Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 5/3/2017 2:19:18 PM
To: Turk, David [Turk.David@epa.gov]; Griffin, Stephanie [griffin.stephanie@epa.gov]; Clark, Katherine [Clark.Katherine@epa.gov]; Milton, Philip [Milton.Philip@epa.gov]
CC: Antisdel, Timothy [Antisdel.Timothy@epa.gov]; Muldrow, Bill [Muldrow.Bill@epa.gov]
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Bassinger – sent maps from Tesoro – OK with contiguous with new maps

Issue now is extracting just Wilmington Terminal from multi-establishment reports – ugh

Suggestions welcomed

Best to all,
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Turk, David
Sent: Tuesday, May 02, 2017 3:16 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Griffin, Stephanie <griffin.stephanie@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>; Milton, Philip <Milton.Philip@epa.gov>
Cc: Antisdel, Timothy <Antisdel.Timothy@epa.gov>; Muldrow, Bill <Muldrow.Bill@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Mort,

The ownership of various establishments changed so we ended up moving all of the reports under these establishments into on TRIFID. Specifically, we merged several sites that had been reporting as separate facilities into one TRIFID as seen below.

TRIFID	Facility Name	Facility Status	Street	City	State	Region	County	ZIP Code
90749RCPRD1801E	TESORO CARSON COKE HANDLING	Active	23500 S ALAMEDA ST	CARSON	California	9	LOS ANGELES	90810

	FACILITY (PART)							
90749RCPRD1801E	TESORO CARSON PRODUCTS TERMINAL (PART)	Active	2149 E SEPULVEDA BLVD	CARSON	California	9	LOS ANGELES	90810
90749RCPRD1801E	TESORO CARSON CRUDE TERMINAL (PART)	Active	24696 S WILMINGTON AVE	CARSON	California	9	LOS ANGELES	90745
90749RCPRD1801E	TESORO LOS ANGELES REFINERY-CARSON OPERATIONS (PART)	Active	2350 E 223RD ST	CARSON	California	9	LOS ANGELES	90810
90749RCPRD1801E	TESORO SULFUR RECOVERY PLANT (PART)	Active	23208 ALAMEDA ST	CARSON	California	9	LOS ANGELES	90810
90749RCPRD1801E	TESORO LOS ANGELES REFINERY (PART)	Active	2101 E PACIFIC COAST HWY	WILMINGTON	California	9	LOS ANGELES	90744
90749RCPRD1801E	TESORO CORP WILMINGTON SALES TERMINAL	Active	1930 E PACIFIC COAST HWY	WILMINGTON	California	9	LOS ANGELES	90744

https://www3.epa.gov/enviro/facts/tri/ef-facilities/#/Facility/90749RCPRD1801E

Does this remedy the confusion on this matter?

-Dave

From: Wakeland, Morton
Sent: Tuesday, May 02, 2017 4:03 PM
To: Griffin, Stephanie <griffin.stephanie@epa.gov>; Turk, David <Turk.David@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>; Milton, Philip <Milton.Philip@epa.gov>
Cc: Antisdel, Timothy <Antisdel.Timothy@epa.gov>; Muldrow, Bill <Muldrow.Bill@epa.gov>
Subject: FW: Enforcement Confidential re Tesoro Wilmington 2015 inspection
Importance: High

Am helping our Dave Bassinger in Region 9

Dave Turk help him back when, resolved a multiestablishment issue with a Tesoro in California.

Facility "just" inspected by NEIC

Dave Turk discovered – see below the supposed new TRIFID they were to report under.

ENFORCEMENT CONFIDENTIAL

FOIA EXEMPT

Email lucina.r.lopez@tsocorp.com

Reporting Year 2012 Separate reporting entities		Reporting Year 2013 Contiguous entities ("multi-establishment")
Tesoro Sulfur Recovery Plant Carson, CA TRIFID: 90810TXCRF23208	→	Tesoro Sulfur Recovery Plant Carson, CA TRIFID: 90744TXCRF2101E
BP West Coast Products LLC Coke Barn Carson, CA TRIFID: 90749RCPRD1801E	→	Tesoro Carson Coke Handling Facility Carson, CA TRIFID: 90744TXCRF2101E
ARCO Carson Products Terminal Carson, CA TRIFID: 90749RCPRD1801E	→	Tesoro Carson Products Terminals Carson, CA TRIFID: 90744TXCRF2101E
Tesoro Los Angeles Refinery Wilmington, CA TRIFID: 90744TXCRF2101E	→	Tesoro Los Angeles Refinery Wilmington, CA TRIFID: 90744TXCRF2101E

" ------- " denotes contiguous facilities under common ownership.

TRIFID 90749RCPRD1801E remains as a separate facility, with other reporting 'parts'.

I have been looking in Wilmington, CA and the refinery is not there – so I see Carson and go Taaa Daaaaa

but guess what when I look in Carson, CA the only TRIFID I get is

TRI FACILITY ID	FACILITY INFORMATION	FACILITY NAME	ADDRESS	COUNTY NAME	SUBMISSIONS
90749RCPRD1801E	View Facility Information	TESORO LOS ANGELES REFINERY-CARSON OPERATIONS	2350 E 223RD ST CARSON, CA 90810	LOS ANGELES	3475

This TRIFID does not match any of the supposed TRIFIDS the facility combined into – yellow below, but does match older
TRIFID's

Reporting Year 2012 Separate reporting entities		Reporting Year 2013 Contiguous entities ("multi-establishment")
Tesoro Sulfur Recovery Plant Carson, CA TRIFID: 90810TXCRF23208	→	Tesoro Sulfur Recovery Plant Carson, CA TRIFID: 90744TXCRF2101E
BP West Coast Products LLC Coke Barn Carson, CA TRIFID: 90749RCPRD1801E	→	Tesoro Carson Coke Handling Facility Carson, CA TRIFID: 90744TXCRF2101E
ARCO Carson Products Terminal Carson, CA TRIFID: 90749RCPRD1801E	→	Tesoro Carson Products Terminals Carson, CA TRIFID: 90744TXCRF2101E
Tesoro Los Angeles Refinery Wilmington, CA TRIFID: 90744TXCRF2101E	→	Tesoro Los Angeles Refinery Wilmington, CA TRIFID: 90744TXCRF2101E

" ------- " **denotes contiguous facilities under common ownership.**

What is blazes is this facility doing???

Hey, if I look up a yellow TRIFID above – guess what ZIPPO

Only TRI facility information was searched to select facilities

TRI Facility ID: Beginning With: 90744TXCRF2101E

Results are based on data extracted on MAR-01-2017
select distinct a.pgm_sys_id, a.primary_name, a.location_address, a.city_
order by state_code, primary_name, a.pgm_sys_id asc

Total Number of Facilities Displayed: 0

My head hurts

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 2:24 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Definitely a refinery.

I've attached Appendix K from the report, note pages 10 & 11, which discusses reporting from multi-establishments, including the refinery.

David Turk actually helped to resolve this issue; I've also attached his letter on this dated March 1, 2016.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 12:00 PM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Is their address in the NEIC report?
They are a refinery for sure – correct?

I'm jotting down some notes for you.....I'll deliver to you before I leave today and if you like we can chat tomorrow if you like?

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 1:57 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Definitely in 9, not 10. Don't know why Tesoro Wilmington isn't shown.

Note that the report states that Tesoro began reporting as a multi-establishment facility in 2013 under the TIFID ID # I provided, but the inspection reviewed the Tesoro Los Angeles Refinery Thresholds (Wilmington), not the combined thresholds (see page 7).

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 11:51 AM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Hmmm, only 2 facilities in Region 9
or are you in 10
age ya know, smile

List of EPA-Regulated Facilities in TRI

TRI FACILITY ID	FACILITY INFORMATION	FACILITY NAME	ADI
90748RCCQC1175C	View Facility Information	TESORO WILMINGTON CALCINER	1175 CARRACK WILMINGTON,
90744TXCRF1926C	View Facility Information	TESORO WILMINGTON SALES TERMINAL	1930 E PACIFIC WILMINGTON,

Go To Top Of The Page

Morton E. Wakeland, Jr., Ph.D. ("Mort")
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U.S. EPA Region 6

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Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 1:49 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

It's the refinery, not the terminal.

Should still be under Tesoro Wilmington, especially for TRI, but Tesoro is in the process of combining Wilmington and Carson facilities and so call them both parts of the "Tesoro Los Angeles Refinery".

The TRIFID number was 90744TXCRF2101E, from a July 2015 report that Russ had done. Address is 2101 E Pacific Coast Highway.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 11:35 AM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection
Importance: High

Afternoon Dave.

You are correct, there is no new ERP, per se, only a new penalty matrix.

Is this your facility?

Click on "View Facility Information" to view EPA Facility information for the facility.

Facility Name:	TESORO WILMINGTON SALES TERMINAL	Mailing Name:	TESORO WILMINGTON SALES TERMINAL
Address:	1930 E PACIFIC COAST HIGHWAY WILMINGTON CA 90744	Mailing Address:	8601 S GARFIELD AVE SOUTH GATE CA 90280
County:	LOS ANGELES	Region:	9
Facility Information:	View Facility Information	TRI ID:	90744TXCRF1926C
DUNS Number:		FRS ID	110016955825
TRI Preferred Latitude:	33.791667	TRI Preferred Longitude:	118.235556
Public Contact:	RUTHANNE WALKER	Phone:	5628064105
Assigned Public Contact:	RUTHANNE WALKER		
Parent Company:	TESORO CORP	Standardized Parent Company:	TESORO CORP
BIA Tribal Code:		Tribe:	

Parent DUNS: 008133480

Starting with Reporting Year 2006, TRI Facilities began reporting NAICS codes, instead of SIC codes, to identify their Primary Business Activities.

NAICS Codes for 2015

NAICS CODE	PRIMARY	NAICS DESCRIPTION
424710	YES	Petroleum Bulk Stations and Terminals

Attached is a lil VBA program I wrote to auto chart a 5 year reporting history on a facility.
Instructions for use on first worksheet.

The history is downloaded from the Submissions Report in EZ-Query and copied into the workbook AFTER ALL DATA ARE DELETED!
Below is FROM last worksheet – it is auto generated
Yellow = reported
White = did not report that chemical for that year.
Good for asking a facility why they did not report for a certain chemical for a certain year.

	A	B	C	D	E	F	G
1	TRI_CHEMICAL	2011	2012	2013	2014	2015	
2	1 2 4-TRIMETHYLBENZENE						
3	BENZENE						
4	BENZO[G H I]PERYLENE						
5	CUMENE						
6	CYCLOHEXANE						
7	ETHYLBENZENE						
8	HYDROGEN SULFIDE						
9	LEAD COMPOUNDS						
10	MERCURY COMPOUNDS						
11	NAPHTHALENE						
12	N-HEXANE						
13	POLYCYCLIC AROMATIC COMPOUNDS						
14	TOLUENE						
15	XYLENE (MIXED ISOMERS)						
16							
17							

Let me look at your attachment and get back with you David.
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 1:18 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Very much appreciate your willingness to help.

Not Valero; it's Tesoro Wilmington (pre-2007 owner was Shell, current operations being combined with Tesoro Carson, previously BP).

Thanks for the ERP – so a completely new ERP was never finalized?

I'm attaching for reference the NEIC final report, along with my internal "quick summary" to my boss of the Findings and Observations table 7. I'm interested in discussing this in more detail with you, when you have some time.

TRI Inspection years were 2012-2014.

I need to determine (probably from new TRI reports) what the facility may have already corrected. Don't believe this is too difficult, but what do you think?

NEIC inspectors (Armando Bustamante and Martha Hamre) are both around and available for discussion as well.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 7:59 AM
To: Basinger, David <Basinger.David@epa.gov>
Subject: From Mort
Importance: High

Thanks for your call Dave.

Would be most happy to assist in your penalty assessment at the refinery you inspected out there in Region 9. Wasn't Valero was it? I have a case here on those guys.

Find attached the latest matrices which covers violations

Gravity-Based Penalty Matrix for Violations that Occurred After January 12, 2009 but before or on November 2, 2015

CIRCUMSTANCE LEVELS	EXTENT		
	A Major	B Significant	C Minor
1	$37,500	$24,080	$7,090
2	$28,330	$18,420	$4,250
3	$21,250	$14,170	$2,130
4	$14,170	$8,500	$1,420
5	$7,090	$4,250	$710
6	$2,840	$1,850	$290

Gravity-Based Penalty Matrix for Violations that Occurred after November 2, 2015[1]

CIRCUMSTANCE LEVELS	EXTENT		
	A Major	B Significant	C Minor
1	$40,779	$27,730	$8,156
2	$32,623	$21,205	$4,893
3	$24,467	$16,312	$2,447
4	$16,312	$9,787	$1,631
5	$8,156	$4,893	$816
6	$3,262	$2,121	$326

CIRCUMSTANCE LEVELS

The higher assessed matrix would be used for **2015** violations. At first this appears incorrect. However, recall, there can be no violation of EPCRA 313 until *after* the due date of the form.
Forms for calendar year 2015 were due on or before July 1, 2016, and July 1, 2016 is AFTER November 2, 2015.
Therefore, the higher penalty matrix would apply to 2015 violations onward.

I also do my darn best to settle up front so as to issue only a CAFO vs issuing a Complaint, then having to negotiate, which may drag out, then close out the Complaint with a CAFO.
The one document advantage is that no clock begins ticking in the ALJ's office in DC. Those boys can get "testy" if things drag out.

However, that is up to how you folks wanna handle.

Best, Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 4/14/2017 3:49:54 PM
To: Senthil, Velu [Senthil.Velu@epa.gov]
BCC: Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: 2015 Data Quality Calls - EPA Region6
Attachments: Region6_RY15 Adhoc PR-Activity List Dec 2016.xlsm; New_Region6_RY15 RMP-TRI Nonreporters-List-Revised-Feb2017.xlsx; Region6_RY15 Adhoc POTW as Landfills List Dec 2016.xlsx; Region6_New_RY15 Adhoc POTW List Dec 2016.xlsx

Importance: High

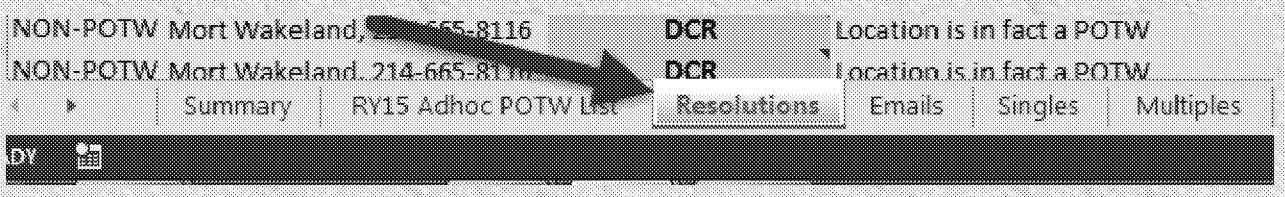
Velu

I don't care how many times I've called some of these folks still have not answered.

I put a deadline of like March 15, and they have still not replied. – I may target all these for desk top enforcement.

Explanation of workbooks so you do not have to guess

All 4 worksbooks – look on the worksheet tab denoted as "resolution" – I also colored it red



or it may say

if facilities have responded and we've resolved he entire row is highlighted in a color – usually yellow but could be another color

	A	B	C	D	E
1	Error Code	EPA Contact	Facility Response Code	Contact Details	TRIFID
2	LND-FILL	Mort Wakeland, 214.665.8116	RWS	Facility admitted put in wrong place, submitting revisions.	71483CHMBN
3	LND-FILL	Mort Wakeland, 214.665.8116	RWS	Facility admitted put in wrong place, submitting revisions.	71483CHMBN
4	LND-FILL	Mort Wakeland, 214.665.8116	RWS	Facility admitted put in wrong place, submitting revisions.	71483CHMBN
5	LND-FILL	Mort Wakeland, 214.665.8116	RWS	Called today, 3/31/17, wrong email, will change both email and location of landfill	72903WNSCR
	LND-FILL		RWS	Called today, 3/31/17, wrong email, will change both email and	

the folks that have not replied and there is no resolution as yet do not have a row color, there could be a cell here and there that
are colored but not the entire row

For example this one from RMP list.

	E	F	G	H	I	J	K	L	M	N	O	P
1	RMP Facility ID	FRS ID	TRI Facility ID	RMP Facility Name	RMP Street	RMP City	State	Region	RMP Year	CAS	ChemicalName	Th
25	100000050115	110000465552	79404HSTCC13CE4	Arctic Glacier Inc. Lubbock	130 East 42nd Street	Lubbock	TX	6	2011	7664417	Ammonia (anhydrous)	
26	100000149644	110000506042	79415BLLDR2O1UN	Gandy's Dairies, LLC	201 University	Lubbock	TX	6	2014	7664417	Ammonia (anhydrous)	
27	100000083811	110000465942	79556DXPTRNO8PL	DPC INDUSTRIES, INC.	NO. 8 PLACE INDUSTRIAL DRIVE	SWEETWATER	TX	6	2015	7664417	Ammonia (anhydrous)	
28	100000089842	110000504124	79903PRCSC6OONP	Creamland Dairies LLC, dba Price's Creameries	600 N. Piedras	El Paso	TX	6	2014	7664417	Ammonia (anhydrous)	
	100000209785	110018936008	88005FDRYP355SC	F&A Dairy Products Inc. - New Mexico Plant	555 S. Crawford	Las Cruces	NM	6	2013	7664417	Ammonia (anhydrous)	

All my workbook files begin with Region6 so you don't have to guess – I can only imagine how some folks send you stuff!!!

I will continue to bug these folks, and should I get a response, I'll send.
If I do enforcement, will also let you know that as well.

What else?????

Have a good weekend Velu….Mort

p.s. I'm home today, will be back in office Monday

OK, my friend, you have a good weekend

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 8/9/2019 9:28:57 PM
To: Morton Wakeland [betterplanet@sbcglobal.net]
Subject: benzene
Attachments: Benzene_HarrisCoTX_2017-2018.CSV

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Toxics Enforcement Section (ECDST)
Enforcement & Compliance Assurance Division (ECD)
U.S. EPA Region 6
Dallas, TX 75270
(214.665.8116)

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 9/5/2019 4:31:25 PM
To: Vaughn, Lorena [Vaughn.Lorena@epa.gov]; Riley, David [riley.david@epa.gov]; Lancaster, Stan [Lancaster.Stan@epa.gov]
Subject: RE: EPCRA - TRI case

My case if the right one.
I'll check the year.
Who is the gentleman inquiring?
I have some info if right case.
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Toxics Enforcement Section (ECDST)
Enforcement & Compliance Assurance Division (ECD)
U.S. EPA Region 6
Dallas, TX 75270
(214.665.8116)

From: Vaughn, Lorena <Vaughn.Lorena@epa.gov>
Sent: Thursday, September 5, 2019 11:26 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Riley, David <riley.david@epa.gov>; Lancaster, Stan <Lancaster.Stan@epa.gov>
Subject: FW: EPCRA - TRI case

Do any of you remember anything regarding this?

From: Mike Soraghan <msoraghan@eenews.net>
Sent: Thursday, September 05, 2019 11:06 AM
To: Vaughn, Lorena <Vaughn.Lorena@epa.gov>
Subject: RE: EPCRA - TRI case

That would be really great. There was discussion of a pretty big penalty, but there's some indication it never really got off the ground.

Thank you,

Mike Soraghan
202-709-3699

From: Vaughn, Lorena [mailto:Vaughn.Lorena@epa.gov]
Sent: Thursday, September 05, 2019 12:05 PM

To: Mike Soraghan <msoraghan@eenews.net>
Subject: RE: EPCRA - TRI case

Did you want me to see if any of the program people remember it?

From: Mike Soraghan <msoraghan@eenews.net>
Sent: Thursday, September 05, 2019 11:04 AM
To: Vaughn, Lorena <Vaughn.Lorena@epa.gov>
Subject: RE: EPCRA - TRI case

Thank you so much for checking.

Mike Soraghan
E&E News reporter
msoraghan@eenews.net
202-709-3699 (office and mobile)
@MikeSoraghan

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From: Vaughn, Lorena [mailto:Vaughn.Lorena@epa.gov]
Sent: Thursday, September 05, 2019 11:51 AM
To: Mike Soraghan <msoraghan@eenews.net>
Subject: RE: EPCRA - TRI case

Hi Mike,

I do not have anything in the file room for Valero for that year.
Sorry,

Lorena

From: Mike Soraghan <msoraghan@eenews.net>
Sent: Thursday, September 05, 2019 9:48 AM
To: Vaughn, Lorena <Vaughn.Lorena@epa.gov>
Subject: RE: EPCRA - TRI case

Thank you very much.

Mike Soraghan
202-709-3699 (office and mobile)

From: Vaughn, Lorena [mailto:Vaughn.Lorena@epa.gov]
Sent: Thursday, September 05, 2019 10:48 AM
To: Mike Soraghan <msoraghan@eenews.net>
Subject: RE: EPCRA - TRI case

I can check the file room to see if I have any case of Valero from 2016.

From: Mike Soraghan <msoraghan@eenews.net>
Sent: Thursday, September 05, 2019 9:41 AM
To: Vaughn, Lorena <Vaughn.Lorena@epa.gov>
Subject: RE: EPCRA - TRI case

I'm not sure of the history of it. What I know, and all I know, is that the company said in a regulatory filing with another agency (SEC) that EPA sought a $700,000 fine in 2016. But I've never been able to find any other record of it.

Mike Soraghan
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202-709-3699 (office and mobile)
@MikeSoraghan

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Energywire, Climatewire, Greenwire, E&E Daily, E&E News PM

From: Vaughn, Lorena [mailto:Vaughn.Lorena@epa.gov]
Sent: Thursday, September 05, 2019 10:38 AM
To: Mike Soraghan <msoraghan@eenews.net>
Subject: RE: EPCRA - TRI case

Good Morning,

Do you have a docket number for it?
So, did they file a complaint with Valero? Or was the company TRI?
If they did not file a complaint then I won't have any information on it.

Lorena

From: Mike Soraghan <msoraghan@eenews.net>
Sent: Thursday, September 05, 2019 9:15 AM
To: Vaughn, Lorena <Vaughn.Lorena@epa.gov>
Subject: EPCRA - TRI case

Ms. Vaughn,

Hi. I am trying to track down documents about an EPCRA-TRI case involving a refinery in Ardmore, Okla., that would have been active in 2016 and perhaps earlier. I think the case may have later been dropped. The owner is Valero. If you had could offer any assistance or advice, I would greatly appreciate it.

Thank you,

Mike Soraghan
202-709-3699

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 5/24/2018 2:54:40 PM
To: Bushman, Daniel [Bushman.Daniel@epa.gov]; Turk, David [Turk.David@epa.gov]
Subject: I found this EPA doc on toluene - thought I'd pass on for your reading file.
Attachments: toluene_EPA.pdf

Dave –

I wonder how many bulk petroleum storage terminals report toluene – the ref tends to imply they may need to report?

Again, thank ya'll.
Mort

Morton E. Wakeland, Jr., Ph.D.
EPCRA 313 Enforcement & TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, Texas
(214.665.8116)

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 10/23/2019 5:19:21 PM
To: Bradford, Deanna [Bradford.Deanna@epa.gov]
CC: Moore, Nathaniel [Moore.Nathaniel@epa.gov]
BCC: Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: RE: FOIA 9084 - Valero EPCRA case file
Attachments: Ardmore 2014 TRI Submittal 2-2-2017.pdf; New_Overview of Pertinent Info_RFI_2014.docx; TechnicalContact_Valero.CSV

Folder = NewData_June_13_2017

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Toxics Enforcement Section (ECDST)
Enforcement & Compliance Assurance Division (ECD)
U.S. EPA Region 6
Dallas, TX 75270
(214.665.8116)

From: Bradford, Deanna <Bradford.Deanna@epa.gov>
Sent: Tuesday, October 22, 2019 4:01 PM
To: Durant, Jennah <Durant.Jennah@epa.gov>; Wakeland, Morton <wakeland.morton@epa.gov>; Potts, Mark <Potts.Mark@epa.gov>
Cc: Stuckey, Troy <Stuckey.Troy@epa.gov>; Moore, Nathaniel <Moore.Nathaniel@epa.gov>; Bradford, Deanna <Bradford.Deanna@epa.gov>
Subject: RE: FOIA 9084 - Valero EPCRA case file
Importance: High

All,

Just to clarify, this is a FOIA request, FOIA requests from reporters are treated the same as a request from any other requester. XA is only involved if the FOIA request seeks XA records. Getting clarification from all requesters is the same, irrespective of the type of requester.

If anyone have questions and/or concerns, please contact me. Thanks

---

From: Durant, Jennah <Durant.Jennah@epa.gov>
Sent: Tuesday, October 22, 2019 7:47 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Potts, Mark <Potts.Mark@epa.gov>
Cc: Stuckey, Troy <Stuckey.Troy@epa.gov>; Moore, Nathaniel <Moore.Nathaniel@epa.gov>; Bradford, Deanna <Bradford.Deanna@epa.gov>
Subject: RE: FOIA 9084 - Valero EPCRA case file

Thanks, Mort!

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Tuesday, October 22, 2019 7:34 AM
To: Potts, Mark <Potts.Mark@epa.gov>
Cc: Durant, Jennah <Durant.Jennah@epa.gov>; Stuckey, Troy <Stuckey.Troy@epa.gov>; Moore, Nathaniel <Moore.Nathaniel@epa.gov>; Bradford, Deanna <Bradford.Deanna@epa.gov>
Subject: RE: FOIA 9084 - Valero EPCRA case file

You bet Mark – have worked with Jennah on a number of occasions.

I don't think we have any or may a few hard copy files.
Most of mine are electronic, but when Nathaniel took over when they lawyered up,
I ceased all communications as we do in such situations.

Jennah, just saw your note – thanks, and acknowledge.
I think I have a pretty good idea what this guy wants from files.

Best to all!
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Toxics Enforcement Section (ECDST)
Enforcement & Compliance Assurance Division (ECD)
U.S. EPA Region 6
Dallas, TX 75270
(214.665.8116)

From: Potts, Mark <Potts.Mark@epa.gov>
Sent: Monday, October 21, 2019 3:25 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: Durant, Jennah <Durant.Jennah@epa.gov>; Stuckey, Troy <Stuckey.Troy@epa.gov>
Subject: FW: FOIA 9084 - Valero EPCRA case file

Mort, I think Mr. Soraghan, the requestor, is a reporter. If you decide you need to contact him to clarify his FOIA request, coordinate with Jennah Durant in XA just in case. Thanks.

From: Bradford, Deanna <Bradford.Deanna@epa.gov>
Sent: Monday, October 21, 2019 10:02 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Potts, Mark <Potts.Mark@epa.gov>; Stuckey, Troy <Stuckey.Troy@epa.gov>; Moore, Nathaniel <Moore.Nathaniel@epa.gov>
Cc: Murdock, Russell <Murdock.Russell@epa.gov>
Subject: RE: FOIA 9084 - Valero EPCRA case file

Morton, per your request. If clarification is needed, you can contact Mr. Soraghan, since this is a single division assignment, please remember to document the conversation (ROC). Thanks

---

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Monday, October 21, 2019 8:07 AM
To: Potts, Mark <Potts.Mark@epa.gov>; Stuckey, Troy <Stuckey.Troy@epa.gov>; Moore, Nathaniel <Moore.Nathaniel@epa.gov>
Cc: Bradford, Deanna <Bradford.Deanna@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: RE: FOIA 9084 - Valero EPCRA case file

thanks Mark

if questions arise, please let me or Nathaniel know.

I believe I have supplied Deanna with the responsive record requested in the FOIA.

Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Toxics Enforcement Section (ECDST)
Enforcement & Compliance Assurance Division (ECD)
U.S. EPA Region 6
Dallas, TX 75270
(214.665.8116)

From: Potts, Mark <Potts.Mark@epa.gov>
Sent: Monday, October 21, 2019 7:57 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Stuckey, Troy <Stuckey.Troy@epa.gov>; Moore, Nathaniel <Moore.Nathaniel@epa.gov>
Cc: Bradford, Deanna <Bradford.Deanna@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: FOIA 9084 - Valero EPCRA case file

Mort, work with Nathaniel and Deanna to identify/provide responsive documents. Thanks.

Sent from my iPhone

Begin forwarded message:

> **From:** "Region 6 FOIA Coordinators" <no-reply@sharepointonline.com>
> **Date:** October 18, 2019 at 5:36:49 PM CDT
> **To:** "Potts, Mark" <Potts.Mark@epa.gov>
> **Subject: 6EN - A New FOIA has been Assigned**
> **Reply-To:** no-reply@sharepointonline.com

FOIA EPA-R6-2019-009084 has been Assigned for:
I request the case file on the 2016 TRI-EPCRA 313 enforcement action against Valero's Oklahoma refinery.

Click here to open and edit the document

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 5/3/2017 1:23:24 PM
To: Basinger, David [Basinger.David@epa.gov]
BCC: Stuckey, Troy [Stuckey.Troy@epa.gov]; Clark, Katherine [Clark.Katherine@epa.gov]
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Importance: High

INTERNAL DELIBERATIVE DO NOT RELEASE UNDER FOIA

Good Early Morning Dave out there where the ocean is on the "left hand side" – ole oceanography joke from Woods Hole
Oceanographic Institution in Massachusetts.

Hope ya had a good evening.

Hope you don't mind, I got Turk involved since he supplied the list of combined TRIFID's before, and I'm confused about all this
at the moment.

We may need to have a conf call with NEIC?

Turk supplied yet a new list with yet even another TRIFID, and more facilities reporting under that single TRIFID

reporting as separate facilities into one TRIFID as seen below.

TRIFID	Facility Name	Facility Status	Street	City	State	Regi
90749RCPRD1801E	TESORO CARSON COKE HANDLING FACILITY (PART) 1	Active	23500 S ALAMEDA ST	CARSON	California	
90749RCPRD1801E	TESORO CARSON PRODUCTS TERMINAL (PA 2	Active	2149 E SEPULVEDA BLVD	CARSON	California	
90749RCPRD1801E	TESORO CARSON CRUDE TERMINAL (PART) 3	Active	24696 S WILMINGTON AVE	CARSON	California	
90749RCPRD1801E	TESORO LOS ANGELES REFINERY-CARSON OPERATIONS (P 4	Active	2350 E 223RD ST	CARSON	California	
90749RCPRD1801E	TESORO SULFUR RECOVERY PLANT (PART) 5	Active	23208 ALAMEDA ST	CARSON	California	
90749RCPRD1801E	TESORO LOS ANGELES REFINERY (PART) 6	Active	2101 E PACIFIC COAST HWY	WILMINGTON	California	
90749RCPRD1801E	TESORO CORP WILMINGTON SALES TERMINAL 7	Active	1930 E PACIFIC COAST HWY	WILMINGTON	California	

https://www3.epa.gov/enviro/facts/tri/ef-facilities/#/Facility/90749RCPRD1801E

At least the above TRIFID agrees with what is in Envirofacts

TRI FACILITY ID	FACILITY INFORMATION	FACILITY NAME	ADDRESS	COUNTY NAME	SUBMISSIONS
90749RCPRD1801E	View Facility Information	TESORO LOS ANGELES REFINERY-CARSON OPERATIONS	2350 E 223RD ST CARSON, CA 90810	LOS ANGELES	3475

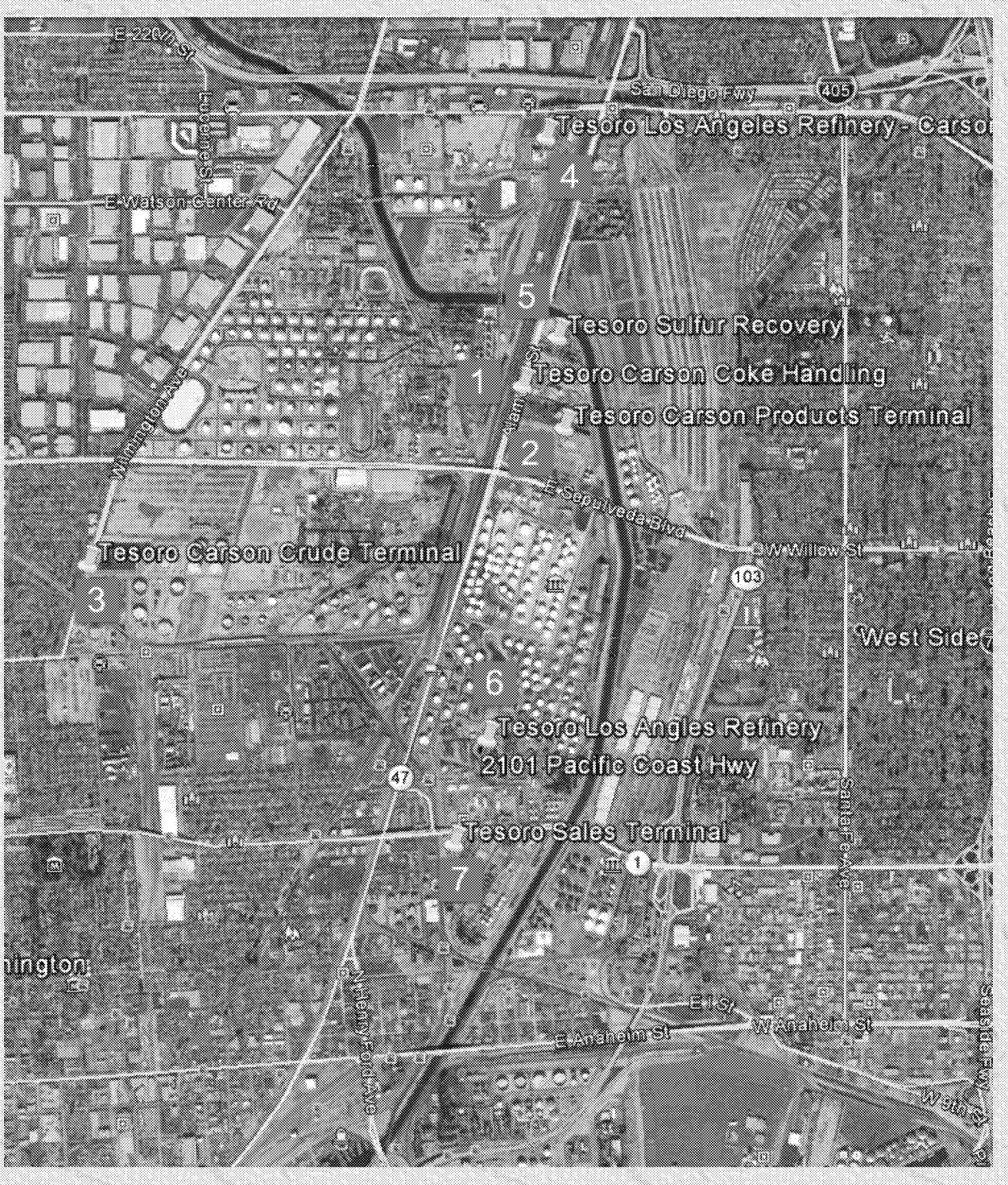
Before we can begin to discuss violations, we have to figure out how they are reporting –

one form per chemical for all establishments
or
a form for each establishment, for each chemical, i.e, reporting as "part of a facility

Not sure if I have access to CA in the TDX viewer.

Does the NEIC report cover all 7 of these locations?

Just for kicks, I plotted all 7 locations and surprisingly they DO NOT APPEAR TO BE ALL CONTIGUOUS / ADJACENT – which is
a requirement for reporting as a multiestablishment facility besides same parent.



The only way to be legit is if Tesoro owned all the land in between each of the locations and me thinks that is not the
case. Could be wrong though.

I have not thumbed through the NEIC report as yet – did they map locations? If the inspection was only for a single location vs
multiple locations, they may not have mapped anything.

If the inspection was for multiple locations, is the map above consistent with what they found?
If NEIC did not map all the locations, I personally would write Tesoro and request they provide EPA a map with the outline of
each of the 7 site's property boundaries. Do not say anything about the requirements for reporting as multiestablishment – that
could be more $$$$ to add to the pot.

Hope you find insightful and helpful??????
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
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Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 3:09 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

But ECHO shows no information under TRI for that facility

From: Basinger, David
Sent: Tuesday, May 2, 2017 1:08 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Think I found them in ECHO under "Los Angeles Refinery, 2101 E Pacific Coast Highway, Wilmington, CA 90744"

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 1:04 PM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

my head hurts...smile. asking who they report under now.

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 2:48 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Thanks; tomorrow works well for me. I'm in around 6 am, which I believe is 8 am your time. Let me know if there's a specific time you would like me to call.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 12:43 PM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Should be Carson, CA and not Wilmington

TRI FACILITY ID	FACILITY INFORMATION	FACILITY NAME	ADDRESS	COUNTY NAME	SUBMISSIONS
90749RCPRD1801E	View Facility Information	TESORO LOS ANGELES REFINERY-CARSON OPERATIONS	2350 E 223RD ST CARSON, CA 90810	LOS ANGELES	3475

this has to be it.

nope TRIFIDS mis match

Reporting Year 2013

Contiguous entities ("multi-establishment")

Tesoro Sulfur Recovery Plant
Carson, CA
TRIFID: 90744TXCRF2101E

Tesoro Carson Coke Handling Facility
Carson, CA
TRIFID: 90744TXCRF2101E

Tesoro Carson Products Terminals
Carson, CA
TRIFID: 90744TXCRF2101E

Tesoro Los Angeles Refinery
Wilmington, CA
TRIFID: 90744TXCRF2101E

der common ownership.

But if I go back to 2012,,,,Bingo

Reporting Year 2012 Separate reporting entities		Reporting Year 2013 Contiguous entities ("multi-establishment")
Tesoro Sulfur Recovery Plant Carson, CA TRIFID: 90810TXCRF23208	→	Tesoro Sulfur Recovery Plant Carson, CA TRIFID: 90744TXCRF2101E
BP West Coast Products LLC Coke Barn Carson, CA TRIFID: 90749RCPRD1801E	→	Tesoro Carson Coke Handling Facility Carson, CA TRIFID: 90744TXCRF2101E
ARCO Carson Products Terminal Carson, CA TRIFID: 90749RCPRD1801E	→	Tesoro Carson Products Terminals Carson, CA TRIFID: 90744TXCRF2101E
Tesoro Los Angeles Refinery Wilmington, CA TRIFID: 90744TXCRF2101E	→	Tesoro Los Angeles Refinery Wilmington, CA TRIFID: 90744TXCRF2101E

* ------- " denotes contiguous facilities under common ownership.

TRI FACILITY ID	FAC
90749RCPRD1801E	V

What are these guys doing changing TRIFID's every other year

Before we talk about violations, we need to straighten out what their TRIFID is or TRIFID's are.

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 2:24 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Definitely a refinery.

I've attached Appendix K from the report, note pages 10 & 11, which discusses reporting from multi-establishments, including the refinery.

David Turk actually helped to resolve this issue; I've also attached his letter on this dated March 1, 2016.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 12:00 PM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Is their address in the NEIC report?
They are a refinery for sure – correct?

I'm jotting down some notes for you.....I'll deliver to you before I leave today and if you like we can chat tomorrow if you like?

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 1:57 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Definitely in 9, not 10. Don't know why Tesoro Wilmington isn't shown.

Note that the report states that Tesoro began reporting as a multi-establishment facility in 2013 under the TIFID ID # I provided, but the inspection reviewed the Tesoro Los Angeles Refinery Thresholds (Wilmington), not the combined thresholds (see page 7).

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 11:51 AM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Hmmm, only 2 facilities in Region 9
or are you in 10
age ya know, smile

List of EPA-Regulated Facilities in TRI

TRI FACILITY ID	FACILITY INFORMATION	FACILITY NAME	ADI
90748RCCQC1175C	View Facility Information	TESORO WILMINGTON CALCINER	1175 CARRACK WILMINGTON, (
90744TXCRF1926C	View Facility Information	TESORO WILMINGTON SALES TERMINAL	1930 E PACIFIC (WILMINGTON, (

Go To Top Of The Page

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 1:49 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

It's the refinery, not the terminal.

Should still be under Tesoro Wilmington, especially for TRI, but Tesoro is in the process of combining Wilmington and Carson facilities and so call them both parts of the "Tesoro Los Angeles Refinery".

The TRIFID number was 90744TXCRF2101E, from a July 2015 report that Russ had done. Address is 2101 E Pacific Coast Highway.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 11:35 AM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection
Importance: High

Afternoon Dave.

You are correct, there is no new ERP, per se, only a new penalty matrix.

Is this your facility?

Click on "View Facility Information" to view EPA Facility information for the facility.

Facility Name:	TESORO WILMINGTON SALES TERMINAL	Mailing Name:	TESORO WILMINGTON SALES TERMINAL
Address:	1950 E PACIFIC COAST HIGHWAY WILMINGTON CA 90744	Mailing Address:	8801 S GARFIELD AVE SOUTH GATE CA 90280
County:	LOS ANGELES	Region:	9
Facility Information:	View Facility Information	TRI ID:	90744TXCRF1926C
DUNS Number:		FRS ID	110018955825
TRI Preferred Latitude:	33.791667	TRI Preferred Longitude:	118.235556
Public Contact:	RUTHANNE WALKER	Phone:	5626064105
Assigned Public Contact:	RUTHANNE WALKER		
Parent Company:	TESORO CORP	Standardized Parent Company:	TESORO CORP
BIA Tribal Code:		Tribe:	

Parent DUNS: 008133480

Starting with Reporting Year 2006, TRI Facilities began reporting NAICS codes, instead of SIC codes, to identify their Primary Business Activities.

NAICS Codes for 2015

NAICS CODE	PRIMARY	NAICS DESCRIPTION
424710	YES	Petroleum Bulk Stations and Terminals

Attached is a lil VBA program I wrote to auto chart a 5 year reporting history on a facility.
Instructions for use on first worksheet.
The history is downloaded from the Submissions Report in EZ-Query and copied into the workbook AFTER ALL DATA ARE DELETED!
Below is FROM last worksheet – it is auto generated
Yellow = reported
White = did not report that chemical for that year.
Good for asking a facility why they did not report for a certain chemical for a certain year.

	A	B	C	D	E	F	G
1	TRI_CHEMICAL	2011	2012	2013	2014	2015	
2	1 2 4-TRIMETHYLBENZENE						
3	BENZENE						
4	BENZO(G H I)PERYLENE						
5	CUMENE						
6	CYCLOHEXANE						
7	ETHYLBENZENE						
8	HYDROGEN SULFIDE						
9	LEAD COMPOUNDS						
10	MERCURY COMPOUNDS						
11	NAPHTHALENE						
12	N-HEXANE						
13	POLYCYCLIC AROMATIC COMPOUNDS						
14	TOLUENE						
15	XYLENE (MIXED ISOMERS)						
16							
17							

Let me look at your attachment and get back with you David.
Mort

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EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 1:18 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Very much appreciate your willingness to help.

