

Paragraph 52 -
No submittal has been made to EPA with respect to the ITPM procedures and intervals required under Paragraph 52. Please provide the required certification along with substantiating documentation as required by Paragraph 58.

Paragraph 53 -
On behalf of AllenCo, Abbey Hudson of Gibson Dunn transmitted various documents responsive to the requirements of Paragraphs 53 and 58 via emails dated 8/8/14, 9/25/14, 10/2/14, 10/21/14 and 11/13/14. Although it appears that many of the requirements of these paragraphs may have been met, the certification required by Paragraph 53 has not yet been submitted. In addition, it is not clear to EPA that the substantive requirements with respect to API 510 and RP 576 have all been met. For example, reports of API 510 external visual inspections have been received for the following pressure four vessels: Free Water Knock Out; Gas Scrubber; West Filter Pot; and East Filter Pot. Additionally, UT examination reports were submitted for the East and West Filter Pots and the Gas Scrubber - but not for the FWKO. Further, the LDAR Plan submitted pursuant to Paragraph 55 listed the following six pressure vessels at the facility: FWKO (V-01); Suction Scrubber (V-02); Fuel Gas Scrubber (V-03); Vent Scrubber (V-16); Vent Stack (V-17); and Sample Pot (V-18) (see revised LDAR Plan p. 8). EPA had previously requested clarification as to the number and naming of AllenCo's pressure vessels; however, this information was never provided and we continue to be confused by this, as well unclear if all of the 510/576 inspections/tests have been performed on all of the vessels as required.

Please ensure that the requirements of Paragraphs 53 & 58 have been met and provide the certification required by Paragraph 53 along with all substantiating documentation required by Paragraph 58 including, but not limited to, that all identified deficiencies & recommendations have been addressed.

Paragraph 54 -

No submittal has been made to EPA with respect to the replumbing of the open trench required under Paragraph 54. Please provide the required certification along with substantiating documentation required by Paragraph 58.

Paragraph 55 -
No submittal has been made to EPA with respect to the continuing/future ITPM procedures and intervals for AllenCo's tanks, vessels and process piping as required under Paragraph 55. Please provide the required certification along with substantiating documentation required by Paragraph 58.

Paragraph 56 -
On behalf of AllenCo, Abbey Hudson transmitted AllenCo's LDAR Inspection and Maintenance Plan on 7/30/14. EPA provided comments to AllenCo's consultant Avanti who revised and submitted a revised Plan on 10/27/14. EPA has determined the revised Plan to be acceptable. However, the certification required under Paragraph 56 has not been submitted. Please provide the required certification along with substantiating documentation required by Paragraph 58.

Paragraph 57 -
On behalf of AllenCo, Abbey Hudson transmitted the results of AllenCo's initial LDAR inspection on 7/30/14 (and again on 9/25/14). However, the certification required under Paragraph 57 has not been submitted. Please provide the required certification along with substantiating documentation required by Paragraph 58. Further, as Paragraph 57 requires that such inspections be continued at specific intervals please also submit the results of any subsequent inspections, including documentation that all identified deficiencies & recommendations have been addressed. Finally, it is my recommendation that AllenCo perform an additional round of LDAR I&M prior to and/or in conjunction with restart activities, especially if the last such round was not done quite recently.

Paragraph 68 -
AllenCo revised and submitted its SPCC in accordance with Paragraph 68. However, the required certification has not been submitted. Please provide the required certification. Additionally, if any changes have subsequently been made to the facility AllenCo should evaluate if additional revisions are necessary/warranted and resubmit, as appropriate, prior to restart.

Paragraph 69 -
We are aware that AllenCo trained its personnel in 2014. However, the certification required under Paragraph 69 has not been submitted. Please provide the required certification. Additionally, if there will be different and/or additional onsite oil-handling personnel once the facility restarts AllenCo should provide them with the training required by 40 CFR §§112.7(f)(1) and (3).

Finally, as I mentioned to you over the phone, the foregoing review required considerable effort to locate the emails to which the various submittals were attached. As a consequence I repeat my request that, in responding to this email and making the outstanding submittals, AllenCo bundle all substantiating documentation – including information that may have been previously submitted – on a paragraph by paragraph basis to facilitate our review of the completeness of the submittals agreed to in the AOC.

Please feel free to call with any questions that you may have about this, and thank you in advance for your cooperation.

Regards,
Jeremy

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From: Tim Parker [mailto:tparker@allencoca.com]
Sent: Friday, September 14, 2018 8:59 AM
To: Johnstone, Jeremy <Johnstone.Jeremy@epa.gov>
Cc: Michael E. Gallagher <mgallagher@behblaw.com>; eric@wittenengineering.com; Eric Winegar <ewinegar@exponent.com>
Subject: ALLENCO ENERGY L.A.

Good Morning Mr. Johnstone,

I'm writing to inform you that we at Allenco Energy believe we are now
100% in compliance with the DOGGR, SCAQMD, Water Board and the
Other California agencies.

Our intended startup date is October 15 2018 please contact me to execute
Our final plan.