PERSONAL NOTES:

Role of the preparer and of the certifying official is different

How could the certifying official mistake his acceptance as the new certifying official from CDX as certifying the facility's submission of reporting forms?

February 17, 2017
Notes from a review of Valero's January response to late reporting for calendar year 2014.

June 30, 2015 – 6:22 AM:
EMAIL From: helpdesk@epacdx.net
CDX Email to: kevin.lasshan@valero.com
Request password reset to access CDX – so Valero knew of the requirement to report to TRI on or before July 1, 2015 for the 2014 calendar year.

June 30, 2015 – 6:23 AM:
EMAIL From: helpdesk@epacdx.net
CDX Email to: kevin.lasshan@valero.com
Password reset confirmation from CDX

June 30, 2015 – 6:26 AM:
EMAIL From: helpdesk@epacdx.net
CDX Email to: kevin.lasshan@valero.com
Accounted created with CDX. Will be notified when activated

June 30, 2015 – 6:29 AM:
EMAIL From: helpdesk@epacdx.net
CDX Email to: kevin.lasshan@valero.com
Accounted created with CDX. Will be notified when activated, duplicate message.

June 30, 2015 – 9:26 AM:

EMAIL From: helpdesk@epacdx.net
CDX Email to: kevin.lasshan@valero.com
LexisNexis user verification attempt – not clear in the least why verification attempt failed

June 30, 2015 – 9:27 AM:
EMAIL From: helpdesk@epacdx.net
CDX Email to: kevin.lasshan@valero.com
Another message saying you have successfully created an account and will be notified when activated

June 30, 2015 – 9:32 AM:
EMAIL From: helpdesk@epacdx.net
CDX Email to: kevin.lasshan@valero.com
Your CDX role has been activated. *Does this imply his role as the certifying official?*

June 30, 2015 – 9:32 AM:
EMAIL From: helpdesk@epacdx.net
CDX Email to: kevin.lasshan@valero.com
Successfully signed document
Successfully signed CDX submission using the CROMERR E signature process

June 30, 2015 – 9:38 AM:
EMAIL From: cherokeeserviccedesk@syssidit.com
CDX Email to: kevin.lasshan@valero.com
CDX Help ticket has been closed
Note sure of the Help Desk request posed by Valero.

Communication to Lyndon Turner later on June 30th.

From: Lassahn, Kevin M <Kevin.Lassahn@valero.com>
Sent: Tuesday, June 30, 2015 9:45 AM
To: Turner, Lyndon
Attachments: trifid_doc_1435675391784_KMLASSAHN.pdf

Appears to be confirmation he is the certifying official for 2014 calendar year.

Toxics Release Inventory (TRI)
TRIFID Certifier Agreement Document

Date:	6/30/2015
Name:	Kevin Lassahn
CDX User ID:	KMLASSAHN
Email Address:	kevin.lassahn@valero.com
TRIFID:	73401TTLPTHIGHW

EXHIBIT B BEGINS

November 23, 2015 – 9:28 AM:
EMAIL From: helpdesk@epacdx.net
CDX Email to: kevin.lasshan@valero.com
Action Required: Certify Reporting Form(s) in TRI-MEweb

2014 Forms finally certified on November 23, 2015.

From: helpdesk@epacdx.net
Sent: Monday, November 23, 2015 9:31 AM
To: kevin.lassahn@valero.com
Subject: TRI-MEweb submission has been certified and sent to a TDX member state.

Duplicate Message

From: Lassahn, Kevin M <Kevin.Lassahn@valero.com>
Sent: Monday, November 23, 2015 9:32 AM
To: Elliott, Greg; Turner, Lyndon
Subject: FW: TRI-MEweb submission has been certified and sent to a TDX member state.

EXHIBIT C