Not Valero; it's Tesoro Wilmington (pre-2007 owner was Shell, current operations being combined with Tesoro Carson, previously BP).

Thanks for the ERP – so a completely new ERP was never finalized?

I'm attaching for reference the NEIC final report, along with my internal "quick summary" to my boss of the Findings and Observations table 7. I'm interested in discussing this in more detail with you, when you have some time.

TRI Inspection years were 2012-2014.

I need to determine (probably from new TRI reports) what the facility may have already corrected. Don't believe this is too difficult, but what do you think?

NEIC inspectors (Armando Bustamante and Martha Hamre) are both around and available for discussion as well.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 7:59 AM
To: Basinger, David <Basinger.David@epa.gov>
Subject: From Mort
Importance: High

Thanks for your call Dave.

Would be most happy to assist in your penalty assessment at the refinery you inspected out there in Region 9. Wasn't Valero was it? I have a case here on those guys.

Find attached the latest matrices which covers violations

Gravity-Based Penalty Matrix for Violations that Occurred After January 12, 2009 but before or on November 2, 2015

CIRCUMSTANCE LEVELS	EXTENT A Major	B Significant	C Minor
1	$37,500	$24,080	$7,090
2	$28,330	$18,420	$4,250
3	$21,250	$14,170	$2,130
4	$14,170	$8,500	$1,420
5	$7,090	$4,250	$710
6	$2,840	$1,850	$290

Gravity-Based Penalty Matrix for Violations that Occurred after November 2, 2015[1]

CIRCUMSTANCE LEVELS	EXTENT A Major	B Significant	C Minor
1	$40,779	$27,730	$8,156
2	$32,623	$21,205	$4,893
3	$24,467	$16,312	$2,447
4	$16,312	$9,787	$1,631
5	$8,156	$4,893	$816
6	$3,262	$2,121	$326

CIRCUMSTANCE LEVELS

The higher assessed matrix would be used for **2015** violations. At first this appears incorrect. However, recall, there can be no violation of EPCRA 313 until *after* the due date of the form.
Forms for calendar year 2015 were due on or before July 1, 2016, and July 1, 2016 is AFTER November 2, 2015.
Therefore, the higher penalty matrix would apply to 2015 violations onward.

I also do my darn best to settle up front so as to issue only a CAFO vs issuing a Complaint, then having to negotiate, which may drag out, then close out the Complaint with a CAFO.
The one document advantage is that no clock begins ticking in the ALJ's office in DC. Those boys can get "testy" if things drag out.

However, that is up to how you folks wanna handle.

Best, Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
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Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 8/9/2019 9:01:17 PM
To: Durant, Jennah [Durant.Jennah@epa.gov]
CC: Stuckey, Troy [Stuckey.Troy@epa.gov]; Hubbard, Joseph [Hubbard.Joseph@epa.gov]
Subject: RE: Media question--TRI benzene emissions for Harris County
Attachments: Benzene_HarrisCoTX_2017-2018.CSV

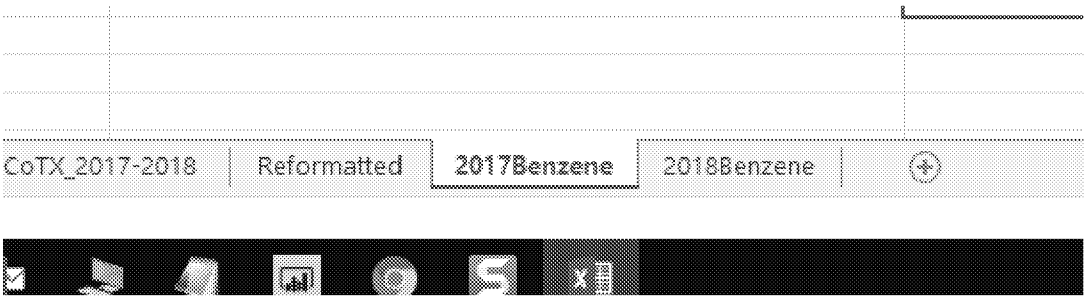
Importance: High

Hi Jennah – very quickly

Attached is a worksheet for Benzene air – both fugitive and stack (point source – like a stack)

Hopefully the tabs are self-explanatory? if not let me know.

I broke out 2017 and 2018 on last two tabs



In addition I added filters to all the columns – the drop downs – can sort any way ya want.

shows I sorted large to small

N	O	P	Q	R	S
TechPhone	FugitiveTotal	StackTotal	TotalAirHere P+Q	TotalAirEZQuery	Compare
(281) 452-8694	34,083	36,324	70,407	70,407	TRUE
(346) 259-0636	24,000	21,000	45,000	45,000	TRUE
(346) 259-0813	14,000	9,700	23,700	23,700	TRUE
(713) 321-5436	12,133	6,541	18,674	18,674	TRUE
(713) 246-7523	12,000	12,000	24,000	24,000	TRUE
(281) 474-1094	9,061	1,492	10,553	10,553	TRUE
(346) 259-0384	8,500	14,000	22,500	22,500	TRUE
(713) 321-5436	6,892	13,170	20,062	20,062	TRUE
(713) 920-4342	5,892	4,374	10,266	10,266	TRUE
(713) 920-3914	4,366	2,992	7,358	7,358	TRUE
(281) 421-6246	1,850	12,429	14,279	14,279	TRUE
(513) 326-0638	1,552	53	1,605	1,605	TRUE

At bottom I have totals – froze headers – skipped a row for totals so they would not be in sort

N	O	P	Q	R	S
TechPhone	FugitiveTotal	StackTotal	TotalAirHere P+Q	TotalAirEZQuery	Compare
(281) 424-1660	0	0	0	0	TRUE
(713) 452-4000	0	0	0	0	TRUE
(281) 930-2593	0	176	176	176	TRUE
(281) 476-2847	0	0	0	0	TRUE
(713) 924-1434	0	0	0	0	TRUE
TOTAL	142,446	200,469	342,915	342,915	

I cannot duplicate his numbers (2017)

	Him	Me
Fugitive:	134,954	142,446
Stack:	165,299	200,469

What else might you like?
Feel free to forward workbook to him if you'd like.
If he has questions, feel free to set up a conf call and just let me know when to show up.

You and your family have a nice weekend!

I stick around for a few more in case you have a question.

Best always,
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Toxics Enforcement Section (ECDST)
Enforcement & Compliance Assurance Division (ECD)
U.S. EPA Region 6
Dallas, TX 75270
(214.665.8116)

From: Durant, Jennah <Durant.Jennah@epa.gov>
Sent: Friday, August 9, 2019 2:52 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: Stuckey, Troy <Stuckey.Troy@epa.gov>; Hubbard, Joseph <Hubbard.Joseph@epa.gov>
Subject: Media question--TRI benzene emissions for Harris County

Hi Mort—

A reporter is trying to compare reported benzene emissions from the ITC incident in Houston earlier this year to overall benzene emissions in Harris County. Please see the inquiry below. Can you help with this?

Thanks,
Jennah
x2287

While looking at the ITC fire from March, I examined the air emissions event report that ITC filed with the TCEQ. ITC reported emitting 715,494.08 pounds of benzene during the event.

I decided to compare that with TRI releases of benzene, just to offer a sense of scale for this release. I searched with TRI Explorer for 2017, Harris County TX, and benzene. TRI Explorer yielded 134,954 pounds of fugitive benzene emissions and 165,299 pounds of point source benzene emissions for Harris County. From this we can see that in the four days of the ITC incident, more than twice Harris County's most recent TRI annual amount of benzene was released.

I'd like to make sure that I've gotten the correct results from TRI Explorer. Can the EPA confirm the TRI figures of 134,954 pounds of fugitive benzene and 165,299 pounds of point source benzene for Harris County, 2017?

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 8/29/2019 8:27:10 PM
To: Rivers, Heather [Heather.Rivers@valero.com]
CC: Senthil, Velu [Senthil.Velu@epa.gov]
Subject: RE: Toxics Release Inventory (TRI) 2018 Data Quality

Most appreciate....

Best Labor Day Weekend,
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Toxics Enforcement Section (ECDST)
Enforcement & Compliance Assurance Division (ECD)
U.S. EPA Region 6
Dallas, TX 75270
(214.665.8116)

From: Rivers, Heather <Heather.Rivers@valero.com>
Sent: Thursday, August 29, 2019 3:19 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: Senthil, Velu <Senthil.Velu@epa.gov>
Subject: RE: Toxics Release Inventory (TRI) 2018 Data Quality

Morton – By the way yesterday I submitted and certified the revised forms.

Heather Rivers
Environmental Engineer
(409) 948-7234
Valero Texas City Refinery
1201 Loop 197 South
Texas City, TX 77590

From: wakeland.morton@epa.gov [mailto:wakeland.morton@epa.gov]
Sent: Monday, August 26, 2019 10:54 AM
To: Rucker, Les <Les.Rucker@valero.com>; Rivers, Heather <Heather.Rivers@valero.com>; wakeland.morton@epa.gov
Cc: senthil.velu@epa.gov
Subject: Toxics Release Inventory (TRI) 2018 Data Quality

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6

1201 Elm Street Suite 500 DALLAS, TX 75270-2102

Data Quality Questions for Facility (TRIFID: 77592TXSCTLOOP1) Regarding 2018 Toxics Release Inventory (TRI) Reporting -- Due 8/22/2019

Dear HEATHER RIVERS and LESLIE G. RUCKER:

You are listed as the technical contact on the following facility's Form R reports for **reporting year 2018.**

Facility Name: VALERO REFINING-TEXAS LP

TRIFID: 77592TXSCTLOOP1

Street Address

City, State Zipcode

Heather - received your response but HQ's said they have not yet seen the revision you indicated on your response. Could you please get in before end of week.

Thanks much!!!

Sincerely,

Morton Wakeland

US EPA Region 6

TRI Data Quality Program

1201 Elm Street Suite 500 DALLAS, TX 75270-2102

(214) 665-8116

wakeland.morton@epa.gov

::QUEST::DONOTDELETE::X-QUEST-EMAIL::a521ca0e-8201-4eda-b136-ca16667cf9c2
::QUEST::DONOTDELETE::X-QUEST-TARGET::2c86bfe1-f3e8-447c-b596-86f956445521

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 12/3/2018 10:01:05 PM
To: chris rascher [rascher.chris@epa.gov]; Crossmon, James [Crossmon.James@epa.gov]; Davis, Lauren O. [Davis.LaurenO@epa.gov]; White, Erika [White.Erika@epa.gov]; Som, Kushal [som.kushal@epa.gov]; Yussen, Craig [Yussen.Craig@epa.gov]; Johnson, Karen T. [Johnson.Karent@epa.gov]; Satter, Suzanne [satter.suzanne@epa.gov]; Nowak, April [Nowak.April@epa.gov]; Baranco, Angela [Baranco.Angela@epa.gov]; Dunn, Meghan [dunn.meghan@epa.gov]
CC: Clark, Katherine [Clark.Katherine@epa.gov]; Milton, Philip [Milton.Philip@epa.gov]; Antisdel, Timothy [Antisdel.Timothy@epa.gov]; Senthil, Velu [Senthil.Velu@epa.gov]; Witkin, Steve [Witkin.Steve@epa.gov]; Swenson, Sarah [Swenson.Sarah@epa.gov]; Briere, Caitlin [briere.caitlin@epa.gov]
BCC: Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: Redo of "Chronic Later Reporters" worksheets
Attachments: Dec_Final_Region9_2013_to_2017.xlsx; Dec_Final_Region8_2013_to_2017.xlsx; Dec_Final_Region4_2013_to_2017.xlsx; Dec_Final_Region3_2013_2017.xlsx; Dec_Final_Region2_2013_2017.xlsx; Dec_FInal_Region7_2013_to_2017.xlsx; Dec_Final_Region1_2013_to_2017.xlsx; Dec_Final_Region5_2013_to_2017.xlsx; Dec_Final_Region10_2013_to_2017.xlsx; Dec_Final_Region6_2013_to_2018.xlsx

Importance: High

Note sure if this will fly (send) but here goes.

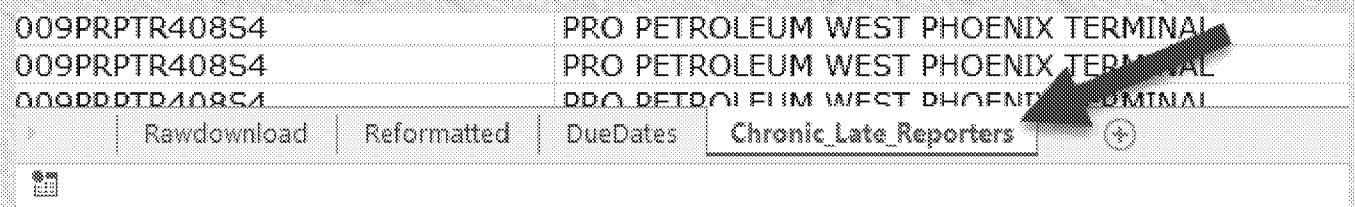
Have included Region 6 for HQ's folks.

Redid the formatting for HQs, and thought I'd pass on to my colleagues.

If I've miss someone in enforcement, please forward to them.
Please compare to the one I sent in Sept. Spot check. If different let me know and on what row the discrepancy is in.
I may have to recode? Took the Call Center and me all morning to work out this for I did not have enough RAM to run some of the Regions,
so we had to recode a major portion of the code workbook.

You do not have to worry about the code, only the results.

Again look at the last worksheet in your workbook – no guess work, only interpretation.



This worksheet will give you who reported late in green, with a date, and who did not report at all, with a red background, no date.
Also to help your eyeballs follow the correct facility I have added a line between facilities.
No color, reported the chemical for that RY (yellow header on time.
Pretty simple.

	A	B	C	D	E	F	G	H
1	TRIFID	Facility_Name	TRI_Chemical	2013	2014	2015	2016	2017
116	85034MRLMN834EH	MARLAM INDUSTRIES INC	STYRENE	5/22/2014	5/28/2015	6/3/2016	6/14/2017	6/11/2018
117	85034RGSWS157RI	AIRGAS WEST PHOENIX	PROPYLENE	6/2/2014	5/29/2015	2/5/2016		
118	85034WHTLC361EU	MERCURY SYSTEMS (FORMERLY WHITE ELECTRONIC	LEAD	3/21/2014	5/11/2015	5/9/2016	8/17/2017	
119	85036MRNCN2325S	AMERON CONCRETE & STEEL PIPE GROUP	MANGANESE	4/15/2014	5/21/2015			
120	8503WCLNPR3844E	CLEANPART SOUTHWEST	NITRIC ACID	6/24/2014	5/21/2015	6/20/2016	6/20/2017	6/14/2018
121	8503WQSTCN281SU	QUEST CONSTRUCTION PRODUCTS LLC - PHOENIX	DIBUTYL PHTHALATE	6/2/2014	5/18/2015	3/17/2016	6/14/2017	6/14/2018
122	8503WQSTCN281SU	QUEST CONSTRUCTION PRODUCTS LLC - PHOENIX	ETHYLENE GLYCOL	6/2/2014	5/18/2015	3/17/2016	6/14/2017	6/14/2018
123	8503WQSTCN281SU	QUEST CONSTRUCTION PRODUCTS LLC - PHOENIX	ZINC COMPOUNDS	6/2/2014	5/18/2015	3/17/2016	6/14/2017	6/14/2018
124	85040BFGDR3414S	GOODRICH INTERIORS (FORMERLY GOODRICH AIP)	TOLUENE	6/20/2014	6/30/2015	6/30/2016	6/28/2017	6/25/2018
125	85040BLMTL292EC	ABLE ENGINEERING & COMPONENT SERVICES INC	LEAD COMPOUNDS	6/4/2014	6/1/2015			
126	85040CNTNN3510E	EBERLE DESIGN INC	LEAD	6/23/2014	6/18/2015	6/30/2016	6/28/2017	
127	85040MTCMT3508E	METCO METAL FINISHING LLC	ZINC COMPOUNDS	6/26/2014	6/23/2015	6/29/2016	6/29/2017	7/6/2018
128	85040SWMPL3225S	SWIM PLATFORMS INC	STYRENE	5/22/2014	5/27/2015	6/3/2016	6/13/2017	6/11/2018
129	85041VLCNM483S4	VULCAN MATERIALS CO WEST 43RD	BENZO(G H I)PERYLENE	6/27/2014	6/30/2015	6/28/2016	6/29/2017	6/28/2018
130	85041VLCNM483S4	VULCAN MATERIALS CO WEST 43RD	ETHYLENE GLYCOL	6/27/2014	6/30/2015	6/28/2016	6/29/2017	6/28/2018
131	85041VLCNM483S4	VULCAN MATERIALS CO WEST 43RD	POLYCYCLIC AROMATIC COMPOUNDS	6/27/2014	6/30/2015	6/28/2016	6/29/2017	6/28/2018
132	85041VLCNM483S4	VULCAN MATERIALS CO WEST 43RD	PROPYLENE	6/27/2014	6/30/2015	6/28/2016	6/29/2017	6/28/2018
133	85043CLJTF125N5	CALJET OF AMERICA INC	1 2 4-TRIMETHYLBENZENE	6/16/2014	6/18/2015	6/30/2016	6/29/2017	6/19/2018

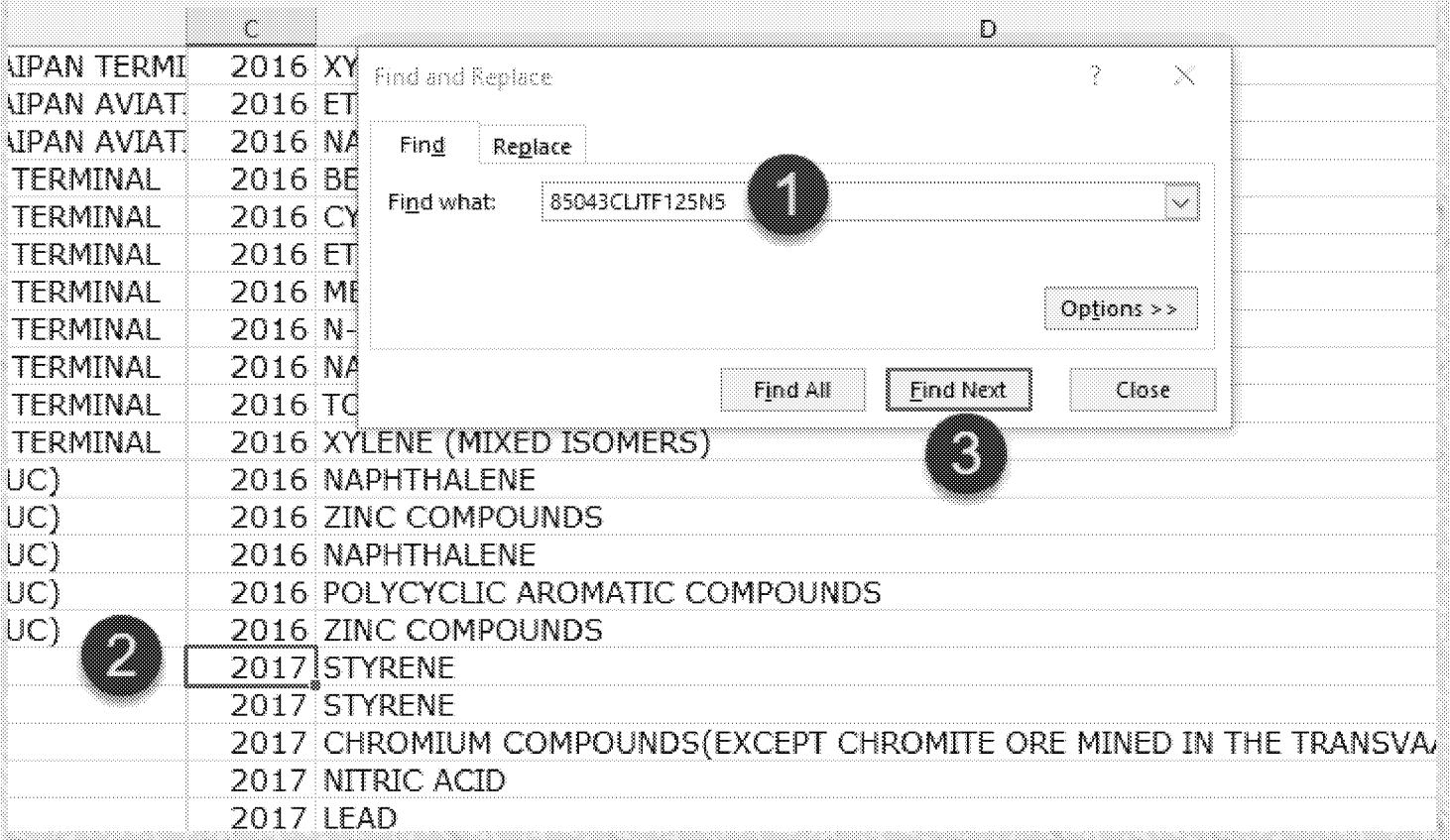
Now if you see a facility of interest that you want to contact....copy the TRIFID Ctrl + c on the Chronic Late Reporter worksheet.

Go to the 2nd **worksheet** that has been reformatted from the original download from EZ-Query – thus easier to read.

Use the FIND command on the Home tab far right – paste in the TRIFID – #1 below

#2 important, scroll down to the beginning of the 2017 RY, for you want the latest email and phone. Click 2017

#3 click find next



Else you're gonna land on every instance that facility reported a chemical form from 2013 – 2017.
See my point? Try it if you don't believe me.

After clicking next, if that site reported for a chemical in 2017, you'll be presented with the TRI Technical contact name, email, and phone number from a 2017 Form R!

8	GREGG MONGER	MONGERG@VMCMAIL.COM	(602) 397-3961
8	GREGG MONGER	MONGERG@VMCMAIL.COM	(602) 397-3961
8	JIM BROWN	JIM@CALJET.COM	(602) 722-0654
8	JIM BROWN	JIM@CALJET.COM	(602) 722-0654

Hope you find useful?

Questions or comments, please let me know, will be happy to assist.

Best Holiday Wishes to my Colleagues.
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program

Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 10/23/2019 5:17:47 PM
To: Bradford, Deanna [Bradford.Deanna@epa.gov]
CC: Moore, Nathaniel [Moore.Nathaniel@epa.gov]
BCC: Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: RE: FOIA 9084 - Valero EPCRA case file
Attachments: ATT00001.htm; ATT00002.htm; ATT00003.htm; ATT00004.htm; ATT00005.htm; ATT00006.htm; EFDP_Sent.docx; Forms_Certified.docx; Forms_Submitted_For_Certification.docx; Nominated_Certifier-Reminder.docx; RY14-16-Day-Uncertified-Reminder.docx; RY14-30-Day-Reminder.docx

Files in my Juan Parra folder – Juan is in charge of the software for TRI reporting in DC.

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Toxics Enforcement Section (ECDST)
Enforcement & Compliance Assurance Division (ECD)
U.S. EPA Region 6
Dallas, TX 75270
(214.665.8116)

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 7/20/2017 1:19:07 PM
To: Clark, Katherine [Clark.Katherine@epa.gov]; Milton, Philip [Milton.Philip@epa.gov]
BCC: Stuckey, Troy [Stuckey.Troy@epa.gov]; Potts, Mark [Potts.Mark@epa.gov]
Subject: RE: Revised RMP-TRI Never Reporters List
Attachments: RY15 RMP-TRI Nonreporters-List-Revised-Feb2017.xlsx; New_Region6_RY15 RMP-TRI Nonreporters-List-Revised-Feb2017.xlsx

Importance: High

Oh boy...brain cells are where.....

First, is the attached workbook, starting with RY15 RMP-TRINonreporters..., the one you are referring to from Velu?

If this is tha one.....

3 off-site record reviews from RMP vs TRI resulted in enforcement cases:

Eco Services – 2 locations
Lucite International
OCI Beaumont

The color code for the attached Region 6 only worksheet is at bottom of sheet

If there is no color at all it means the facility did not respond to our inquiry, which I may look at later.
Right now, I am max'd out on off-site reviews at 8 and the Region has 16 EPCRA cases under our belt.

If questions, let me know.
Best Kathy & Phil

Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Clark, Katherine
Sent: Thursday, July 20, 2017 7:53 AM
To: Alkon, Margaret <Alkon.Margaret@epa.gov>; Baillie, Carol <baillie.carol@epa.gov>; Baranco, Angela <Baranco.Angela@epa.gov>; Basinger, David <Basinger.David@epa.gov>; Bazley, Greg <Bazley.Greg@epa.gov>; Blunk, Terri <Blunk.Terri@epa.gov>; Bookman, Robert <Bookman.Robert@epa.gov>; bpathare <Pathare.Bhushan@epa.gov>; Brown, Evon <Brown.Evon@epa.gov>; Bussey, Carol <Bussey.Carol@epa.gov>; Bustamante, Armando <Bustamante.Armando@epa.gov>; Calvo, Estrella <calvo.estrella@epa.gov>; Caplan, Robert W. <Caplan.Robert@epa.gov>; Chan, Janice <chan.jancie@epa.gov>; Chew, Andrew <Chew.Andrew@epa.gov>; Cobb, David <cobb.david@epa.gov>; Dagseth, Renee <Dagseth.Renee@epa.gov>; 'davis, lauren' <davis.lauren@epa.gov>; Davis, Tony <Davis.tony@epa.gov>; Devito, Steve <Devito.Steve@epa.gov>; Dunn, Meghan <dunn.meghan@epa.gov>; Nering, Emily <Nering.Emily@epa.gov>; Falconer, Caron <Falconer.Caron@epa.gov>; Fisher, Bethany <fisher.bethany@epa.gov>; Ford, Jim <Ford.Jim@epa.gov>; 'frishman, bob ' <frishman.bob@epa.gov>; Fudge, Shelley <Fudge.Shelley@epa.gov>; Gallagher, Shirin <Gallagher.Shirin@epa.gov>; Gallagher, Shirin <Gallagher.Shirin@epa.gov>; Gilrein, Stephen <gilrein.stephen@epa.gov>; Goerke, Ariadne <Goerke.Ariadne@epa.gov>; Gorman, John <Gorman.John@epa.gov>; Grams, Bradley <grams.bradley@epa.gov>; Grant, Deanne <Grant.Deanne@epa.gov>; Greenwald, Steven <Greenwald.Steven@epa.gov>; Gsell, Alyssa <Gsell.Alyssa@epa.gov>; Hamre, Martha <Hamre.Martha@epa.gov>; Harper, Jodi <Harper.Jodi@epa.gov>; Hess, George <Hess.George@epa.gov>; Hoard, Christine <Hoard.Christine@epa.gov>; Hsia, Peter <Hsia.Peter@epa.gov>; Kaczmarek, Chris <Kaczmarek.Chris@epa.gov>; Johnson, Karen T. <Johnson.Karent@epa.gov>; Kim, David <Kim.David@epa.gov>; Klevs, Mardi <klevs.mardi@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Lancaster, Stan <Lancaster.Stan@epa.gov>; Mears, Gilbert <Mears.Gilbert@epa.gov>; Medici, Andrea <medici.andrea@epa.gov>; Meinhardt, Danielle <meinhardt.danielle@epa.gov>; Meyer, Jeff <Meyer.Jeff@epa.gov>; Miles, James <miles.james@epa.gov>; Milton, Philip <Milton.Philip@epa.gov>; Myhre, John <myhre.john@epa.gov>; Nazar, Kristen <Nazar.Kristen@epa.gov>; Ndiaye, Fatimatou <Ndiaye.Fatimatou@epa.gov>; Nowak, April <Nowak.April@epa.gov>; O'Donnell, Mary Jane <Odonnell.Maryjane@epa.gov>; O'Meara, Nidhi <Omeara.Nidhi@epa.gov>; Parra, Juan <Parra.Juan@epa.gov>; Pearson, Evan <Pearson.Evan@epa.gov>; Poole, Vinson <Poole.Vinson@epa.gov>; Potts, Mark <Potts.Mark@epa.gov>; Pratt, Stacie <Pratt.Stacie@epa.gov>; Rascher, Chris <rascher.chris@epa.gov>; Riley, David <riley.david@epa.gov>; Robinson, Janis <Robinson.Janis@epa.gov>; Salazar, Matt <Salazar.Matt@epa.gov>; Salisbury, Demetra <Salisbury.Demetra@epa.gov>; Sawyer, William <Sawyer.William@epa.gov>; Schulz, Susan <Schulz.Susan@epa.gov>; Senthil, Velu <Senthil.Velu@epa.gov>; Siegal, Tod <Siegal.Tod@epa.gov>; Smith, Catherine <smith.catherine@epa.gov>; Snowbarger, Robert <Snowbarger.Robert@epa.gov>; Spielmann, Lee <Spielmann.Lee@epa.gov>; Stedeford, Todd <Stedeford.Todd@epa.gov>; Stoy, Alyse <Stoy.Alyse@epa.gov>; Stuckey, Troy <Stuckey.Troy@epa.gov>; Sullivan, Greg <Sullivan.Greg@epa.gov>; Tekrony, Linda <Tekrony.Linda@epa.gov>; Turk, David <Turk.David@epa.gov>; Velez, Ezequiel <Velez.Ezequiel@epa.gov>; Vizard, Elizabeth <Vizard.Elizabeth@epa.gov>; Wakefield, Benjamin J. <wakefield.benjamin@epa.gov>; Wakeland, Morton <wakeland.morton@epa.gov>; White, Erika <White.Erika@epa.gov>; Yaras, Michelle <Yaras.Michelle@epa.gov>; Yussen, Craig <Yussen.Craig@epa.gov>; Davis, Lauren O. <Davis.LaurenO@epa.gov>; seagar.cheryl@epa.gov
Cc: Milton, Philip <Milton.Philip@epa.gov>; Miles, James <miles.james@epa.gov>
Subject: RE: Revised RMP-TRI Never Reporters List

ENFORCEMENT CONFIDENTIAL FOIA EXEMPT

Good morning. Would each region please send Phil Milton and me an update on your RMP-TRI target list? Please let us know which targets you intend to inspect or do an off-site record review and the intended dates, and if you have already conducted an inspection or off-site record review, what were the results? Please indicate whether the inspection or off-site record review is intended for FY17 or FY18.

I hope everyone is having a good summer.

Thanks,

Kathy & Phil

Katherine M. Clark
Attorney for EPA
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW, #2249A
Washington, DC 20460
202 564-4164

From: Clark, Katherine
Sent: Thursday, April 06, 2017 1:37 PM
To: alkon, maragret <alkon.margaret@epa.gov>; Baillie, Carol <Baillie.Carol@epa.gov>; Baranco, Angela <baranco.angela@epa.gov>; Basinger, David <basinger.david@epa.gov>; Bazley, Greg <Bazley.Greg@epa.gov>; Blunk, Terri <Blunk.Terri@epa.gov>; Bookman, Robert <Bookman.Robert@epa.gov>; bpathare <Pathare.Bhushan@epa.gov>; Brown, Evon <Brown.Evon@epa.gov>; Bussey, Carol <Bussey.Carol@epa.gov>; Bustamante, Armando <Bustamante.Armando@epa.gov>; Calvo, Estrella <calvo.estrella@epa.gov>; Caplan, Robert W. <Caplan.Robert@epa.gov>; Chan, Janice <chan.jancie@epa.gov>; Chew, Andrew <chew.andrew@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>; Cobb, David <cobb.david@epa.gov>; Dagseth, Renee <Dagseth.Renee@epa.gov>; davis, lauren <davis.lauren@epa.gov>; Davis, Tony <Davis.tony@epa.gov>; Devito, Steve <devito.steve@epa.gov>; Dunn, Meghan <dunn.meghan@epa.gov>; Emily Nering <Nering.Emily@epa.gov>; Falconer, Caron <Falconer.Caron@epa.gov>; Fisher.Bethany <fisher.bethany@epa.gov>; Ford, Jim <Ford.Jim@epa.gov>; frishman, bob <frishman.bob@epa.gov>; Fudge, Shelley <Fudge.Shelley@epa.gov>; Gallagher, Shirin <Gallagher.Shirin@epa.gov>; gallagher.shirin@epa.gov; Gilrein, Stephen <gilrein.stephen@epa.gov>; Goerke, Ariadne <goerke.ariadne@epa.gov>; Gorman, John <Gorman.John@epa.gov>; Grams, Bradley <grams.bradley@epa.gov>; Grant, Deanne <Grant.Deanne@epa.gov>; Greenwald, Steven <Greenwald.Steven@epa.gov>; Gsell, Alyssa <gsell.alyssa@epa.gov>; Hamre, Martha <Hamre.Martha@epa.gov>; Harper, Jodi <Harper.Jodi@epa.gov>; Hess, George <Hess.George@epa.gov>; Hoard, Christine <Hoard.Christine@epa.gov>; Hsia, Peter <Hsia.Peter@epa.gov>; Kaczmarek, Chris <Kaczmarek.Chris@epa.gov>; Karen T Johnson <johnson.karent@epa.gov>; Kim, David <Kim.David@epa.gov>; Klevs, Mardi <klevs.mardi@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Lancaster, Stan <Lancaster.Stan@epa.gov>; Mears, Gilbert <Mears.Gilbert@epa.gov>; Medici, Andrea <medici.andrea@epa.gov>; Meinhardt,Danielle <meinhardt.danielle@epa.gov>; meyer, jeff <meyer.jeff@epa.gov>; Miles, James <miles.james@epa.gov>; Milton, Philip <Milton.Philip@epa.gov>; Myhre, John <Myhre.John@epa.gov>; Nazar, Kristen <Nazar.Kristen@epa.gov>; Ndiaye, Fatimatou <Ndiaye.Fatimatou@epa.gov>; Nowak, April <nowak.april@epa.gov>; O'Donnell, Mary Jane <Odonnell.Maryjane@epa.gov>; O'Meara, Nidhi <omeara.nidhi@epa.gov>; Parra, Juan <Parra.Juan@epa.gov>; Pearson, Evan <Pearson.Evan@epa.gov>; Poole, Vinson <Poole.Vinson@epa.gov>; Potts, Mark <potts.mark@epa.gov>; Pratt, Stacie <pratt.stacie@epa.gov>; Rascher, Chris <rascher.chris@epa.gov>; Riley, David <riley.david@epa.gov>; Robinson, Janis <robinson.janis@epa.gov>; salazar,matt <salazar.matt@epa.gov>; Salisbury, Demetra <Salisbury.Demetra@epa.gov>; Sawyer, William <Sawyer.William@epa.gov>; Schulz, Susan <Schulz.Susan@epa.gov>; Seager, Chery <seager.chery@epa.gov>; Senthil, Velu <Senthil.Velu@epa.gov>; Siegal, Tod <Siegal.Tod@epa.gov>; smith, catherine <smith.catherine@epa.gov>; Snowbarger, Robert <Snowbarger.Robert@epa.gov>; Spielmann, Lee <Spielmann.Lee@epa.gov>; Stedeford, Todd <Stedeford.Todd@epa.gov>; Stoy, Alyse <Stoy.Alyse@epa.gov>; Stuckey, Troy <stuckey.troy@epa.gov>; Sullivan, Greg <Sullivan.Greg@epa.gov>; Tekrony, Linda <Tekrony.Linda@epa.gov>; Turk, David <Turk.David@epa.gov>; Velez, Ezequiel <Velez.Ezequiel@epa.gov>; Vizard, Elizabeth <vizard.elizabeth@epa.gov>; Wakefield, Benjamin J. <wakefield.benjamin@epa.gov>; Wakeland, Morton <wakeland.morton@epa.gov>; White, Erika <White.Erika@epa.gov>; yaras, michelle <yaras.michelle@epa.gov>; Yussen, Craig <Yussen.Craig@epa.gov>
Cc: Milton, Philip <Milton.Philip@epa.gov>
Subject: FW: Revised RMP-TRI Never Reporters List

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Please find attached the revised RY11-15 RMP-TRI Never-Reporters List.

Velu, as always, thanks for your work.

Kathy

Katherine M. Clark
Attorney for EPA
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW, #2249A
Washington, DC 20460
202 564-4164

From: Senthil, Velu
Sent: Thursday, April 06, 2017 11:10 AM
To: Clark, Katherine <Clark.Katherine@epa.gov>; Milton, Philip <Milton.Philip@epa.gov>
Cc: Senthil, Velu <Senthil.Velu@epa.gov>; Devito, Steve <Devito.Steve@epa.gov>
Subject: Revised RMP-TRI Never Reporters List

Hi Kathy,
Here is a revised list as per discussion at last enforcement call.
Could you please forward this to regions?
Thanks
Velu Senthil

Message

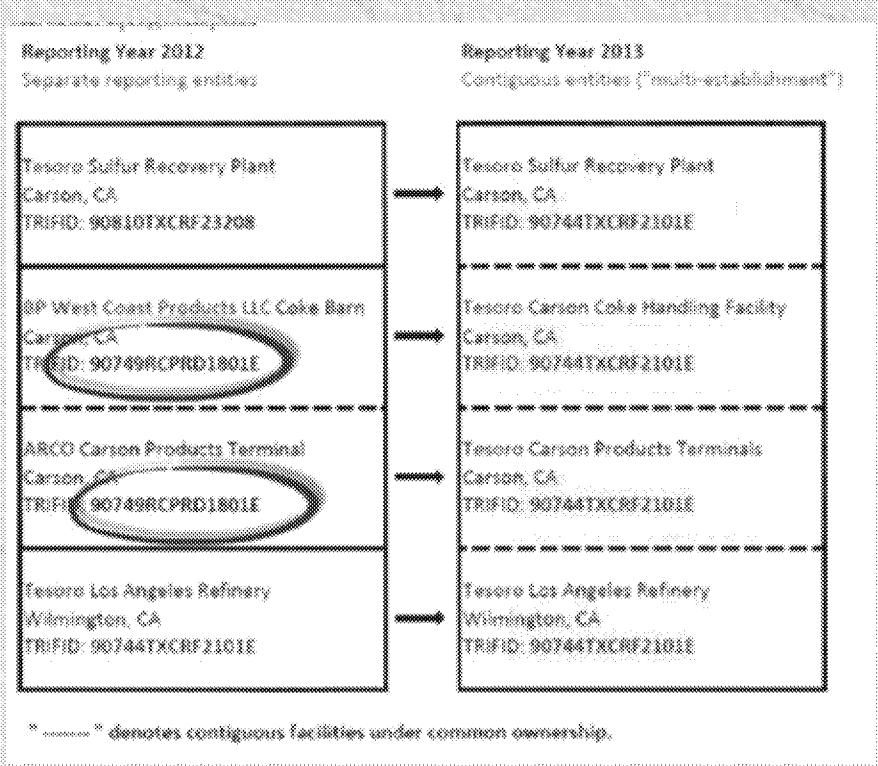
From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 5/3/2017 1:04:48 PM
To: Turk, David [Turk.David@epa.gov]; Griffin, Stephanie [griffin.stephanie@epa.gov]; Clark, Katherine [Clark.Katherine@epa.gov]; Milton, Philip [Milton.Philip@epa.gov]
CC: Antisdel, Timothy [Antisdel.Timothy@epa.gov]; Muldrow, Bill [Muldrow.Bill@epa.gov]
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Fully understand merging sites into one TRIFID
The question now becomes does the site report as an entire facility or by each establishment?
If I'm not mistaken we can only view our Region's report in the TDX viewer – how can this be changed
since I help out all regions. I need to see if this site is reporting as whole facility or as individual parts (establishments).

The TRIFID you show below agrees with the TRIFID in Envirofacts, thank goodness!!!

TRI FACILITY ID	FACILITY INFORMATION	FACILITY NAME	ADDRESS	COUNTY NAME	SUBMISSIONS
90749RCPRD1801E	View Facility Information	TESORO LOS ANGELES REFINERY-CARSON OPERATIONS	2350 E 223RD ST CARSON, CA 90810	LOS ANGELES	3475

However, it disagrees with an email from CDX back when – in 2013 the TRIFID was **90744TXCRF2101E**



Above there are only 4 facilities, whereas you now have 7. Guess Tesoro had some acquisitions in the interim?

Importantly David / Steph – when "we" merged all those 7 sites into a single TRIFID = **90749RCPRD1801E**
Is this historical?

I see in the list you provided they did add the sales terminal in Wilmington, CA, which was not part of the 4 above.

TRI FACILITY ID	FACILITY INFORMATION	FACILITY NAME	ADDRESS	COUNTY NAME	SUBMISSIONS
90748RCCQC1175C	View Facility Information	TESORO WILMINGTON CALCINER	1175 CARRACK AVE WILMINGTON, CA 90748	LOS ANGELES	78
90744TXCRF1926C	View Facility Information	TESORO WILMINGTON SALES TERMINAL	1930 E PACIFIC COAST HIGHWAY WILMINGTON, CA 90744	LOS ANGELES	314

I just plotted the Calciner compared to the Sales Terminal and it's obvious the Calciner could not be added for it is definitely
not contiguous.

