Message

From: Williams, Christopher [Williams.Christopher@epa.gov]
Sent: 9/9/2019 3:41:43 PM
To: Lyle@sonomatech.com; hilary@sonomatech.com [Hilary@sonomatech.com]; Mchale, Robert E. [robert.mchale@markwest.com]
CC: Caballero, Kathryn [Caballero.Kathryn@epa.gov]; Snyder, Doug [Snyder.Doug@epa.gov]; McAuliffe, Mary [mcauliffe.mary@epa.gov]; Heilman, Michael [mheilman@pa.gov]; Rimkus, Christopher L. [CLRimkus@marathonpetroleum.com]; Elmer, Mark (ENRD) <Mark.Elmer@usdoj.gov> (Mark.Elmer@usdoj.gov) [Mark.Elmer@usdoj.gov]
Subject: RE: EPA's Response to STI's Audit Site Selection Technical Memorandum for Pennsylvania (dated August 14, 2019)
Attachments: Site selection Pennsylvania2.pdf; ATT00001.htm; Site selection Ohio2.pdf; ATT00002.htm

Lyle Chinkin (STI), Hilary Hafner (STI), and Robert McHale (Marathon Petroleum):

EPA, in consultation with PADEP, approves of the attached Audit Site Selection Technical Memorandum for Pennsylvania (dated August 19, 2019) and for Ohio (dated August 23, 2019). Approval is granted with the understanding that as requested, seven (7) days advance notice of the location of the audits will be provided to EPA and PADEP.

Regards,

Chris

From: Williams, Christopher
Sent: Friday, August 23, 2019 4:19 PM
To: Lyle@sonomatech.com; hilary@sonomatech.com; Mchale, Robert E. <robert.mchale@markwest.com>
Cc: Caballero, Kathryn <Caballero.Kathryn@epa.gov>; Snyder, Doug <Snyder.Doug@epa.gov>; McAuliffe, Mary <mcauliffe.mary@epa.gov>; Heilman, Michael <mheilman@pa.gov>; Rimkus, Christopher L. <CLRimkus@marathonpetroleum.com>
Subject: EPA's Response to STI's Audit Site Selection Technical Memorandum for Pennsylvania (dated August 14, 2019)

Lyle Chinkin (STI), Hilary Hafner (STI), and Robert McHale (Marathon Petroleum):

Thank you for providing EPA and PADEP the opportunity to respond to the attached Audit Site Selection Technical Memorandum for Pennsylvania (dated August 14, 2019 and received by EPA R3 on August 20, 2019). The following correspondence is EPA's response (in consultation with PADEP) to the Pennsylvania site selections and selection criteria. The EPA case team received the audit memorandum for Ohio facilites from STI today, and will respond after having sufficient time to review it.

It is EPA's and PADEP's expectation for the scope of the audit, pursuant to paragraph 52 of the CD, that the 3rd party auditor shall "conduct an audit of the installation and operation of the injunctive relief required pursuant to Section IV to determine compliance with this [CD] at a total of five (5) of the Compressor Stations or Stand-Alone Facilities identified in Appendices 1 and 3…". Therefore, where a Compressor Station or Stand-Alone Facility has injunctive relief pursuant to the CD and there are multiple launchers or receivers collocated at the Station or Facility, then all of the launchers and receivers are to be included in the audit for that Compressor Station or Stand-Alone Facility. Additionally, EPA and PADEP expect that 5 Compressor Stations or Stand-Alone Facilities will be audited.

After reviewing the selected sites, EPA and PADEP would like clarification about the following:

- Does Site b (Chiarelli to Brigich receiver) correspond to any of the locations identified in Appendices 1 or 3?;
- Are the launchers or receivers identified as Site c ("Smith to Loffert (Joe Cain) HP receiver") and Site d ("Airport to Loffert (Joe Cain) LP receiver") collocated at the same Compressor Station or Stand-Alone Facility? It is our understanding that there are 4 receivers and 1 launcher located at the Loffert (Joe Cain) Stand-Alone Facility

listed in Appendix 3. As such, all of the launchers and receivers should be part of the audit and should be considered as only one Stand-Alone Facility for purposes of the audit;

- Was the distance between pigging facilities considered when prioritizing the facilities? A longer pigging run should, in theory, have a more significant emissions profile than a shorter pigging run; if correct then EPA and PADEP believe that the distance between launcher and receiver is an important factor to consider in prioritizing candidates for audit; and
- EPA and/or PADEP intend for staff to observe the audits. However, given the long time frame for the audit, the agencies need advance notice. EPA and PADEP request 7 days notice of the location of the audits.

Feel free to contact me at my number below, if you wish to discuss this matter in more detail.

Regards,

Christopher Williams, P.E.
Air Enforcement Division
U.S. EPA Headquarters, Rm 1142C
William Jefferson Clinton Building-South
1200 Pennsylvania Avenue, N.W.
Mail Code: 2242A
Washington, D.C. 20460
williams.christopher@epa.gov
Tel: 202.564.7889