Message

From: Jacqueline Ronstadt [Jacqueline.Ronstadt@pima.gov]
Sent: 7/9/2020 2:55:30 PM
To: Sims, Mark [Sims.Mark@epa.gov]; Brahmbhatt, Roshni [brahmbhatt.Roshni@epa.gov]; Rupesh Patel [Rupesh.Patel@pima.gov]
Subject: RE: stack test delay request COVID-19 (TIM?)
Attachments: 20-06-17 SSIR.pdf; 20-06-24 Response to June 12 Records Request Page 1.pdf

Good Morning Roshni and Mark,

The correspondence from Irvin Bilsky is indeed for Tucson Iron and Metal. The initial letter from Mr. Kippur stated that the company was deemed non-essential. We requested documentation from the TI&M regarding the stack testing company being deemed non-essential and their lack of availability to test. They said they did not have any correspondence as it was over the phone (attached). PDEQ's newest inspector previously worked for the stack testing company and we were told that the company was actually furloughing individuals because they didn't have enough work. In addition, on June 17, 2020 inspectors were on site and TI&M told inspectors they were doing a 3-day burn with a new agency from California as a trial run (attached).

TI&M has since scheduled to conduct a RATA on July 21, 2020 and still has plans to conduct the performance testing in September. PDEQ has received a protocol and it has been reviewed and approved. TI&M continues to conduct burns with 5 burns scheduled in July and August.

Thank you,

Jackie Ronstadt
Air Compliance Manager
P: 520-724-9726 Ex. 6 Personal Privacy (PP)
www.pima.gov/deq
Be Counted in Census 2020

From: Sims, Mark <Sims.Mark@epa.gov>
Sent: Wednesday, July 8, 2020 5:17 PM
To: Brahmbhatt, Roshni <brahmbhatt.Roshni@epa.gov>; Rupesh Patel <Rupesh.Patel@pima.gov>; Jacqueline Ronstadt <Jacqueline.Ronstadt@pima.gov>
Subject: RE: stack test delay request COVID-19 (TIM?)

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This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.
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Saw these two TIM letters in the RO mail today.

From: Brahmbhatt, Roshni <brahmbhatt.Roshni@epa.gov>
Sent: Wednesday, July 08, 2020 5:13 PM
To: Rupesh Patel <rupesh.patel@pima.gov>; Jacqueline Ronstadt <Jacqueline.Ronstadt@pima.gov>
Cc: Sims, Mark <Sims.Mark@epa.gov>
Subject: Fwd: stack test delay request COVID-19

Hi Rupesh,

Before we respond to Irvin Bilsky, I wanted to ask if he is referring to the Tucson Iron & Metal facility.

Thanks,
Roshni

Roshni Brahmbhatt
Manager, Air Enforcement Section
Enforcement and Compliance Assurance Division
US EPA, Region 9
Brahmbhatt.Roshni@EPA.gov
Ph: 415-972-3995

Begin forwarded message:

> **From:** "Trombadore, Claire" <Trombadore.Claire@epa.gov>
> **Date:** July 8, 2020 at 5:07:59 PM PDT
> **To:** "Fried, Gregory" <Fried.Gregory@epa.gov>
> **Cc:** "Crowley, Kate" <crowley.kate@epa.gov>, "Tozzi, Lauren" <Tozzi.Lauren@epa.gov>, "South, Peter" <South.Peter@epa.gov>, "Modak, Nabanita" <Modak.Nabanita@epa.gov>, "Brahmbhatt, Roshni" <brahmbhatt.Roshni@epa.gov>
> **Subject: Re: stack test delay request COVID-19**
>
> Thanks. Looping in Roshni Brahmbhatt, the manager of the Air Enforcement section in R9 ECAD.
>
> Claire Trombadore
> Assistant Director
> Enforcement and Compliance Assurance Division
> U.S. EPA Region 9
> 75 Hawthorne Street
> San Francisco, CA 94105
> 415-972-3013
> Trombadore.claire@epa.gov

> On Jul 7, 2020, at 6:02 AM, Fried, Gregory <Fried.Gregory@epa.gov> wrote:
>
> Thanks Kate. This request should go to the R9 air enforcement office. I have cc'd Claire Trombadore who is the branch chief in Region 9's air enforcement shop.
>
> Greg
>
> Sent from my iPhone

> > On Jul 7, 2020, at 8:15 AM, Crowley, Kate <crowley.kate@epa.gov> wrote:

Hi Greg and Lauren,

My understanding is that inquiries related to compliance and COVID-19 should be forwarded to you. Please let me know if I should send elsewhere.

Thanks,
Kate Crowley

Kate Crowley | U.S. EPA | OAQPS | Sector Policies and Programs Division | (919) 541-9420 | crowley.kate@epa.gov

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From: Irvin Bilsky <irvin.bilsky@gmail.com>
Sent: Friday, July 3, 2020 2:47 PM
To: Crowley, Kate <crowley.kate@epa.gov>
Subject: Re: stack test delay request

Kate,

My understanding of the delayed annual staack test request is due to cancellation of U.S. Drug Enforcement Agency (DEA) waste delivery to be incinerated due to the spike in COVID-19 infections in Arizona as well as the stack test company scheduling test time-frame of June 2020 cancellation. U.S. Customs and Border Protection (CBP), law enforcement and DEA are the only authorized suppliers of the waste to the incinerator. DEA is presently the only active provider; CBP temporarily did not have federal funding to make such deliveries (not to say COVID-19 would not have stopped them as well). Because of the COVID-19 situation in Arizona the stack test has been rescheduled for September 2020. I understand the stack test company was not considered an "essential" business resulting in its recent unavailability.

Regards,

Irvin L. Bilsky, P.E.
Bilsky Environmental
P.O. Box 26044
Austin, Texas 78755
TBPE Registration #F-8991
(512) 799-6048

On Tue, Jun 30, 2020 at 12:44 PM Crowley, Kate <crowley.kate@epa.gov> wrote:

> Mr. Bilsky,
>
> Thanks for your inquiry. Could you clarify if the request for a delay of the annual stack test is due to COVID-19 or due to another reason?

Best,
Kate Crowley

From: drupal_admin@epa.gov <drupal_admin@epa.gov> on behalf of Irvin Bilsky via EPA <no-reply@epa.gov>
Sent: Monday, June 22, 2020 6:06 PM
To: Crowley, Kate <crowley.kate@epa.gov>
Subject: Form submission from: Stationary Sources of Air Pollution Contact Us About Stationary Sources of Air Pollution form

Submitted on 06/22/2020 6:06PM
Submitted values are:

Name: Irvin Bilsky
Email Address: irvin.bilsky@gmail.com
Comments: In requesting a delay of an annual stack test required under NSPS
EEEE what elements must be addressed in the written request to meet regulatory requirements for an approval?