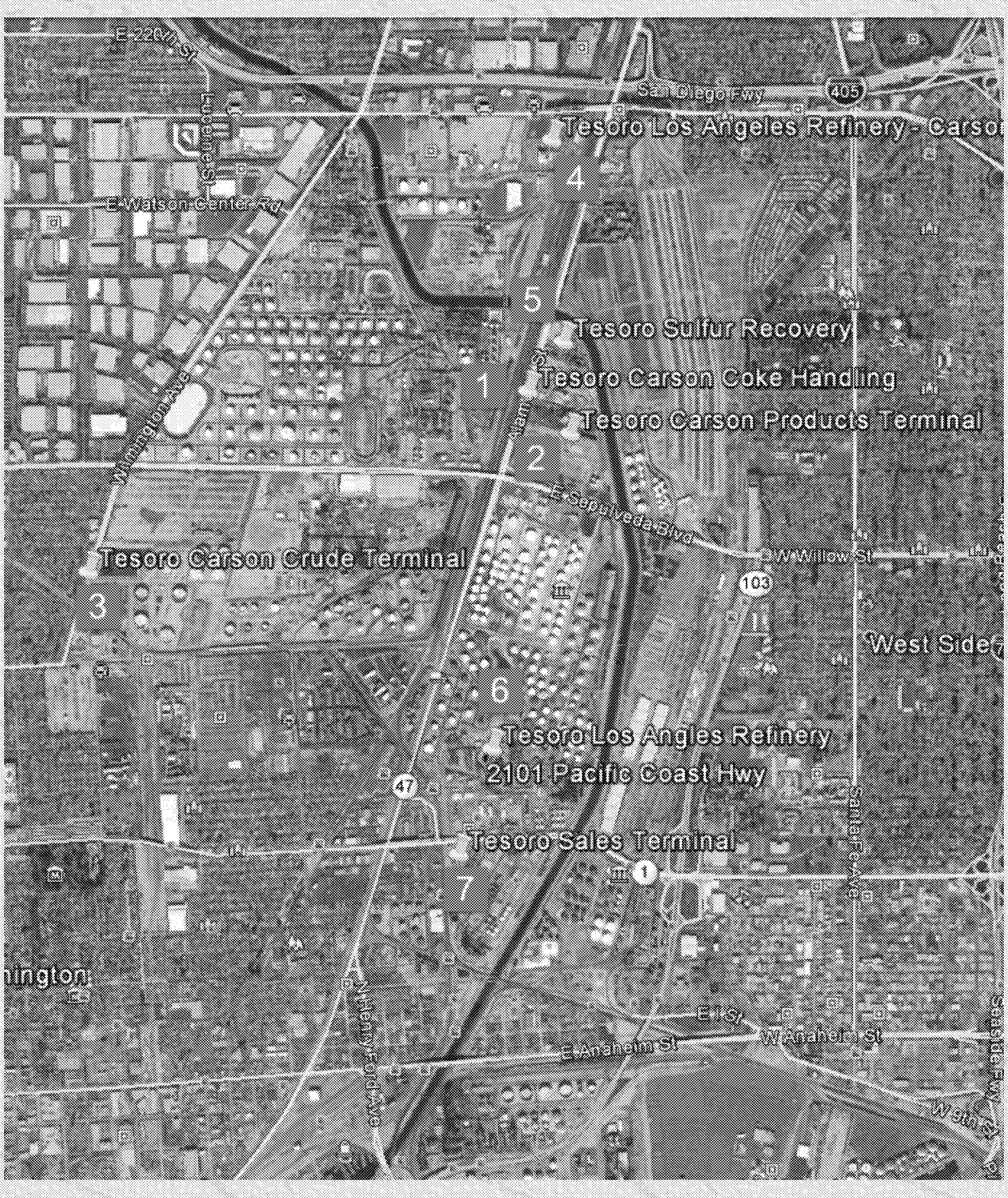
PLEASE REVIEW – IF YOU BELIEVE GOOGLE MAPS – I PLOTTED ALL 7 LOCATIONS BASED ON ADDRESS.
AREN'T THE LOCATIONS SUPPOSED TO BE CONTIGUOUS OR ADJACENT TO REPORT AS MULTIESTABLISHMENT,
OR DOES TESEORO OWN ALL THE LAND AND BUILDINGS BETWEEN ALL 7 LOCATIONS?????

reporting as separate facilities into one TRIFID as seen below.

TRIFID	Facility Name	Facility Status	Street	City	State	Regi
90749RCPRD1801E	TESORO CARSON COKE HANDLING FACILITY (PART) 1	Active	23500 S ALAMEDA ST	CARSON	California	
90749RCPRD1801E	TESORO CARSON PRODUCTS TERMINAL (PA 2	Active	2149 E SEPULVEDA BLVD	CARSON	California	
90749RCPRD1801E	TESORO CARSON CRUDE TERMINAL (PART) 3	Active	24696 S WILMINGTON AVE	CARSON	California	
90749RCPRD1801E	TESORO LOS ANGELES REFINERY-CARSON OPERATIONS (P 4	Active	2350 E 223RD ST	CARSON	California	
90749RCPRD1801E	TESORO SULFUR RECOVERY PLANT (PART) 5	Active	23208 ALAMEDA ST	CARSON	California	
90749RCPRD1801E	TESORO LOS ANGELES REFINERY (PART) 6	Active	2101 E PACIFIC COAST HWY	WILMINGTON	California	
90749RCPRD1801E	TESORO CORP WILMINGTON SALES TERMINAL 7	Active	1930 E PACIFIC COAST HWY	WILMINGTON	California	

https://www3.epa.gov/enviro/facts/tri/ef-facilities/#/Facility/90749RCPRD1801E

HERE'S THE MAP...



Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division

Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Turk, David
Sent: Tuesday, May 02, 2017 3:16 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Griffin, Stephanie <griffin.stephanie@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>; Milton, Philip <Milton.Philip@epa.gov>
Cc: Antisdel, Timothy <Antisdel.Timothy@epa.gov>; Muldrow, Bill <Muldrow.Bill@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Mort,

The ownership of various establishments changed so we ended up moving all of the reports under these establishments into on TRIFID. Specifically, we merged several sites that had been reporting as separate facilities into one TRIFID as seen below.

TRIFID	Facility Name	Facility Status	Street	City	State	Region	County	ZIP Code
90749RCPRD1801E	TESORO CARSON COKE HANDLING FACILITY (PART)	Active	23500 S ALAMEDA ST	CARSON	California	9	LOS ANGELES	90810
90749RCPRD1801E	TESORO CARSON PRODUCTS TERMINAL (PART)	Active	2149 E SEPULVEDA BLVD	CARSON	California	9	LOS ANGELES	90810
90749RCPRD1801E	TESORO CARSON CRUDE TERMINAL (PART)	Active	24696 S WILMINGTON AVE	CARSON	California	9	LOS ANGELES	90745
90749RCPRD1801E	TESORO LOS ANGELES REFINERY-CARSON OPERATIONS (PART)	Active	2350 E 223RD ST	CARSON	California	9	LOS ANGELES	90810
90749RCPRD1801E	TESORO SULFUR RECOVERY PLANT (PART)	Active	23208 ALAMEDA ST	CARSON	California	9	LOS ANGELES	90810
90749RCPRD1801E	TESORO LOS ANGELES REFINERY (PART)	Active	2101 E PACIFIC COAST HWY	WILMINGTON	California	9	LOS ANGELES	90744

90749RCPRD1801E	TESORO CORP WILMINGTON SALES TERMINAL	Active	1930 E PACIFIC COAST HWY	WILMINGTON	California	9	LOS ANGELES	90744

https://www3.epa.gov/enviro/facts/tri/ef-facilities/#/Facility/90749RCPRD1801E

Does this remedy the confusion on this matter?

-Dave

From: Wakeland, Morton
Sent: Tuesday, May 02, 2017 4:03 PM
To: Griffin, Stephanie <griffin.stephanie@epa.gov>; Turk, David <Turk.David@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>; Milton, Philip <Milton.Philip@epa.gov>
Cc: Antisdel, Timothy <Antisdel.Timothy@epa.gov>; Muldrow, Bill <Muldrow.Bill@epa.gov>
Subject: FW: Enforcement Confidential re Tesoro Wilmington 2015 inspection
Importance: High

Am helping our Dave Bassinger in Region 9

Dave Turk help him back when, resolved a multiestablishment issue with a Tesoro in California.
Facility "just" inspected by NEIC

Dave Turk discovered – see below the supposed new TRIFID they were to report under.

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Email/luciana.c.lopez@tsocorp.com

Reporting Year 2012 Separate reporting entities		Reporting Year 2013 Contiguous entities ("multi-establishment")
Tesoro Sulfur Recovery Plant Carson, CA TRIFID: **90810TXCRF23208**	→	Tesoro Sulfur Recovery Plant Carson, CA TRIFID: **90744TXCRF2101E**
BP West Coast Products LLC Coke Barn Carson, CA TRIFID: **90749RCPRD1801E**	→	Tesoro Carson Coke Handling Facility Carson, CA TRIFID: **90744TXCRF2101E**
ARCO Carson Products Terminal Carson, CA TRIFID: **90749RCPRD1801E**	→	Tesoro Carson Products Terminals Carson, CA TRIFID: **90744TXCRF2101E**
Tesoro Los Angeles Refinery Wilmington, CA TRIFID: **90744TXCRF2101E**	→	Tesoro Los Angeles Refinery Wilmington, CA TRIFID: **90744TXCRF2101E**

" ------- " denotes contiguous facilities under common ownership.

TRIFID 90749RCPRD1801E remains as a separate facility, with other reporting 'parts'.

I have been looking in Wilmington, CA and the refinery is not there – so I see Carson and go Taaa Daaaaa

but guess what when I look in Carson, CA the only TRIFID I get is

TRI FACILITY ID	FACILITY INFORMATION	FACILITY NAME	ADDRESS	COUNTY NAME	SUBMISSIONS
90749RCPRD1801E	View Facility Information	TESORO LOS ANGELES REFINERY-CARSON OPERATIONS	2350 E 223RD ST CARSON, CA 90810	LOS ANGELES	3475

This TRIFID does not match any of the supposed TRIFIDS the facility combined into – yellow below, but does match older
TRIFID's

Reporting Year 2012 Separate reporting entities		Reporting Year 2013 Contiguous entities ("multi-establishment")
Tesoro Sulfur Recovery Plant Carson, CA TRIFID: 90810TXCRF23208	→	Tesoro Sulfur Recovery Plant Carson, CA TRIFID: 90744TXCRF2101E
BP West Coast Products LLC Coke Barn Carson, CA TRIFID: 90749RCPRD1801E	→	Tesoro Carson Coke Handling Facility Carson, CA TRIFID: 90744TXCRF2101E
ARCO Carson Products Terminal Carson, CA TRIFID: 90749RCPRD1801E	→	Tesoro Carson Products Terminals Carson, CA TRIFID: 90744TXCRF2101E
Tesoro Los Angeles Refinery Wilmington, CA TRIFID: 90744TXCRF2101E	→	Tesoro Los Angeles Refinery Wilmington, CA TRIFID: 90744TXCRF2101E

" ------- " **denotes contiguous facilities under common ownership.**

What is blazes is this facility doing???

Hey, if I look up a yellow TRIFID above – guess what ZIPPO

Only TRI facility information was searched to select facilities

TRI Facility ID: Beginning With: 90744TXCRF2101E

Results are based on data extracted on MAR-01-2017
select distinct a.pgm_sys_id, a.primary_name, a.location_address, a.city_
order by state_code, primary_name, a.pgm_sys_id asc

Total Number of Facilities Displayed: 0

My head hurts

Morton E. Wakeland, Jr., Ph.D. ("Mort")
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Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
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From: Basinger, David
Sent: Tuesday, May 02, 2017 2:24 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Definitely a refinery.

I've attached Appendix K from the report, note pages 10 & 11, which discusses reporting from multi-establishments, including the refinery.

David Turk actually helped to resolve this issue; I've also attached his letter on this dated March 1, 2016.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 12:00 PM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Is their address in the NEIC report?
They are a refinery for sure – correct?

I'm jotting down some notes for you.....I'll deliver to you before I leave today and if you like we can chat tomorrow if you like?

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
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Dallas, Texas 75202
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From: Basinger, David
Sent: Tuesday, May 02, 2017 1:57 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Definitely in 9, not 10. Don't know why Tesoro Wilmington isn't shown.

Note that the report states that Tesoro began reporting as a multi-establishment facility in 2013 under the TIFID ID # I provided, but the inspection reviewed the Tesoro Los Angeles Refinery Thresholds (Wilmington), not the combined thresholds (see page 7).

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 11:51 AM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Hmmm, only 2 facilities in Region 9
or are you in 10
age ya know, smile

List of EPA-Regulated Facilities in TRI

TRI FACILITY ID	FACILITY INFORMATION	FACILITY NAME	ADI
90748RCCQC1175C	View Facility Information	TESORO WILMINGTON CALCINER	1175 CARRACK WILMINGTON,
90744TXCRF1926C	View Facility Information	TESORO WILMINGTON SALES TERMINAL	1930 E PACIFIC WILMINGTON,

Go To Top Of The Page

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6

Compliance Assurance & Enforcement Division
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Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 1:49 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

It's the refinery, not the terminal.

Should still be under Tesoro Wilmington, especially for TRI, but Tesoro is in the process of combining Wilmington and Carson facilities and so call them both parts of the "Tesoro Los Angeles Refinery".

The TRIFID number was 90744TXCRF2101E, from a July 2015 report that Russ had done. Address is 2101 E Pacific Coast Highway.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 11:35 AM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection
Importance: High

Afternoon Dave.

You are correct, there is no new ERP, per se, only a new penalty matrix.

Is this your facility?

Click on "View Facility Information" to view EPA Facility information for the facility.

Facility Name:	TESORO WILMINGTON SALES TERMINAL	Mailing Name:	TESORO WILMINGTON SALES TERMINAL
Address:	1930 E PACIFIC COAST HIGHWAY WILMINGTON CA 90744	Mailing Address:	8601 S GARFIELD AVE SOUTH GATE CA 90280
County:	LOS ANGELES	Region:	9
Facility Information:	View Facility Information	TRI ID:	90744TXCRF1926C
DUNS Number:		FRS ID	110016955825
TRI Preferred Latitude:	33.791667	TRI Preferred Longitude:	118.235556
Public Contact:	RUTHANNE WALKER	Phone:	5628064105
Assigned Public Contact:	RUTHANNE WALKER		
Parent Company:	TESORO CORP	Standardized Parent Company:	TESORO CORP
BIA Tribal Code:		Tribe:	

Parent DUNS: 008133480

Starting with Reporting Year 2006, TRI Facilities began reporting NAICS codes, instead of SIC codes, to identify their Primary Business Activities.

NAICS Codes for 2015

NAICS CODE	PRIMARY	NAICS DESCRIPTION
424710	YES	Petroleum Bulk Stations and Terminals

Attached is a lil VBA program I wrote to auto chart a 5 year reporting history on a facility.
Instructions for use on first worksheet.

The history is downloaded from the Submissions Report in EZ-Query and copied into the workbook AFTER ALL DATA ARE DELETED!
Below is FROM last worksheet – it is auto generated
Yellow = reported
White = did not report that chemical for that year.
Good for asking a facility why they did not report for a certain chemical for a certain year.

	A	B	C	D	E	F	G
1	TRI_CHEMICAL	2011	2012	2013	2014	2015	
2	1 2 4-TRIMETHYLBENZENE						
3	BENZENE						
4	BENZO[G H I]PERYLENE						
5	CUMENE						
6	CYCLOHEXANE						
7	ETHYLBENZENE						
8	HYDROGEN SULFIDE						
9	LEAD COMPOUNDS						
10	MERCURY COMPOUNDS						
11	NAPHTHALENE						
12	N-HEXANE						
13	POLYCYCLIC AROMATIC COMPOUNDS						
14	TOLUENE						
15	XYLENE (MIXED ISOMERS)						
16							
17							

Let me look at your attachment and get back with you David.
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
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Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
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214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 1:18 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Very much appreciate your willingness to help.

Not Valero; it's Tesoro Wilmington (pre-2007 owner was Shell, current operations being combined with Tesoro Carson, previously BP).

Thanks for the ERP – so a completely new ERP was never finalized?

I'm attaching for reference the NEIC final report, along with my internal "quick summary" to my boss of the Findings and Observations table 7. I'm interested in discussing this in more detail with you, when you have some time.

TRI Inspection years were 2012-2014.

I need to determine (probably from new TRI reports) what the facility may have already corrected. Don't believe this is too difficult, but what do you think?

NEIC inspectors (Armando Bustamante and Martha Hamre) are both around and available for discussion as well.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 7:59 AM
To: Basinger, David <Basinger.David@epa.gov>
Subject: From Mort
Importance: High

Thanks for your call Dave.

Would be most happy to assist in your penalty assessment at the refinery you inspected out there in Region 9. Wasn't Valero was it? I have a case here on those guys.

Find attached the latest matrices which covers violations

Gravity-Based Penalty Matrix for Violations that Occurred After January 12, 2009 but before or on November 2, 2015

CIRCUMSTANCE LEVELS	EXTENT		
	A Major	B Significant	C Minor
1	$37,500	$24,080	$7,090
2	$28,330	$18,420	$4,250
3	$21,250	$14,170	$2,130
4	$14,170	$8,500	$1,420
5	$7,090	$4,250	$710
6	$2,840	$1,850	$290

Gravity-Based Penalty Matrix for Violations that Occurred after November 2, 2015[1]

CIRCUMSTANCE LEVELS	EXTENT		
	A Major	B Significant	C Minor
1	$40,779	$27,730	$8,156
2	$32,623	$21,205	$4,893
3	$24,467	$16,312	$2,447
4	$16,312	$9,787	$1,631
5	$8,156	$4,893	$816
6	$3,262	$2,121	$326

CIRCUMSTANCE LEVELS

The higher assessed matrix would be used for **2015** violations. At first this appears incorrect. However, recall, there can be no violation of EPCRA 313 until *after* the due date of the form.
Forms for calendar year 2015 were due on or before July 1, 2016, and July 1, 2016 is AFTER November 2, 2015.
Therefore, the higher penalty matrix would apply to 2015 violations onward.

I also do my darn best to settle up front so as to issue only a CAFO vs issuing a Complaint, then having to negotiate, which may drag out, then close out the Complaint with a CAFO.
The one document advantage is that no clock begins ticking in the ALJ's office in DC. Those boys can get "testy" if things drag out.

However, that is up to how you folks wanna handle.

Best, Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
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Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 5/8/2019 5:50:46 PM
To: Smith, Donald-M [Smith.Donald-M@epa.gov]
BCC: Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: Completed uses of Ammonia and reporting history for facilities reporting ammonia
Attachments: Use_of_Ammonia.xlsx; Ammonia_Reporters_Historical_2013_to_2017.xlsx

Importance: High

You have lots to play with regarding TRI ammonia reporters.

1st spreadsheet will give you an idea of how the reporter uses the ammonia Look in column AD for the activity. There may be more than a single activity.

	AD	
ncillary e	Chemical Activity	Total A (p
	only Manufactured	1
	only Otherwise Used	
	only Otherwise Used	
	TRI Chemical Manufactured & Otherwise Used	2
	only Processed	
	only Manufactured	2
	TRI Chemical Manufactured & Otherwise Used	9
	only Otherwise Used	1
	only Otherwise Used	1
	TRI Chemical Manufactured & Otherwise Used	
	TRI Chemical Manufactured & Otherwise Used	6
	only Manufactured	
	only Otherwise Used	
	only Otherwise Used	1
	TRI Chemical Manufactured & Otherwise Used	1
	TRI Chemical Manufactured, Processed & Otherwise Used	
	only Otherwise Used	
	only Otherwise Used	
	TRI Chemical Manufactured & Otherwise Used	
	only Otherwise Used	
	only Otherwise Used	1
	TRI Chemical Manufactured & Processed	

If chemical was only otherwise used – had to have used more than 10,000 pounds
If chemical was only processed or only manufactured, had to have used more than 25,000 pounds.
If chemical was both manufactured and processed – same holds, 25,000 pounds.
If chemical use included otherwise use with manufacturing and processing – anyones guess.

In same workbook, note approx. max on site column (M).
Unfortunately facility can report a range code – column L – so column M is the mid-point of the range.

2nd workbook gives you an idea of who reported ammonia from 2013 to 2017. Red cells means they did not report ammonia for that year.
However, if a date shows through on the red, means they reported but reported late.

	A	B	C	D	E	F	G	H
1	TRIFID	Facility_Name	TRI_Chemical	2013	2014	2015	2016	2017
32	70634BSSTHUSHIG	PACKAGING CORP OF AMERICA - DERIDDER MILL	AMMONIA	5/16/2014	6/22/2015	6/21/2016	5/30/2017	6/4/2018
33	70663STHRN1697D	SOUTHERN IONICS INC	AMMONIA	6/24/2014	6/29/2015	6/30/2016		6/29/2018
34	70663WRGRCDAVIS	W R GRACE & CO-CONN GRACE	AMMONIA	6/24/2014	6/18/2015	6/16/2016	6/27/2017	6/26/2018
35	70669CNCLXOLDSP	PHILLIPS 66 LAKE CHARLES REFINERY	AMMONIA	6/30/2014	7/1/2015	6/28/2016	6/26/2017	6/14/2018
36	70669PPGNDCOLUM	EAGLE US 2 LLC	AMMONIA	6/27/2014	6/25/2015	6/21/2016	6/27/2017	6/26/2018
37	70669RPRDC12TRU	AIR PRODUCTS & CHEMICALS INC	AMMONIA	6/16/2014	6/17/2015	6/20/2016	6/13/2017	
38	70669VSTCHOLDSP	SASOL CHEMICALS (USA) LLC-LAKE CHARLES CHEMICAL COM	AMMONIA	6/25/2014	6/24/2015	6/17/2016		
39	70723TXCRFFOOTO	CONVENT REFINERY	AMMONIA	6/20/2014	6/29/2015	6/30/2016	6/26/2017	6/28/2018
40	707348SFCRRIVER	BASF CORP	AMMONIA	6/30/2014	6/25/2015	6/29/2016	6/29/2017	6/28/2018
41	70734LQDCRPOBOX	PRAXAIR INC	AMMONIA	6/25/2014	5/13/2015	5/16/2016	5/10/2017	6/15/2018
42	70734NRYLCPOBOX	LION COPOLYMER GEISMAR LLC	AMMONIA	6/30/2014				
43	70734RBCNN9156H	RUBICON LLC	AMMONIA	6/27/2014	6/30/2015	6/28/2016	6/29/2017	6/27/2018
44	70734RCDNCHIGHW	PCS NITROGEN FERTILIZER LP	AMMONIA	6/30/2014	6/26/2015	6/29/2016	6/28/2017	6/28/2018
45	707375HLCRIVER	SHELL CHEMICAL LP	AMMONIA	6/26/2014	6/23/2015	6/23/2016	6/29/2017	6/26/2018

Hope you find useful?
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 10/23/2019 5:15:32 PM
To: Bradford, Deanna [Bradford.Deanna@epa.gov]
CC: Moore, Nathaniel [Moore.Nathaniel@epa.gov]
BCC: Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: RE: FOIA 9084 - Valero EPCRA case file
Attachments: Automated_Emails.xlsx; image005.jpg; image006.jpg; OT09000012740.pdf; removed.txt; Submission History.xlsx

Here are my electronic files in my Central Data Exchange (CDX) Folder.

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Toxics Enforcement Section (ECDST)
Enforcement & Compliance Assurance Division (ECD)
U.S. EPA Region 6
Dallas, TX 75270
(214.665.8116)

From: Bradford, Deanna <Bradford.Deanna@epa.gov>
Sent: Tuesday, October 22, 2019 4:01 PM
To: Durant, Jennah <Durant.Jennah@epa.gov>; Wakeland, Morton <wakeland.morton@epa.gov>; Potts, Mark <Potts.Mark@epa.gov>
Cc: Stuckey, Troy <Stuckey.Troy@epa.gov>; Moore, Nathaniel <Moore.Nathaniel@epa.gov>; Bradford, Deanna <Bradford.Deanna@epa.gov>
Subject: RE: FOIA 9084 - Valero EPCRA case file
Importance: High

All,

Just to clarify, this is a FOIA request, FOIA requests from reporters are treated the same as a request from any other requester. XA is only involved if the FOIA request seeks XA records. Getting clarification from all requesters is the same, irrespective of the type of requester.

If anyone have questions and/or concerns, please contact me. Thanks

From: Durant, Jennah <Durant.Jennah@epa.gov>
Sent: Tuesday, October 22, 2019 7:47 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Potts, Mark <Potts.Mark@epa.gov>
Cc: Stuckey, Troy <Stuckey.Troy@epa.gov>; Moore, Nathaniel <Moore.Nathaniel@epa.gov>; Bradford, Deanna <Bradford.Deanna@epa.gov>
Subject: RE: FOIA 9084 - Valero EPCRA case file

Thanks, Mort!

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Tuesday, October 22, 2019 7:34 AM

To: Potts, Mark <Potts.Mark@epa.gov>
Cc: Durant, Jennah <Durant.Jennah@epa.gov>; Stuckey, Troy <Stuckey.Troy@epa.gov>; Moore, Nathaniel <Moore.Nathaniel@epa.gov>; Bradford, Deanna <Bradford.Deanna@epa.gov>
Subject: RE: FOIA 9084 - Valero EPCRA case file

You bet Mark – have worked with Jennah on a number of occasions.

I don't think we have any or may a few hard copy files.
Most of mine are electronic, but when Nathaniel took over when they lawyered up,
I ceased all communications as we do in such situations.

Jennah, just saw your note – thanks, and acknowledge.
I think I have a pretty good idea what this guy wants from files.

Best to all!
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Toxics Enforcement Section (ECDST)
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U.S. EPA Region 6
Dallas, TX 75270
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From: Potts, Mark <Potts.Mark@epa.gov>
Sent: Monday, October 21, 2019 3:25 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: Durant, Jennah <Durant.Jennah@epa.gov>; Stuckey, Troy <Stuckey.Troy@epa.gov>
Subject: FW: FOIA 9084 - Valero EPCRA case file

Mort, I think Mr. Soraghan, the requestor, is a reporter. If you decide you need to contact him to clarify his FOIA request, coordinate with Jennah Durant in XA just in case. Thanks.

From: Bradford, Deanna <Bradford.Deanna@epa.gov>
Sent: Monday, October 21, 2019 10:02 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Potts, Mark <Potts.Mark@epa.gov>; Stuckey, Troy <Stuckey.Troy@epa.gov>; Moore, Nathaniel <Moore.Nathaniel@epa.gov>
Cc: Murdock, Russell <Murdock.Russell@epa.gov>
Subject: RE: FOIA 9084 - Valero EPCRA case file

Morton, per your request. If clarification is needed, you can contact Mr. Soraghan, since this is a single division assignment, please remember to document the conversation (ROC). Thanks

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Monday, October 21, 2019 8:07 AM
To: Potts, Mark <Potts.Mark@epa.gov>; Stuckey, Troy <Stuckey.Troy@epa.gov>; Moore, Nathaniel <Moore.Nathaniel@epa.gov>
Cc: Bradford, Deanna <Bradford.Deanna@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: RE: FOIA 9084 - Valero EPCRA case file

thanks Mark

if questions arise, please let me or Nathaniel know.

I believe I have supplied Deanna with the responsive record requested in the FOIA.

Mort

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Toxics Enforcement Section (ECDST)
Enforcement & Compliance Assurance Division (ECD)
U.S. EPA Region 6
Dallas, TX 75270
(214.665.8116)

From: Potts, Mark <Potts.Mark@epa.gov>
Sent: Monday, October 21, 2019 7:57 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Stuckey, Troy <Stuckey.Troy@epa.gov>; Moore, Nathaniel <Moore.Nathaniel@epa.gov>
Cc: Bradford, Deanna <Bradford.Deanna@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: FOIA 9084 - Valero EPCRA case file

Mort, work with Nathaniel and Deanna to identify/provide responsive documents. Thanks.

Sent from my iPhone

Begin forwarded message:

> **From:** "Region 6 FOIA Coordinators" <no-reply@sharepointonline.com>
> **Date:** October 18, 2019 at 5:36:49 PM CDT
> **To:** "Potts, Mark" <Potts.Mark@epa.gov>
> **Subject: 6EN - A New FOIA has been Assigned**
> **Reply-To:** no-reply@sharepointonline.com
>
> FOIA EPA-R6-2019-009084 has been Assigned for:
> I request the case file on the 2016 TRI-EPCRA 313 enforcement action against Valero's Oklahoma refinery.

Click here to open and edit the document

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 5/14/2018 1:45:12 PM
To: Senthil, Velu [Senthil.Velu@epa.gov]
BCC: Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: TRI Program's 2016 Data Quality Calls
Attachments: A_Region_6_RY16 Adhoc Data Quality Calls - 2014-NEI-TRI-Jan 2018.xlsm; A_Region_6_RY16 Adhoc Calls-PR List-Jan2018.xlsx; A_Region_6_RY16 Adhoc offsite RCRA Waste-List-Jan2018.xlsx; Region_6_RY16_Adhoc_M40_List_Jan2018.xlsx

Importance: High

Velu

Good Morning.

Apologize for the delay as I was doing my best to get the last few stragglers to respond so that I could happily report 100% response.

If I get updates this week, I'll send to you ASAP.

Well there are still a few left but I thought you'd want these anyway, so here they are.

Use the worksheet tab that is colored red for my results
I've colored the background of the entire row if the facility responded.

	H	I	J	K
1	TRIFID	TRI Facility Name	TRI Street	TRI City
55	77536MPKNC2759B	VOPAK LOGISTICS SERVICES USA INC DEER PARK	2759 INDEPENDENCE PKWY SOUTH	DEER PARK
56	77536MPKNC2759B	VOPAK LOGISTICS SERVICES USA INC DEER PARK	2759 INDEPENDENCE PKWY SOUTH	DEER PARK
57	77562STHWS18310	SOUTHWEST SHIPYARD LP	18310 MARKET ST	CHANNELVIEV
58	77571DPNTL12501	DUPONT LA PORTE PLANT	12501 STRANG RD	LA PORTE
59	7757WKRRYM12342	KURARAY AMERICA INC	12342 STRANG RD	LAPORTE

The M40 vs M41 waste codes is 100% complete.

If something is unclear, please let me know.

Take care Velu, best week's wishes,

Attached:

NEI vs TRI for 2014

Production Ratio
RCRA Waste Codes
M40 vs M41 Codes

Mort

Morton E. Wakeland, Jr., Ph.D.
EPCRA 313 Enforcement & TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, Texas
(214.665.8116)

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 1/30/2017 5:29:31 PM
To: Deppe, Fred [Deppe.Fred@epa.gov]
Subject: Use this workbook vs one Friday
Attachments: LA_Offsite_Transfers_2015_withVBA_Code_Mon_Jan_30.xlsm

Why?

Forgot to put chemicals in alphabetical order and forgot to remove duplicates in chemicals sent to BFI

Makes for a more concise list, with fewer highlights.

Mort

from toxicity 261.24, add chromium, lead, and mercury going to BFI.

	A	B
1	**TRI chemicals Sent to BFI 2015**	**Toxicity Characteristic 261.24**
8	ACRYLONITRILE	CHLOROBENZENE
9	AMMONIA	CHLOROFORM
10	ANILINE	CHROMIUM
11	ASBESTOS (FRIABLE)	O-CRESOL
12	BENZO(G H I)PERYLENE	M-CRESOL
13	CHLOROPRENE	P-CRESOL
14	CHROMIUM	CRESOL
15	CHROMIUM COMPOUNDS	2,4-D
16	COBALT COMPOUNDS	1,4-DICHLOROBENZENE
17	COPPER	1,2-DICHLOROETHANE
18	COPPER COMPOUNDS	1,1-DICHLOROETHYLENE
19	CREOSOTE	2,4-DINITROTOLUENE
20	CRESOL (MIXED ISOMERS)	ENDRIN
21	CUMENE	HEPTACHLOR (AND ITS EPOXIDE)
22	DIISOCYANATES	HEXACHLOROBENZENE
23	DIMETHYLAMINE	HEXACHLOROBUTADIENE
24	DIOXIN AND DIOXIN-LIKE COMPOUNDS	HEXACHLOROETHANE
25	EPICHLOROHYDRIN	LEAD
26	ETHYLBENZENE	LINDANE
27	ETHYLENE GLYCOL	MERCURY
28	FORMALDEHYDE	METHOXYCHLOR
29	LEAD	METHYL ETHYL KETONE
30	LEAD COMPOUNDS	NITROBENZENE
31	MANGANESE COMPOUNDS	PENTRACHLOROPHENOL
32	MERCURY	PYRIDINE
33	MOLYBDENUM TRIOXIDE	SELENIUM
34	NAPHTHALENE	SILVER

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Dallas, Texas 75202
214.665.8116

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 5/3/2017 11:55:10 AM
To: Turk, David [Turk.David@epa.gov]; Griffin, Stephanie [griffin.stephanie@epa.gov]; Clark, Katherine [Clark.Katherine@epa.gov]; Milton, Philip [Milton.Philip@epa.gov]
CC: Antisdel, Timothy [Antisdel.Timothy@epa.gov]; Muldrow, Bill [Muldrow.Bill@epa.gov]
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Let me read and study Dave...sorry to have bothered, just want to insure I have this straight....

Morton E. Wakeland, Jr., Ph.D. ("Mort")
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Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Turk, David
Sent: Tuesday, May 02, 2017 3:16 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Griffin, Stephanie <griffin.stephanie@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>; Milton, Philip <Milton.Philip@epa.gov>
Cc: Antisdel, Timothy <Antisdel.Timothy@epa.gov>; Muldrow, Bill <Muldrow.Bill@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Mort,

The ownership of various establishments changed so we ended up moving all of the reports under these establishments into on TRIFID. Specifically, we merged several sites that had been reporting as separate facilities into one TRIFID as seen below.

TRIFID	Facility Name	Facility Status	Street	City	State	Region	County	ZIP Code
90749RCPRD1801E	TESORO CARSON COKE HANDLING FACILITY (PART)	Active	23500 S ALAMEDA ST	CARSON	California	9	LOS ANGELES	90810
90749RCPRD1801E	TESORO CARSON PRODUCTS TERMINAL (PART)	Active	2149 E SEPULVEDA BLVD	CARSON	California	9	LOS ANGELES	90810

90749RCPRD1801E	TESORO CARSON CRUDE TERMINAL (PART)	Active	24696 S WILMINGTON AVE	CARSON	California	9	LOS ANGELES	90745
90749RCPRD1801E	TESORO LOS ANGELES REFINERY-CARSON OPERATIONS (PART)	Active	2350 E 223RD ST	CARSON	California	9	LOS ANGELES	90810
90749RCPRD1801E	TESORO SULFUR RECOVERY PLANT (PART)	Active	23208 ALAMEDA ST	CARSON	California	9	LOS ANGELES	90810
90749RCPRD1801E	TESORO LOS ANGELES REFINERY (PART)	Active	2101 E PACIFIC COAST HWY	WILMINGTON	California	9	LOS ANGELES	90744
90749RCPRD1801E	TESORO CORP WILMINGTON SALES TERMINAL	Active	1930 E PACIFIC COAST HWY	WILMINGTON	California	9	LOS ANGELES	90744

https://www3.epa.gov/enviro/facts/tri/ef-facilities/#/Facility/90749RCPRD1801E

Does this remedy the confusion on this matter?

-Dave

From: Wakeland, Morton
Sent: Tuesday, May 02, 2017 4:03 PM
To: Griffin, Stephanie <griffin.stephanie@epa.gov>; Turk, David <Turk.David@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>; Milton, Philip <Milton.Philip@epa.gov>
Cc: Antisdel, Timothy <Antisdel.Timothy@epa.gov>; Muldrow, Bill <Muldrow.Bill@epa.gov>
Subject: FW: Enforcement Confidential re Tesoro Wilmington 2015 inspection
Importance: High

Am helping our Dave Bassinger in Region 9

Dave Turk help him back when, resolved a multiestablishment issue with a Tesoro in California.
Facility "just" inspected by NEIC

Dave Turk discovered – see below the supposed new TRIFID they were to report under.

ENFORCEMENT CONFIDENTIAL FOIA EXEMPT

Email/lucina.r.lopez@tsocorp.com

Reporting Year 2012 Separate reporting entities		Reporting Year 2013 Contiguous entities ("multi-establishment")
Tesoro Sulfur Recovery Plant Carson, CA TRIFID: 90810TXCRF23208	→	Tesoro Sulfur Recovery Plant Carson, CA TRIFID: 90744TXCRF2101E
BP West Coast Products LLC Coke Barn Carson, CA TRIFID: 90749RCPRD1801E	→	Tesoro Carson Coke Handling Facility Carson, CA TRIFID: 90744TXCRF2101E
ARCO Carson Products Terminal Carson, CA TRIFID: 90749RCPRD1801E	→	Tesoro Carson Products Terminals Carson, CA TRIFID: 90744TXCRF2101E
Tesoro Los Angeles Refinery Wilmington, CA TRIFID: 90744TXCRF2101E	→	Tesoro Los Angeles Refinery Wilmington, CA TRIFID: 90744TXCRF2101E

" ------ " denotes contiguous facilities under common ownership.

TRIFID 90749RCPRD1801E remains as a separate facility, with other reporting 'parts'.

I have been looking in Wilmington, CA and the refinery is not there – so I see Carson and go Taaa Daaaaa

but guess what when I look in Carson, CA the only TRIFID I get is

TRI FACILITY ID	FACILITY INFORMATION	FACILITY NAME	ADDRESS	COUNTY NAME	SUBMISSIONS
90749RCPRD1801E	View Facility Information	TESORO LOS ANGELES REFINERY-CARSON OPERATIONS	2350 E 223RD ST CARSON, CA 90810	LOS ANGELES	3475

This TRIFID does not match any of the supposed TRIFIDS the facility combined into – yellow below, but does match older
TRIFID's

Reporting Year 2012 Separate reporting entities		Reporting Year 2013 Contiguous entities ("multi-establishment")
Tesoro Sulfur Recovery Plant Carson, CA TRIFID: 90810TXCRF23208	→	Tesoro Sulfur Recovery Plant Carson, CA TRIFID: 90744TXCRF2101E
BP West Coast Products LLC Coke Barn Carson, CA TRIFID: 90749RCPRD1801E	→	Tesoro Carson Coke Handling Facility Carson, CA TRIFID: 90744TXCRF2101E
ARCO Carson Products Terminal Carson, CA TRIFID: 90749RCPRD1801E	→	Tesoro Carson Products Terminals Carson, CA TRIFID: 90744TXCRF2101E
Tesoro Los Angeles Refinery Wilmington, CA TRIFID: 90744TXCRF2101E	→	Tesoro Los Angeles Refinery Wilmington, CA TRIFID: 90744TXCRF2101E

" ------- " **denotes contiguous facilities under common ownership.**

What is blazes is this facility doing???

Hey, if I look up a yellow TRIFID above – guess what ZIPPO

Only TRI facility information was searched to select facilities

TRI Facility ID: Beginning With: 90744TXCRF2101E

Results are based on data extracted on MAR-01-2017
select distinct a.pgm_sys_id, a.primary_name, a.location_address, a.city_
order by state_code, primary_name, a.pgm_sys_id asc

Total Number of Facilities Displayed: 0

My head hurts

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 2:24 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Definitely a refinery.

I've attached Appendix K from the report, note pages 10 & 11, which discusses reporting from multi-establishments, including the refinery.

David Turk actually helped to resolve this issue; I've also attached his letter on this dated March 1, 2016.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 12:00 PM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Is their address in the NEIC report?
They are a refinery for sure – correct?

I'm jotting down some notes for you.....I'll deliver to you before I leave today and if you like we can chat tomorrow if you like?

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 1:57 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Definitely in 9, not 10. Don't know why Tesoro Wilmington isn't shown.

Note that the report states that Tesoro began reporting as a multi-establishment facility in 2013 under the TIFID ID # I provided, but the inspection reviewed the Tesoro Los Angeles Refinery Thresholds (Wilmington), not the combined thresholds (see page 7).

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 11:51 AM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Hmmm, only 2 facilities in Region 9
or are you in 10
age ya know, smile

List of EPA-Regulated Facilities in TRI

TRI FACILITY ID	FACILITY INFORMATION	FACILITY NAME	ADI
90748RCCQC1175C	View Facility Information	TESORO WILMINGTON CALCINER	1175 CARRACK WILMINGTON,
90744TXCRF1926C	View Facility Information	TESORO WILMINGTON SALES TERMINAL	1930 E PACIFIC WILMINGTON,

Go To Top Of The Page

Morton E. Wakeland, Jr., Ph.D. ("Mort")
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214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 1:49 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

It's the refinery, not the terminal.

Should still be under Tesoro Wilmington, especially for TRI, but Tesoro is in the process of combining Wilmington and Carson facilities and so call them both parts of the "Tesoro Los Angeles Refinery".

The TRIFID number was 90744TXCRF2101E, from a July 2015 report that Russ had done. Address is 2101 E Pacific Coast Highway.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 11:35 AM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection
Importance: High

Afternoon Dave.

You are correct, there is no new ERP, per se, only a new penalty matrix.

Is this your facility?

Click on "View Facility Information" to view EPA Facility information for the facility.

Facility Name:	TESORO WILMINGTON SALES TERMINAL	Mailing Name:	TESORO WILMINGTON SALES TERMINAL
Address:	1930 E PACIFIC COAST HIGHWAY WILMINGTON CA 90744	Mailing Address:	8601 S GARFIELD AVE SOUTH GATE CA 90280
County:	LOS ANGELES	Region:	9
Facility Information:	View Facility Information	TRI ID:	90744TXCRF1926C
DUNS Number:		FRS ID	110016955825
TRI Preferred Latitude:	33.791667	TRI Preferred Longitude:	118.235556
Public Contact:	RUTHANNE WALKER	Phone:	5628064105
Assigned Public Contact:	RUTHANNE WALKER		
Parent Company:	TESORO CORP	Standardized Parent Company:	TESORO CORP
BIA Tribal Code:		Tribe:	

Parent DUNS: 008133480

Starting with Reporting Year 2006, TRI Facilities began reporting NAICS codes, instead of SIC codes, to identify their Primary Business Activities.

NAICS Codes for 2015

NAICS CODE	PRIMARY	NAICS DESCRIPTION
424710	YES	Petroleum Bulk Stations and Terminals

Attached is a lil VBA program I wrote to auto chart a 5 year reporting history on a facility.
Instructions for use on first worksheet.

The history is downloaded from the Submissions Report in EZ-Query and copied into the workbook AFTER ALL DATA ARE DELETED!
Below is FROM last worksheet – it is auto generated
Yellow = reported
White = did not report that chemical for that year.
Good for asking a facility why they did not report for a certain chemical for a certain year.

	A	B	C	D	E	F	G
1	TRI_CHEMICAL	2011	2012	2013	2014	2015	
2	1 2 4-TRIMETHYLBENZENE						
3	BENZENE						
4	BENZO[G H I]PERYLENE						
5	CUMENE						
6	CYCLOHEXANE						
7	ETHYLBENZENE						
8	HYDROGEN SULFIDE						
9	LEAD COMPOUNDS						
10	MERCURY COMPOUNDS						
11	NAPHTHALENE						
12	N-HEXANE						
13	POLYCYCLIC AROMATIC COMPOUNDS						
14	TOLUENE						
15	XYLENE (MIXED ISOMERS)						
16							
17							

Let me look at your attachment and get back with you David.
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 1:18 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Very much appreciate your willingness to help.

Not Valero; it's Tesoro Wilmington (pre-2007 owner was Shell, current operations being combined with Tesoro Carson, previously BP).

Thanks for the ERP – so a completely new ERP was never finalized?

I'm attaching for reference the NEIC final report, along with my internal "quick summary" to my boss of the Findings and Observations table 7. I'm interested in discussing this in more detail with you, when you have some time.

TRI Inspection years were 2012-2014.

I need to determine (probably from new TRI reports) what the facility may have already corrected. Don't believe this is too difficult, but what do you think?

NEIC inspectors (Armando Bustamante and Martha Hamre) are both around and available for discussion as well.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 7:59 AM
To: Basinger, David <Basinger.David@epa.gov>
Subject: From Mort
Importance: High

Thanks for your call Dave.

Would be most happy to assist in your penalty assessment at the refinery you inspected out there in Region 9. Wasn't Valero was it? I have a case here on those guys.

