Message

From: STEVE LAWRY [lawrylts@sbcglobal.net]
Sent: 3/6/2014 6:42:28 PM
To: Chew, Sandra [Chew.Sandra@epa.gov]
CC: Bromley, Eugene [Bromley.Eugene@epa.gov]; Marina Robertson [mrobertson@betaoffshore.com]
Subject: Re: Offshore Oil and Gas Reissued Permit - BETA Offshore
Attachments: RP Sum_Schedule all platforms.xlsx

Sandra, are the code numbers you need those listed under each Parameter in the DMR Form PDF file you sent? Also, attached is a **draft** summary of the changes to the monitoring program per the new permit (for my clients only). The conductivity is added for the undissociated sulfide calculation. You will need to review the permit to confirm this table has all the correct changes.....hope this helps

Steven G. Lawry
Environmental and NPDES Compliance Specialist
State Certified Potable Water Distribution Operator
Marine Biologist, LTS Environmental, Inc.
(805) 644-4560

From: "Chew, Sandra" <Chew.Sandra@epa.gov>
To: STEVE LAWRY <lawrylts@sbcglobal.net>; Marina Robertson <mrobertson@betaoffshore.com>
Cc: "Bromley, Eugene" <Bromley.Eugene@epa.gov>; Clem Alberts <alberts@pacops.com>; Pat Corcoran <pcorcoran@venocoinc.com>
Sent: Thursday, March 6, 2014 7:41 AM
Subject: RE: Offshore Oil and Gas Reissued Permit - BETA Offshore

Hi Steve,

I just tried calling you but no one was available.

Is it possible for you to give me a list of all the changes comparing the last permit to what is different in the new permit? This will make it much easier for me to code all the permits. I understand that you want to use your forms but I still need to keep the data coding up to date in ICIS. Because your forms are different from what our DMR form 3320-1 look like; it is difficult for me to enter the data into ICIS; however if Eugene is fine with the form, then I will consider them acceptable. Manual checking of your data will be necessary.

In the meantime, a list of the changes in the new permit would help me a great deal. If and when you decide to go electronic, I will have them available and up-to-date. Thanks.

Sandra Chew
US EPA Region 9 - Enf-4-1
75 Hawthorne Street
San Francisco, CA 94105
Phone: 415-972-3335

From: STEVE LAWRY [mailto:lawrylts@sbcglobal.net]
Sent: Thursday, March 06, 2014 7:28 AM
To: Chew, Sandra; Marina Robertson
Cc: Bromley, Eugene; Clem Alberts; Pat Corcoran
Subject: Re: Offshore Oil and Gas Reissued Permit - BETA Offshore

No problem Sandra. You might consider allowing the operators to continue using the current forms they use that are already modified specifically for each platform until the NetDMR takes over. As the new permit takes effect this month, operators are beginning slight mods to the existing forms as they go. Feel free to obtain a copy of those 3320-1 forms we submit from here on for reference. Eugene has agreed in the past as long as our 3320-1 forms are completed with the proper information, they are acceptable. Since there are many changes to make to all the forms on your end for each platform, it might be best to modify your new forms to be used in the NetDMR reporting that will be mandated next year some time. Seems silly to change the entire process now and fill in a much larger non-writable PDF form, when everything is going to go with the electronic reporting next year. We can discuss more when you call.....food for thought..... Have a great day Sandra.

Steven G. Lawry
Environmental and NPDES Compliance Specialist
State Certified Potable Water Distribution Operator
Marine Biologist, LTS Environmental, Inc.
(805) 644-4560

From: "Chew, Sandra" <Chew.Sandra@epa.gov>
To: STEVE LAWRY <lawrylts@sbcglobal.net>; Marina Robertson <mrobertson@betaoffshore.com>
Cc: "Bromley, Eugene" <Bromley.Eugene@epa.gov>
Sent: Wednesday, March 5, 2014 6:55 AM
Subject: RE: Offshore Oil and Gas Reissued Permit - BETA Offshore

Hi Steve,

Thanks for looking over the DMRs so quickly. Please let me know if there are any other issues. I will need time to review the permit again. Perhaps we can have a call sometime next week.