Find attached the latest matrices which covers violations

Gravity-Based Penalty Matrix for Violations that Occurred After January 12, 2009 but before or on November 2, 2015

CIRCUMSTANCE LEVELS	EXTENT		
	A Major	B Significant	C Minor
1	$37,500	$24,080	$7,090
2	$28,330	$18,420	$4,250
3	$21,250	$14,170	$2,130
4	$14,170	$8,500	$1,420
5	$7,090	$4,250	$710
6	$2,840	$1,850	$290

Gravity-Based Penalty Matrix for Violations that Occurred after November 2, 2015[1]

CIRCUMSTANCE LEVELS	EXTENT		
	A Major	B Significant	C Minor
1	$40,779	$27,730	$8,156
2	$32,623	$21,205	$4,893
3	$24,467	$16,312	$2,447
4	$16,312	$9,787	$1,631
5	$8,156	$4,893	$816
6	$3,262	$2,121	$326

CIRCUMSTANCE LEVELS

The higher assessed matrix would be used for **2015** violations. At first this appears incorrect. However, recall, there can be no violation of EPCRA 313 until *after* the due date of the form.
Forms for calendar year 2015 were due on or before July 1, 2016, and July 1, 2016 is AFTER November 2, 2015.
Therefore, the higher penalty matrix would apply to 2015 violations onward.

I also do my darn best to settle up front so as to issue only a CAFO vs issuing a Complaint, then having to negotiate, which may drag out, then close out the Complaint with a CAFO.
The one document advantage is that no clock begins ticking in the ALJ's office in DC. Those boys can get "testy" if things drag out.

However, that is up to how you folks wanna handle.

Best, Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
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Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 5/7/2019 8:23:05 PM
To: Smith, Donald-M [Smith.Donald-M@epa.gov]
BCC: Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: Here ya go Don! Let me give you this workbook.
Attachments: TestVBAAmmonia_Region6_TRI_2013-2017.xlsx

Importance: High

The first worksheet is a consolidation of all the others.
The headers should be self-explanator.

I captured both Stack and fugitive emissions – again, TRI data is summed over a year's time period.
Have included 2013-2017, all 5 states, and any facility that reported ammonia even once in that time period.

By report I mean the facility reported amounts released to air, land, and water as well as amounts waste managed.

To the far right of the information I have included the primary NAICS code of the facility as well as
the email and phone number of both the public and technical contact for the facility, in case you should
have questions of them.

I'm trying to work up some stats on how many of the 14 activities facilities marked.

A #1 means they checked that activity, a 0 (zero) means they did not check that activity – activity meaning how
the facility uses the chemical. It is conceivable a facility can mark multiple activities covering all three major
activities of chemical usage – *manufacturing, processing, and otherwise using*.

If there is something in particular you wanna see, let me know. Do you know pivot tables? They can slice and dice
data multiple ways....

Am going to continue on with the activities. I thought at one time I have a formula to evaluate that - but I've searched
all my files to no avail.

Hope this is useful? I turned it into a table so you can sort on any column.

Best Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Smith, Donald-M
Sent: Tuesday, May 7, 2019 12:49 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Had to have a TSCA briefing meeting, now out, back to the grind

TSCA Meeting definitely come first.

From: Wakeland, Morton
Sent: Tuesday, May 07, 2019 11:32 AM
To: Smith, Donald-M <Smith.Donald-M@epa.gov>
Subject: Had to have a TSCA briefing meeting, now out, back to the grind

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Smith, Donald-M
Sent: Tuesday, May 7, 2019 9:22 AM

To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: I have the data for you - but I need to revise the headers for they are in SQL and horrible to interpret - Need to make them more meaningful so you'll know what they are.

Thanks, Mort. You take your time and let me know if I need to help in any way.

From: Wakeland, Morton
Sent: Tuesday, May 07, 2019 9:20 AM
To: Smith, Donald-M <Smith.Donald-M@epa.gov>
Subject: RE: I have the data for you - but I need to revise the headers for they are in SQL and horrible to interpret - Need to make them more meaningful so you'll know what they are.

Yep, will send an Excel Workbook with explanations.

There are codes used for some data elements – I have to convert those codes to what the value actually is.

am getting there....

Morton E. Wakeland, Jr., Ph.D. ("Mort")
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Waste Compliance III Section
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U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Smith, Donald-M
Sent: Tuesday, May 7, 2019 9:11 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: I have the data for you - but I need to revise the headers for they are in SQL and horrible to interpret - Need to make them more meaningful so you'll know what they are.

Thanks, Mort. Is there an attachment coming?

From: Wakeland, Morton
Sent: Tuesday, May 07, 2019 8:42 AM
To: Smith, Donald-M <Smith.Donald-M@epa.gov>
Subject: I have the data for you - but I need to revise the headers for they are in SQL and horrible to interpret - Need to make them more meaningful so you'll know what they are.
Importance: High

also need to rearrange columns.....

I pulled each year from 2013 to present.

Why?
Ammonia is tricky in the sense it is most often used as a refrigerant.
Thus we say the activity is "otherwise used"
However there can be other uses so I wanted to capture that for you as well....
So a facility would only report releases and waste management when they use more than 10,000 lbs if "otherwise used"
After charging the system initially, they only report when they have to recharge amounts loss if more than 10,000 lbs.
See?

That's way I did a consecutive 5 year search for you.

Here are all the possibilities for activities of ammonia from Form R:
3.1, 3.2, and 3.3 are the major activities for TRI chemicals at a facility.
Under these activities we have further refined what is done with the chemical.

SECTION 3. ACTIVITIES AND USES OF THE TOXIC CHEMICAL AT THE FACILITY
(Important: Check all that apply.)

3.1 Manufacture the toxic chemical:	3.2 Process the toxic chemical:	3.3 Otherwise use the toxic chemical:
a. ☐ Produce b. ☐ Import If Produce or Import c. ☐ For on-site use/processing d. ☐ For sale/distribution e. ☐ As a byproduct f. ☐ As an impurity	a. ☐ As a reactant b. ☐ As a formulation component c. ☐ As an article component d. ☐ Repackaging e. ☐ As an impurity	a. ☐ As a chemical processing aid b. ☐ As a manufacturing aid c. ☐ Ancillary or other use

Here is all the data elements I gathered for you from the data base for all 5 states in Region 6...again, only for ammonia which includes both anhydrous and aqueous.
As soon as I get this in shape, will ship to you – am sure you'll have questions – so just let me know and I'll do my best to explain.

Mort

STEP 3: Enter Search Criteria and Organize the Output

Output Options for Selected Columns

Column Name	Operator Definition	Search Value	Column Display Order	Sort Column	Sort Order	Where Only
TRI Facility Id	Equal to				Ascending	
Facility Name	Equal to				Ascending	
Reporting Year	Equal to				Ascending	
Chemical Name	Equal to				Ascending	
Street Address	Equal to				Ascending	
City Name	Equal to				Ascending	
State Abbreviation	Equal to	1. List All State Abbreviation(s)			Ascending	
Zip Code	Equal to				Ascending	
Region	Equal to	2. List All Region(s)			Ascending	
Facility Closed Indicator	Equal to				Ascending	
Facility Registry System ID	Equal to				Ascending	
Assigned Public Contact	Equal to				Ascending	
Assigned Public Phone	Equal to				Ascending	
Assigned Public Email	Equal to				Ascending	
Form Type Indicator	Equal to				Ascending	
Maximum Amount Of Chemical	Equal to	2. List All Maximum Amount Of Chemical(s)			Ascending	
Production Ratio	Equal to				Ascending	
Orig Postmark	Equal to	*The date must be entered completely in MON-DD-YYYY format (eg. JUN-23-1989)*			Ascending	
Federal Facility Indicator	Equal to				Ascending	
Produce	Equal to				Ascending	
Imported	Equal to				Ascending	
Used Processed	Equal to				Ascending	
Sale Distribution	Equal to				Ascending	
Byproduct	Equal to				Ascending	
Reactant	Equal to				Ascending	
Formulation Component	Equal to				Ascending	
Article Component	Equal to				Ascending	
Repackaging	Equal to				Ascending	
Chem Processing Aid	Equal to				Ascending	
Manufacture Aid	Equal to				Ascending	
Ancillary	Equal to				Ascending	
Air Total Release	Equal to				Ascending	
Asgn Technical Contact	Equal to				Ascending	
Asgn Technical Contact Email	Equal to				Ascending	
Asgn Technical Phone	Equal to				Ascending	
Dun and Bradstreet Number 1	Equal to				Ascending	
Fugitive Release Range Code	Equal to				Ascending	
Fugitive Tot Rel	Equal to				Ascending	
Manufacture Impurity	Equal to				Ascending	
Process Impurity	Equal to				Ascending	
Release 81A Current Year Quantity	Equal to				Ascending	
Release 81B Current Year Quantity	Equal to				Ascending	
Release 81C Current Year Quantity	Equal to				Ascending	
Release 81D Current Year Quantity	Equal to				Ascending	
Stack Tot Rel	Equal to				Ascending	
Total Production Related Waste	Equal to				Ascending	
Primary NAICS Code	Equal to				Ascending	

Search Database | Reset | Output to CSV File

Morton E. Wakeland, Jr., Ph.D. ("Mort")
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(214.665.8116)

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 9/19/2017 2:15:51 PM
To: Clark, Katherine [Clark.Katherine@epa.gov]; Miles, James [miles.james@epa.gov]; Ziegel, Dean [Ziegel.Dean@epa.gov]; Haas, Craig [Haas.Craig@epa.gov]
CC: Milton, Philip [Milton.Philip@epa.gov]
Subject: Benzene Reporting per TRI - Valero Refinery - Houston, TX (TRIFID - 77012HLLPT9701M

Importance: High

I only went back to 2012 (statute of limitation) – Utilized Envirofacts EZ-Query, *the flat files*

TRI Facility Id	Facility Name	Reporting Year	Chemical Name	Street Address	City Name	State Abbreviation	One Time Release Quantity	Air Total Release	Asgn Technical Contact	Asgn Technical Contact Email	Asgn Technical Phone	Release 81A Current Year Quantity	Release 81B Current Year Quantity	Release 81C Current Year Quantity	Release 81D Current Year Quantity
77012HLLPT9701M	VALERO REFINING - TEXAS LP HOUSTON REFINERY	2012	BENZENE	9701 MANCHESTER	HOUSTON	TX	1	5532	PREETHI JOSEPH	PREETHI.JOSEPH@VALERO.COM	7139233345		3 5532	20	
77012HLLPT9701M	VALERO REFINING - TEXAS LP HOUSTON REFINERY	2013	BENZENE	9701 MANCHESTER	HOUSTON	TX	2	8486	PREETHI JOSEPH	PREETHI.JOSEPH@VALERO.COM	7139233345		8486	3	
77012HLLPT9701M	VALERO REFINING - TEXAS LP HOUSTON REFINERY	2014	BENZENE	9701 MANCHESTER	HOUSTON	TX		5658	PREETHI JOSEPH	PREETHI.JOSEPH@VALERO.COM	7139233345		5658	4	
77012HLLPT9701M	VALERO REFINING - TEXAS LP HOUSTON REFINERY	2015	BENZENE	9701 MANCHESTER	HOUSTON	TX		6680	PREETHI JOSEPH	PREETHI.JOSEPH@VALERO.COM	7139233345		6680	14	
77012HLLPT9701M	VALERO REFINING - TEXAS LP HOUSTON REFINERY	2016	BENZENE	9701 MANCHESTER	HOUSTON	TX		2878	PREETHI JOSEPH	PREETHI.JOSEPH@VALERO.COM	7139233345		2878	6	

#1 is if they reported any releases due to a catastrophic event, i.e. One Time Release Quantity – have reporting nothing in last 5 years

#2 Total air release reported (stack or point + fugitive)

#3 8.1B is a summation of several sections on the Form R – most important of which is air releases + land releases + water releases + other sections. If you are so inclined the formula for section 8.1B is:

§ 8.1b = § 5.1 + § 5.2 + § 5.3 + § 5.4.2 + § 5.5.2 + § 5.5.3A + § 5.5.3B + § 5.5.4 - § 8.8
§ 8.1b = Total other on-site disposal or other releases

5.1 = Fugitive
5.2 = Stack
5.3 = Discharges to water
5.4.2 = Underground Injection, Class II-V wells
5.5.2 = Land treatment
5.5.3A = RCRA Sub C surface impoundments
5.5.3B = Other surface impoundments
5.5.4 = Other disposal
8.8 = One time (misleading cause it can actually be more than once) releases as a rsult of remedial actions, catastrophic event or "one-time"events NOT associated with production processes.

Presuming Valero will have to report benzene to TRI for 2017, then they will have to also report amounts in 8.8 as a result of Harvey. NOTE – 2017 reports will not be due until July 1, 2018 – so this is a future even that will have to be monitored.

Please let me know if you would like something else compiled.

Best week's wishes,
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
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From: Clark, Katherine
Sent: Monday, September 18, 2017 1:29 PM
To: Miles, James <miles.james@epa.gov>; Ziegel, Dean <Ziegel.Dean@epa.gov>; Wakeland, Morton <wakeland.morton@epa.gov>; Haas, Craig <Haas.Craig@epa.gov>
Cc: Milton, Philip <Milton.Philip@epa.gov>
Subject: Re: EPA wants Valero's records on benzene leak

ENFORCEMENT CONFIDENTIAL FOIA EXEMPT

James -

The benzene release is probably reportable under a number of statutes - at the least, CAA, EPCRA, CERCLA 103. With the emphasis on volatile organic compounds and air monitoring, this sounds primarily like a CAA case at this point, although it is possible other statutory counts could be taken.

If CERCLA 103 requires emergency notification, EPCRA 304 also is triggered. Emergency notification to the national response center would be prompted by EPCRA section 304. (As a carcinogen, benzene should be an extremely hazardous substance covered by CERCLA and EPCRA 304).

It also would be included in the TRI (toxic chemicals) report as a facility release because benzene is included on the TRI list. There was some discussion about including a special section for emergency releases on the form to differentiate routine facility releases with emergency releases.

There is overlap between the 313 and non-313 chemicals and CERCLA 103 even though they have different categories of chemicals (toxic, hazardous, and extremely hazardous). Dean used to have a Venn diagram demonstrating the amount of the overlap. (Dean, do you still have that diagram?). There also is overlap with the Clean Air Act's hazardous air pollutants/chemicals.

https://www.epa.gov/epcra/consolidated-list-lists

This EPA List of Lists is helpful.

Consolidated List of Lists | Emergency Planning and ...

www.epa.gov

List of chemicals subject to reporting requirements under the Emergency Planning and Community Right- To-Know Act (EPCRA), Comprehensive Environmental Response ...

Mort, Valero has reported for every year except RY2014. Did they report releases for benzene last year? As an aside, Mort created a list of almost 200 facilities that potentially could be affected by Harvey.

James, just including some background for you that you may already know, so ignore if you have already absorbed some of this in other cases/scenarios. Dean/Craig, feel free to chime in if I misstated something in your areas of expertise.

Kathy

From: Miles, James
Sent: Monday, September 18, 2017 1:55 PM
To: Clark, Katherine
Subject: EPA wants Valero's records on benzene leak

HURRICANE HARVEY
EPA wants Valero's records on benzene leak

Published: Monday, September 18, 2017

U.S. EPA has asked Valero Energy Corp. to turn over records related to benzene emissions at its Houston refinery in the wake of Hurricane Harvey.

After the storm damaged a storage tank roof at the refinery, local and federal officials detected benzene — a carcinogen — in a nearby Houston neighborhood.

Valero initially said the refinery released roughly 6.7 pounds of benzene and more than 3,350 pounds of unspecified volatile compounds, but EPA says that was likely a severe underestimate (*Greenwire*, Sept. 15).

EPA's enforcement division requested a timeline of what happened at "Tank 3 and Tank 228," where the agency cited problems with roof draining, indicating two storage tanks may have been involved. It also wants information on emissions and what the refinery did to prevent them, as well as air monitoring data and maintenance records (Jordan Blum, *Houston Chronicle*, Sept. 15).

However, Valero on Friday said the plume of benzene may not have originated from its facility after all.

Some of the chemical compounds that officials detected weren't present in the storage tank whose roof failed, Valero said (Jordan Blum, *Houston Chronicle*, Sept. 15). **— MJ**

James Miles, Chief
Chemical Risk and Reporting Enforcement Branch
Waste and Chemical Enforcement Division
Office of Civil Enforcement
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
William Jefferson Clinton Bldg., South, Rm. 4111A
1201 Constitution Ave., NW

Washington, DC 20004
202.564.5161
miles.james@epa.gov

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 1/31/2018 4:03:33 PM
To: Riley, David [riley.david@epa.gov]; Lancaster, Stan [Lancaster.Stan@epa.gov]
CC: Stuckey, Troy [Stuckey.Troy@epa.gov]; Ruple, Rhonda [ruple.rhonda@epa.gov]
Subject: FW: ICIS reports
Attachments: CAA 114 CWA 308 and RCRA 3007 Information Request Report.01.29.18.pdf; Compliance Inspections Federal Facilities only.01.29.18.pdf; Compliance Inspections.01.29.18.pdf; Informal_Enforcement_Action_Report.01.29.18.pdf; Snapshot Report.01.30.18.pdf

Importance: High

Have ya'll done any 313 inspections or issued any 313 cases to date?
If so, please see attached from Rhonda and insure those are in ICIS.
If missing please let me know as well as Rhonda.
If you are unable to input into ICIS, please give Rhonda the necessary info she needs to get into ICIS.

Many Thanks, Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Ruple, Rhonda
Sent: Tuesday, January 30, 2018 7:54 AM
To: Potts, Mark <Potts.Mark@epa.gov>; Stuckey, Troy <Stuckey.Troy@epa.gov>; Tidmore, Guy <tidmore.guy@epa.gov>; Singhvi, Sunita <Singhvi.Sunita@epa.gov>; Thrush, Dale <Thrush.Dale@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Wakeland, Morton <wakeland.morton@epa.gov>
Subject: ICIS reports

I have run the snapshot report again – found some issues with the one I sent yesterday. Attached is the new snapshot report.

Attached are ICIS reports showing actions in ICIS for FY2018. Just a heads up on what is in the system – want to make sure we have everything in on time.

Rhonda Ruple
U.S. EPA Region 6
Region 6 ICIS System Administrator
Region 6 SRF Coordinator
Enforcement Division Planning Coordinator
Region 6 Audit Policy Coordinator

214-665-2710
Fax 214-665-7446
ruple.rhonda@epa.gov

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Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 7/18/2017 6:50:57 PM
To: Davis, Wayne [Davis.Wayne@epa.gov]
CC: Senthil, Velu [Senthil.Velu@epa.gov]
Subject: RE: How close are ya'll working with Velu on DQ calls?
Attachments: RY15-PBTs and Others-List.xlsx

We get spreadsheets, appropriately named with this issue at hand, e.g., increaser/decreaser, PBT for PBT issues, etc
On the worksheet he will list the facility name, TRIFID, tech contact, his/her email, and chemical in question, if an amount is involved
the amount reported in 2015 and then the amount reported in 2016.

.(see attached real example from 2015).

As long as all data for a single facility is located on a single line/row, all works fine – can use Word's email merge.
Waterloo comes in when multiple questions or chemicals are of issue at a single facility.
Sometimes referred to as a "many to one" relationship.

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
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214.665.8116

From: Davis, Wayne
Sent: Tuesday, July 18, 2017 1:41 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: Senthil, Velu <Senthil.Velu@epa.gov>
Subject: RE: How close are ya'll working with Velu on DQ calls?

Hi Mort,

I do not know how Velu parses and sends out the facility lists for data quality calls/emails. I have not been able to figure that out – how does Velu take the results from all of those scripts produced by Tim and then make it into lists that get sent out?

I am providing Velu with the RSEI list so everyone gets the data quality call/emails from one main source – Velu. Velu is the official source of the data quality call/email lists.

Our dashboard is a way of looking at it and documenting for all to see how we are preparing the information to send to Velu. This documentation is part of our quality assurance requirements.

We will work to make things more transparent, and you are certainly helping with that.

Wayne

Wayne S. Davis
Communications and Outreach Branch
Toxics Release Inventory Program Division

OCSPP/OPPT
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

phone: 202/566-2425
https://www.epa.gov/RSEI

CONFIDENTIAL COMMUNICATION
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From: Wakeland, Morton
Sent: Tuesday, July 18, 2017 2:33 PM
To: Davis, Wayne <Davis.Wayne@epa.gov>
Cc: Senthil, Velu <Senthil.Velu@epa.gov>
Subject: How close are ya'll working with Velu on DQ calls?
Importance: High

Good presentation on Dashboard, but I was lost most of the time.

Sounds like your folks with ABT are fairly computer SAVVY. Why do I ask...

Did not wanna ask this over the call for it does not apply to the Dashboard per se, but does apply to
accomplishing our DQ calls "in certain instances"

Our data quality calls are really meaningless unless we have the ability to communicate with the facility in a time efficient method what question(s) EPA has regarding their previously submitted data. Read again slowly – may have to re-read a third or forth time.

What am I getting at?

First, for regions with only a handful of facilities it is no problem to write individual emails or call the facilities individually regarding
EPA issues.

For other Regions with numerous facilities in questions, it is time prohibitive to write individual emails or call each facility individually.

Thank God for Word's Email Merge whereby individual emails can be sent to a ton of facilities in the blink of an eye,
utilizing Word for the text of the email, Excel and the database for information to be included in the email, and Outlook
as the transmitting mechanism.

This method is fine and dandy if and only if one row of data equals one record (i.e., one facility)

Our questions and data quality issues have grown more complex.

We now have, in some cases, multiple issues (chemicals and or questions) at a facility.
This equates to an Excel spreadsheet having multiple rows of data (chemicals and/or questions) for a single record, i.e., for a single facility.
The automated built in email merge no longer works in these situations.

We need to be able to auto email multiple lines of data to a single facility.

I have worked on this issue for the past two years.
I have an Excel workbook that will do such (skipping Word for the text, Excel is used for the text), but it it complex and I'm not sure the average TRI'er could follow.

I have a Word Add in from an English dude, but in involves adding a VBA Word Program in the startup menu of Word which is not for the faint of heart.

Bottom Line
Do you think your computer gurus could develop a simplistic methodology that most TRI'ers could follow to send multi-line emails to facilities?
I think it would be easiest(?) to use Word for the email text – easier that using Excel for the text, Excel for the data to insert into the email , i.e., placeholders, and Outlook to send the emails. If we do this way, it will most likely have to be some type of alteration to Word.

Thanks much,

Understand if this is beyond their scope of work.

Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
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Compliance Assurance & Enforcement Division
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Dallas, Texas 75202
214.665.8116

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 5/2/2017 8:03:44 PM
To: Basinger, David [Basinger.David@epa.gov]
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

my head hurts...smile. asking who they report under now.

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From: Basinger, David
Sent: Tuesday, May 02, 2017 2:48 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Thanks; tomorrow works well for me. I'm in around 6 am, which I believe is 8 am your time. Let me know if there's a specific time you would like me to call.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 12:43 PM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Should be Carson, CA and not Wilmington

TRI FACILITY ID	FACILITY INFORMATION	FACILITY NAME	ADDRESS	COUNTY NAME	SUBMISSIONS
90749RCPRD1801E	View Facility Information	TESORO LOS ANGELES REFINERY-CARSON OPERATIONS	2350 E 223RD ST CARSON, CA 90810	LOS ANGELES	3475

this has to be it.

nope TRIFIDS mis match

Reporting Year 2013

Contiguous entities ("multi-establishment")

Tesoro Sulfur Recovery Plant
Carson, CA
TRIFID: 90744TXCRF2101E

Tesoro Carson Coke Handling Facility
Carson, CA
TRIFID: 90744TXCRF2101E

Tesoro Carson Products Terminals
Carson, CA
TRIFID: 90744TXCRF2101E

Tesoro Los Angeles Refinery
Wilmington, CA
TRIFID: 90744TXCRF2101E

der common ownership.

But if I go back to 2012,,,,Bingo

Reporting Year 2012
Separate reporting entities

Reporting Year 2013
Contiguous entities ("multi-establishment")

Tesoro Sulfur Recovery Plant Carson, CA TRIFID: 90810TXCRF23208	→	Tesoro Sulfur Recovery Plant Carson, CA TRIFID: 90744TXCRF2101E
BP West Coast Products LLC Coke Barn Carson, CA TRIFID: 90749RCPRD1801E	→	Tesoro Carson Coke Handling Facility Carson, CA TRIFID: 90744TXCRF2101E
ARCO Carson Products Terminal Carson, CA TRIFID: 90749RCPRD1801E	→	Tesoro Carson Products Terminals Carson, CA TRIFID: 90744TXCRF2101E
Tesoro Los Angeles Refinery Wilmington, CA TRIFID: 90744TXCRF2101E	→	Tesoro Los Angeles Refinery Wilmington, CA TRIFID: 90744TXCRF2101E

" ------- " denotes contiguous facilities under common ownership.

TRI FACILITY ID	FAC
90749RCPRD1801E	V

What are these guys doing changing TRIFID's every other year

Before we talk about violations, we need to straighten out what their TRIFID is or TRIFID's are.

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From: Basinger, David
Sent: Tuesday, May 02, 2017 2:24 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Definitely a refinery.

I've attached Appendix K from the report, note pages 10 & 11, which discusses reporting from multi-establishments, including the refinery.

David Turk actually helped to resolve this issue; I've also attached his letter on this dated March 1, 2016.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 12:00 PM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Is their address in the NEIC report?
They are a refinery for sure – correct?

I'm jotting down some notes for you.....I'll deliver to you before I leave today and if you like we can chat tomorrow if you like?

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From: Basinger, David
Sent: Tuesday, May 02, 2017 1:57 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Definitely in 9, not 10. Don't know why Tesoro Wilmington isn't shown.

Note that the report states that Tesoro began reporting as a multi-establishment facility in 2013 under the TIFID ID # I provided, but the inspection reviewed the Tesoro Los Angeles Refinery Thresholds (Wilmington), not the combined thresholds (see page 7).

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 11:51 AM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Hmmm, only 2 facilities in Region 9
or are you in 10
age ya know, smile

List of EPA-Regulated Facilities in TRI

TRI FACILITY ID	FACILITY INFORMATION	FACILITY NAME	ADI
90748RCCQC1175C	View Facility Information	TESORO WILMINGTON CALCINER	1175 CARRACK WILMINGTON, (
90744TXCRF1926C	View Facility Information	TESORO WILMINGTON SALES TERMINAL	1930 E PACIFIC (WILMINGTON, (

Go To Top Of The Page

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From: Basinger, David
Sent: Tuesday, May 02, 2017 1:49 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

It's the refinery, not the terminal.

Should still be under Tesoro Wilmington, especially for TRI, but Tesoro is in the process of combining Wilmington and Carson facilities and so call them both parts of the "Tesoro Los Angeles Refinery".

The TRIFID number was 90744TXCRF2101E, from a July 2015 report that Russ had done. Address is 2101 E Pacific Coast Highway.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 11:35 AM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection
Importance: High

Afternoon Dave.

You are correct, there is no new ERP, per se, only a new penalty matrix.

Is this your facility?

Click on "View Facility Information" to view EPA Facility information for the facility.

Facility Name:	TESORO WILMINGTON SALES TERMINAL	Mailing Name:	TESORO WILMINGTON SALES TERMINAL
Address:	1950 E PACIFIC COAST HIGHWAY WILMINGTON CA 90744	Mailing Address:	8601 S GARFIELD AVE SOUTH GATE CA 90280
County:	LOS ANGELES	Region:	9
Facility Information:	View Facility Information	TRI ID:	90744TXCRF1926C
DUNS Number:		FRS ID	110018955825
TRI Preferred Latitude:	33.791667	TRI Preferred Longitude:	118.235556
Public Contact:	RUTHANNE WALKER	Phone:	5626064105
Assigned Public Contact:	RUTHANNE WALKER		
Parent Company:	TESORO CORP	Standardized Parent Company:	TESORO CORP — Parent DUNS: 008133480
BIA Tribal Code:		Tribe:	

Starting with Reporting Year 2006, TRI Facilities began reporting NAICS codes, instead of SIC codes, to identify their Primary Business Activities.

NAICS Codes for 2015

NAICS CODE	PRIMARY	NAICS DESCRIPTION
424710	YES	Petroleum Bulk Stations and Terminals

Attached is a lil VBA program I wrote to auto chart a 5 year reporting history on a facility.
Instructions for use on first worksheet.
The history is downloaded from the Submissions Report in EZ-Query and copied into the workbook AFTER ALL DATA ARE DELETED!
Below is FROM last worksheet – it is auto generated
Yellow = reported
White = did not report that chemical for that year.
Good for asking a facility why they did not report for a certain chemical for a certain year.

	A	B	C	D	E	F	G
1	TRI_CHEMICAL	2011	2012	2013	2014	2015	
2	1 2 4-TRIMETHYLBENZENE						
3	BENZENE						
4	BENZO(G H I)PERYLENE						
5	CUMENE						
6	CYCLOHEXANE						
7	ETHYLBENZENE						
8	HYDROGEN SULFIDE						
9	LEAD COMPOUNDS						
10	MERCURY COMPOUNDS						
11	NAPHTHALENE						
12	N-HEXANE						
13	POLYCYCLIC AROMATIC COMPOUNDS						
14	TOLUENE						
15	XYLENE (MIXED ISOMERS)						
16							
17							

Let me look at your attachment and get back with you David.
Mort

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From: Basinger, David
Sent: Tuesday, May 02, 2017 1:18 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Very much appreciate your willingness to help.

Not Valero; it's Tesoro Wilmington (pre-2007 owner was Shell, current operations being combined with Tesoro Carson, previously BP).

Thanks for the ERP – so a completely new ERP was never finalized?

I'm attaching for reference the NEIC final report, along with my internal "quick summary" to my boss of the Findings and Observations table 7. I'm interested in discussing this in more detail with you, when you have some time.

TRI Inspection years were 2012-2014.

I need to determine (probably from new TRI reports) what the facility may have already corrected. Don't believe this is too difficult, but what do you think?

NEIC inspectors (Armando Bustamante and Martha Hamre) are both around and available for discussion as well.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 7:59 AM
To: Basinger, David <Basinger.David@epa.gov>
Subject: From Mort
Importance: High

Thanks for your call Dave.

Would be most happy to assist in your penalty assessment at the refinery you inspected out there in Region 9. Wasn't Valero was it? I have a case here on those guys.

Find attached the latest matrices which covers violations

Gravity-Based Penalty Matrix for Violations that Occurred After January 12, 2009 but before or on November 2, 2015

CIRCUMSTANCE LEVELS	EXTENT A Major	B Significant	C Minor
1	$37,500	$24,080	$7,090
2	$28,330	$18,420	$4,250
3	$21,250	$14,170	$2,130
4	$14,170	$8,500	$1,420
5	$7,090	$4,250	$710
6	$2,840	$1,850	$290

Gravity-Based Penalty Matrix for Violations that Occurred after November 2, 2015[1]

CIRCUMSTANCE LEVELS	EXTENT A Major	B Significant	C Minor
1	$40,779	$27,730	$8,156
2	$32,623	$21,205	$4,893
3	$24,467	$16,312	$2,447
4	$16,312	$9,787	$1,631
5	$8,156	$4,893	$816
6	$3,262	$2,121	$326

CIRCUMSTANCE LEVELS

The higher assessed matrix would be used for **2015** violations. At first this appears incorrect. However, recall, there can be no violation of EPCRA 313 until *after* the due date of the form.
Forms for calendar year 2015 were due on or before July 1, 2016, and July 1, 2016 is AFTER November 2, 2015.
Therefore, the higher penalty matrix would apply to 2015 violations onward.

I also do my darn best to settle up front so as to issue only a CAFO vs issuing a Complaint, then having to negotiate, which may drag out, then close out the Complaint with a CAFO.
The one document advantage is that no clock begins ticking in the ALJ's office in DC. Those boys can get "testy" if things drag out.

However, that is up to how you folks wanna handle.

Best, Mort

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Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 8/1/2017 2:49:40 PM
To: Senthil, Velu [Senthil.Velu@epa.gov]
Subject: Region 6, completed DQ checks
Attachments: Region_6_RY16 NA DQ Calls-DiffAddress&PartOnly-List.xlsm; Region_6_RY16 NA DQ Calls-Non-Certifiers List.xlsm; Region_6_RY16 NA DQ Calls-TRIFID_Only-List.xlsm

Mort

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Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 9/5/2017 1:19:32 PM
To: Milton, Philip [Milton.Philip@epa.gov]
CC: Clark, Katherine [Clark.Katherine@epa.gov]
Subject: FW: Further Clarification for Valero -
Attachments: RY14-16-Day-Uncertified-Reminder.docx

forgot to cc you Phil - sorry

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From: Wakeland, Morton
Sent: Tuesday, September 05, 2017 8:19 AM
To: Parra, Juan <Parra.Juan@epa.gov>; Knipschild, Shane <Knipschild.Shane@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>
Cc: Blake-Coleman, Wendy <Blake-Coleman.Wendy@epa.gov>; Mohamed, Ahmed (CGI Federal) <ahmed.mohamed@cgifederal.com>; Antisdel, Timothy <Antisdel.Timothy@epa.gov>
Subject: Further Clarification for Valero -

INTERNAL DELIBERTAIVE DO NOT RELEASE UNDER FOIA

Just off the phone with Kathy this Tue Morn, and now I understand what the question is more clearly.

Let me see if I can explain…

Currently in our CDX database we have that Valero in Oklahoma, both transmitted and certified their reporting forms for 2014
on 11/23/2015 – 2014 reports were due 7/1/2015

Search Again

CDX Id	User	TRIDID	Transmit Date	Cert. Date	Cancel Date	State	RY
TR0002201708231702446928LASSAHN.xml	COWBOY56	73461TTLPTHKDHV	6/23/17 13:42	6/23/17 17:02		OK	2016
	Transaction ID: [illegible]						
TR0002201806201609040COWBOY56.xml	COWBOY56	73461TTLPTHKDHV	6/20/18 16:09	6/20/18 18:18		OK	2016
	Transaction ID: [illegible]						
TR0002201708231702446928LASSAHN.xml	COWBOY56	73461TTLPTHKDHV	6/23/17 13:42	6/23/17 17:02		OK	2016
	Transaction ID: [illegible]						
TR0002201605131349390KLASSAHN.xml	KMLASSAHN	73461TTLPTHKDHV	5/13/16 13:49	5/13/16 13:52		OK	2014
	Transaction ID: [illegible]						
TR0002201511231522727KMLASSAHN.xml	KMLASSAHN	73461TTLPTHKDHV	11/23/15 15:27	11/23/15 15:32		OK	2015
	Transaction ID: [illegible]						
TR0002201306251651151MARIONWATSON.xml	MARIONWATSON	73461TTLPTHKDHV	6/25/13 16:51	6/25/13 18:09		OK	2011

In one of the attachments that Juan was kind enough to send on Friday September 1, there is a "form" email announcement (attached) alerting facilities that they need to certify. Attached to the end of that email is specific information that was inserted into that email for a specific facility (Valero-OK), if my interpretation is correct (scroll to bottom of form announcement to see contents)?

<u>If my interpretation is incorrect – PLEASE LET ALL OF US KNOW WHAT THE CORRECT INTERPRETATION IS - THANKS</u>!

BY THE WAY – WHOEVER THOUGHT THIS TRACKING MECHANISME UP – MUCHO KUDOO'S – IT'S GREAT!!! KEEP UP THE GREAT WORK TO HELP US ENFORCEMENT TYPES OUT

First it appears that 3 individuals received this email, but two (2) at same address:

Don Wilson @

7. EMAILADDRESS	don.wilson@valero.com

Tracy Watson @

7. EMAILADDRESS	marion.watson@valero.com

and
Marion Watson @ the same email address as above – odd?

7. EMAILADDRESS	marion.watson@valero.com

QUESTION – DO THESE INDIVIDUALS REPRESENT?:

1. **CERTIFYING OFFICIAL**
2. **TEHCNICAL CONTACT**
3. **PREPARER**

If no, who do they represent? How do we know who is who?

The current date that was inserted into the email is, I assume, filled in by computer – Yes / No?
The current date is listed as June 13, 2015 for first two emails and June 14, 2015 for last email (see below):

6. currentDate	June 13, 2015
7. EMAILADDRESS	don.wilson@valero.com

6. currentDate	June 13, 2015
7. EMAILADDRESS	marion.watson@valero.com

6. currentDate	June 14, 2015
7. EMAILADDRESS	marion.watson@valero.com

Importantly, the very first sentence in this email *reminder* is

need to correct the space after the second form(s)

To:

$!CONTACTNAME,

Your form(s) were transmitted for certification in TRI-MEweb, but your form(s)have not been certified

There are only $!days days left before the Toxics Release Inventory (TRI) reporting deadline (11:59 pm on July 1). As of $!todaysDate, our data processing center (DPC) has detected that you have TRI submission(s) that needs to be properly certified for all chemical form(s) that were prepared using our

I STRONGLY, STRONGLY SUGGEST ADDING ANTOHER VARIABLE TO THE EMAIL – *THE DATE ON WHICH THE FORMS WERE TRANSMITTED!*

Your form(s) were transmitted for certification on June 5, 2015, in TRI-MEweb, but your form(s) have ...

This sentence implies that this email is a reminder to certify forms that have already been transmitted through CDX

If so, this email alone suggests that Valero had already transmitted their 2014 reporting forms *prior to June 13, 2015*,
otherwise why in blue blazes would they be getting this email?

Therefore, there is a major disconnect between the attached email and what appears in the CDX database as a transmittal date.

We need to know if, in fact, there were 2014 forms from Valero **(73410TTLPTHIGHW)** in the system prior to July 1, 2015,
but uncertified, as the attached email would strongly suggest.

Could it be those *original* forms were withdrawn for whatever reason?

Hopefully, this is a lil more clear as to the disconnect that both Kathy and I now see.

Thanks for everyone's assistance in this matter.

Mort

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Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 9/20/2019 4:17:03 PM
To: Clark, Katherine [Clark.Katherine@epa.gov]; Milton, Philip [Milton.Philip@epa.gov]; Alkon, Margaret [Alkon.Margaret@epa.gov]; Baranco, Angela [Baranco.Angela@epa.gov]; Bazley, Greg [Bazley.Greg@epa.gov]; Blunk, Terri [Blunk.Terri@epa.gov]; bpathare [Pathare.Bhushan@epa.gov]; Brown, Evon [Brown.Evon@epa.gov]; Bussey, Carol [Bussey.Carol@epa.gov]; Bustamante, Armando [Bustamante.Armando@epa.gov]; Calvo, Estrella [calvo.estrella@epa.gov]; Caplan, Robert W. [Caplan.Robert@epa.gov]; Chan, Janice [Chan.Janice@epa.gov]; Chew, Andrew [Chew.Andrew@epa.gov]; Davis, Lauren O. [Davis.LaurenO@epa.gov]; Dunn, Meghan [dunn.meghan@epa.gov]; Fisher, Bethany [fisher.bethany@epa.gov]; Gallagher, Shirin [Gallagher.Shirin@epa.gov]; Goerke, Ariadne [Goerke.Ariadne@epa.gov]; Gorman, John [Gorman.John@epa.gov]; Greenwald, Steven [Greenwald.Steven@epa.gov]; Gsell, Alyssa [Gsell.Alyssa@epa.gov]; Hamre, Martha [Hamre.Martha@epa.gov]; Harper, Jodi [Harper.Jodi@epa.gov]; Johnson, Karen T. [Johnson.Karent@epa.gov]; Kaczmarek, Chris [Kaczmarek.Chris@epa.gov]; Kim, David [Kim.David@epa.gov]; Klevs, Mardi [klevs.mardi@epa.gov]; Medici, Andrea [medici.andrea@epa.gov]; Meinhardt, Danielle [meinhardt.danielle@epa.gov]; Meyer, Jeff [Meyer.Jeff@epa.gov]; Myhre, John [myhre.john@epa.gov]; Nazar, Kristen [Nazar.Kristen@epa.gov]; Ndiaye, Fatimatou [Ndiaye.Fatimatou@epa.gov]; Nowak, April [Nowak.April@epa.gov]; O'Donnell, Mary Jane [Odonnell.Maryjane@epa.gov]; O'Meara, Nidhi [omeara.nidhi@epa.gov]; Pratt, Stacie [Pratt.Stacie@epa.gov]; Rascher, Chris [rascher.chris@epa.gov]; Robinson, Janis [Robinson.Janis@epa.gov]; Salazar, Matt [Salazar.Matt@epa.gov]; Salisbury, Demetra [Salisbury.Demetra@epa.gov]; Sawyer, William [Sawyer.William@epa.gov]; Schulz, Susan [Schulz.Susan@epa.gov]; Senthil, Velu [Senthil.Velu@epa.gov]; Siegal, Tod [Siegal.Tod@epa.gov]; Smith, Catherine [smith.catherine@epa.gov]; Spielmann, Lee [Spielmann.Lee@epa.gov]; Stoy, Alyse [Stoy.Alyse@epa.gov]; Velez, Ezequiel [Velez.Ezequiel@epa.gov]; Vizard, Elizabeth [Vizard.Elizabeth@epa.gov]; White, Erika [White.Erika@epa.gov]; Yussen, Craig [Yussen.Craig@epa.gov]; Som, Kushal [som.kushal@epa.gov]; Ramirez, Steven A [ramirez.stevena@epa.gov]; Crossmon, James [Crossmon.James@epa.gov]; Griffin, Stephanie [griffin.stephanie@epa.gov]; Salamasick, Tyler [salamasick.tyler@epa.gov]; Basinger, David [Basinger.David@epa.gov]
CC: Antisdel, Timothy [Antisdel.Timothy@epa.gov]; Turk, David [Turk.David@epa.gov]
BCC: Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: Regional Analysis of Late & Non-Reporters for EPCRA 313/TRI Reporting
Attachments: Final_Region1_2014-2018.xlsx; Final_Region8_2014-2018.xlsx; Final_Region9_2014-2018.xlsx; Final_Region10_2014-2018.xlsx; Final_Region7_2014-2018.xlsx; Final_Region5_2014-2018.xlsx; Final_Region2_2014-2018.xlsx; Final_Region3_2014-2018.xlsx; Final_Region4_2014-2018.xlsx

Importance: High

I did my best to eliminate those folks I knew would not be involved in targeting/inspections/investigations/enforcement for FY20.

I know we have some new folks on board. I also see names I don't recognize – so, if you are a manager, attorney, or simply not interested in these data, allow me to apologize. My intent was to ensure I included any new enforcement folks we have.

WHAT ARE THESE WORKBOOKS?

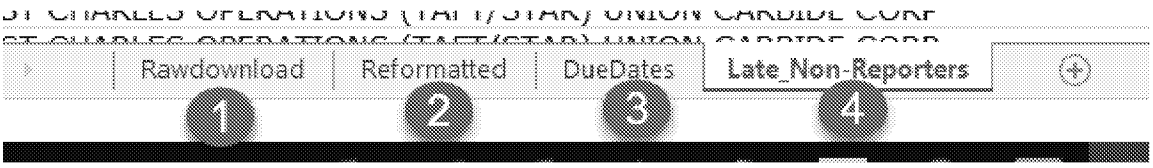
Basically, I've tabulated every facility that reported a chemical to EPA from 2014-2018, captured the certification date, and compared the certification date to when the forms were due – i.e., Late Reporters

In addition, I've noted if the facility did not report a chemical between 2014-2018 – non-reporter.

Note: each workbook has an .xlsx file extension – meaning there is no code or anything to "run" – it's all done for you.
You may now stand and cheer.

GUIDE

There are 4 worksheets per workbook, all are named the same; however, the data are reflective of that region – Hello!



1) Rawdownload = the data as it appears originally downloaded from Envirofacts (Internal)
2) Reformatted = reformatted so the data are more readable
3) Due Dates = Form R due dates for RY's 2014-2018
4) Late_Non-Reporters = **this is the sheet you wanna concentrate on for it gives late & non-reporters.**

For ease of interpretation, I have color coded each type of violation
If the chemical was not reported for a RY, the cell(s) has(have) a red background
If the chemical was reported even 1 day after the stipulated due date, the cell(s) has(have) a green background.
Cannot get much simpler than this.

5	6/15/2016	5/30/2017	6/26/2018	6/25/2019
5	6/15/2016	5/30/2017	6/26/2018	6/25/2019
5				
5	6/15/2016	5/30/2017	6/26/2018	6/25/2019
5	6/15/2016	5/30/2017	6/26/2018	6/25/2019
5	6/15/2016	5/30/2017	6/26/2018	6/25/2019
5	6/15/2016	5/30/2017	6/26/2018	6/25/2019
5	6/15/2016	5/30/2017	6/26/2018	6/25/2019
5	6/13/2016	5/20/2017	6/21/2018	3/20/2019
5	6/13/2016	5/20/2017	6/21/2018	3/20/2019
5	6/22/2016	6/30/2017	7/3/2018	7/3/2019
5	6/22/2016	6/30/2017	7/3/2018	7/3/2019
5	6/22/2016	6/30/2017	7/3/2018	7/3/2019

RY's are at the top of the of the worksheet:

	D	E	F	G	H	I
	2014	**2015**	**2016**	**2017**	**2018**	
	6/29/2015	6/28/2016	8/10/2017	6/25/2018	6/24/2019	
	6/24/2015	6/29/2016	6/30/2017	6/26/2018	6/19/2019	
	6/24/2015	6/29/2016				
	6/24/2015	6/29/2016				
	4/13/2015	4/7/2016	4/10/2017	5/2/2018	5/1/2019	
	4/13/2015	4/7/2016	4/10/2017	5/2/2018	5/1/2019	

Any questions, give me a shout – Happy FY20 Targeting

Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Toxics Enforcement Section (ECDST)
Enforcement & Compliance Assurance Division (ECD)
U.S. EPA Region 6
Dallas, TX 75270
(214.665.8116)

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 4/10/2017 4:45:46 PM
To: Moore, Nathaniel [Moore.Nathaniel@epa.gov]
BCC: Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: RE: Valero Additional information
Attachments: Valero_ReportingHistory_April_10_2017.xlsm

Importance: High

Find attached an Excel workbook containing max on site at any time for years 2011 – 2015
As I said before we only have a code to go by, but the code is associated with a range of pounds.

Range codes are on the RangeCodes worksheet, I associated the code with midpoint

	A	B	C	D	E
1	CODE	LOWER	UPPER	MIDPOINT	
2	1	0	99	49.5	**Units here = pounds**
3	2	100	999	549.5	
4	3	1,000	99,999	50,499.5	
5	4	10,000	99,999	54,999.5	
6	5	100,000	999,999	549,999.5	
7	6	1,000,000	9,999,999	5,499,999.5	
8	7	10,000,000	49,999,999	29,999,999.5	
9	8	50,000,000	99,999,999	74,999,999.5	
10	9	100,000,000	499,999,999	299,999,999.5	
11	10	500,000,000	999,999,999	749,999,999.5	
12	11	1,000,000,000	5,999,999,999	3,499,999,999.5	
13	12	0.0	0.10	**0.05**	**Units here down = grams**
14	13	0.1	0.99	**0.55**	
15	14	1.0	9.99	**5.50**	
16	15	10.0	99.00	**54.50**	
17	16	100.0	999.00	**549.50**	
18	17	1,000.0	9,999.00	**5,499.50**	
19	18	10,000.0	99,999.00	**54,999.50**	
20	19	100,000.0	999,999.00	**549,999.50**	
21	20	1,000,000.0	5,999,999.00	**3,499,999.50**	
22					

Utilizing the INDEX / MATCH functions in Excel on this worksheet

172	2015	SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY)	ONE VALERO WAY	ARDMORE	OK
173	2015	TETRACHLOROETHYLENE	ONE VALERO WAY	ARDMORE	OK
174	2015	TOLUENE	ONE VALERO WAY	ARDMORE	OK
175	2015	VANADIUM COMPOUNDS	ONE VALERO WAY	ARDMORE	OK
176	2015	XYLENE (MIXED ISOMERS)	ONE VALERO WAY	ARDMORE	OK
177					

RawDownloadedData | Max_OnsiteMidPoint | PivotTable | RangeCodes

READY

I tabulated the mid-points in the far right hand column

	RY	TRI_CHEMICAL	ADDRESS	CITY	STATE	MAX_ONSITE_CODE	Code Expansion for Maximum Amount Of Chemical	Mid-Point of Range	*Red font implies dioxins
145	2015	BENZENE	ONE VALERO WAY	ARDMORE	OK	6	1000000 to 9999999	5,499,999.50	
146	2015	BENZO(G H I)PERYLENE	ONE VALERO WAY	ARDMORE	OK	1	0 to 99	49.50	
147	2015	CARBON DISULFIDE	ONE VALERO WAY	ARDMORE	OK	2	100 to 999	549.50	
148	2015	CARBONYL SULFIDE	ONE VALERO WAY	ARDMORE	OK	1	0 to 99	49.50	
149	2015	COBALT COMPOUNDS	ONE VALERO WAY	ARDMORE	OK	4	10000 to 99999	54,999.50	
150	2015	CRESOL (MIXED ISOMERS)	ONE VALERO WAY	ARDMORE	OK	3	1000 to 9999	50,499.50	
151	2015	CUMENE	ONE VALERO WAY	ARDMORE	OK	4	10000 to 99999	54,999.50	

I then utilized a pivot table to view each chemical by year – PivotTable Worksheet

Just from a quick examination of the table, I noted that Valero utilized the same range code in each year 2011 – 2015 for the same chemical

Sum of Mid-Point of Range	Column Labels						
Row Labels	2011	2012	2013	2014	2015	(blank)	Grand Total
1 2 4-TRIMETHYLBENZENE	5499999.5	5499999.5	5499999.5	5499999.5	5499999.5		27499997.5
1 3-BUTADIENE	549.5	549.5	549.5	549.5	549.5		2747.5
AMMONIA	54999.5	54999.5	54999.5	54999.5	54999.5		274997.5
ANTHRACENE	54999.5	54999.5	54999.5	54999.5	54999.5		274997.5
BENZENE	5499999.5	5499999.5	5499999.5	5499999.5	5499999.5		27499997.5
BENZO(G H I)PERYLENE	49.5	49.5	49.5	49.5	49.5		247.5
CARBON DISULFIDE	549.5	549.5	549.5	549.5	549.5		2747.5
CARBONYL SULFIDE	49.5	49.5	49.5	49.5	49.5		247.5
COBALT COMPOUNDS			54999.5	54999.5	54999.5		164998.5
CRESOL (MIXED ISOMERS)	50499.5	50499.5	50499.5	50499.5	50499.5		252497.5
CUMENE	54999.5	54999.5	54999.5	54999.5	54999.5		274997.5
CYCLOHEXANE	5499999.5	5499999.5	5499999.5	5499999.5	5499999.5		27499997.5
DIOXIN AND DIOXIN-LIKE COMPOUNDS	0.545	0.0495	0.545	0.545	0.545		2.2295
ETHYLBENZENE	5499999.5	5499999.5	5499999.5	5499999.5	5499999.5		27499997.5
ETHYLENE	549999.5	549999.5	549999.5	549999.5	549999.5		2749997.5

i.e., them mid point stays the same. Because we don't have the exact number of pounds used this is about all we can say
on the max amount of a TRI chemical on site at any one time during that calendar year. If there is no midpoint given, it simply
means that the TRI chemical was not reported for that year.

Hope this helps????

Anything else that might be helpful, let me know.

Mort
Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Moore, Nathaniel
Sent: Friday, April 07, 2017 8:56 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: Valero Additional information

Good morning Mort,

I was wondering if you are able to access, or know someone who is able to access, Valero's previous and post 2015 Form-Rs. I think this will help shed light on what different chemicals they had on site from year to year or what volumes they had. Any information will be appreciated.

Respectfully,

Nathaniel N. Moore
Assistant Regional Counsel
RCRA & Toxics Enforcement Branch
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue
Dallas, Texas 75202
Tel. (214) 665-8151
moore.nathaniel@epa.gov

THIS MESSAGE, INCLUDING ATTACHMENTS, CONTAINS SENSITIVE INFORMATION THAT IS INTENDED ONLY FOR THE RECIPIENT(S). INFORMATION IN THIS MESSAGE IS CONFIDENTIAL AND MAY BE PROTECTED BY ATTORNEY/CLIENT, WORK PRODUCT, OR OTHER PRIVILEGES.

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 1/27/2017 8:54:22 PM
To: Antisdel, Timothy [Antisdel.Timothy@epa.gov]
Subject: Thanks I deleted zero's in col E
Attachments: LA_Offsite_Transfers_2015.xlsm

If you want my code....

I used an autofilter, because row number get screwed up I added a call to another sub to fix that.

Hell, here is the whole workbook...code is not password protected
Module 1 delete zeros
Module 2 keep only amounts sent to BFI

Hope ya like,
Mort

because this has code, you will most likely have to "enable contents" at top of page on first opening workbook

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
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Dallas, Texas 75202
214.665.8116

From: Antisdel, Timothy
Sent: Friday, January 27, 2017 2:46 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: Re: one final confirmation

Agree with what you said below.

From: Wakeland, Morton
Sent: Friday, January 27, 2017 2:33 PM
To: Antisdel, Timothy
Subject: one final confirmation

C	D	E	F	G
V_TRI_OF	V_TRI_OFF_SITE_EZ.CHEM_NAME	V_TRI_OFF_SITE_EZ.TRANSFER_AMT	V_TRI_OF	V_TR
2015	1 3-BUTADIENE	0	201 RED R	COUS
2015	1 3-BUTADIENE	0	201 RED R	COUS
2015	2 4-DIMETHYLPHENOL	0	201 RED R	COUS
2015	2 4-DIMETHYLPHENOL	0	201 RED R	COUS
2015	ACETALDEHYDE	0	201 RED R	COUS
2015	ACETALDEHYDE	0	201 RED R	COUS
2015	AMMONIA	0	201 RED R	COUS

this is the chemical sent off site and the amount of that chemical sent off site

"we" feel that if there is a zero amount the chemical was simply prepopulated in TRI-ME with no entry, hence zero.

I think OK to delete all zero rows

I have to get the worksheet reformatted so the RCRA folks can interpret as well as state of Louisiana....

BIG ISSUE, NON HAZ LANDFILL MAY HAVE BEEN ACCEPTING HAZ WASTE!!!!

Your patience with ole moi is appreciated,
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Antisdel, Timothy
Sent: Friday, January 27, 2017 1:10 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Senthil, Velu <Senthil.Velu@epa.gov>
Subject: Re: how do I interpret for dioxins

Thanks.

From: Wakeland, Morton
Sent: Friday, January 27, 2017 2:08 PM
To: Antisdel, Timothy; Senthil, Velu
Subject: RE: how do I interpret for dioxins

Got it from the TDX viewer in CDX, should be same as the attachment

thanks for checking

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Antisdel, Timothy
Sent: Friday, January 27, 2017 12:15 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Senthil, Velu <Senthil.Velu@epa.gov>
Subject: Re: how do I interpret for dioxins

Hi Mort,

Where are did you get this file from (attached)? Did it come from TRI-MEweb or eFDP Regional Component?

It was pointed out to me by the Envirofacts folks that it looks like it came from one of those two places. Note on the snippet below I took from the file, it says, "Printed Using TRI-MEweb".

Bill Muldrow got back to me about the Schedule One display in Envirofacts and said that the display was correct. I checked it and he was right.

So, the report in the file must be coming from somewhere else. Let me know where you got it from and we'll get it fixed there.

Tim

See snippet below...

5.5 Disposal to Land On-site						
5.5.2	NA	X	5.5.3A	NA	X	5.5.3B
d treatment/application farming			RCRA Subtitle C surface impoundment			Othe impo

Printed using TRI-MEweb

From: Wakeland, Morton
Sent: Friday, January 27, 2017 11:16 AM
To: Antisdel, Timothy; Senthil, Velu
Subject: RE: how do I interpret for dioxins

U R a good teacher!!

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Antisdel, Timothy
Sent: Friday, January 27, 2017 10:02 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Senthil, Velu <Senthil.Velu@epa.gov>
Subject: Re: how do I interpret for dioxins

Yes. It should. Good catch.

From: Wakeland, Morton
Sent: Friday, January 27, 2017 10:02 AM
To: Senthil, Velu; Antisdel, Timothy
Subject: RE: how do I interpret for dioxins

leave it to "Grumpy Ole Men" to rock the boat

I surmised the sequence in 6.2 = the sequence on the Schedule

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Senthil, Velu
Sent: Friday, January 27, 2017 8:55 AM
To: Antisdel, Timothy <Antisdel.Timothy@epa.gov>; Wakeland, Morton <wakeland.morton@epa.gov>
Cc: Senthil, Velu <Senthil.Velu@epa.gov>
Subject: Re: how do I interpret for dioxins

Thanks much for taking care of this problem, Tim.

Velu Senthil

From: Antisdel, Timothy
Sent: Friday, January 27, 2017 9:52:25 AM
To: Senthil, Velu
Subject: Re: how do I interpret for dioxins

Hi Velu,

This is an error in the programing. I'll contact SAIC and ask them to fix it.

Essentially, the entries from Section 6.2 on the Form R match the entries in the Schedule One. They're in the same order. So, the first entry on the Form R matches the first entry on the Schedule One. The second matches the second. And, the third matches the third.

The numbering on the Schedule One in section 6.2 is wrong. The first entry shows a number of "6.2.-1". This should be "6.2.1". The second Schedule One entry has a number of "6.2.0". This should be "6.2.2". The third is "6.2.1" which should be "6.2.3".

Again, I'll ask SAIC to fix this.

Thanks for pointing it out. Or, thanks to Mort.

Tim

From: Senthil, Velu
Sent: Friday, January 27, 2017 9:22 AM
To: Antisdel, Timothy
Cc: Senthil, Velu
Subject: Fw: how do I interpret for dioxins

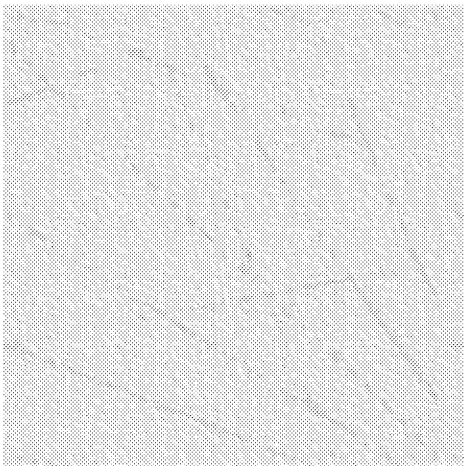
Tim,

Please look at the form and it is hard to relate Form R to Schedule 1 data.

Thanks

Velu Senthil

From: Wakeland, Morton
Sent: Friday, January 27, 2017 9:04 AM
To: Senthil, Velu; Parra, Juan
Subject: how do I interpret for dioxins



EPA
United States Environmental Protection Agency

FORM R Schedule 1

PART II. CHEMICAL-SPECIFIC INFORMATION (continued)

TRI Facility ID Number: 70765GRGGLHIGHW

SECTION 6. TRANSFERS OF DIOXIN AND DIOXIN-LIKE COMPOUNDS IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY-OWNED TREATMENT WORKS (POTWs) NA [X]

6.1	C. Mass (grams) of each compound in the category (1-17)																
		1		2		3		4		5		6		7		8	
9		10		11		12		13		14		15		16		17	

6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS NA [ ]

6.2.1	D. Mass (grams) of each compound in the category (1-17)																
2.		1	0.000078	2	0.000874	3	0.00338	4	0.007654	5	0.004904	6	0.241256	7	1.936722	8	0.001502
9	0.012213	10	0.021581	11	0.344086	12	0.23483	13	0.137671	14	0.341453	15	6.31028	16	0.853582	17	19.9188

6.2.0	D. Mass (grams) of each compound in the category (1-17)																
2.		1	0	2	0.000016	3	0.0001	4	0.000436	5	0.00028	6	0.016613	7	0.14017	8	0.000015
9	0.000483	10	0.001194	11	0.023362	12	0.015574	13	0.008722	14	0.025957	15	0.456851	16	0.058145	17	1.401703

6.2.1	D. Mass (grams) of each compound in the category (1-17)																
2.		1	0.003767	2	0.035125	3	0.110819	4	0.108818	5	0.069885	6	1.545223	7	7.799662	8	0.068683
9	0.318113	10	0.332741	11	2.422588	12	1.899413	13	1.387613	14	0.542245	15	29.73323	16	5.890208	17	165.116103

EPA Form 9350-3 Printed using TRI-MEweb

How do I know which off-site location got what? Not clear.

Complete form R attached....

Thanks,
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 8/26/2019 3:48:28 PM
To: Senthil, Velu [Senthil.Velu@epa.gov]; Rascher, Chris [rascher.chris@epa.gov]; Crossmon, James [Crossmon.James@epa.gov]; Barth, Carina [barth.carina@epa.gov]; Travers, Timothy [travers.timothy@epa.gov]; Velez, Ezequiel [Velez.Ezequiel@epa.gov]; Chatham, Douglas [Chatham.Douglas@epa.gov]; Bergin, Sean [Bergin.Sean@epa.gov]; Nowak, April [Nowak.April@epa.gov]; Satter, Suzanne [satter.suzanne@epa.gov]; Baranco, Angela [Baranco.Angela@epa.gov]; Cheryl Keenan [cheryl.keenan@erg.com]; Abby Burton [abby.burton@erg.com]; Walters, Elizabeth R. [walters.elizabeth@epa.gov]
Subject: RE: RY18 NA Data Quality Checks - Except NAICS issue - Due 8/30/2019

Super job Velu – thanks for helping!
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Toxics Enforcement Section (ECDST)
Enforcement & Compliance Assurance Division (ECD)
U.S. EPA Region 6
Dallas, TX 75270
(214.665.8116)

From: Senthil, Velu <Senthil.Velu@epa.gov>
Sent: Monday, August 26, 2019 8:33 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Senthil, Velu <Senthil.Velu@epa.gov>; Rascher, Chris <rascher.chris@epa.gov>; Crossmon, James <Crossmon.James@epa.gov>; Barth, Carina <barth.carina@epa.gov>; Travers, Timothy <travers.timothy@epa.gov>; Velez, Ezequiel <Velez.Ezequiel@epa.gov>; Chatham, Douglas <Chatham.Douglas@epa.gov>; Bergin, Sean <Bergin.Sean@epa.gov>; Nowak, April <Nowak.April@epa.gov>; Satter, Suzanne <satter.suzanne@epa.gov>; Baranco, Angela <Baranco.Angela@epa.gov>; Cheryl Keenan <cheryl.keenan@erg.com>; Abby Burton <abby.burton@erg.com>; Walters, Elizabeth R. <walters.elizabeth@epa.gov>
Subject: RE: RY18 NA Data Quality Checks - Except NAICS issue - Due 8/30/2019

Hi All,

Here are the list of 1) facilities that submitted revisions but not submitted responses yet, and 2) promised revisions but not yet submitted revisions:

1) **Submitted Revisions but NOT submitted Responses yet:**

Region 1
HOLDEN TRAP ROCK
01520HLDNT2077N

Region 2
SCHWEITZER-MAUDUIT
1250WSCHWT2424R

Region 3

MONROE ENERGY LLC-TRAINER REFINERY
19061BPLCMPOSTR

NEW MARKET POULTRY LLC
2284WNWMRK145LD

WESTROCK CP LLC
23181CHSPK19THM

Region 4
JDC COATINGS INC
37122JHNDL206ED

KRATON CHEMICAL LLC
32402RZNCHEVERE

Region 5
DOMTAR PAPER CO LLC
54474WYRHS200GR

EMERALD PERFORMANCE MATERIALS LLC
61537BFGDRRR1BO

GATEWAY ENERGY & COKE CO
6204WGTWYN2585E

VEOLIA ES TECHNICAL SOLUTIONS LLC
53051TSCNTW124N

Region 7
EDWARDS FIBERGLASS
6530WDWRDS1415E

2) Facilities promised revisions but not yet submitted revisions:

Region 3
INTERBAKE FOODS
2263WNTRBK2BAKE

Region 4
ADM
31603RCHRDCLAYR

KRATON CHEMICAL LLC
32501RZNCH411SO

Region 5
MICHIGAN TURKEY PRODUCERS
49509MDMRC2140C

MIDWEST MANUFACTURING TREATING PLANT
54703MDWSTRR2XX

QUEMETCO INC

46231QMTCN7870W

SANDUSKY INTERNATIONAL INC
44871SNDSK615WE

Region 6
VALERO REFINING-TEXAS LP
77592TXSCTLOOP1

Region 7
GEORGE'S PROCESSING INC OF MISSOURI
65623GRGSPHWY37

TYSON FRESH MEATS INC WWTP
68731BPNCWGSTXX

Region 8
ENERGYSOLUTIONS LLC
84029NVRCRUSINT

Region 9
METAL BRIQUITTING
90011MTLBR5800S

Region 10
BP CHERRY POINT REFINERY
98248RCCHR4519G

EMERALD SERVICES INC
98421SLPRN1825A

Hope you find this helpful.

Thanks

Velu Senthil

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Monday, August 26, 2019 8:55 AM
To: Senthil, Velu <Senthil.Velu@epa.gov>
Subject: RE: RY18 NA Data Quality Checks - Except NAICS issue - Due 8/30/2019

Can the CGI folks run a report for those that promised revisions and have not submitted revisions?

Likewise, can CGI run a report for those that have submitted revision but have not responded to questionnaire link?

Thanks Velu –

We can send a reminder to these folks if we know who they are.

Happy Week,
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Toxics Enforcement Section (ECDST)
Enforcement & Compliance Assurance Division (ECD)
U.S. EPA Region 6
Dallas, TX 75270
(214.665.8116)

From: Senthil, Velu <Senthil.Velu@epa.gov>
Sent: Monday, August 26, 2019 6:29 AM
To: Rascher, Chris <rascher.chris@epa.gov>; Crossmon, James <Crossmon.James@epa.gov>; Barth, Carina <barth.carina@epa.gov>; Travers, Timothy <travers.timothy@epa.gov>; Velez, Ezequiel <Velez.Ezequiel@epa.gov>; Chatham, Douglas <Chatham.Douglas@epa.gov>; Som, Kushal <som.kushal@epa.gov>; Gabrielow, Frank <gabrielow.frank@epa.gov>; Wakeland, Morton <wakeland.morton@epa.gov>; Bergin, Sean <Bergin.Sean@epa.gov>; Nowak, April <Nowak.April@epa.gov>; Satter, Suzanne <satter.suzanne@epa.gov>; Baranco, Angela <Baranco.Angela@epa.gov>; Cheryl Keenan <cheryl.keenan@erg.com>; Abby Burton <abby.burton@erg.com>; Walters, Elizabeth R. <walters.elizabeth@epa.gov>; Senthil, Velu <Senthil.Velu@epa.gov>
Subject: RY18 NA Data Quality Checks - Except NAICS issue - Due 8/30/2019

Hi All,
Just a reminder that due date (8/30/19) is fast approaching for RY18 NA data quality checks except NAICS issue.
I notice facilities submitted revisions but No facility responses; and facilities promised revisions but not yet submitted. Please follow up these facilities so we can wrap up this effort on time.
Thanks
Velu Senthil

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 9/6/2018 7:42:59 PM
To: Senthil, Velu [Senthil.Velu@epa.gov]
BCC: Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: 2017 Data Quality
Attachments: A_Region_6_RY17-NA-Ethylene Oxide List-July2018.xlsx; A_Mort_Region_6_RY17-NA-PBTs and Other Chems List-21July2018.xlsx; A_ARegion_6_RY17-NA-IncDec-List-21July2018.xlsx; A_Region_6_RY17-NA-Dioxin List-21July2018.xlsx; Mort_Region_6_RY17-NA-Comment Check-List23July2018.xlsx; Mort_Region_6_RY17-NA-Tribal List-21July2018.xlsx; Region6_RY17-NA-Comment Check-List23July2018.xlsx

A lot have not answered but I finally got all my emails answered and worksheets updated.

I think this is it????

If questions – let me know Velu,
Best Week's Wishes,

Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program
Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 5/2/2017 8:03:23 PM
To: Griffin, Stephanie [griffin.stephanie@epa.gov]; Turk, David [Turk.David@epa.gov]; Clark, Katherine [Clark.Katherine@epa.gov]; Milton, Philip [Milton.Philip@epa.gov]
CC: Antisdel, Timothy [Antisdel.Timothy@epa.gov]; Muldrow, Bill [Muldrow.Bill@epa.gov]
Subject: FW: Enforcement Confidential re Tesoro Wilmington 2015 inspection
Attachments: Tesoro_Response_3_1_2016.pdf; Appendix K - Envirofacts Form R Summary.pdf

Importance: High

Am helping our Dave Bassinger in Region 9

Dave Turk help him back when, resolved a multiestablishment issue with a Tesoro in California.
Facility "just" inspected by NEIC

Dave Turk discovered – see below the supposed new TRIFID they were to report under.

ENFORCEMENT CONFIDENTIAL

FOIA EXEMPT

Email: lucina.s.lopez@tsocorp.com

Reporting Year 2012 Separate reporting entities		Reporting Year 2013 Contiguous entities ("multi-establishment")
Tesoro Sulfur Recovery Plant Carson, CA TRIFID: 90810TXCRF23208	→	Tesoro Sulfur Recovery Plant Carson, CA TRIFID: 90744TXCRF2101E
BP West Coast Products LLC Coke Barn Carson, CA TRIFID: 90749RCPRD1801E	→	Tesoro Carson Coke Handling Facility Carson, CA TRIFID: 90744TXCRF2101E
ARCO Carson Products Terminal Carson, CA TRIFID: 90749RCPRD1801E	→	Tesoro Carson Products Terminals Carson, CA TRIFID: 90744TXCRF2101E
Tesoro Los Angeles Refinery Wilmington, CA TRIFID: 90744TXCRF2101E	→	Tesoro Los Angeles Refinery Wilmington, CA TRIFID: 90744TXCRF2101E

" ------- " denotes contiguous facilities under common ownership.

TRIFID 90749RCPRD1801E remains as a separate facility, with other reporting 'parts'.

I have been looking in Wilmington, CA and the refinery is not there – so I see Carson and go Taaa Daaaaa

but guess what when I look in Carson, CA the only TRIFID I get is

TRI FACILITY ID	FACILITY INFORMATION	FACILITY NAME	ADDRESS	COUNTY NAME	SUBMISSIONS
90749RCPRD1801E	View Facility Information	TESORO LOS ANGELES REFINERY-CARSON OPERATIONS	2350 E 223RD ST CARSON, CA 90810	LOS ANGELES	3475

This TRIFID does not match any of the supposed TRIFIDS the facility combined into – yellow below, but does match older
TRIFID's

Reporting Year 2012 Separate reporting entities		Reporting Year 2013 Contiguous entities ("multi-establishment")
Tesoro Sulfur Recovery Plant Carson, CA TRIFID: 90810TXCRF23208	→	Tesoro Sulfur Recovery Plant Carson, CA TRIFID: 90744TXCRF2101E
BP West Coast Products LLC Coke Barn Carson, CA TRIFID: 90749RCPRD1801E	→	Tesoro Carson Coke Handling Facility Carson, CA TRIFID: 90744TXCRF2101E
ARCO Carson Products Terminal Carson, CA TRIFID: 90749RCPRD1801E	→	Tesoro Carson Products Terminals Carson, CA TRIFID: 90744TXCRF2101E
Tesoro Los Angeles Refinery Wilmington, CA TRIFID: 90744TXCRF2101E	→	Tesoro Los Angeles Refinery Wilmington, CA TRIFID: 90744TXCRF2101E

" ------- " denotes contiguous facilities under common ownership.

What is blazes is this facility doing???

Hey, if I look up a yellow TRIFID above – guess what ZIPPO

Only TRI facility information was searched to select facilities

TRI Facility ID: Beginning With: 90744TXCRF2101E

Results are based on data extracted on MAR-01-2017
select distinct a.pgm_sys_id, a.primary_name, a.location_address, a.city_
order by state_code, primary_name, a.pgm_sys_id asc

Total Number of Facilities Displayed: 0

My head hurts

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 2:24 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Definitely a refinery.

I've attached Appendix K from the report, note pages 10 & 11, which discusses reporting from multi-establishments, including the refinery.

David Turk actually helped to resolve this issue; I've also attached his letter on this dated March 1, 2016.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 12:00 PM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Is their address in the NEIC report?

They are a refinery for sure – correct?

I'm jotting down some notes for you.....I'll deliver to you before I leave today and if you like we can chat tomorrow if you like?

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 1:57 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Definitely in 9, not 10. Don't know why Tesoro Wilmington isn't shown.

Note that the report states that Tesoro began reporting as a multi-establishment facility in 2013 under the TIFID ID # I provided, but the inspection reviewed the Tesoro Los Angeles Refinery Thresholds (Wilmington), not the combined thresholds (see page 7).

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 11:51 AM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Hmmm, only 2 facilities in Region 9
or are you in 10
age ya know, smile

List of EPA-Regulated Facilities in TRI

TRI FACILITY ID	FACILITY INFORMATION	FACILITY NAME	ADI
90748RCCQC1175C	View Facility Information	TESORO WILMINGTON CALCINER	1175 CARRACK WILMINGTON,
90744TXCRF1926C	View Facility Information	TESORO WILMINGTON SALES TERMINAL	1930 E PACIFIC WILMINGTON,

Go To Top Of The Page

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 1:49 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

It's the refinery, not the terminal.

Should still be under Tesoro Wilmington, especially for TRI, but Tesoro is in the process of combining Wilmington and Carson facilities and so call them both parts of the "Tesoro Los Angeles Refinery".

The TRIFID number was 90744TXCRF2101E, from a July 2015 report that Russ had done. Address is 2101 E Pacific Coast Highway.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 11:35 AM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection
Importance: High

Afternoon Dave.

You are correct, there is no new ERP, per se, only a new penalty matrix.

Is this your facility?

Click on "View Facility Information" to view EPA Facility information for the facility.

Facility Name:	TESORO WILMINGTON SALES TERMINAL	Mailing Name:	TESORO WILMINGTON SALES TERMINAL
Address:	1950 E PACIFIC COAST HIGHWAY WILMINGTON CA 90744	Mailing Address:	8601 S GARFIELD AVE SOUTH GATE CA 90280
County:	LOS ANGELES	Region:	9
Facility Information:	View Facility Information	TRI ID:	90744TXCRF1926C
DUNS Number:		FRS ID:	110018955825
TRI Preferred Latitude:	33.791667	TRI Preferred Longitude:	118.235556
Public Contact:	RUTHANNE WALKER	Phone:	5628064105
Assigned Public Contact:	RUTHANNE WALKER		
Parent Company:	TESORO CORP	Standardized Parent Company:	TESORO CORP
BIA Tribal Code:		Tribe:	

Parent DUNS: 008133480

Starting with Reporting Year 2006, TRI Facilities began reporting NAICS codes, instead of SIC codes, to identify their Primary Business Activities.

NAICS Codes for 2015

NAICS CODE	PRIMARY	NAICS DESCRIPTION
424710	YES	Petroleum Bulk Stations and Terminals

Attached is a lil VBA program I wrote to auto chart a 5 year reporting history on a facility.
Instructions for use on first worksheet.
The history is downloaded from the Submissions Report in EZ-Query and copied into the workbook AFTER ALL DATA ARE DELETED!
Below is FROM last worksheet – it is auto generated
Yellow = reported
White = did not report that chemical for that year.
Good for asking a facility why they did not report for a certain chemical for a certain year.

	A	B	C	D	E	F	G
1	TRI_CHEMICAL	2011	2012	2013	2014	2015	
2	1 2 4-TRIMETHYLBENZENE						
3	BENZENE						
4	BENZO(G H I)PERYLENE						
5	CUMENE						
6	CYCLOHEXANE						
7	ETHYLBENZENE						
8	HYDROGEN SULFIDE						
9	LEAD COMPOUNDS						
10	MERCURY COMPOUNDS						
11	NAPHTHALENE						
12	N-HEXANE						
13	POLYCYCLIC AROMATIC COMPOUNDS						
14	TOLUENE						
15	XYLENE (MIXED ISOMERS)						
16							
17							

Let me look at your attachment and get back with you David.
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 1:18 PM

To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Very much appreciate your willingness to help.

Not Valero; it's Tesoro Wilmington (pre-2007 owner was Shell, current operations being combined with Tesoro Carson, previously BP).

Thanks for the ERP – so a completely new ERP was never finalized?

I'm attaching for reference the NEIC final report, along with my internal "quick summary" to my boss of the Findings and Observations table 7. I'm interested in discussing this in more detail with you, when you have some time.

TRI Inspection years were 2012-2014.

I need to determine (probably from new TRI reports) what the facility may have already corrected. Don't believe this is too difficult, but what do you think?

NEIC inspectors (Armando Bustamante and Martha Hamre) are both around and available for discussion as well.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 7:59 AM
To: Basinger, David <Basinger.David@epa.gov>
Subject: From Mort
Importance: High

Thanks for your call Dave.

Would be most happy to assist in your penalty assessment at the refinery you inspected out there in Region 9. Wasn't Valero was it? I have a case here on those guys.

Find attached the latest matrices which covers violations

Gravity-Based Penalty Matrix for Violations that Occurred After January 12, 2009 but before or on November 2, 2015

CIRCUMSTANCE LEVELS	EXTENT A Major	B Significant	C Minor
1	$37,500	$24,080	$7,090
2	$28,330	$18,420	$4,250
3	$21,250	$14,170	$2,130
4	$14,170	$8,500	$1,420
5	$7,090	$4,250	$710
6	$2,840	$1,850	$290

Gravity-Based Penalty Matrix for Violations that Occurred after November 2, 2015[1]

CIRCUMSTANCE LEVELS	EXTENT A Major	B Significant	C Minor
1	$40,779	$27,730	$8,156
2	$32,623	$21,205	$4,893
3	$24,467	$16,312	$2,447
4	$16,312	$9,787	$1,631
5	$8,156	$4,893	$816
6	$3,262	$2,121	$326

CIRCUMSTANCE LEVELS

The higher assessed matrix would be used for **2015** violations. At first this appears incorrect. However, recall, there can be no violation of EPCRA 313 until *after* the due date of the form.
Forms for calendar year 2015 were due on or before July 1, 2016, and July 1, 2016 is AFTER November 2, 2015.
Therefore, the higher penalty matrix would apply to 2015 violations onward.

I also do my darn best to settle up front so as to issue only a CAFO vs issuing a Complaint, then having to negotiate, which may drag out, then close out the Complaint with a CAFO.
The one document advantage is that no clock begins ticking in the ALJ's office in DC. Those boys can get "testy" if things drag out.

However, that is up to how you folks wanna handle.

Best, Mort

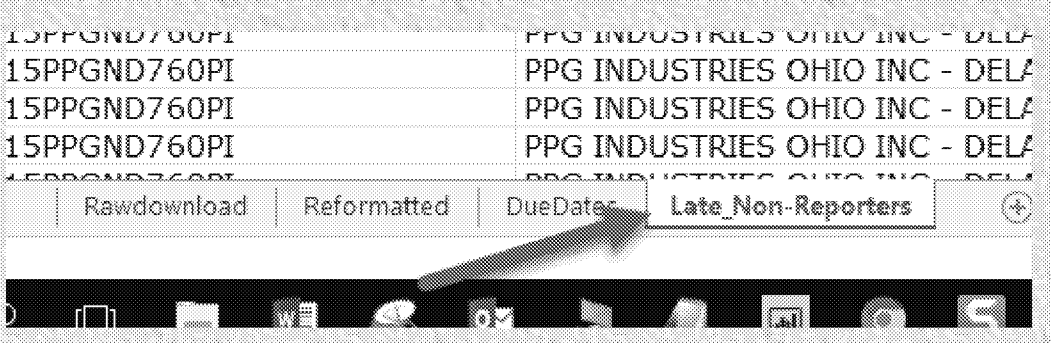
Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 10/22/2019 7:22:49 PM
To: Staniec, Carol [staniec.carol@epa.gov]
Subject: Don't recall sending you Region 5's historical reporting for all facilities, for all chemicals 2014 - 2018
Attachments: Final_Region5_2014-2018.xlsx

Importance: High

Workbook has 4 worksheets



You want the last worksheet –

Facilities that did not report a chemical for a calendar year have a red background and obviously, no date.
So you can see who or what chemical was reported in 2018 but not 2017 and reported in 2017 and not 2018

Facilities that reported ***after*** the reporting deadline has the ***certification date+highlighted in green***

Suggest making a copy of this workbook, and working on the copy using Excel functions to sort, or extract, or do whatever to target facilities.

Questions, let me know,
Mort

	A	B	C	D	E	F	G	H	I
1	TRIFID	Facility_Name	TRI_Chemical	2014	2015	2016	2017	2018	
2	2623WNLSTL999EA	O'NEAL STEEL INC	MANGANESE	6/25/2015	6/30/2016	6/21/2017	6/29/2018	6/12/2019	
3	2821WNLNDW486MI	INLAND WATERS POLLUTION CONTROL DETROIT FACILITY	STYRENE	6/19/2015	6/28/2016	6/27/2017			
4	3537WDYCHM97IND	HERAEUS EPURIO LLC	DICHLOROMETHANE	6/30/2015	6/30/2016	6/16/2017	6/29/2018	6/24/2019	
5	3537WDYCHM97IND	HERAEUS EPURIO LLC	METHANOL	6/30/2015	6/30/2016	6/16/2017	6/29/2018	6/24/2019	
6	3537WDYCHM97IND	HERAEUS EPURIO LLC	N N-DIMETHYLFORMAMIDE	6/30/2015					
7	43004DNCRP6635T	SCHAFER DRIVELINE LLC	COPPER	6/15/2015	6/3/2016	6/16/2017	6/26/2018	6/17/2019	
8	43004GRTCX1160G	GROTE CO	CHROMIUM	6/8/2015	6/30/2016	6/29/2017	6/12/2018	6/7/2019	
9	43004GRTCX1160G	GROTE CO	NICKEL	6/8/2015	6/30/2016	6/29/2017	6/12/2018	6/7/2019	
10	43015GNRLC550LI	LIBERTY CASTING CO LLC	1 2 4-TRIMETHYLBENZENE	6/26/2015	6/24/2016	6/30/2017	7/2/2018	7/9/2019	
11	43015GNRLC550LI	LIBERTY CASTING CO LLC	COPPER	6/26/2015	6/23/2016	6/30/2017	7/2/2018	7/9/2019	
12	43015GNRLC550LI	LIBERTY CASTING CO LLC	DIISOCYANATES	6/26/2015		6/30/2017	7/2/2018	7/9/2019	
13	43015GNRLC550LI	LIBERTY CASTING CO LLC	LEAD	6/26/2015	6/24/2016				
14	43015GNRLC550LI	LIBERTY CASTING CO LLC	MANGANESE	6/26/2015	6/23/2016	6/30/2017	7/2/2018	7/9/2019	
15	43015GNRLC550LI	LIBERTY CASTING CO LLC	NAPHTHALENE	6/26/2015	6/23/2016	6/30/2017	7/2/2018	7/9/2019	
16	43015GNRLC550LI	LIBERTY CASTING CO LLC	PHENOL	6/26/2015	6/23/2016	6/30/2017	7/2/2018	7/9/2019	
17	43015GNRLC550LI	LIBERTY CASTING CO LLC	XYLENE (MIXED ISOMERS)	6/26/2015		6/30/2017			
18	43015LBRTC975PI	LIEBERT CORP	COPPER	6/19/2015					
19	43015LBRTC975PI	LIEBERT CORP	MANGANESE	6/19/2015					
20	43015NPPRT1376P	LUVATA OHIO INC FPBU	COPPER COMPOUNDS	6/25/2015	6/30/2016	5/31/2017	6/28/2018	6/17/2019	
21	43015PNNWL4211O	HENKEL CORP	CERTAIN GLYCOL ETHERS	6/25/2015	6/29/2016	6/13/2017	6/25/2018	6/20/2019	
22	43015PNNWL4211O	HENKEL CORP	DIETHANOLAMINE	6/25/2015	6/29/2016	6/13/2017	6/25/2018	6/20/2019	

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Enforcement & Compliance Assurance Division (ECD)
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Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 9/19/2017 1:16:03 PM
To: Clark, Katherine [Clark.Katherine@epa.gov]; Miles, James [miles.james@epa.gov]; Ziegel, Dean [Ziegel.Dean@epa.gov]; Haas, Craig [Haas.Craig@epa.gov]
CC: Milton, Philip [Milton.Philip@epa.gov]
Subject: Valero - Houston Refinery - Initial Response with Respect to TRI Reporting Consistency
Attachments: Valero_5Year_Reporting_Consistency.xlsm

Importance: High

Please find attached a workbook with Valero's (Houston, Texas) reporting history. Note: there are several Valero's in Houston, the news article did not specify an exact location,
they only used the term – *refinery*

Therefore, my presumption is that the facility in question is highlighted below and this is the one for
which I ran my "consistency in TRI reporting" program (attached).