Sandra Chew
US EPA Region 9 - Enf-4-1
75 Hawthorne Street
San Francisco, CA 94105
Phone: 415-972-3335

From: STEVE LAWRY [mailto:lawrylts@sbcglobal.net]
Sent: Tuesday, March 04, 2014 1:47 PM
To: Chew, Sandra; Marina Robertson
Cc: Bromley, Eugene
Subject: Re: Offshore Oil and Gas Reissued Permit - BETA Offshore

Hi Sandra, I ran through these quickly and these are not correct. Did you update these in regards to the new permit? In a quick read I saw the following errors and upon closer review there may be more:

- They all say Pg. 1 at the bottom.
- Produced water has no toxicity listed. It is required quarterly for the first year now, annually thereafter.

- You list fire water chlorine as monthly. There are no chlorine requirements for fire water anymore. (all three Es)
- N.C.Cooling water Cl2 is listed as monthly and it is now quarterly. (all three Es)
- Eureka lists Cl2 for the MSD as monthly. It is not required (USCG approved device).

It looks like these will need to be reviewed closely by each operator and corrected before they can be sent out and required to be completed. We worked good together in the past and I look forward to helping you again if you like. Until these can all be updated and fully reviewed, it appears best for industry to continue reporting the way they currently are and we can transform to any new forms as time permits. It should also be noted that the current DMRs submitted include about 12-18 pages depending on the platform and types of discharges. Your forms here are close to 50 pgs for each. Is there a way EPA can consolidate them more?

Steven G. Lawry
Environmental and NPDES Compliance Specialist
State Certified Potable Water Distribution Operator
Marine Biologist, LTS Environmental, Inc.
(805) 644-4560

From: "Chew, Sandra" <Chew.Sandra@epa.gov>
To: Marina Robertson <mrobertson@betaoffshore.com>
Cc: steve lawry <lawrylts@sbcglobal.net>; "Bromley, Eugene" <Bromley.Eugene@epa.gov>
Sent: Tuesday, March 4, 2014 11:58 AM
Subject: RE: Offshore Oil and Gas Reissued Permit - BETA Offshore

Marina,

Here are the pdf. Sorry you were not able to open the earlier one sent.

Sandra Chew
US EPA Region 9 - Enf-4-1
75 Hawthorne Street
San Francisco, CA 94105
Phone: 415-972-3335

From: Marina Robertson [mailto:mrobertson@betaoffshore.com]
Sent: Tuesday, March 04, 2014 10:24 AM
To: Chew, Sandra
Cc: steve lawry
Subject: RE: Offshore Oil and Gas Reissued Permit - BETA Offshore

For some reason I cannot open the pdf file. I get a message that says the file was damaged. Can you try to resend it please?

Thanks,
Marina Robertson
HSE Manager
mrobertson@betaoffshore.com

111 W. Ocean Blvd., Ste 1240, Long Beach, CA 90802
Office: 562-683-3497 Fax: 562-628-1536 Cell: 714-309-9481

From: Chew, Sandra [mailto:Chew.Sandra@epa.gov]
Sent: Tuesday, March 04, 2014 10:20 AM
To: Marina Robertson
Cc: steve lawry; Bromley, Eugene
Subject: Offshore Oil and Gas Reissued Permit - BETA Offshore

Please note that your permit was recently reissued as of 3/1/2014. Attached are the updated DMRs. Please note that these are the official DMR forms that need to be filled out and returned to EPA. Forms will be sent periodically with sufficient time before they are due. The instructions are attached.

In the past, we have encourage all dischargers to use NetDMR, EPA's e-reporting software which is still available to you. With the NPDES Proposed E-reporting Rule that will require e-reporting of DMR data, we want you to be aware that this regulation will come into effect as early as next year.

Sandra Chew
US EPA Region 9 - Enf-4-1
75 Hawthorne Street
San Francisco, CA 94105
Phone: 415-972-3335

********** ATTACHMENT NOT DELIVERED **********

This Email message contained an attachment named
image001.jpg
which may be a computer program. This attached computer program could contain a computer virus which could cause harm to EPA's computers, network, and data. The attachment has been deleted.

This was done to limit the distribution of computer viruses introduced into the EPA network. EPA is deleting all computer program attachments sent from the Internet into the agency via Email.

If the message sender is known and the attachment was legitimate, you should contact the sender and request that they rename the file name extension and resend the Email with the renamed attachment. After receiving the revised Email, containing the renamed attachment, you can rename the file extension to its correct name.

For further information, please contact the EPA Call Center at (866) 411-4EPA (4372). The TDD number is (866) 489-4900.

********** ATTACHMENT NOT DELIVERED **********