List of EPA-Regulated Facilities in TRI

TRI FACILITY ID	FACILITY INFORMATION	FACILITY NAME	ADDRESS	COUNTY NAME	SUBMISSIONS
77045LMDRE11750	View Facility Information	VALERO ALMEDA REFINED PRODUCTS TERMINAL	11750 ALMEDA RD HOUSTON, TX 77045	HARRIS	15
77012VLRNR9701MA	View Facility Information	VALERO ENERGY PARTNERS LP	9701 MANCHESTER HOUSTON, TX 77012	HARRIS	23
77061HBBYR8673M	View Facility Information	VALERO HOBBY REFINED PRODUCTS TERMINAL	8673 MONROE HOUSTON, TX 77061	HARRIS	6
77029VLRHS9704CL	View Facility Information	VALERO HOUSTON ASPHALT TERMINAL	9704 CLINTON DR HOUSTON, TX 77029	HARRIS	15
77012MLLPT9701M	View Facility Information	VALERO REFINING - TEXAS LP HOUSTON REFINERY	9701 MANCHESTER HOUSTON, TX 77012	HARRIS	1092
77041VNLRF9505B	View Facility Information	VALERON STRENGTH FILMS LP	9505 BAMBOO RD HOUSTON, TX 77041	HARRIS	4

Go To Top Of The Page

Please look on the last worksheet tab to see a "chart" representation of which TRI chemicals were reported in which year
(2012 – statute of limitation to 2016). Because there are no red cells, all reports were submitted on or before the due date
for that reporting year. If a report has been submitted after the July 1 due date, the cell would be filled with red and not yellow.

Except for 5 chemicals, of the 39 different chemicals reported, all were consistently reported from 2012 to 2016.
The 5 are highlighted in pink. It is totally feasible to ask Valero why they had not submitted reports for these chemicals in the
years for which the cell/year intersection is white.

N11

	A	B	C	D	E	F	G	H
1	TRI_CHEMICAL	2012	2013	2014	2015	2016		
2	1 2 4-TRIMETHYLBENZENE							
3	1 3-BUTADIENE							
4	AMMONIA							
5	ANTHRACENE							
6	ANTIMONY COMPOUNDS							
7	BENZENE							
8	BENZO(G H I)PERYLENE							
9	CARBON DISULFIDE							

I will next turn my attention to chemical releases, especially benzene – note above, it was consistently reported from 2012 – 2016.

If there is something specifically you would like me to investigate – please feel free to ask.

Best,
Mort

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214.665.8116

Message

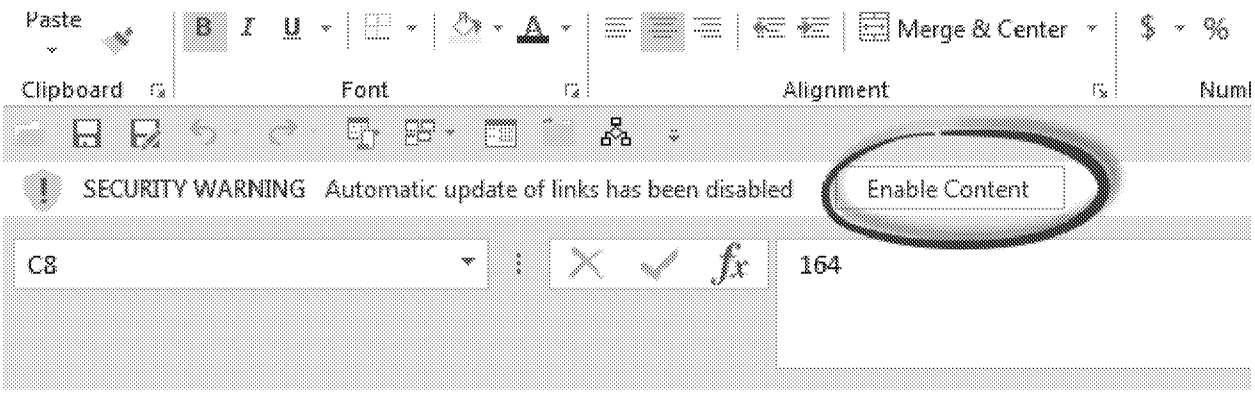
From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 4/10/2017 1:07:10 PM
To: Moore, Nathaniel [Moore.Nathaniel@epa.gov]
BCC: Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: Valero's 5 year reporting history
Attachments: Valero_ReportingHistory_April_2016.xlsm; Valero_ReportingHistory_April_10_2017.xlsm

Importance: High

2015 is latest.
2016 forms are not due until July 1, 2017

See attached workbook – this workbook has code – VBA code that is, to auto chart which chemicals were reported in which RY (reporting year).
This was run in April 2016

If you see this warning, click OK – due to fact the workbook has code in it.



This comes in very handy for facilities that have a large number of chemicals, like Valero.

The last tab (worksheet) has the results
April 2016 worksheets
yellow = reported for that TRI chemical in that calendar year
white = DID NOT report for that TRI chemical in that calendar year

	A	B	C	D	E	F	G
1	TRI_CHEMICAL	2010	2011	2012	2013	2014	
2	1 2 4-TRIMETHYLBENZENE						
3	1 3-BUTADIENE						
4	AMMONIA						
5	ANTHRACENE						
6	BENZENE						
7	BENZO(G H I)PERYLENE						
8	CARBON DISULFIDE						
9	CARBONYL SULFIDE						
10	COBALT COMPOUNDS						
11	CRESOL (MIXED ISOMERS)						
12	CUMENE						
13	CYANIDE COMPOUNDS						
14	CYCLOHEXANE						
15	DIOXIN AND DIOXIN-LIKE COMPOUNDS						
16	ETHYLBENZENE						
17	ETHYLENE						
18	HYDROCHLORIC ACID (1995 AND AFTER "ACID AEROSOLS" ONLY)						
19	HYDROGEN CYANIDE						
20	HYDROGEN FLUORIDE						
21	HYDROGEN SULFIDE						
22	LEAD COMPOUNDS						
23	MERCURY COMPOUNDS						
24	METHANOL						
25	MOLYBDENUM TRIOXIDE						
26	NAPHTHALENE						
27	N-HEXANE						
28	NICKEL COMPOUNDS						
29	NITRATE COMPOUNDS						
30	PHENANTHRENE						
31	PHENOL						
32	POLYCYCLIC AROMATIC COMPOUNDS						
33	PROPYLENE						
34	STYRENE						
35	SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY)						
36	TETRACHLOROETHYLENE						
37	TOLUENE						
38	VANADIUM COMPOUNDS						
39	XYLENE (MIXED ISOMERS)						
40							

There are reasons to not report, i.e., did not exceed threshold for reporting.

Mr. Parker needs to provide the usage for:

1. **cobalt compounds** 2011 and 2012 (2010 has dropped due to statute of limitation)
2. **cyanide compounds** for 2011, 2012, 2013, 2014
3. **hydrogen cyanide** for 2011, 2012, 2013, 2014
4. **hydrogen sulfide became reportable only in 2012**
5. **molybdenum trioxide** for 2012

(see update below for questions to ask)

For grins let's see if these boys did something between last April 2016 and now...am going to redo this analysis for 2011 – 2015:
Me thinks they did

	A	B	C	D	E	F	G
1	TRI_CHEMICAL	2011	2012	2013	2014	2015	
2	1 2 4-TRIMETHYLBENZENE						
3	1 3-BUTADIENE						
4	AMMONIA						
5	ANTHRACENE						
6	BENZENE						
7	BENZO(G H I)PERYLENE						
8	CARBON DISULFIDE						
9	CARBONYL SULFIDE						
10	COBALT COMPOUNDS						
11	CRESOL (MIXED ISOMERS)						
12	CUMENE						
13	CYCLOHEXANE						
14	DIOXIN AND DIOXIN-LIKE COMPOUNDS						
15	ETHYLBENZENE						
16	ETHYLENE						
17	HYDROCHLORIC ACID (1995 AND AFTER "ACID AEROSOLS" ONLY)						
18	HYDROGEN FLUORIDE						
19	HYDROGEN SULFIDE						
20	LEAD COMPOUNDS						
21	MERCURY COMPOUNDS						
22	METHANOL						
23	MOLYBDENUM TRIOXIDE						
24	NAPHTHALENE						
25	N-HEXANE						
26	NICKEL COMPOUNDS						
27	NITRATE COMPOUNDS						
28	PHENANTHRENE						
29	PHENOL						
30	POLYCYCLIC AROMATIC COMPOUNDS						
31	PROPYLENE						
32	STYRENE						
33	SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY)						
34	TETRACHLOROETHYLENE						
35	TOLUENE						
36	VANADIUM COMPOUNDS						
37	XYLENE (MIXED ISOMERS)						
38							
39							

First they did not need to report for **vanadium compounds** – I have affirmed this from initial inquiry.
However,

1. cobalt compounds – questions remain
2. molybdenum trioxide – questions remain

We may wish to reaffirm that vanadium compounds were below threshold for reporting.

Of note:

cyanide compounds were completely removed
hydrogen cyanide completely removed

Think we should know why they initially reported, then all of a sudden after we begin our investigation, they deleted.

Both workbooks attached.

Will get to work on max on site.

Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Moore, Nathaniel
Sent: Friday, April 07, 2017 8:56 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: Valero Additional information

Good morning Mort,

I was wondering if you are able to access, or know someone who is able to access, Valero's previous and post 2015 Form-Rs. I think this will help shed light on what different chemicals they had on site from year to year or what volumes they had. Any information will be appreciated.

Respectfully,

Nathaniel N. Moore
Assistant Regional Counsel
RCRA & Toxics Enforcement Branch
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue
Dallas, Texas 75202
Tel. (214) 665-8151
moore.nathaniel@epa.gov

THIS MESSAGE, INCLUDING ATTACHMENTS, CONTAINS SENSITIVE INFORMATION THAT IS INTENDED ONLY FOR THE RECIPIENT(S). INFORMATION IN THIS MESSAGE IS CONFIDENTIAL AND MAY BE PROTECTED BY ATTORNEY/CLIENT, WORK PRODUCT, OR OTHER PRIVILEGES.

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 9/5/2017 1:18:56 PM
To: Parra, Juan [Parra.Juan@epa.gov]; Knipschild, Shane [Knipschild.Shane@epa.gov]; Clark, Katherine [Clark.Katherine@epa.gov]
CC: Blake-Coleman, Wendy [Blake-Coleman.Wendy@epa.gov]; Mohamed, Ahmed (CGI Federal) [ahmed.mohamed@cgifederal.com]; Antisdel, Timothy [Antisdel.Timothy@epa.gov]
Subject: Further Clarification for Valero -
Attachments: RY14-16-Day-Uncertified-Reminder.docx

INTERNAL DELIBERTAIVE DO NOT RELEASE UNDER FOIA

Just off the phone with Kathy this Tue Morn, and now I understand what the question is more clearly.

Let me see if I can explain...

Currently in our CDX database we have that Valero in Oklahoma, both transmitted and certified their reporting forms for 2014
on 11/23/2015 – 2014 reports were due 7/1/2015

Search Again

CDX Id	User	TRIFID	Transmit Date	Cert. Date	Cancel Date	State	RY
TRI00032017062317024 4KMLASSAHN.xml	COWBOY56	73461TTLPTHIGHW	6/23/17 13:42	6/23/17 17:02		OK	2016
	Transaction ID: [illegible]						
TRI00022016052016050 4COWBOY56.xml	COWBOY56	73461TTLPTHIGHW	6/20/16 16:09	6/20/16 16:18		OK	2015
	Transaction ID: [illegible]						
TRI00032017062317024 4KMLASSAHN.xml	COWBOY56	73461TTLPTHIGHW	6/23/17 13:42	6/23/17 17:02		OK	2016
	Transaction ID: [illegible]						
TRI00022016051313493 9KMLASSAHN.xml	KMLASSAHN	73461TTLPTHIGHW	5/13/16 13:49	5/13/16 13:52		OK	2014
	Transaction ID: [illegible]						
TRI00022015112310272 7KMLASSAHN.xml	KMLASSAHN	73461TTLPTHIGHW	11/23/15 10:27	11/23/15 10:30		OK	2014
	Transaction ID: [illegible]						
TRI00022013062519515 1MARIONWATSON.xml	MARIONWATSON	73461TTLPTHIGHW	6/29/13 19:51	6/28/13 18:09		OK	2011
	Transaction ID:						

In one of the attachments that Juan was kind enough to send on Friday September 1, there is a "form" email announcement (attached) alerting facilities that they need to certify. Attached to the end of that email is specific information that was inserted into that email for a specific facility (Valero-OK), if my interpretation is correct (scroll to bottom of form announcement to see contents)?

If my interpretation is incorrect – PLEASE LET ALL OF US KNOW WHAT THE CORRECT INTERPRETATION IS - THANKS!

BY THE WAY – WHOEVER THOUGHT THIS TRACKING MECHANISME UP – MUCHO KUDOO'S – IT'S GREAT!!! KEEP UP THE GREAT WORK TO HELP US ENFORCEMENT TYPES OUT

First it appears that 3 individuals received this email, but two (2) at same address:

Don Wilson @

7. EMAILADDRESS	don.wilson@valero.com

Tracy Watson @

7. EMAILADDRESS	marion.watson@valero.com

and
Marion Watson @ the same email address as above – odd?

6. currentDate	June 14, 2015
7. EMAILADDRESS	marion.watson@valero.com

QUESTION – DO THESE INDIVIDUALS REPRESENT?:

1. **CERTIFYING OFFICIAL**
2. **TEHCNICAL CONTACT**
3. **PREPARER**

If no, who do they represent? How do we know who is who?

The current date that was inserted into the email is, I assume, filled in by computer – Yes / No?
The current date is listed as June 13, 2015 for first two emails and June 14, 2015 for last email (see below):

6. currentDate	June 13, 2015
7. EMAILADDRESS	don.wilson@valero.com

6. currentDate	June 13, 2015
7. EMAILADDRESS	marion.watson@valero.com

6. currentDate	June 14, 2015
7. EMAILADDRESS	marion.watson@valero.com

Importantly, the very first sentence in this email *reminder* is

need to correct the space after the second form(s)

To:

$!CONTACTNAME,

Your form(s) were transmitted for certification in TRI-MEweb, but your form(s)have not been certified

There are only $!days days left before the Toxics Release Inventory (TRI) reporting deadline (11:59 pm on July 1). As of $!todaysDate, our data processing center (DPC) has detected that you have TRI submission(s) that needs to be properly certified for all chemical form(s) that were prepared using our

I STRONGLY, STRONGLY SUGGEST ADDING ANTOHER VARIABLE TO THE EMAIL – *THE DATE ON WHICH THE FORMS WERE TRANSMITTED!*

Your form(s) were transmitted for certification on June 5, 2015, in TRI-MEweb, but your form(s) have ...

This sentence implies that this email is a reminder to certify forms that have already been transmitted through CDX

If so, this email alone suggests that Valero had already transmitted their 2014 reporting forms *prior to June 13, 2015*,
otherwise why in blue blazes would they be getting this email?

Therefore, there is a major disconnect between the attached email and what appears in the CDX database as a transmittal date.

We need to know if, in fact, there were 2014 forms from Valero **(73410TTLPTHIGHW)** in the system prior to July 1, 2015,
but uncertified, as the attached email would strongly suggest.

Could it be those *original* forms were withdrawn for whatever reason?

Hopefully, this is a lil more clear as to the disconnect that both Kathy and I now see.

Thanks for everyone's assistance in this matter.

Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 1/27/2017 7:06:33 PM
To: Knipschild, Shane [Knipschild.Shane@epa.gov]
CC: Antisdel, Timothy [Antisdel.Timothy@epa.gov]; Parra, Juan [Parra.Juan@epa.gov]; Turk, David [Turk.David@epa.gov]; Griffin, Stephanie [griffin.stephanie@epa.gov]
Subject: RE: TRI-MEweb - CDX

Will review, may have questions....in the midst of DQ with Velu

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

-----Original Message-----
From: Knipschild, Shane
Sent: Thursday, January 26, 2017 9:28 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: Antisdel, Timothy <Antisdel.Timothy@epa.gov>; Parra, Juan <Parra.Juan@epa.gov>; Turk, David <Turk.David@epa.gov>; Griffin, Stephanie <griffin.stephanie@epa.gov>
Subject: FW: TRI-MEweb - CDX

Hi Mort

Below is the information you requested for this facility. The only thing not listed here is the user's CDX Inbox extract. We have history of all automated emails to this facility since 6/27/2016 in TRIPS. We would have to get the rest from the user's CDX Inbox. That requires coordination with the CDX Security team and we have initiated that. We will send you an update as soon as we receive that. Here is everything else:

Facility Status

ACTIVE

Multi-Part

No

TRIFID

73401TTLPTHIGHW

Name

VALERO REFINING CO -OKLAHOMA VALERO ARDMORE REFINERY

Street

ONE VALERO WAY

City,State,ZIP Cod

ARDMORE OK 73401

BIA/Tribe Code

NA

County

CARTER

Mailing Information

Mailing Street

PO BOX 188

City,State,ZIP Code

ARDMORE OK 73402

Facility Type

Commercial

Certifying Official Name

KEVIN LASSAHN

Certifying Official Title

VP & GENERAL MANAGER

Technical Contact Name

TRACY WATSON

Technical Contact Phone

5802213114

Technical Contact Email

MARION.WATSON@VALERO.COM<mailto:MARION.WATSON@VALERO.COM>

Public Contact Name

GREG ELLIOTT

Public Contact Phone

5802216232

Public Contact Email

GREG.ELLIOTT@VALERO.COM<mailto:GREG.ELLIOTT@VALERO.COM>

NAICS

324110

D&B

247122161

Submitted Name

VALERO ENERGY CORP

Submission History

The attached "Submission History.xlsx" spreadsheet lists this facility's historical submissions.

Correspondence History

Date

Type

Description

08/17/2009

Email to DPC (See attached OT09000012740.PDF)

The DPC contacted the user about a change in address. The user responded with the following:

"THE ADDRESS FOR THE FACILITY IS LISTED AS CORRECT AT "ONE VALERO WAY". A NEW ENTRANCE TO THE FACILITY WAS COMPLETED IN 2008 AND THIS RESULTED IN AN ASSOCIATED ADDRESS CHANGE. OTHER ENTRANCES TO THE FACILITY HAVE BEEN FENCED IN AND BARRICADED DUE TO HOMELAND SECURITY OBJECTIVES. "

Automated Emails

The attached (Automated_Emails.xlsx) document contains all automated emails that TRI sent to this facility since June 27, 2016.

CDX Activity

Here are the user accounts associated with the facility were used to submit TRI data.

Name

User ID

User Type

Registration Date

Last Log In Date

Used to

Kevin Lassahn

KMLASSAHN

Certifying Official

3/11/2013 4:05:23 PM

8/31/2016 4:50:53 PM

Submit and Certify RY2014 data on 11/23/2015. See Submission History.xlsx.
Submit and Certify RY2014 data on 05/13/2016. See Submission History.xlsx

Lyndon S. Turner

COWBOY56

Preparer

12/23/2015 11:03:35 AM

1/12/2017 11:06:35 AM

Submit and Certify RY2015 data on 06/20/2016. See Submission History.xlsx

Marion Watson

MARIONWATSON

Preparer

5/8/2006 9:11:34 AM

1/3/2017 11:27:48 AM

Submit and Certify RY 2008- 2013 on data See Submission History.xlsx

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 3/4/2019 1:51:43 PM
To: Lancaster, Stan [Lancaster.Stan@epa.gov]; Riley, David [riley.david@epa.gov]
CC: Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: Possible EPCRA 313 Targets from HQ's Non-reporter list.
Attachments: Non-Reporters-List-From-HQ's.xlsx

Importance: High

I have 10 off-sites already initiated, 5 for the 1st qtr and 5 for the 2nd qtr

	E	F
	TRIFID	**Facility_Name**
	70737SHLLCRIVER	Shell Chemical LP
	77303HMPLC600CD	Hempel (USA) Inc.
	75041CRRLL2900W	Carroll Clean Company
	79762CHMCN105PR	Univar USA Inc. Odessa Pronto
	79714WSTCN9998H	Waste Control Specialist LLC
	76304CNCNC1214N	Phillips 66
	77586STHWS5306H	PolyOne Corp
	79086WTCCRHCR1B	Continental Carbon
	77378RMNRG10586	NOV Wellbore
	75119PLYGR3801H	Poly Guard Products

To make things easy on ya'll – am attaching a list of non-reporters from HQ's, all my 2nd qtr targets are from that list and highlighted in yellow, beginning with Phillips 66.

161	1316214980031	76179MTRPL451SA	METRO POOL CHEMICAL INC	451 SANSOM SAGINAW	TX		6	CYNTHIA M MEYER
162	1316215028743	7620WHTCHM31JIM	HI TECH METAL FINISHING	3100 JIM CHF DENTON	TX		6	STEVEN K. MOUNCE
163	1316215543149	76304CNCNC1214N	PHILLIPS 66 PIPELINE-WICHITA FALLS PRO	1214 MARTIN WICHITA FALL	TX		6	SPENCER CAVE
164	1316215543164	76304CNCNC1214N	PHILLIPS 66 PIPELINE-WICHITA FALLS PRO	1214 MARTIN WICHITA FALL	TX		6	SPENCER CAVE
165	1316215543188	76304CNCNC1214N	PHILLIPS 66 PIPELINE-WICHITA FALLS PRO	1214 MARTIN WICHITA FALL	TX		6	SPENCER CAVE
166	1316215543152	76304CNCNC1214N	PHILLIPS 66 PIPELINE-WICHITA FALLS PRO	1214 MARTIN WICHITA FALL	TX		6	SPENCER CAVE
167	1316215543202	76304CNCNC1214N	PHILLIPS 66 PIPELINE-WICHITA FALLS PRO	1214 MARTIN WICHITA FALL	TX		6	SPENCER CAVE
168	1316215543190	76304CNCNC1214N	PHILLIPS 66 PIPELINE-WICHITA FALLS PRO	1214 MARTIN WICHITA FALL	TX		6	SPENCER CAVE
169	1316215543137	76304CNCNC1214N	PHILLIPS 66 PIPELINE-WICHITA FALLS PRO	1214 MARTIN WICHITA FALL	TX		6	SPENCER CAVE
170	1316215543176	76304CNCNC1214N	PHILLIPS 66 PIPELINE-WICHITA FALLS PRO	1214 MARTIN WICHITA FALL	TX		6	SPENCER CAVE
171	1316215579297	76501DLTCN3402C	DELTA CENTRIFUGAL LLC	3402 CENTER TEMPLE	TX		6	KEVIN CANFIELD

Note at top this list is filtered on Region 6 – hence the high row count.

A facility is listed for each chemical projected to have not been reported in 2017.

I'd pick facilities that have maybe more than 3 chemicals, or you can pick a facility that may not have reported for just a single chemical.
However, for a single chemical it could very easily not exceeded threshold for reporting.

You may want to "test the waters" first, for a number of sites, to see which are good potential cases, and keep only those.

Once you have your targets, let me know, as well as your colleague, so we do not duplicate effort.
I need to mark those off the master list.

Questions, let me know.
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 5/2/2017 7:43:06 PM
To: Basinger, David [Basinger.David@epa.gov]
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Should be Carson, CA and not Wilmington

TRI FACILITY ID	FACILITY INFORMATION	FACILITY NAME	ADDRESS	COUNTY NAME	SUBMISSIONS
90749RCPRD1801E	View Facility Information	TESORO LOS ANGELES REFINERY-CARSON OPERATIONS	2350 E 223RD ST CARSON, CA 90810	LOS ANGELES	3475

this has to be it.

nope TRIFIDS mis match

Reporting Year 2013
Contiguous entities ("multi-establishment")

Tesoro Sulfur Recovery Plant
Carson, CA
TRIFID: 90744TXCRF2101E

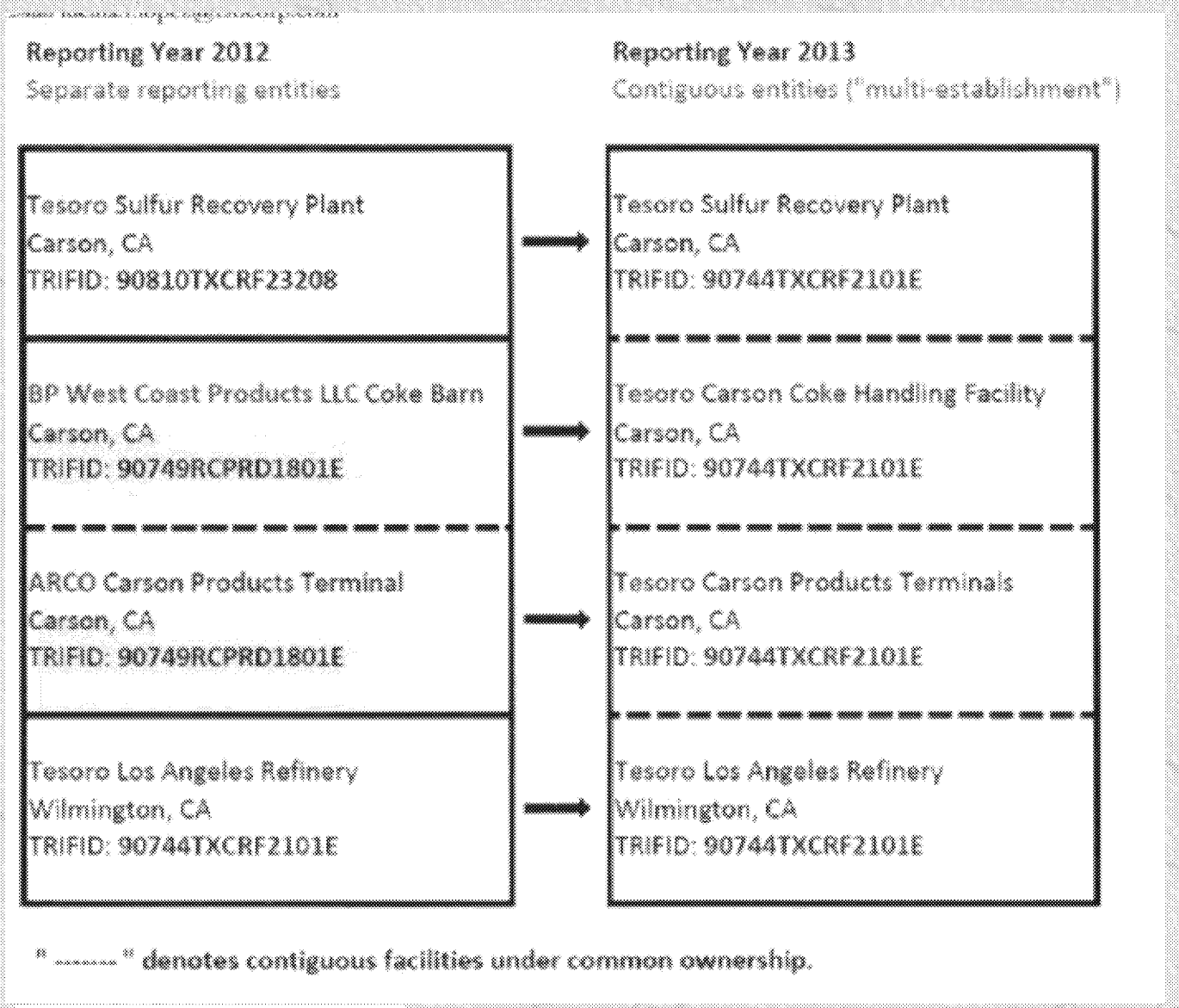
Tesoro Carson Coke Handling Facility
Carson, CA
TRIFID: 90744TXCRF2101E

Tesoro Carson Products Terminals
Carson, CA
TRIFID: 90744TXCRF2101E

Tesoro Los Angeles Refinery
Wilmington, CA
TRIFID: 90744TXCRF2101E

der common ownership.

But if I go back to 2012,,,,Bingo



TRI FACILITY ID	FAC
90749RCPRD1801E	V

What are these guys doing changing TRIFID's every other year

Before we talk about violations, we need to straighten out what their TRIFID is or TRIFID's are.

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 2:24 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Definitely a refinery.

I've attached Appendix K from the report, note pages 10 & 11, which discusses reporting from multi-establishments, including the refinery.

David Turk actually helped to resolve this issue; I've also attached his letter on this dated March 1, 2016.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 12:00 PM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Is their address in the NEIC report?
They are a refinery for sure – correct?

I'm jotting down some notes for you.....I'll deliver to you before I leave today and if you like we can chat tomorrow if you like?

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 1:57 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Definitely in 9, not 10. Don't know why Tesoro Wilmington isn't shown.

Note that the report states that Tesoro began reporting as a multi-establishment facility in 2013 under the TIFID ID # I provided, but the inspection reviewed the Tesoro Los Angeles Refinery Thresholds (Wilmington), not the combined thresholds (see page 7).

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 11:51 AM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Hmmm, only 2 facilities in Region 9
or are you in 10
age ya know, smile

List of EPA-Regulated Facilities in TRI

TRI FACILITY ID	FACILITY INFORMATION	FACILITY NAME	ADI
90748RCCQC1175C	View Facility Information	TESORO WILMINGTON CALCINER	1175 CARRACK WILMINGTON, (
90744TXCRF1926C	View Facility Information	TESORO WILMINGTON SALES TERMINAL	1930 E PACIFIC (WILMINGTON, (

Go To Top Of The Page

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 1:49 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

It's the refinery, not the terminal.

Should still be under Tesoro Wilmington, especially for TRI, but Tesoro is in the process of combining Wilmington and Carson facilities and so call them both parts of the "Tesoro Los Angeles Refinery".

The TRIFID number was 90744TXCRF2101E, from a July 2015 report that Russ had done. Address is 2101 E Pacific Coast Highway.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 11:35 AM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection
Importance: High

Afternoon Dave.

You are correct, there is no new ERP, per se, only a new penalty matrix.

Is this your facility?

Click on "View Facility Information" to view EPA Facility information for the facility.

Facility Name:	TESORO WILMINGTON SALES TERMINAL	Mailing Name:	TESORO WILMINGTON SALES TERMINAL
Address:	1950 E PACIFIC COAST HIGHWAY WILMINGTON CA 90744	Mailing Address:	8601 S GARFIELD AVE SOUTH GATE CA 90280
County:	LOS ANGELES	Region:	9
Facility Information:	View Facility Information	TRI ID:	90744TXCRF1926C
DUNS Number:		FRS ID	110018955825
TRI Preferred Latitude:	33.791667	TRI Preferred Longitude:	118.235556
Public Contact:	RUTHANNE WALKER	Phone:	5628064105
Assigned Public Contact:	RUTHANNE WALKER		
Parent Company:	TESORO CORP	Standardized Parent Company:	TESORO CORP
BIA Tribal Code:		Tribe:	

Parent DUNS: 008133480

Starting with Reporting Year 2006, TRI Facilities began reporting NAICS codes, instead of SIC codes, to identify their Primary Business Activities.

NAICS Codes for 2015

NAICS CODE	PRIMARY	NAICS DESCRIPTION
424710	YES	Petroleum Bulk Stations and Terminals

Attached is a lil VBA program I wrote to auto chart a 5 year reporting history on a facility.
Instructions for use on first worksheet.
The history is downloaded from the Submissions Report in EZ-Query and copied into the workbook AFTER ALL DATA ARE DELETED!
Below is FROM last worksheet – it is auto generated
Yellow = reported
White = did not report that chemical for that year.
Good for asking a facility why they did not report for a certain chemical for a certain year.

	A	B	C	D	E	F	G
1	TRI_CHEMICAL	2011	2012	2013	2014	2015	
2	1 2 4-TRIMETHYLBENZENE						
3	BENZENE						
4	BENZO(G H I)PERYLENE						
5	CUMENE						
6	CYCLOHEXANE						
7	ETHYLBENZENE						
8	HYDROGEN SULFIDE						
9	LEAD COMPOUNDS						
10	MERCURY COMPOUNDS						
11	NAPHTHALENE						
12	N-HEXANE						
13	POLYCYCLIC AROMATIC COMPOUNDS						
14	TOLUENE						
15	XYLENE (MIXED ISOMERS)						
16							
17							

Let me look at your attachment and get back with you David.
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 1:18 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Very much appreciate your willingness to help.

Not Valero; it's Tesoro Wilmington (pre-2007 owner was Shell, current operations being combined with Tesoro Carson, previously BP).

Thanks for the ERP – so a completely new ERP was never finalized?

I'm attaching for reference the NEIC final report, along with my internal "quick summary" to my boss of the Findings and Observations table 7. I'm interested in discussing this in more detail with you, when you have some time.

TRI Inspection years were 2012-2014.

I need to determine (probably from new TRI reports) what the facility may have already corrected. Don't believe this is too difficult, but what do you think?

NEIC inspectors (Armando Bustamante and Martha Hamre) are both around and available for discussion as well.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 7:59 AM
To: Basinger, David <Basinger.David@epa.gov>
Subject: From Mort
Importance: High

Thanks for your call Dave.

Would be most happy to assist in your penalty assessment at the refinery you inspected out there in Region 9. Wasn't Valero was it? I have a case here on those guys.

Find attached the latest matrices which covers violations

Gravity-Based Penalty Matrix for Violations that Occurred After January 12, 2009 but before or on November 2, 2015

CIRCUMSTANCE LEVELS	EXTENT		
	A Major	B Significant	C Minor
1	$37,500	$24,080	$7,090
2	$28,330	$18,420	$4,250
3	$21,250	$14,170	$2,130
4	$14,170	$8,500	$1,420
5	$7,090	$4,250	$710
6	$2,840	$1,850	$290

Gravity-Based Penalty Matrix for Violations that Occurred after November 2, 2015[1]

CIRCUMSTANCE LEVELS	EXTENT		
	A Major	B Significant	C Minor
1	$40,779	$27,730	$8,156
2	$32,623	$21,205	$4,893
3	$24,467	$16,312	$2,447
4	$16,312	$9,787	$1,631
5	$8,156	$4,893	$816
6	$3,262	$2,121	$326

CIRCUMSTANCE LEVELS

The higher assessed matrix would be used for **2015** violations. At first this appears incorrect. However, recall, there can be no violation of EPCRA 313 until *after* the due date of the form.
Forms for calendar year 2015 were due on or before July 1, 2016, and July 1, 2016 is AFTER November 2, 2015.
Therefore, the higher penalty matrix would apply to 2015 violations onward.

I also do my darn best to settle up front so as to issue only a CAFO vs issuing a Complaint, then having to negotiate, which may drag out, then close out the Complaint with a CAFO.
The one document advantage is that no clock begins ticking in the ALJ's office in DC. Those boys can get "testy" if things drag out.

However, that is up to how you folks wanna handle.

Best, Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 10/22/2019 12:48:49 PM
To: Durant, Jennah [Durant.Jennah@epa.gov]
Subject: RE: FOIA 9084 - Valero EPCRA case file

Always enjoy working with you Jennah!

Hope you folks have a super week...now have to dig into my old electronic files.

If you need anything from me, just let me know.
I'll document all I send to Deanna Bradford for the FOIA.

Best, Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Toxics Enforcement Section (ECDST)
Enforcement & Compliance Assurance Division (ECD)
U.S. EPA Region 6
Dallas, TX 75270
(214.665.8116)

From: Durant, Jennah <Durant.Jennah@epa.gov>
Sent: Tuesday, October 22, 2019 7:47 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Potts, Mark <Potts.Mark@epa.gov>
Cc: Stuckey, Troy <Stuckey.Troy@epa.gov>; Moore, Nathaniel <Moore.Nathaniel@epa.gov>; Bradford, Deanna <Bradford.Deanna@epa.gov>
Subject: RE: FOIA 9084 - Valero EPCRA case file

Thanks, Mort!

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Tuesday, October 22, 2019 7:34 AM
To: Potts, Mark <Potts.Mark@epa.gov>
Cc: Durant, Jennah <Durant.Jennah@epa.gov>; Stuckey, Troy <Stuckey.Troy@epa.gov>; Moore, Nathaniel <Moore.Nathaniel@epa.gov>; Bradford, Deanna <Bradford.Deanna@epa.gov>
Subject: RE: FOIA 9084 - Valero EPCRA case file

You bet Mark – have worked with Jennah on a number of occasions.

I don't think we have any or may a few hard copy files.

Most of mine are electronic, but when Nathaniel took over when they lawyered up,
I ceased all communications as we do in such situations.

Jennah, just saw your note – thanks, and acknowledge.
I think I have a pretty good idea what this guy wants from files.

Best to all!
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Toxics Enforcement Section (ECDST)
Enforcement & Compliance Assurance Division (ECD)
U.S. EPA Region 6
Dallas, TX 75270
(214.665.8116)

From: Potts, Mark <Potts.Mark@epa.gov>
Sent: Monday, October 21, 2019 3:25 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: Durant, Jennah <Durant.Jennah@epa.gov>; Stuckey, Troy <Stuckey.Troy@epa.gov>
Subject: FW: FOIA 9084 - Valero EPCRA case file

Mort, I think Mr. Soraghan, the requestor, is a reporter. If you decide you need to contact him to clarify his FOIA request, coordinate with Jennah Durant in XA just in case. Thanks.

From: Bradford, Deanna <Bradford.Deanna@epa.gov>
Sent: Monday, October 21, 2019 10:02 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Potts, Mark <Potts.Mark@epa.gov>; Stuckey, Troy <Stuckey.Troy@epa.gov>; Moore, Nathaniel <Moore.Nathaniel@epa.gov>
Cc: Murdock, Russell <Murdock.Russell@epa.gov>
Subject: RE: FOIA 9084 - Valero EPCRA case file

Morton, per your request. If clarification is needed, you can contact Mr. Soraghan, since this is a single division assignment, please remember to document the conversation (ROC). Thanks

---

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Monday, October 21, 2019 8:07 AM
To: Potts, Mark <Potts.Mark@epa.gov>; Stuckey, Troy <Stuckey.Troy@epa.gov>; Moore, Nathaniel <Moore.Nathaniel@epa.gov>
Cc: Bradford, Deanna <Bradford.Deanna@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: RE: FOIA 9084 - Valero EPCRA case file

thanks Mark

if questions arise, please let me or Nathaniel know.

I believe I have supplied Deanna with the responsive record requested in the FOIA.

Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Toxics Enforcement Section (ECDST)
Enforcement & Compliance Assurance Division (ECD)
U.S. EPA Region 6
Dallas, TX 75270
(214.665.8116)

From: Potts, Mark <Potts.Mark@epa.gov>
Sent: Monday, October 21, 2019 7:57 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Stuckey, Troy <Stuckey.Troy@epa.gov>; Moore, Nathaniel <Moore.Nathaniel@epa.gov>
Cc: Bradford, Deanna <Bradford.Deanna@epa.gov>; Murdock, Russell <Murdock.Russell@epa.gov>
Subject: FOIA 9084 - Valero EPCRA case file

Mort, work with Nathaniel and Deanna to identify/provide responsive documents. Thanks.

Sent from my iPhone

Begin forwarded message:

> **From:** "Region 6 FOIA Coordinators" <no-reply@sharepointonline.com>
> **Date:** October 18, 2019 at 5:36:49 PM CDT
> **To:** "Potts, Mark" <Potts.Mark@epa.gov>
> **Subject: 6EN - A New FOIA has been Assigned**
> **Reply-To:** no-reply@sharepointonline.com
>
> FOIA EPA-R6-2019-009084 has been Assigned for:
> I request the case file on the 2016 TRI-EPCRA 313 enforcement action against Valero's Oklahoma refinery.
>
> Click here to open and edit the document

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 9/19/2017 12:32:27 PM
To: Clark, Katherine [Clark.Katherine@epa.gov]
Subject: RE: EPA wants Valero's records on benzene leak

Just between us – no one has said a damn word about this to me down here in this Division.
Sad you have to read a newspaper article to be informed about something.

Kathy, I honestly think this Division hates 313 and wants it to go away – why is beyond my logical comprehension.

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Clark, Katherine
Sent: Monday, September 18, 2017 1:29 PM
To: Miles, James <miles.james@epa.gov>; Ziegel, Dean <Ziegel.Dean@epa.gov>; Wakeland, Morton <wakeland.morton@epa.gov>; Haas, Craig <Haas.Craig@epa.gov>
Cc: Milton, Philip <Milton.Philip@epa.gov>
Subject: Re: EPA wants Valero's records on benzene leak

ENFORCEMENT CONFIDENTIAL FOIA EXEMPT

James -

The benzene release is probably reportable under a number of statutes - at the least, CAA, EPCRA, CERCLA 103. With the emphasis on volatile organic compounds and air monitoring, this sounds primarily like a CAA case at this point, although it is possible other statutory counts could be taken.

If CERCLA 103 requires emergency notification, EPCRA 304 also is triggered. Emergency notification to the national response center would be prompted by EPCRA section 304. (As a carcinogen, benzene should be an extremely hazardous substance covered by CERCLA and EPCRA 304).

It also would be included in the TRI (toxic chemicals) report as a facility release because benzene is included on the TRI list. There was some discussion about including a special section for emergency releases on the form to differentiate routine facility releases with emergency releases.

There is overlap between the 313 and non-313 chemicals and CERCLA 103 even though they have different categories of chemicals (toxic, hazardous, and extremely hazardous). Dean used to have a Venn diagram demonstrating the amount of the overlap. (Dean, do you still have that diagram?). There also is overlap with the Clean Air Act's hazardous air pollutants/chemicals.

https://www.epa.gov/epcra/consolidated-list-lists

This EPA List of Lists is helpful.

Consolidated List of Lists | Emergency Planning and ...

www.epa.gov

List of chemicals subject to reporting requirements under the Emergency Planning and Community Right- To-Know Act (EPCRA), Comprehensive Environmental Response ...

Mort, Valero has reported for every year except RY2014. Did they report releases for benzene last year? As an aside, Mort created a list of almost 200 facilities that potentially could be affected by Harvey.

James, just including some background for you that you may already know, so ignore if you have already absorbed some of this in other cases/scenarios. Dean/Craig, feel free to chime in if I misstated something in your areas of expertise.

Kathy

From: Miles, James
Sent: Monday, September 18, 2017 1:55 PM
To: Clark, Katherine
Subject: EPA wants Valero's records on benzene leak

HURRICANE HARVEY
EPA wants Valero's records on benzene leak

Published: Monday, September 18, 2017

U.S. EPA has asked Valero Energy Corp. to turn over records related to benzene emissions at its Houston refinery in the wake of Hurricane Harvey.

After the storm damaged a storage tank roof at the refinery, local and federal officials detected benzene — a carcinogen — in a nearby Houston neighborhood.

Valero initially said the refinery released roughly 6.7 pounds of benzene and more than 3,350 pounds of unspecified volatile compounds, but EPA says that was likely a severe underestimate (*Greenwire*, Sept. 15).

EPA's enforcement division requested a timeline of what happened at "Tank 3 and Tank 228," where the agency cited problems with roof draining, indicating two storage tanks may have been involved. It also wants information on emissions and what the refinery did to prevent them, as well as air monitoring data and maintenance records (Jordan Blum, *Houston Chronicle*, Sept. 15).

However, Valero on Friday said the plume of benzene may not have originated from its facility after all.

Some of the chemical compounds that officials detected weren't present in the storage tank whose roof failed, Valero said (Jordan Blum, *Houston Chronicle*, Sept. 15). **— MJ**

James Miles, Chief
Chemical Risk and Reporting Enforcement Branch
Waste and Chemical Enforcement Division

Office of Civil Enforcement
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
William Jefferson Clinton Bldg., South, Rm. 4111A
1201 Constitution Ave., NW
Washington, DC 20004
202.564.5161
miles.james@epa.gov

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 4/4/2017 8:12:54 PM
To: Milton, Philip [Milton.Philip@epa.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]; Alkon, Margaret [Alkon.Margaret@epa.gov]; Baillie, Carol [baillie.carol@epa.gov]; Baranco, Angela [Baranco.Angela@epa.gov]; Basinger, David [Basinger.David@epa.gov]; Bazley, Greg [Bazley.Greg@epa.gov]; Blunk, Terri [Blunk.Terri@epa.gov]; Bookman, Robert [Bookman.Robert@epa.gov]; bpathare [Pathare.Bhushan@epa.gov]; Brown, Evon [Brown.Evon@epa.gov]; Bussey, Carol [Bussey.Carol@epa.gov]; Bustamante, Armando [Bustamante.Armando@epa.gov]; Calvo, Estrella [calvo.estrella@epa.gov]; Caplan, Robert W. [Caplan.Robert@epa.gov]; Chan, Janice [Chan.Janice@epa.gov]; Chew, Andrew [Chew.Andrew@epa.gov]; Clark, Katherine [Clark.Katherine@epa.gov]; Cobb, David [cobb.david@epa.gov]; Dagseth, Renee [Dagseth.Renee@epa.gov]; Davis, Lauren O. [Davis.LaurenO@epa.gov]; Davis, Tony [Davis.tony@epa.gov]; Devito, Steve [Devito.Steve@epa.gov]; Dunn, Meghan [dunn.meghan@epa.gov]; Falconer, Caron [Falconer.Caron@epa.gov]; Fisher, Bethany [fisher.bethany@epa.gov]; Ford, Jim [Ford.Jim@epa.gov]; Frishman, Bob [Frishman.Bob@epa.gov]; Fudge, Shelley [Fudge.Shelley@epa.gov]; Gallagher, Shirin [Gallagher.Shirin@epa.gov]; Gilrein, Stephen [gilrein.stephen@epa.gov]; Goerke, Ariadne [Goerke.Ariadne@epa.gov]; Gorman, John [Gorman.John@epa.gov]; Grams, Bradley [grams.bradley@epa.gov]; Grant, Deanne [Grant.Deanne@epa.gov]; Greenwald, Steven [Greenwald.Steven@epa.gov]; Gsell, Alyssa [Gsell.Alyssa@epa.gov]; Hamre, Martha [Hamre.Martha@epa.gov]; Harper, Jodi [Harper.Jodi@epa.gov]; Hess, George [Hess.George@epa.gov]; Hoard, Christine [Hoard.Christine@epa.gov]; Hsia, Peter [Hsia.Peter@epa.gov]; Johnson, Karen T. [Johnson.Karent@epa.gov]; Kaczmarek, Chris [Kaczmarek.Chris@epa.gov]; Kim, David [Kim.David@epa.gov]; Klevs, Mardi [klevs.mardi@epa.gov]; Koch, Erin [Koch.Erin@epa.gov]; Lancaster, Stan [Lancaster.Stan@epa.gov]; Mears, Gilbert [Mears.Gilbert@epa.gov]; Medici, Andrea [medici.andrea@epa.gov]; Meinhardt, Danielle [meinhardt.danielle@epa.gov]; Meyer, Jeff [Meyer.Jeff@epa.gov]; Miles, James [miles.james@epa.gov]; Myhre, John [myhre.john@epa.gov]; Nazar, Kristen [Nazar.Kristen@epa.gov]; Ndiaye, Fatimatou [Ndiaye.Fatimatou@epa.gov]; Nering, Emily [Nering.Emily@epa.gov]; Nowak, April [Nowak.April@epa.gov]; O'Donnell, Mary Jane [Odonnell.Maryjane@epa.gov]; O'Meara, Nidhi [omeara.nidhi@epa.gov]; Parra, Juan [Parra.Juan@epa.gov]; Pearson, Evan [Pearson.Evan@epa.gov]; Poole, Vinson [Poole.Vinson@epa.gov]; Potts, Mark [Potts.Mark@epa.gov]; Pratt, Stacie [Pratt.Stacie@epa.gov]; Rascher, Chris [rascher.chris@epa.gov]; Riley, David [riley.david@epa.gov]; Robinson, Janis [Robinson.Janis@epa.gov]; Salazar, Matt [Salazar.Matt@epa.gov]; Salisbury, Demetra [Salisbury.Demetra@epa.gov]; Sawyer, William [Sawyer.William@epa.gov]; Schulz, Susan [Schulz.Susan@epa.gov]; Senthil, Velu [Senthil.Velu@epa.gov]; Siegal, Tod [Siegal.Tod@epa.gov]; Smith, Catherine [smith.catherine@epa.gov]; Snowbarger, Robert [Snowbarger.Robert@epa.gov]; Spielmann, Lee [Spielmann.Lee@epa.gov]; Stoy, Alyse [Stoy.Alyse@epa.gov]; Stuckey, Troy [Stuckey.Troy@epa.gov]; Sullivan, Greg [Sullivan.Greg@epa.gov]; Tekrony, Linda [Tekrony.Linda@epa.gov]; Turk, David [Turk.David@epa.gov]; Velez, Ezequiel [Velez.Ezequiel@epa.gov]; Vizard, Elizabeth [Vizard.Elizabeth@epa.gov]; Wakefield, Benjamin J. [wakefield.benjamin@epa.gov]; White, Erika [White.Erika@epa.gov]; Yaras, Michelle [Yaras.Michelle@epa.gov]; Yussen, Craig [Yussen.Craig@epa.gov]
CC: Senthil, Velu [Senthil.Velu@epa.gov]
BCC: Potts, Mark [Potts.Mark@epa.gov]; Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: Non-Reporter / RMP Checklist - the easy way
Attachments: VBA_RY15 Adhoc RMP-TRI Non-Reporters List Jan 2017.xlsm

Importance: High

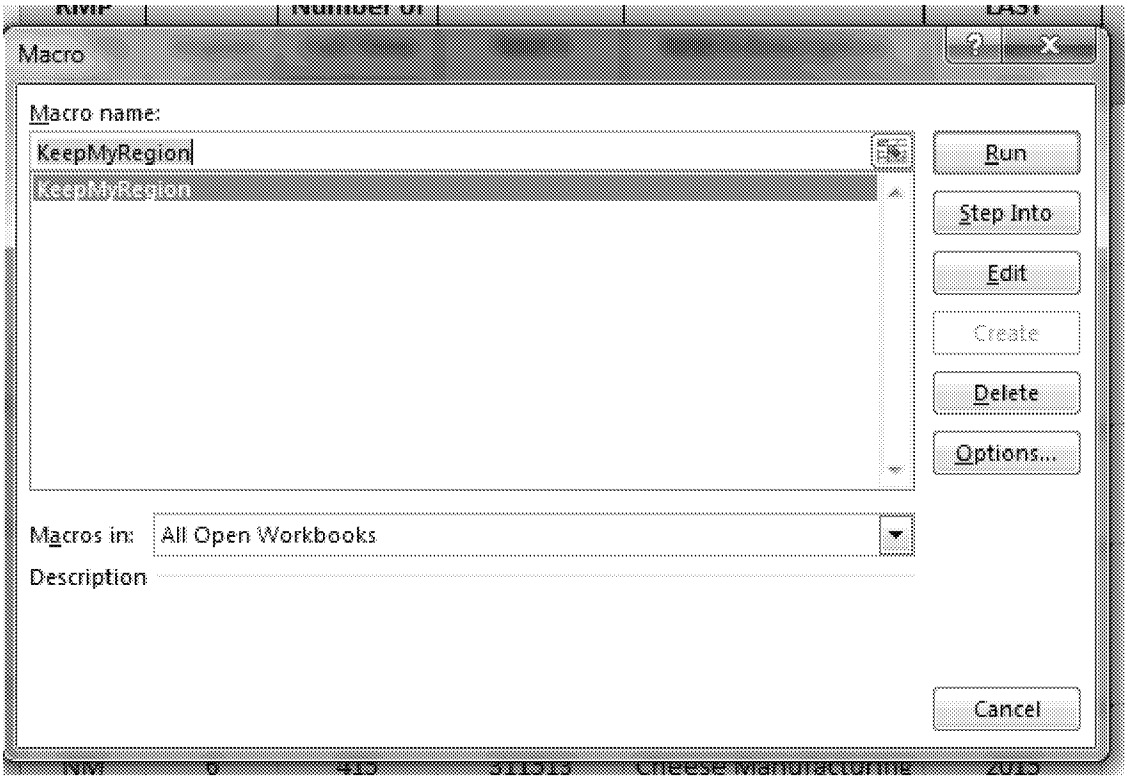
To help Regions out I've added VBA code to Velu's workbook so that you can select just your region.

When you first open this workbook you will most likely seen a yellow warning "Enable Contents" at top of the screen.
Click this button or the code will not run.

First and foremost copy the entire worksheet and operate on the copy NOT THE ORIGINAL!

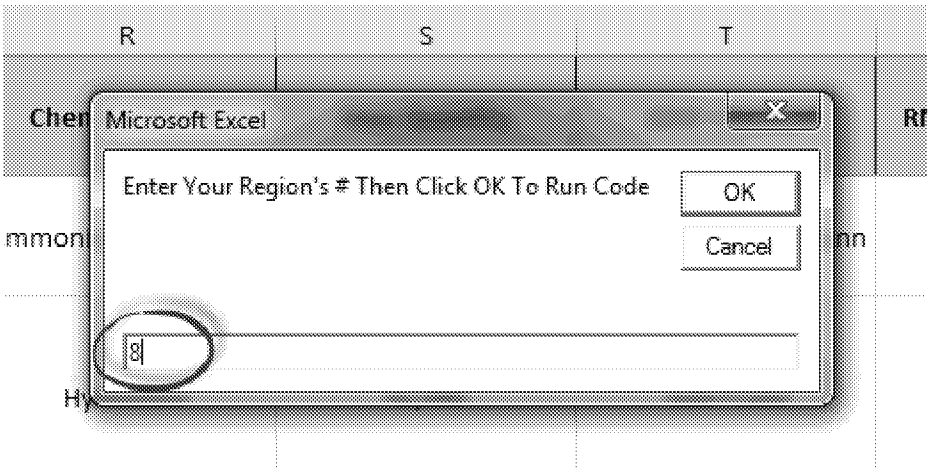
On the worksheet copy, press and hold Alt+F8

A screen pop's up showing the name of the code, "KeepMyRegion"



Click Run

On the next screen enter you Region's number at the blinking cursor and either press Enter or click OK



There will be a slight pause, then, all of a sudden, all Regions, other than your's will be erased.

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Error Code	EPA Contact	Facility Response	Contact Details	RMP ID	FRS ID	TRI Facility ID	RMP Facility Name	RMP Facility Street	RMP Facility City	RMP Facility	Region	Number of Full Time	NAIC
2	RMP-TRI				100000181849	110014338582	57015GRTPL27716	Great Plains Ethanol	27716 462nd Avenue	Chancellor	SD	8	45	3251
3	RMP-TRI				100000186158	110017775433	57034SXRVR29619	Sioux River Ethanol	29619 Spur Avenue	Hudson	SD	8	45	3251
4	RMP-TRI				100000201453	110058300921	57041WMRNNR27283	NuGen Energy, LLC	27283 447th Avenue	Marion	SD	8	52	3251
5	RMP-TRI				100000229479	110011493437	57216BGSTN48450	Big Stone Plant	48450 144th Street	Big Stone City	SD	8	80	2211
6	RMP-TRI				100000209204	110010952380	57248LKNRD408DA	Lake Norden Cheese	408 Dakota Street	Lake Norden	SD	8	208	31151
7	RMP-TRI				100000199224	110030736611	5735WDKTTR28274	Dakota Turkey Growers	20827-403rd Ave.	Huron	SD	8	600	31161
8	RMP-TRI				100000182492	110015598147	57445JMSVL44251	James Valley Ethanol	40425 133rd Street	Groton	SD	8	35	3251
9	RMP-TRI				100000203022	110035968584	5804WRBFCQ923CU	VeraSun Hankinson, LLC	9230 County Road 1	Hankinson	ND	8	40	3251
10	RMP-TRI				100000224848	110000428181	58102CSSCL200N2	Kemps LLC	200 20th Street N	Fargo	ND	8	113	31151
11	RMP-TRI				100000204487	110038363623	59034HRDNGSUGAR	Hardin Generating Station	Sugar Factory Rd	Hardin	MT	8	38	22111
12	RMP-TRI				100000117857	110000428546	59701DWNCD11914	REC Silicon	119140 Rick Jones Way	Silver Bow	MT	8	275	33141
13	RMP-TRI				100000124073	110000495321	80110BRDNN1325W	Meadow Gold Dairies-Englewood	1325 W. Oxford Avenue	Englewood	CO	8	232	31151
14	RMP-TRI				100000120647	110000522694	80201CHMRX10601	BASF Contruction Chemicals	10601 Fulton Street	Brighton	CO	8	89	3255
15	RMP-TRI				100000179558	110000467021	80216SFWYM4301F	Denver Milk Plant	4301 Forest Street	Denver	CO	8	75	31151
16	RMP-TRI				100000192855	110001132550	80223KNGSP60YUM	King Soopers Bakery	60 Yuma St.	Denver	CO	8	363	31181
17	RMP-TRI				100000081868	110000758136	80631MNFRT920N7	JBS - Greeley, CO Lamb Processing Facility	920 North 7th Avenue	Greeley	CO	8	136	3116
18	RMP-TRI				100000215377	110000467557	80631WSTRN13021	Leprino Foods, Greeley	1302 1st Ave	Greeley	CO	8	400	31151
19	RMP-TRI				100000084473	110000467619	80642DPCND23500	DPC INDUSTRIES, INC.	23500 I-76 FRONTAGE ROAD	HUDSON	CO	8	16	4246

If you are curious, the code is in Module 1, if you delete or insert any columns you will have to change the number of the column
the region's number is in, currently in the 12th column.

Enjoy,
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 1/26/2017 6:22:39 PM
To: Stucky, Marie [Stucky.Marie@epa.gov]
Subject: RMP workbook
Attachments: Region6_RY15 Adhoc RMP-TRI Non-Reporters List Jan 2017.xlsm

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 2/21/2019 9:20:10 PM
To: Jennifer Tullier [jtullier@spiritenv.com]
CC: Araiza, Joseph [jaraiza@continentalcarbon.com]
BCC: Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: RE: After some additional research...

next week is fine...
Appreciate the note.

I'm really interested in threshold calculations for the chemicals.
As well as the processes that go on at the facility.

Best Jennifer,
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Jennifer Tullier <jtullier@spiritenv.com>
Sent: Thursday, February 21, 2019 3:13 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: Araiza, Joseph <jaraiza@continentalcarbon.com>
Subject: Re: After some additional research...

Mort,
Working through final calculations for Joe's review in the morning and will have everything to you as soon as possible.

Thanks,

Jennifer Tullier
Senior Air Project Manager
Spirit Environmental, LLC
Mobile: (225) 892-1083

On Feb 21, 2019, at 1:52 PM, Wakeland, Morton <wakeland.morton@epa.gov> wrote:

Do appreciate...thanks – questions, let me know.
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Araiza, Joseph <jaraiza@continentalcarbon.com>
Sent: Thursday, February 21, 2019 1:40 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Jennifer Tullier <jtullier@spiritenv.com>
Subject: FW: After some additional research...
Importance: High

Jennifer, please see Mort's note below. Can you give him an estimate for getting all the info to him on the TRI?

Thanks,

Joe Araiza
EHS Manager
Continental Carbon Company
O: 281-647-3807
C: 713-818-3285 (temporary)

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Thursday, February 21, 2019 1:38 PM
To: Araiza, Joseph <jaraiza@continentalcarbon.com>
Subject: RE: After some additional research...
Importance: High

Joe

I think I missed this email –understand issues arise. Please document your investigations.

We are especially interested in how you determine thresholds vs just showing data from Form R.

How much more time do you think it will take to get the info to us?

Best week's wishes,
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Araiza, Joseph <jaraiza@continentalcarbon.com>
Sent: Tuesday, February 12, 2019 2:33 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: After some additional research...

Mort,
We've been working on your request and have identified some recordkeeping and calculation areas that need improvement. While there are no significant changes expected to reporting, we have identified some areas (including fugitive air releases) in which the facility has better information that impacts releases for 2017. Understanding you had requested all data by February 13, 2019, we request an extension to this date. We propose to have revised 2017 Form Rs and all supporting documentation/calculations submitted to you by COB, February 22, 2019. We will do our best to get it to you sooner but let me know if that new date works for you.

Thanks,

Joe Araiza
EHS Manager
Continental Carbon Company
O: 281-647-3807
C: 713-818-3285 (temporary)

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Tuesday, February 12, 2019 12:24 PM
To: Araiza, Joseph <jaraiza@continentalcarbon.com>
Subject: RE: After some additional research...

acknowledge receipt – thanks Joe
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division

U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Araiza, Joseph <jaraiza@continentalcarbon.com>
Sent: Tuesday, February 12, 2019 12:02 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: After some additional research...

Mort, attached is the safety data sheet for the oil that we receive from the Valero refinery. It is a refinery feedstock oil. Basically after the refinery starts with crude oil and extracts all of the gasolines, kerosene, diesels, jet fuels, etc., what's left over is this feedstock oil. It has no more value in the refining process so the refinery sends it to our plant and we use it to create carbon black.

The analysis I sent you is on this feedstock oil.

Thanks,

Joe Araiza
EHS Manager
Continental Carbon Company
O: 281-647-3807
C: 713-818-3285 (temporary)

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Tuesday, February 12, 2019 10:30 AM
To: Araiza, Joseph <jaraiza@continentalcarbon.com>
Subject: RE: After some additional research...

thanks Joe....did the lab test of other chemicals besides metals? What exactly is this analysis on, i.e., type of oil, if oil?

thanks, Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Araiza, Joseph <jaraiza@continentalcarbon.com>
Sent: Tuesday, February 12, 2019 8:21 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: After some additional research...

Mort, here is the oil sample analysis you requested.

Thanks,

Joe Araiza
EHS Manager
Continental Carbon Company
O: 281-647-3807
C: 713-818-3285 (temporary)

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Monday, February 11, 2019 8:13 AM
To: Araiza, Joseph <jaraiza@continentalcarbon.com>
Subject: After some additional research...

Please be sure to include the type of oil the facility uses, and its chemical composition as weight percentages.

Thanks, Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Araiza, Joseph <jaraiza@continentalcarbon.com>
Sent: Wednesday, February 6, 2019 8:09 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: FW: TRI-MEweb submission has been certified and sent to EPA and a TRI Data Exchange member state.

Mort, see below that 2017 was submitted. I assume we are looking at some sort of penalty?

Thanks,

Joe Araiza
EHS Manager
Continental Carbon Company
O: 281-647-3807
C: 713-818-3285 (temporary)

From: no-reply@epacdx.net <no-reply@epacdx.net>
Sent: Wednesday, February 06, 2019 7:01 AM
To: Araiza, Joseph <jaraiza@continentalcarbon.com>; Bownds, Arlie <abounds@continentalcarbon.com>; Araiza, Joseph <jaraiza@continentalcarbon.com>

Subject: TRI-MEweb submission has been certified and sent to EPA and a TRI Data Exchange member state.

Dear JOSEPH Araiza, Arlie Bownds, Joe Araiza ,

The TRI-MEweb submission for the facility and chemical(s) listed below has been prepared, certified, and sent to EPA. You have reported that your facility is located in the state of Texas.

Please be aware that the state of Texas is participating in EPA's TRI Data Exchange. This certified submission will be electronically forwarded to Texas, satisfying your obligation to report to both EPA and the state in which the facility is located (Texas).

You may wish to print a copy of this receipt and keep it for your records. You may also print a copy of your state submission by navigating to the Submission History page. Do not send this receipt to EPA.

If you have any questions regarding this email, please contact the CDX Help Desk at the phone numbers listed below for further assistance. Please reference the information below when contacting the CDX Help Desk.

---- REFERENCE INFORMATION ----

TRI Facility ID: 79086WTCCRHCR1B
Facility: CONTINENTAL CARBON CO SUNRAY
11702 CARBON BLACK RD
SUNRAY, TX, 79086
Certifying Official Name: Arlie Bownds
Email: abownds@continentalcarbon.com
Transaction ID:_7a896aca-f8bd-4399-a3dd-2ec89f9646f2
Date Certified and Sent to EPA: 02/06/2019 8:00.

Chemical Name	RY	CAS	Form	Revision	Withdrawal	Prepared By	Prepara Comple Dat
Polycyclic aromatic compounds	2017	N590	R	No	No	jaraiza@continentalcarbon.com	02/05/20 16:24
Hydrogen Sulfide	2017	007783064	R	No	No	jaraiza@continentalcarbon.com	02/05/20 16:24
Hydrogen cyanide	2017	000074908	R	No	No	jaraiza@continentalcarbon.com	02/05/20 16:24
Carbonyl sulfide	2017	000463581	R	No	No	jaraiza@continentalcarbon.com	02/05/20 16:24
Carbon disulfide	2017	000075150	R	No	No	jaraiza@continentalcarbon.com	02/05/20 16:24
Benzo(g,h,i)perylene	2017	000191242	R	No	No	jaraiza@continentalcarbon.com	02/05/20 16:24

---- CDX HELP DESK ----

Phone (toll-free): +1 (888) 890-1995
Phone (toll): (970) 494-5500
Email: helpdesk@epacdx.net
The CDX Help Desk is available Monday through Friday, 8:00 AM to 6:00 PM Eastern Time.

Access CDX Home: https://cdx.epa.gov/

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 11/30/2017 4:07:04 PM
To: Parra, Juan [Parra.Juan@epa.gov]
Subject: Look at the last two spreadsheets, specifically red tab
Attachments: 2015_vs_2016.xlsx

Importance: High

I don't have much time before 11

Red Tab is facility as a whole reported in 2015 but not 2016.
Then I have sorted by the number of forms – more forms, more problems.

So red tab is reported in 2015 but does not appear in 2016.

If something is not clear, let me know.

Thanks Juan, Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 4/23/2018 7:30:31 PM
To: Stuckey, Troy [Stuckey.Troy@epa.gov]
CC: Roberts, Lou [Roberts.Lou@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Subject: Revised list after removing CSQG and other for type
Attachments: ListAfterYurk_RemoveCSQG+Other.xlsm

Morton E. Wakeland, Jr., Ph.D.
EPCRA 313 Enforcement & TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, Texas
(214.665.8116)

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 5/2/2017 6:59:42 PM
To: Basinger, David [Basinger.David@epa.gov]
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Is their address in the NEIC report?
They are a refinery for sure – correct?

I'm jotting down some notes for you.....I'll deliver to you before I leave today and if you like we can chat tomorrow if you like?

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 1:57 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Definitely in 9, not 10. Don't know why Tesoro Wilmington isn't shown.

Note that the report states that Tesoro began reporting as a multi-establishment facility in 2013 under the TIFID ID # I provided, but the inspection reviewed the Tesoro Los Angeles Refinery Thresholds (Wilmington), not the combined thresholds (see page 7).

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 11:51 AM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Hmmm, only 2 facilities in Region 9
or are you in 10
age ya know, smile

List of EPA-Regulated Facilities in TRI

TRI FACILITY ID	FACILITY INFORMATION	FACILITY NAME	ADI
90748RCCQC1175C	View Facility Information	TESORO WILMINGTON CALCINER	1175 CARRACK WILMINGTON, (
90744TXCRF1926C	View Facility Information	TESORO WILMINGTON SALES TERMINAL	1930 E PACIFIC (WILMINGTON, (

Go To Top Of The Page

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 1:49 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection

It's the refinery, not the terminal.

Should still be under Tesoro Wilmington, especially for TRI, but Tesoro is in the process of combining Wilmington and Carson facilities and so call them both parts of the "Tesoro Los Angeles Refinery".

The TRIFID number was 90744TXCRF2101E, from a July 2015 report that Russ had done. Address is 2101 E Pacific Coast Highway.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 11:35 AM
To: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Enforcement Confidential re Tesoro Wilmington 2015 inspection
Importance: High

Afternoon Dave.

You are correct, there is no new ERP, per se, only a new penalty matrix.

Is this your facility?

Click on "View Facility Information" to view EPA Facility information for the facility.

Facility Name:	TESORO WILMINGTON SALES TERMINAL	Mailing Name:	TESORO WILMINGTON SALES TERMINAL
Address:	1930 E PACIFIC COAST HIGHWAY WILMINGTON CA 90744	Mailing Address:	8601 S GARFIELD AVE SOUTH GATE CA 90280
County:	LOS ANGELES	Region:	9
Facility Information:	View Facility Information	TRI ID:	90744TXCRF1926C
DUNS Number:		FRS ID	110018955825
TRI Preferred Latitude:	33.791667	TRI Preferred Longitude:	118.233556
Public Contact:	RUTHANNE WALKER	Phone:	5628064105
Assigned Public Contact:	RUTHANNE WALKER		
Parent Company:	TESORO CORP	Standardized Parent Company:	TESORO CORP
BIA Tribal Code:		Tribe:	

Parent DUNS: 008133480

Starting with Reporting Year 2006, TRI Facilities began reporting NAICS codes, instead of SIC codes, to identify their Primary Business Activities.

NAICS Codes for 2015

NAICS CODE	PRIMARY	NAICS DESCRIPTION
424710	YES	Petroleum Bulk Stations and Terminals

Attached is a lil VBA program I wrote to auto chart a 5 year reporting history on a facility.
Instructions for use on first worksheet.
The history is downloaded from the Submissions Report in EZ-Query and copied into the workbook AFTER ALL DATA ARE DELETED!
Below is FROM last worksheet – it is auto generated
Yellow = reported
White = did not report that chemical for that year.
Good for asking a facility why they did not report for a certain chemical for a certain year.

	A	B	C	D	E	F	G
1	TRI CHEMICAL	2011	2012	2013	2014	2015	
2	1 2 4-TRIMETHYLBENZENE						
3	BENZENE						
4	BENZO(G H I)PERYLENE						
5	CUMENE						
6	CYCLOHEXANE						
7	ETHYLBENZENE						
8	HYDROGEN SULFIDE						
9	LEAD COMPOUNDS						
10	MERCURY COMPOUNDS						
11	NAPHTHALENE						
12	N-HEXANE						
13	POLYCYCLIC AROMATIC COMPOUNDS						
14	TOLUENE						
15	XYLENE (MIXED ISOMERS)						
16							
17							

Let me look at your attachment and get back with you David.

Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Tuesday, May 02, 2017 1:18 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: Enforcement Confidential re Tesoro Wilmington 2015 inspection

Very much appreciate your willingness to help.

Not Valero; it's Tesoro Wilmington (pre-2007 owner was Shell, current operations being combined with Tesoro Carson, previously BP).

Thanks for the ERP – so a completely new ERP was never finalized?

I'm attaching for reference the NEIC final report, along with my internal "quick summary" to my boss of the Findings and Observations table 7. I'm interested in discussing this in more detail with you, when you have some time.

TRI Inspection years were 2012-2014.

I need to determine (probably from new TRI reports) what the facility may have already corrected. Don't believe this is too difficult, but what do you think?

NEIC inspectors (Armando Bustamante and Martha Hamre) are both around and available for discussion as well.

From: Wakeland, Morton
Sent: Tuesday, May 2, 2017 7:59 AM
To: Basinger, David <Basinger.David@epa.gov>
Subject: From Mort
Importance: High

Thanks for your call Dave.

Would be most happy to assist in your penalty assessment at the refinery you inspected out there in Region 9. Wasn't Valero was it? I have a case here on those guys.

Find attached the latest matrices which covers violations

Gravity-Based Penalty Matrix for Violations that Occurred After January 12, 2009 but before or on November 2, 2015

CIRCUMSTANCE LEVELS	EXTENT		
	A Major	B Significant	C Minor
1	$37,500	$24,080	$7,090
2	$28,330	$18,420	$4,250
3	$21,250	$14,170	$2,130
4	$14,170	$8,500	$1,420
5	$7,090	$4,250	$710
6	$2,840	$1,850	$290

Gravity-Based Penalty Matrix for Violations that Occurred after November 2, 2015[1]

CIRCUMSTANCE LEVELS	EXTENT		
	A Major	B Significant	C Minor
1	$40,779	$27,730	$8,156
2	$32,623	$21,205	$4,893
3	$24,467	$16,312	$2,447
4	$16,312	$9,787	$1,631
5	$8,156	$4,893	$816
6	$3,262	$2,121	$326

CIRCUMSTANCE LEVELS

The higher assessed matrix would be used for **2015** violations. At first this appears incorrect. However, recall, there can be no violation of EPCRA 313 until *after* the due date of the form.
Forms for calendar year 2015 were due on or before July 1, 2016, and July 1, 2016 is AFTER November 2, 2015.
Therefore, the higher penalty matrix would apply to 2015 violations onward.

I also do my darn best to settle up front so as to issue only a CAFO vs issuing a Complaint, then having to negotiate, which may drag out, then close out the Complaint with a CAFO.
The one document advantage is that no clock begins ticking in the ALJ's office in DC. Those boys can get "testy" if things drag out.

However, that is up to how you folks wanna handle.

Best, Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 4/17/2018 1:02:21 PM
To: Riley, David [riley.david@epa.gov]; Stuckey, Troy [Stuckey.Troy@epa.gov]; Lancaster, Stan [Lancaster.Stan@epa.gov]
Subject: RE: Analysis of 32 sites in Louisiana for Haz Waste TSDF's (NAICS = 562211)
Attachments: Final EPCRA_RCRA-Targets_LA.xlsx

If you have a preference let me know.

Here's the list I sent to Lou to send to Lous e anna

Mort

From: Riley, David
Sent: Tuesday, April 17, 2018 7:52 AM
To: Stuckey, Troy <Stuckey.Troy@epa.gov>; Lancaster, Stan <Lancaster.Stan@epa.gov>
Cc: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Analysis of 32 sites in Louisiana for Haz Waste TSDF's (NAICS = 562211)

Whoops, never mind… Ashley's training packet includes a sample OTC letter and CAFO. Good to go!

dave

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 9/19/2017 11:52:05 AM
To: Clark, Katherine [Clark.Katherine@epa.gov]; Miles, James [miles.james@epa.gov]; Ziegel, Dean [Ziegel.Dean@epa.gov]; Haas, Craig [Haas.Craig@epa.gov]
CC: Milton, Philip [Milton.Philip@epa.gov]
Subject: RE: EPA wants Valero's records on benzene leak

Good Morning Kathy

Am just reading in that I had to leave early yesterday.

Will get on right away for you all.

If additional questions arise just please let me know.

Best wishes to all,
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Clark, Katherine
Sent: Monday, September 18, 2017 1:29 PM
To: Miles, James <miles.james@epa.gov>; Ziegel, Dean <Ziegel.Dean@epa.gov>; Wakeland, Morton <wakeland.morton@epa.gov>; Haas, Craig <Haas.Craig@epa.gov>
Cc: Milton, Philip <Milton.Philip@epa.gov>
Subject: Re: EPA wants Valero's records on benzene leak

ENFORCEMENT CONFIDENTIAL FOIA EXEMPT

James -

The benzene release is probably reportable under a number of statutes - at the least, CAA, EPCRA, CERCLA 103. With the emphasis on volatile organic compounds and air monitoring, this sounds primarily like a CAA case at this point, although it is possible other statutory counts could be taken.

If CERCLA 103 requires emergency notification, EPCRA 304 also is triggered. Emergency notification to the national response center would be prompted by EPCRA section 304. (As a carcinogen, benzene should be an extremely hazardous substance covered by CERCLA and EPCRA 304).

It also would be included in the TRI (toxic chemicals) report as a facility release because benzene is included on the TRI list. There was some discussion about including a special section for emergency releases on the form to differentiate routine facility releases with emergency releases.

There is overlap between the 313 and non-313 chemicals and CERCLA 103 even though they have different categories of chemicals (toxic, hazardous, and extremely hazardous). Dean used to have a Venn diagram demonstrating the amount of the overlap. (Dean, do you still have that diagram?). There also is overlap with the Clean Air Act's hazardous air pollutants/chemicals.

https://www.epa.gov/epcra/consolidated-list-lists

This EPA List of Lists is helpful.

Consolidated List of Lists | Emergency Planning and ...

www.epa.gov

List of chemicals subject to reporting requirements under the Emergency Planning and Community Right- To-Know Act (EPCRA), Comprehensive Environmental Response ...

Mort, Valero has reported for every year except RY2014. Did they report releases for benzene last year? As an aside, Mort created a list of almost 200 facilities that potentially could be affected by Harvey.

James, just including some background for you that you may already know, so ignore if you have already absorbed some of this in other cases/scenarios. Dean/Craig, feel free to chime in if I misstated something in your areas of expertise.

Kathy

From: Miles, James
Sent: Monday, September 18, 2017 1:55 PM
To: Clark, Katherine
Subject: EPA wants Valero's records on benzene leak

HURRICANE HARVEY
EPA wants Valero's records on benzene leak

Published: Monday, September 18, 2017

U.S. EPA has asked Valero Energy Corp. to turn over records related to benzene emissions at its Houston refinery in the wake of Hurricane Harvey.

After the storm damaged a storage tank roof at the refinery, local and federal officials detected benzene — a carcinogen — in a nearby Houston neighborhood.

Valero initially said the refinery released roughly 6.7 pounds of benzene and more than 3,350 pounds of unspecified volatile compounds, but EPA says that was likely a severe underestimate (*Greenwire*, Sept. 15).

EPA's enforcement division requested a timeline of what happened at "Tank 3 and Tank 228," where the agency cited problems with roof draining, indicating two storage tanks may have been involved. It also wants information on emissions and what the refinery did to prevent them, as well as air monitoring data and maintenance records (Jordan Blum, *Houston Chronicle*, Sept. 15).

However, Valero on Friday said the plume of benzene may not have originated from its facility after all.

Some of the chemical compounds that officials detected weren't present in the storage tank whose roof failed, Valero said (Jordan Blum, *Houston Chronicle*, Sept. 15). **— MJ**

James Miles, Chief
Chemical Risk and Reporting Enforcement Branch
Waste and Chemical Enforcement Division
Office of Civil Enforcement
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
William Jefferson Clinton Bldg., South, Rm. 4111A
1201 Constitution Ave., NW
Washington, DC 20004
202.564.5161
miles.james@epa.gov

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 2/21/2019 7:52:37 PM
To: Araiza, Joseph [jaraiza@continentalcarbon.com]; Jennifer Tullier [jtullier@spiritenv.com]
Subject: RE: After some additional research...

Do appreciate...thanks – questions, let me know.
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Araiza, Joseph <jaraiza@continentalcarbon.com>
Sent: Thursday, February 21, 2019 1:40 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Jennifer Tullier <jtullier@spiritenv.com>
Subject: FW: After some additional research...
Importance: High

Jennifer, please see Mort's note below. Can you give him an estimate for getting all the info to him on the TRI?

Thanks,

Joe Araiza
EHS Manager
Continental Carbon Company
O: 281-647-3807
C: 713-818-3285 (temporary)

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Thursday, February 21, 2019 1:38 PM
To: Araiza, Joseph <jaraiza@continentalcarbon.com>
Subject: RE: After some additional research...
Importance: High

Joe

I think I missed this email –understand issues arise. Please document your investigations.

We are especially interested in how you determine thresholds vs just showing data from Form R.

How much more time do you think it will take to get the info to us?

Best week's wishes,
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Araiza, Joseph <jaraiza@continentalcarbon.com>
Sent: Tuesday, February 12, 2019 2:33 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: After some additional research...

Mort,
We've been working on your request and have identified some recordkeeping and calculation areas that need improvement. While there are no significant changes expected to reporting, we have identified some areas (including fugitive air releases) in which the facility has better information that impacts releases for 2017. Understanding you had requested all data by February 13, 2019, we request an extension to this date. We propose to have revised 2017 Form Rs and all supporting documentation/calculations submitted to you by COB, February 22, 2019. We will do our best to get it to you sooner but let me know if that new date works for you.

Thanks,

Joe Araiza
EHS Manager
Continental Carbon Company
O: 281-647-3807
C: 713-818-3285 (temporary)

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Tuesday, February 12, 2019 12:24 PM
To: Araiza, Joseph <jaraiza@continentalcarbon.com>
Subject: RE: After some additional research...

acknowledge receipt – thanks Joe
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Araiza, Joseph <jaraiza@continentalcarbon.com>
Sent: Tuesday, February 12, 2019 12:02 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: After some additional research...

Mort, attached is the safety data sheet for the oil that we receive from the Valero refinery. It is a refinery feedstock oil. Basically after the refinery starts with crude oil and extracts all of the gasolines, kerosene, diesels, jet fuels, etc., what's left over is this feedstock oil. It has no more value in the refining process so the refinery sends it to our plant and we use it to create carbon black.

The analysis I sent you is on this feedstock oil.

Thanks,

Joe Araiza
EHS Manager
Continental Carbon Company
O: 281-647-3807
C: 713-818-3285 (temporary)

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Tuesday, February 12, 2019 10:30 AM
To: Araiza, Joseph <jaraiza@continentalcarbon.com>
Subject: RE: After some additional research...

thanks Joe....did the lab test of other chemicals besides metals?
What exactly is this analysis on, i.e., type of oil, if oil?

thanks, Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Araiza, Joseph <jaraiza@continentalcarbon.com>
Sent: Tuesday, February 12, 2019 8:21 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: After some additional research...

Mort, here is the oil sample analysis you requested.

Thanks,

Joe Araiza
EHS Manager
Continental Carbon Company
O: 281-647-3807
C: 713-818-3285 (temporary)

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Monday, February 11, 2019 8:13 AM
To: Araiza, Joseph <jaraiza@continentalcarbon.com>
Subject: After some additional research...

Please be sure to include the type of oil the facility uses, and its chemical composition as weight percentages.

Thanks, Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Araiza, Joseph <jaraiza@continentalcarbon.com>
Sent: Wednesday, February 6, 2019 8:09 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: FW: TRI-MEweb submission has been certified and sent to EPA and a TRI Data Exchange member state.

Mort, see below that 2017 was submitted. I assume we are looking at some sort of penalty?

Thanks,

Joe Araiza
EHS Manager
Continental Carbon Company
O: 281-647-3807

C: 713-818-3285 (temporary)

From: no-reply@epacdx.net <no-reply@epacdx.net>
Sent: Wednesday, February 06, 2019 7:01 AM
To: Araiza, Joseph <jaraiza@continentalcarbon.com>; Bownds, Arlie <abounds@continentalcarbon.com>; Araiza, Joseph <jaraiza@continentalcarbon.com>
Subject: TRI-MEweb submission has been certified and sent to EPA and a TRI Data Exchange member state.

Dear JOSEPH Araiza, Arlie Bownds, Joe Araiza ,

The TRI-MEweb submission for the facility and chemical(s) listed below has been prepared, certified, and sent to EPA. You have reported that your facility is located in the state of Texas.

Please be aware that the state of Texas is participating in EPA's TRI Data Exchange. This certified submission will be electronically forwarded to Texas, satisfying your obligation to report to both EPA and the state in which the facility is located (Texas).

You may wish to print a copy of this receipt and keep it for your records. You may also print a copy of your state submission by navigating to the Submission History page. Do not send this receipt to EPA.

If you have any questions regarding this email, please contact the CDX Help Desk at the phone numbers listed below for further assistance. Please reference the information below when contacting the CDX Help Desk.

---- REFERENCE INFORMATION ----

TRI Facility ID: 79086WTCCRHCR1B
Facility: CONTINENTAL CARBON CO SUNRAY
11702 CARBON BLACK RD
SUNRAY, TX, 79086
Certifying Official Name: Arlie Bownds
Email: abownds@continentalcarbon.com
Transaction ID:_7a896aca-f8bd-4399-a3dd-2ec89f9646f2
Date Certified and Sent to EPA: 02/06/2019 8:00.

Chemical Name	RY	CAS	Form	Revision	Withdrawal	Prepared By	Preparation Completion Date
Polycyclic aromatic compounds	2017	N590	R	No	No	jaraiza@continentalcarbon.com	02/05/2019 16:24
Hydrogen Sulfide	2017	007783064	R	No	No	jaraiza@continentalcarbon.com	02/05/2019 16:24
Hydrogen cyanide	2017	000074908	R	No	No	jaraiza@continentalcarbon.com	02/05/2019 16:24
Carbonyl sulfide	2017	000463581	R	No	No	jaraiza@continentalcarbon.com	02/05/2019 16:24

Chemical Name	RY	CAS	Form	Revision	Withdrawal	Prepared By	Preparation Completion Date
Carbon disulfide	2017	000075150	R	No	No	jaraiza@continentalcarbon.com	02/05/2019 16:24
Benzo(g,h,i)perylene	2017	000191242	R	No	No	jaraiza@continentalcarbon.com	02/05/2019 16:24

---- CDX HELP DESK ----

Phone (toll-free): +1 (888) 890-1995
Phone (toll): (970) 494-5500
Email: helpdesk@epacdx.net
The CDX Help Desk is available Monday through Friday, 8:00 AM to 6:00 PM Eastern Time.

Access CDX Home: https://cdx.epa.gov/

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 1/25/2017 9:23:46 PM
To: PREETHI.JOSEPH@VALERO.COM
Subject: TRI Data Inquiry from RMP Report

Dear [PREETHI JOSEPH]:

Each year the TRI Program embarks on data quality checks for the immediate previous year (2015) but which may also include the previous year to that (2014).

You are listed as the most recent TRI technical contact for the following facility:
Facility Name: VALERO REFINING - TEXAS LP HOUSTON REFINERY
Facility Address: 9701 MANCHESTER
Facility City: HOUSTON
Facility State: TX

TRI ID #: 77012HLLPT9701M

I would appreciate it if you would acknowledge receipt of this communication so that I know I have the correct email address for you.

If you happen not to be the current TRI technical contact and know who is, then I would appreciate you forwarding this email on to them. If however, you do not know who the current TRI technical contact is, I would appreciate you notifying me who I may contact at your facility to find out who I might contact regarding this TRI inquiry.

Up front, you may receive several emails regarding this inquiry, one for each chemical in question. I think it may be more easily understood if only one chemical per email is addressed. A few facilities will only have one email inquiry, the vast majority will have 2 or more chemicals involved.

What is the issue?

Very simply, the following chemical:
[Chlorine]
was reported on your RMP (Risk Management Plan), but was not reported for TRI purposes for 2015. Please provide the amount (pounds) of this chemical used at your facility for calendar year 2015, along with each activity it was used in – "manufacturing, processing, or otherwise using." Based on our data base the facility is in a TRI covered NAICS code and has more than 10 full-time employees. If this is not the case, then please provide the correct information.

In addition, for calendar years 2011 – 2014, please provide the usage (pounds) of this chemical if it was not reported to TRI, along with its activity – "manufacturing, processing, or otherwise using.

Please provide your information to me by February 22nd. If you should have any questions regarding this matter, feel free to contact me by phone (214.824.7474) or via email at wakeland.morton@epa.gov

Your immediate attention and cooperation in this matter is most appreciated.

Sincerely yours,

Mort Wakeland
EPCRA § 313 Enforcement & TRI Program
Coordinator
U.S. EPA Region 6
Dallas, Texas 75202

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 4/11/2018 8:41:00 PM
To: Roberts, Lou [Roberts.Lou@epa.gov]
CC: Stuckey, Troy [Stuckey.Troy@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Subject: RE: Analysis of 32 sites in Louisiana for Haz Waste TSDF's (NAICS = 562211)
Attachments: Final EPCRA_RCRA-Targets_LA.xlsx

Here ya go, 31 sites, forgot I have a header.

Mort

From: Roberts, Lou
Sent: Wednesday, April 11, 2018 3:33 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Analysis of 32 sites in Louisiana for Haz Waste TSDF's (NAICS = 562211)

The first facility on the list?

From: Wakeland, Morton
Sent: Wednesday, April 11, 2018 3:31 PM
To: Roberts, Lou <Roberts.Lou@epa.gov>
Cc: Stuckey, Troy <Stuckey.Troy@epa.gov>; Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: RE: Analysis of 32 sites in Louisiana for Haz Waste TSDF's (NAICS = 562211)

Delete Chem Waste and you have the final list.
Mort

From: Roberts, Lou
Sent: Wednesday, April 11, 2018 3:28 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Analysis of 32 sites in Louisiana for Haz Waste TSDF's (NAICS = 562211)

Mort,

Do you have your final list of facilities in an excel spreadsheet?

I can't send this email to the States.

THANKS

Lou

From: Wakeland, Morton
Sent: Monday, April 09, 2018 10:26 AM
To: Stuckey, Troy <Stuckey.Troy@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>; Roberts, Lou <Roberts.Lou@epa.gov>; Mansfield, William

<Mansfield.William@epa.gov>; Riley, David <riley.david@epa.gov>; Lancaster, Stan <Lancaster.Stan@epa.gov>
Subject: Analysis of 32 sites in Louisiana for Haz Waste TSDF's (NAICS = 562211)
Importance: High

This comparison is based only on facilities that reported to TRI in 2016 (latest year) because the likelihood is that contact email is still valid.
All are also RCRA LQG's.

Out of close to 400 facilities that reported to TRI in 2016, in the State of Louisiana, only 3 report a primary NAICS code of 562211

	A	B	C	D	E	F	G	H
1	TRIFID	Facility_Name	Address	City	State	Zip	NAICS	
7	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	7170 JOHN BRANNON RD	SULPHUR	LA	70665	562211	
5	70807FTYK13351	CLEAN HARBORS BATON ROUGE LLC	13351 SCENIC HWY	BATON ROUGE	LA	70807	562211	
6	71417WCLNHW3783H	CLEAN HARBORS COLFAX LLC	3783 HIGHWAY 471	COLFAX	LA	71417	562211	
38								
39								
41								

Of these 3, only Chemical Waste Management in Sulphur, Louisiana is on our list of potential targets.

If you review the names of the other sites, it's rather intuitive none of these are TSDF's. The NAICS analysis confirms this.

Therefore, remove Chem Waste, and we are good to go. However, from an EPCRA 313 perspective, having discrepancies on 33 chemicals is significant. It would be interesting to see what they have to say about all those chemicals, not being reported in certain years. To give you a perspective, below is
a screen shot of the original analysis on Chem Waste Mgmt.

Obviously, **Yes** means they reported for that chemical, for that year listed in the header.
On the other hand, **No** means they <u>did not report</u> for that chemical, for that year listed in the header.

1	TRIFID	FACILITY_NAME	TRI_CHEMICAL	2011	2012	2013	2014	2015	2016
1660	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	ACRYLIC ACID	YES	NO	NO	NO	NO	NO
1661	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	ALUMINUM (FUME OR DUST)	NO	NO	YES	NO	YES	NO
1662	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	ALUMINUM OXIDE (FIBROUS FORMS)	NO	NO	YES	NO	YES	YES
1663	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	ANILAZINE	YES	YES	YES	NO	NO	NO
1664	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	ANTHRACENE	YES	NO	NO	NO	NO	NO
1665	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	ASBESTOS (FRIABLE)	YES	YES	YES	YES	YES	YES
1666	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	ATRAZINE	YES	YES	NO	YES	YES	YES
1667	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	BARIUM	YES	NO	YES	YES	YES	YES
1668	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	BENZO(G H I)PERYLENE	NO	NO	NO	YES	YES	NO
1669	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	CATECHOL	NO	NO	YES	NO	NO	NO
1670	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	CHROMIUM COMPOUNDS(EXCEPT CHROMITE OI	YES	YES	YES	YES	YES	YES
1671	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	COBALT COMPOUNDS	NO	YES	NO	NO	NO	YES
1672	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	COPPER COMPOUNDS	YES	YES	YES	YES	YES	YES
1673	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	CREOSOTE	NO	YES	NO	NO	NO	NO
1674	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	CYANAZINE	NO	YES	YES	NO	NO	NO
1675	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	DECABROMODIPHENYL OXIDE	YES	YES	NO	NO	YES	YES
1676	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	DIISOCYANATES	YES	YES	YES	YES	YES	NO
1677	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	DIOXIN AND DIOXIN-LIKE COMPOUNDS	NO	NO	YES	YES	NO	YES
1678	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	ETHYLBENZENE	NO	NO	NO	YES	NO	YES
1679	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	ETHYLENE GLYCOL	YES	YES	YES	YES	YES	YES
1680	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	HEXACHLOROBENZENE	YES	YES	YES	YES	YES	YES
1681	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	HYDROQUINONE	NO	NO	YES	NO	NO	NO
1682	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	LEAD COMPOUNDS	YES	YES	YES	YES	YES	YES
1683	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	MANGANESE	NO	YES	YES	YES	YES	YES
1684	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	MANGANESE COMPOUNDS	YES	NO	NO	NO	NO	NO
1685	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	MERCURY	YES	YES	YES	YES	YES	NO
1686	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	MERCURY COMPOUNDS	NO	NO	NO	NO	NO	YES
1687	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	MOLYBDENUM TRIOXIDE	YES	YES	NO	YES	YES	YES
1688	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	NAPHTHALENE	NO	NO	NO	YES	NO	NO
1689	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	NICKEL	NO	NO	YES	NO	NO	NO
1690	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	NICKEL COMPOUNDS	YES	YES	NO	YES	YES	YES
1691	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	PHENANTHRENE	YES	NO	NO	NO	NO	NO
1692	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	POLYCHLORINATED BIPHENYLS	YES	YES	YES	YES	YES	YES
1693	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	POLYCYCLIC AROMATIC COMPOUNDS	YES	YES	YES	YES	YES	YES
1694	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	SIMAZINE	YES	YES	NO	NO	NO	YES
1695	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	STYRENE	NO	YES	NO	NO	NO	YES
1696	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	TETRABROMOBISPHENOL A	NO	NO	NO	NO	YES	YES
1697	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	TOLUENE	NO	NO	YES	YES	NO	NO
1698	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	VANADIUM COMPOUNDS	NO	YES	YES	NO	NO	NO
1699	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	XYLENE (MIXED ISOMERS)	NO	NO	NO	YES	NO	NO
1700	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	ZINC (FUME OR DUST)	NO	NO	NO	NO	NO	YES
1701	70665CHMCL7170J	CHEMICAL WASTE MANAGEMENT - LA KE CHARLES FACILITY	ZINC COMPOUNDS	YES	YES	YES	YES	YES	YES

Questions or comments, let me know.

Please advise as soon as we have the GREEN LIGHT to send out our notifications. Please advise on language you want
included regarding RCRA if you disagree with my proposal. I propose to only mention that RCRA folks will be contacting them shortly so they do not have
a chance to prepare, say a Contingency Plan, or a list of trainings.

Mort

Morton E. Wakeland, Jr., Ph.D.
EPCRA 313 Enforcement & TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, Texas
(214.665.8116)

Message

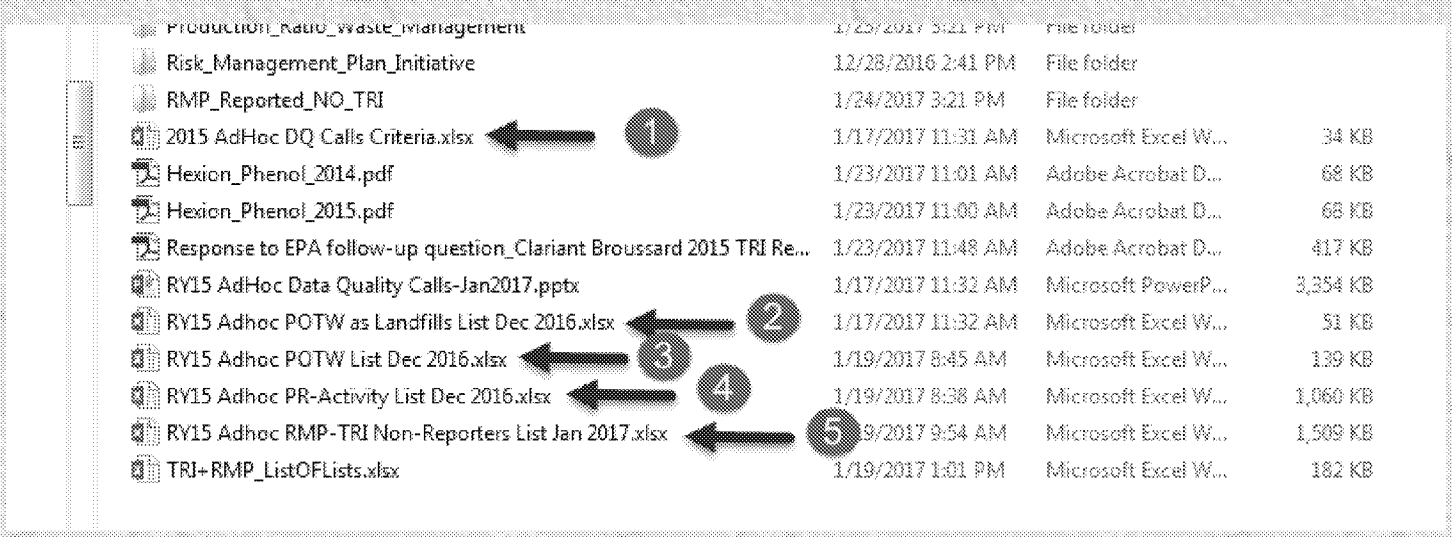
From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 1/25/2017 1:49:59 PM
To: chris rascher [rascher.chris@epa.gov]
BCC: Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: Regarding Velu's 2015 data quality review calls
Attachments: 2015 AdHoc DQ Calls Criteria.xlsx; RY15 AdHoc Data Quality Calls-Jan2017.pptx; RY15 Adhoc POTW as Landfills List Dec 2016.xlsx; RY15 Adhoc POTW List Dec 2016.xlsx; RY15 Adhoc PR-Activity List Dec 2016.xlsx; RY15 Adhoc RMP-TRI Non-Reporters List Jan 2017.xlsx; TRI+RMP_ListOFLists.xlsx

Importance: High

Good Morning again Chris....

Coffee is tastin way good today.

Velu sent us these 5 emails



Production_Ratio_Waste_Management	1/25/2017 3:21 PM	File folder	
Risk_Management_Plan_Initiative	12/28/2016 2:41 PM	File folder	
RMP_Reported_NO_TRI	1/24/2017 3:21 PM	File folder	
2015 AdHoc DQ Calls Criteria.xlsx (1)	1/17/2017 11:31 AM	Microsoft Excel W...	34 KB
Hexion_Phenol_2014.pdf	1/23/2017 11:01 AM	Adobe Acrobat D...	68 KB
Hexion_Phenol_2015.pdf	1/23/2017 11:00 AM	Adobe Acrobat D...	68 KB
Response to EPA follow-up question_Clariant Broussard 2015 TRI Re...	1/23/2017 11:48 AM	Adobe Acrobat D...	417 KB
RY15 AdHoc Data Quality Calls-Jan2017.pptx	1/17/2017 11:32 AM	Microsoft PowerP...	3,354 KB
RY15 Adhoc POTW as Landfills List Dec 2016.xlsx (2)	1/17/2017 11:32 AM	Microsoft Excel W...	51 KB
RY15 Adhoc POTW List Dec 2016.xlsx (3)	1/19/2017 8:45 AM	Microsoft Excel W...	139 KB
RY15 Adhoc PR-Activity List Dec 2016.xlsx (4)	1/19/2017 8:38 AM	Microsoft Excel W...	1,060 KB
RY15 Adhoc RMP-TRI Non-Reporters List Jan 2017.xlsx (5)	1/19/2017 9:54 AM	Microsoft Excel W...	1,509 KB
TRI+RMP_ListOFLists.xlsx	1/19/2017 1:01 PM	Microsoft Excel W...	182 KB

#2 the issue is amounts were put in POTW section when it appears should have been put going to a landfill

#3 the issue is that the name appearing on the Form R appears not to be a POTW

Chris, Velu screwed this one up big time, well in a way

I sent an email out yesterday – many of the supposed POTW names are duplicated throughout the list

Rather than send emails to all the listed facilities who reported the POTW name sort the list for just the unique POTW names, and send to just those facilities.

Mine went from 50 or so facilities down to about 15!!

#4 the issue here is that the production ratio went up from 2014 to 2015, yet waste amounts went down, or vice versa

I have discovered with several facilities the reason for this is that waste was not actually moved until following year

Sounds reasonable to me

#5 the issue here is that the facility reported a TRI chemical on their RMP, yet did not report for it in TRI.

Straight forward question to facility, should you have reported for this chemical to TRI?

#1 is the data quality calls codes and response codes we always use.

I took the latest List of Lists and modified it on a different worksheet to include only those TRI chemicals that are also RMP chemicals

If you may have misplaced Velu's stuff, am attaching so you have all, including List of Lists.

If you have any further questions, just let me know. I'm finalizing my emails to the RMP facilities this morning. The damn bastards at Microsoft
did not allow for one record = multiple rows = one email
Emails can only go out as one record = one row = one email. Hence if a facility has 4 chemicals in question, they are gonna get 4 emails.
Will explain in my Word Text what is going on to facility.

Hope this helps???

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 2/21/2019 7:38:02 PM
To: Araiza, Joseph [jaraiza@continentalcarbon.com]
BCC: Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: RE: After some additional research...

Importance: High

Joe

I think I missed this email –understand issues arise. Please document your investigations.

We are especially interested in how you determine thresholds vs just showing data from Form R.

How much more time do you think it will take to get the info to us?

Best week's wishes,
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Araiza, Joseph <jaraiza@continentalcarbon.com>
Sent: Tuesday, February 12, 2019 2:33 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: After some additional research...

Mort,
We've been working on your request and have identified some recordkeeping and calculation areas that need improvement. While there are no significant changes expected to reporting, we have identified some areas (including fugitive air releases) in which the facility has better information that impacts releases for 2017. Understanding you had requested all data by February 13, 2019, we request an extension to this date. We propose to have revised 2017 Form Rs and all supporting documentation/calculations submitted to you by COB, February 22, 2019. We will do our best to get it to you sooner but let me know if that new date works for you.

Thanks,

Joe Araiza
EHS Manager
Continental Carbon Company
O: 281-647-3807
C: 713-818-3285 (temporary)

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Tuesday, February 12, 2019 12:24 PM
To: Araiza, Joseph <jaraiza@continentalcarbon.com>
Subject: RE: After some additional research...

acknowledge receipt – thanks Joe
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Araiza, Joseph <jaraiza@continentalcarbon.com>
Sent: Tuesday, February 12, 2019 12:02 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: After some additional research...

Mort, attached is the safety data sheet for the oil that we receive from the Valero refinery. It is a refinery feedstock oil. Basically after the refinery starts with crude oil and extracts all of the gasolines, kerosene, diesels, jet fuels, etc., what's left over is this feedstock oil. It has no more value in the refining process so the refinery sends it to our plant and we use it to create carbon black.

The analysis I sent you is on this feedstock oil.

Thanks,

Joe Araiza
EHS Manager
Continental Carbon Company
O: 281-647-3807
C: 713-818-3285 (temporary)

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Tuesday, February 12, 2019 10:30 AM
To: Araiza, Joseph <jaraiza@continentalcarbon.com>
Subject: RE: After some additional research...

thanks Joe....did the lab test of other chemicals besides metals?
What exactly is this analysis on, i.e., type of oil, if oil?

thanks, Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Araiza, Joseph <jaraiza@continentalcarbon.com>
Sent: Tuesday, February 12, 2019 8:21 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: After some additional research...

Mort, here is the oil sample analysis you requested.

Thanks,

Joe Araiza
EHS Manager
Continental Carbon Company
O: 281-647-3807
C: 713-818-3285 (temporary)

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Monday, February 11, 2019 8:13 AM
To: Araiza, Joseph <jaraiza@continentalcarbon.com>
Subject: After some additional research...

Please be sure to include the type of oil the facility uses, and its chemical composition as weight percentages.

Thanks, Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6

Dallas, TX 75202
(214.665.8116)

From: Araiza, Joseph <jaraiza@continentalcarbon.com>
Sent: Wednesday, February 6, 2019 8:09 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: FW: TRI-MEweb submission has been certified and sent to EPA and a TRI Data Exchange member state.

Mort, see below that 2017 was submitted. I assume we are looking at some sort of penalty?

Thanks,

Joe Araiza
EHS Manager
Continental Carbon Company
O: 281-647-3807
C: 713-818-3285 (temporary)

From: no-reply@epacdx.net <no-reply@epacdx.net>
Sent: Wednesday, February 06, 2019 7:01 AM
To: Araiza, Joseph <jaraiza@continentalcarbon.com>; Bownds, Arlie <abounds@continentalcarbon.com>; Araiza, Joseph <jaraiza@continentalcarbon.com>
Subject: TRI-MEweb submission has been certified and sent to EPA and a TRI Data Exchange member state.

Dear JOSEPH Araiza, Arlie Bownds, Joe Araiza ,

The TRI-MEweb submission for the facility and chemical(s) listed below has been prepared, certified, and sent to EPA. You have reported that your facility is located in the state of Texas.

Please be aware that the state of Texas is participating in EPA's TRI Data Exchange. This certified submission will be electronically forwarded to Texas, satisfying your obligation to report to both EPA and the state in which the facility is located (Texas).

You may wish to print a copy of this receipt and keep it for your records. You may also print a copy of your state submission by navigating to the Submission History page. Do not send this receipt to EPA.

If you have any questions regarding this email, please contact the CDX Help Desk at the phone numbers listed below for further assistance. Please reference the information below when contacting the CDX Help Desk.

---- REFERENCE INFORMATION ----

TRI Facility ID: 79086WTCCRHCR1B
Facility: CONTINENTAL CARBON CO SUNRAY
11702 CARBON BLACK RD
SUNRAY, TX, 79086
Certifying Official Name: Arlie Bownds
Email: abownds@continentalcarbon.com

Transaction ID:_7a896aca-f8bd-4399-a3dd-2ec89f9646f2
Date Certified and Sent to EPA: 02/06/2019 8:00.

Chemical Name	RY	CAS	Form	Revision	Withdrawal	Prepared By	Preparation Completion Date
Polycyclic aromatic compounds	2017	N590	R	No	No	jaraiza@continentalcarbon.com	02/05/2019 16:24
Hydrogen Sulfide	2017	007783064	R	No	No	jaraiza@continentalcarbon.com	02/05/2019 16:24
Hydrogen cyanide	2017	000074908	R	No	No	jaraiza@continentalcarbon.com	02/05/2019 16:24
Carbonyl sulfide	2017	000463581	R	No	No	jaraiza@continentalcarbon.com	02/05/2019 16:24
Carbon disulfide	2017	000075150	R	No	No	jaraiza@continentalcarbon.com	02/05/2019 16:24
Benzo(g,h,i)perylene	2017	000191242	R	No	No	jaraiza@continentalcarbon.com	02/05/2019 16:24

---- CDX HELP DESK ----

Phone (toll-free): +1 (888) 890-1995
Phone (toll): (970) 494-5500
Email: helpdesk@epacdx.net
The CDX Help Desk is available Monday through Friday, 8:00 AM to 6:00 PM Eastern Time.

Access CDX Home: https://cdx.epa.gov/

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 11/16/2017 8:27:28 PM
To: Senthil, Velu [Senthil.Velu@epa.gov]
CC: Clark, Katherine [Clark.Katherine@epa.gov]; Antisdel, Timothy [Antisdel.Timothy@epa.gov]
BCC: Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: Have you done facility wide non-reporter yet?
Attachments: 2015.xlsx; 2016.xlsx

Importance: High

I just finished doing Region 6 and found a whopping **174 facilities**, i.e. reported in 2016 and not 2015.
What did you find?

If true have a lotta 2018 targets, then add on those that reported in 2015 and not 2016 (235)

I had the EPA Call Center gurus check my Conditional Formatting in Excel – extract below
Yellow means reported in 2016 and not 2015
Blue means reported in 2015 and not 2016
Comparisons are based on TRIFID not names – names can be duplicated.
This is an entire facility.
Thoughts Velu?
Mort

p.s. Tim – check me
I simply down loaded all Region 6 reporters for 2015, then 2016
TRIFID, FacilityName, FY, TRI Chemical, Street, City, State, Zip, Region, Assign Tech Name, Assign Tech Phone, Assign Tech Email, Cert Sign Date, Orig Post Mark
Sorted by TRIFD then chem name.
spreadsheets attached.

	A	B	C	D	E	F
1	TRIFID(2015)	FacilityName	RY	TRIFID(2016)	FacilityName	RY
76	70340MCDRMDEGRA	BOLLINGER MARINE FABRICATORS LLC	2015	70340BKRHGHWY56	NOV TUBOSCOPE AMELIA NORTH & SOUTH CO	2016
77	70346CFNDSHWY30	CF INDUSTRIES NITROGEN LLC	2015	70340MCDRMDEGRA	BOLLINGER MARINE FABRICATORS LLC	2016
78	70346GRCCHLAHIG	MOSAIC PHOSPHATES CO FAUSTINA PLANT	2015	70346CFNDSHWY30	CF INDUSTRIES NITROGEN LLC	2016
79	[redacted]	[redacted]	2015	70346GRCCHLAHIG	MOSAIC PHOSPHATES CO FAUSTINA PLANT	2016
80	70357BLLNG16NRM	BOLLINGER FOURCHON LLC	2015	70357BLLNG16NRM	BOLLINGER FOURCHON LLC	2016
81	70357CPRT2181ST	C-PORT 2 LLC	2015	70357CPRT2181ST	C-PORT 2 LLC	2016
82	70357CPRTL169TH	C-PORT LLC	2015	70357CPRTL169TH	C-PORT LLC	2016
83	70357MRTNT365AJ	MARTIN TERMINAL SOUTH YARD	2015	70357MRTNT365AJ	MARTIN TERMINAL SOUTH YARD	2016
84	7035WCPRTX3ADAM	C-PORT 3	2015	7035WBLLNG236AD	BOLLINGER FOURCHON NORTH	2016
85	[redacted]	[redacted]	2015	7035WCPRTX3ADAM	C-PORT 3	2016
86	[redacted]	[redacted]	2015	7035WHWCMT363TW	HOWCO METALS MANAGEMENT LLC	2016
87	7035WMRTNP191AJ	MARTIN OPERATING PTNR-FOURCHON 15	2015	7035WMRTNP191AJ	MARTIN OPERATING PTNR-FOURCHON 15	2016
88	70363DLPHN4THMP	DOLPHIN SERVICES LLC	2015	70363DLPHN4THMP	DOLPHIN SERVICES LLC	2016
89	70363GLFSL583TH	GULF ISLAND LLC MAIN YARD WEST YARD & SOUTHPORT	2015	70363GLFSL583TH	GULF ISLAND LLC MAIN YARD WEST YARD & SC	2016
90	[redacted]	[redacted]	2015	7036WLSHPL367DI	LASHIP LLC	2016
91	[redacted]	[redacted]	2015	7036WVLLRC1914G	VALLOUREC TUBE-ALLOY LLC	2016
92	7036WLSHPL367DI	LASHIP LLC	2015	70373NRTHM800IN	NORTH AMERICAN SHIPBUILDING LLC-LAROSE	2016
93	7036WVLLRC1914G	VALLOUREC TUBE-ALLOY LLC	2015	70374BLLNGLAHWY	BOLLINGER SHIPYARDS LOCKPORT LLC	2016
94	[redacted]	[redacted]	2015	70380CMRNN37HWY	CAMERON INTERNATIONAL CORP	2016
95	70373NRTHM800IN	NORTH AMERICAN SHIPBUILDING LLC-LAROSE SHIPYARD	2015	70380NWFFS6032R	NEW INDUSTRIES LLC	2016
96	70374BLLNGLAHWY	BOLLINGER SHIPYARDS LOCKPORT LLC	2015	70380STMRYCORNE	AZZ GALVANIZING - MORGAN CITY	2016
97	70380CMRNN37HWY	CAMERON INTERNATIONAL CORP	2015	70381CNRDS29DUH	CONRAD SHIPYARD LLC (DEEPWATER YARD)	2016
98	[redacted]	[redacted]	2015	7038WBKRHG1FIRS	BAKER HUGHES OILFIELD OPERATIONS INC	2016
99	70380NWFFS6072B	NEW INDUSTRIES LLC	2015	7038WCMRNN5SHIG	CAMERON INTERNATIONAL CORP	2016
100	70380STMRYCORNE	AZZ GALVANIZING - MORGAN CITY	2015	70391DWCHMLOUIS	THE DOW CHEMICAL CO GRAND BAYOU OPER	2016
101	70381CNRDS29DUH	CONRAD SHIPYARD LLC (DEEPWATER YARD)	2015	70404SNDRSHWY19	SANDERSON FARMS INC	2016
102	7038WBKRHG1FIRS	BAKER HUGHES OILFIELD OPERATIONS INC	2015	70406WSTHN641HWY	SOUTHERN FOODS GROUP LLC OF HAMMOND	2016
103	7038WCMRNN5SHIG	CAMERON INTERNATIONAL CORP	2015	70422MTPND13040	BRADKEN INC	2016
104	[redacted]	[redacted]	2015	70427GYLRD4THST	INTERNATIONAL PAPER BOGALUSA MILL	2016
105	70391DWCHMLOUIS	THE DOW CHEMICAL CO GRAND BAYOU OPERATIONS	2015	7042WMLSBG215IH	JOE N MILES & SONS LLC	2016

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 1/10/2017 4:34:06 PM
To: kathy clark [clark.kathy@epa.gov]
Subject: FW: Valero Case in Region 9
Attachments: Valero Refining - Consent Agreement.pdf; Valero Refining - Cover Letter.pdf

Case from Region 9 Valero....Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Chew, Andrew
Sent: Thursday, November 03, 2016 1:11 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Basinger, David <Basinger.David@epa.gov>; Baranco, Angela <Baranco.Angela@epa.gov>
Cc: Clark, Kathy <Clark.Kathy@epa.gov>
Subject: RE: Valero Case in Region 9

Here you go..

- Andrew

Andrew Chew, P.E.
T: (415) 947-4197 | F: (415) 947-3579 | chew.andrew@epa.gov
U.S. EPA, Region 9, Air/TRI Enforcement Section (ENF-2-1) | 75 Hawthorne St., San Francisco, CA 94105

From: Wakeland, Morton
Sent: Thursday, November 03, 2016 11:03 AM
To: Basinger, David <Basinger.David@epa.gov>; Baranco, Angela <Baranco.Angela@epa.gov>
Cc: Clark, Kathy <Clark.Kathy@epa.gov>; Chew, Andrew <Chew.Andrew@epa.gov>
Subject: RE: Valero Case in Region 9

Hey Dave...most appreciate.....

You take are and have a good week.
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Thursday, November 03, 2016 12:42 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Baranco, Angela <Baranco.Angela@epa.gov>
Cc: Clark, Kathy <Clark.Kathy@epa.gov>; Chew, Andrew <Chew.Andrew@epa.gov>
Subject: RE: Valero Case in Region 9

I hadn't forwarded this yet to Andrew; he should be able to help with this. Now he has your email, so should be able to respond.

From: Wakeland, Morton
Sent: Thursday, November 03, 2016 8:52 AM
To: Basinger, David <Basinger.David@epa.gov>; Baranco, Angela <Baranco.Angela@epa.gov>
Cc: Clark, Kathy <Clark.Kathy@epa.gov>
Subject: RE: Valero Case in Region 9

Dave/Angela

Hope this finds all well out on the west coast!!

Possible to get a copy of Complaint/CAFO for your Valero case?

Have a Valero in Oklahoma that late reported 34 chemicals in 2014 and the penalty is > $500K

Seems they are appearing a lot with various violaitons.

Thanks much.

With HQ's wanting large cases I'm going to pursue this OK Valero case with fervor.

Thank ya'll,
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6

Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Basinger, David
Sent: Wednesday, October 26, 2016 9:11 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Baranco, Angela <Baranco.Angela@epa.gov>
Cc: Clark, Kathy <Clark.Kathy@epa.gov>
Subject: RE: Valero Case in Region 9

*$57,000, not (%)

From: Basinger, David
Sent: Wednesday, October 26, 2016 7:09 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Baranco, Angela <Baranco.Angela@epa.gov>
Cc: Clark, Kathy <Clark.Kathy@epa.gov>
Subject: RE: Valero Case in Region 9

On the call, I corrected this; while the overall settlement (mostly RCRA) was "large", the TRI portion was relatively small (%57,000) and was considered not significant by the region.

From my section, Andrew Chew worked on the TRI portion of the case, and either he or Angela can address your questions and requests. I was told there is a press release. Andrew is out of the office the rest of this week, but should be returning Monday. Hope that's soon enough, but perhaps Angela can help meanwhile.

From: Wakeland, Morton
Sent: Wednesday, October 26, 2016 6:20 AM
To: Basinger, David <Basinger.David@epa.gov>; Baranco, Angela <Baranco.Angela@epa.gov>
Cc: Clark, Kathy <Clark.Kathy@epa.gov>
Subject: Valero Case in Region 9
Importance: High

Sorry I missed yesterday's enforcement call, I was enduring Jury Duty all day long – ugh!

I see Region 9 has a Valero case which has just settled and is "large"

- Cases update - David Basinger – 20 minutes

1. Valero Benicia CA refinery TRI settlement – combined with a RCRA settlement at this site, this is a significant (large) TRI case that was recently settled.
2. Hawaii Chevron (becoming Island Energy) and Par Kapolei (previously known as Independent Energy and previous to that, owned by Tesoro) refineries – have for both, but due to resource constraints, are advertising internally to EPA to solicit assistance in completing case development
3. Tesoro Wilmington refinery – will develop this potential case with NEIC support in FY17

- Other issues

Could I get a brief overview – have you written it up, for example, as a press release? Copy of any overview would be great.
May I also have a copy of the Complaint / CAFO?

FYI, I also have a Valero case in Oklahoma and they are kicking and screaming – 34 chemicals reported 145 days days late for 2014.
Who was their attorney?
"They forgot to click the send button" - Don't think so! And yes, they reiterate – "it's only a paper work violation" – Did your Valero claim the same thing?
If so, how did you respond?

My gross calculated penalty...

	A	B	C	D	E	F	G	H	I	J	K
1	> 50 employees for RY 2014										
2	>$10MM in Gross Revenue in RY 2014								<5 Year Late		
3	TRI Chemical	RY Due Date	Submitted	# Days Late Reporting	RR, P, OWU	Usage (lbs)	> or < 50K Threshold	Excess Level	Gross Penalty		
4	1,2,4-TRIMETHYLBENZENE	7/1/2015	11/23/2015	145	P	118,424,675	>50K	A	$23,374		$37,500
5	1,3-BUTADIENE	7/1/2015	11/23/2015	145	M	109,695	<50K	B	$14,647		$24,080
6	AMMONIA	7/1/2015	11/23/2015	145	M	2,992,498	>50K	A	$23,374		$37,500
7	ANTHRACENE	7/1/2015	11/23/2015	145	M	1,800,277	>50K	A	$23,374		$37,500
8	BENZENE	7/1/2015	11/23/2015	145	P	62,833,721	>50K	A	$23,374		$37,500
9	BENZIDINE (PRE/PLENE)	7/1/2015	11/23/2015	145	M	1,418,977	>50K	A	$23,374		$37,500
10	CARBON DISULFIDE	7/1/2015	11/23/2015	145	M	788,908	>50K	A	$23,374		$37,500
11	CARBONYL SULFIDE	7/1/2015	11/23/2015	145	M	780,154	>50K	A	$23,374		$37,500
12	COBALT COMPOUNDS	7/1/2015	11/23/2015	145	M	35,574	<50K	B	$14,647		$24,080
13	CRESOL (MIXED ISOMERS)	7/1/2015	11/23/2015	145	M	787,642	>50K	A	$23,374		$37,500
14	CUMENE	7/1/2015	11/23/2015	145	P	80,996,411	>50K	A	$23,374		$37,500
15	CYCLOHEXANE	7/1/2015	11/23/2015	145	P	171,882,110	>50K	A	$23,374		$37,500
16	DIOXIN AND DIOXIN-LIKE COMPOUNDS	7/1/2015	11/23/2015	145	M	0.287042	<50K	B	$14,647		$24,080
17	ETHYLBENZENE	7/1/2015	11/23/2015	145	P	71,813,816	>50K	A	$23,374		$37,500
18	ETHYLENE	7/1/2015	11/23/2015	145	P	33,080,871	>50K	A	$23,374		$37,500
19	HYDROCHLORIC ACID (1995 AND AFTER "ACID AEROSOLS" ONLY)	7/1/2015	11/23/2015	145	M	36,019	<50K	B	$14,647		$37,500
20	HYDROGEN FLUORIDE	7/1/2015	11/23/2015	145	OWU	784,860	>50K	A	$23,374		$37,500
21	HYDROGEN SULFIDE	7/1/2015	11/23/2015	145	M	78,094,702	>50K	A	$23,374		$37,500
22	LEAD COMPOUNDS	7/1/2015	11/23/2015	145	P	6,790	<50K	A	$23,374		$37,500
23	MERCURY COMPOUNDS	7/1/2015	11/23/2015	145	P	22	<50K	B	$14,647		$24,080
24	METHANOL	7/1/2015	11/23/2015	145	OWU	47,180	<50K	B	$14,647		$24,080
25	MOLYBDENUM TRIOXIDE	7/1/2015	11/23/2015	145	OWU	124,230	>50K	A	$23,374		$37,500
26	NAPHTHALENE	7/1/2015	11/23/2015	145	P	43,865,249	>50K	A	$23,374		$37,500
27	N-HEXANE	7/1/2015	11/23/2015	145	M	44,860,782	>50K	A	$23,374		$37,500
28	NICKEL COMPOUNDS	7/1/2015	11/23/2015	145	M	71,047	<50K	B	$14,647		$24,080
29	NITRATE COMPOUNDS	7/1/2015	11/23/2015	145	M	56,473	<50K	B	$14,647		$24,080
30	PHENANTHRENE	7/1/2015	11/23/2015	145	M	10,963,868	>50K	A	$23,374		$37,500
31	PHENOL	7/1/2015	11/23/2015	145	M	2,741,843	<50K	A	$23,374		$37,500
32	POLYCYCLIC AROMATIC COMPOUNDS	7/1/2015	11/23/2015	145	M	16,873,966	>50K	A	$23,374		$37,500
33	PROPYLENE	7/1/2015	11/23/2015	145	M	196,106,798	>50K	A	$23,374		$37,500
34	STYRENE	7/1/2015	11/23/2015	145	M	2,910,321	>50K	A	$23,374		$37,500
35	SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY)	7/1/2015	11/23/2015	145	M	117,688	<50K	B	$14,647		$24,080
36	TETRACHLOROETHYLENE (PERCHLOROETHYLENE)	7/1/2015	11/23/2015	145	OWU	40,690	<50K	B	$14,647		$24,080
37	TOLUENE	7/1/2015	11/23/2015	145	M	249,967,563	>50K	A	$23,374		$37,500
38	XYLENE (MIXED ISOMERS)	7/1/2015	11/23/2015	145	P	74,532,232	<50K	A	$23,374		$37,500
39								TOTAL	$730,550		$1,181,730
40											

Thanks David / Angela

Best week's wishes for our West Coast folks!!
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 3/29/2017 4:18:48 PM
To: Thrush, Dale [Thrush.Dale@epa.gov]
CC: Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: TRI Data Info - Ammonia - Region 6 - 2015
Attachments: section 8 formulas.pdf; 2015_Form_R_blank.pdf; Ammonia_Dale_Thrush.xlsx; RMP_TRI_Comparison.xlsm

Importance: High

This may or may not be what you want, or more likely, somewhere in the middle.

Attached workbook #1 your download –
1st worksheet RawDownloaded data
2nd worksheet Reformatted data – use this worksheet to view info. in a better format

Attached workbook #2
Data Quality check this year for RMP vs TRI data
Multiple chemicals were considered.
I used code to delete all rows not containing the word "ammonia" – this is a "macro enabled workbook"
hence the extension .xlsm
You may see a yellow warning at top on opening "Enable Contents" on first opening, OK to click on.

UP FRONT MAJOR WARNING ABOUT COMPARING TRI AMMONIA TO RMP AMMONIA

The major use of ammonia (anhydrous) is for refrigeration.
The only time ammonia is reported to TRI is when a refrigeration system is first charged, and then only if the amount (in pounds)
exceeds the 10,000 "otherwise use threshold"
If during the year leaks occur, reports to TRI are only made if the system is recharged with more than 10,000 pounds.
If less than 10,000 pounds is recharged, no TRI reporting is required.

NOW TO YOUR REQUEST...

First, TRI does not distinguish ammonias – i.e. anhydrous vs aqueous
The reports are for ammonia CAS 7664-41-7
Am not sure how HQ's did their search – have requested.

Next, TRI does not utilize amounts in **volumes**, **TRI always utilizes amounts in pounds**

The following data was extracted from the TRI database for Region 6 for 2015, the most recent year of data collection.

Output Options for Selected Columns

Column Name	Operator Definition	Search Value
TRI Facility Id	Equal to	
Facility Name	Equal to	
Reporting Year	Equal to	2015
Chemical Name	Equal to	AMMONIA ×
Street Address	Equal to	
City Name	Equal to	
State Abbreviation	Equal to	1. List All State Abbreviation(s)
Zip Code	Equal to	
Region	Equal to	6 2. List All Region(s)
Facility Registry System ID	Equal to	
Maximum Amount Of Chemical	Equal to	3. List All Maximum Amount Of Chemical(s)
Primary SIC Code	Equal to	
Asgn Technical Contact	Equal to	
Asgn Technical Contact Email	Equal to	
Asgn Technical Phone	Equal to	
Dun and Bradstreet Number 1	Equal to	
Release 8IA Current Year Quantity	Equal to	
Release 8IB Current Year Quantity	Equal to	
Release 8IC Current Year Quantity	Equal to	
Release 8ID Current Year Quantity	Equal to	
Primary NAICS Code	Equal to	

Have included the Technical Contact's info so you can contact them directly to find out if anhydrous or aqueous,
along with TRI Facility Name, Address, Zip

Primary NAICS given, TRI no longer collects SIC codes for they went by the way side with the adoption of NAICS for 2006 onward.
Can however convert from NAICS back to SIC using NAICS concordances.
Can download conversion spreadsheets

1987 SIC to 2002 NAICS –
NAICS are updated every 5 years, is possible the 2002 NAICS for a SIC may have changed!
Link to download.
https://www.census.gov/eos/www/naics/concordances/concordances.html

Releases in pounds from section 8.1 a, b, c, and d from From R also extracted
8.1b includes releases from air, land, and water, plus some other sections on Form R.

See attached copy of Form R + formulas to calculate various sections in Section 8

TRI ID #, D&B#, and FRS # included in your workbook

Maximum Amount on-site at any one time during the year (given as a range code)
See below for amounts:

Section 4. Maximum Amount of the EPCRA Section 313 Chemical On-site at Any Time during the Calendar Year (Form R)

For data element 4.1 of Part II, select the code (see codes below) that indicates the maximum quantity of the EPCRA Section 313 chemical (e.g., in storage tanks, process vessels, on-site shipping containers, or in wastes generated) at your facility at any time during the calendar year. If the EPCRA Section 313 chemical was present at several locations within your facility, use the maximum total amount present at the entire facility at any one time. While range reporting is not allowed for PBT chemicals elsewhere on the Form R, range reporting for PBT chemicals is allowed for the Maximum Amount On-site.

Weight Range in Pounds

Range Code	From	To
01	0	99
02	100	999
03	1,000	9,999
04	10,000	99,999
05	100,000	999,999
06	1,000,000	9,999,999
07	10,000,000	49,999,999
08	50,000,000	99,999,999
09	100,000,000	499,999,999
10	500,000,000	999,999,999
11	1 billion	more than 1 billion

If the EPCRA Section 313 chemical present at your facility was part of a mixture or other trade name

If questions or clarifications, simply give me a shout.

Hope this helps in what you were looking for?????
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Thrush, Dale
Sent: Tuesday, March 28, 2017 7:01 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: Stuckey, Troy <Stuckey.Troy@epa.gov>
Subject: Data request

Mort,

Is the following possible? I am trying to get a list of companies which use/store anhydrous ammonia based upon EPCRA data. It is a bit late and I may be using incorrect terms, but I wanted to shoot you a quick email as a reminder to both of us.

If it is possible, I am trying to generate a list (hopefully in excel or a similar searchable program) which contains the following columns:

- Facility name
- Facility address
- Any type of EPA identifier (EPA ID number, FRS number, etc.)
- SIC code
- NAICS code
- Volume of anhydrous ammonia used / stored

Please feel free to catch me tomorrow whenever you see me and we can discuss further. Thanks!

Dale

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 8/22/2019 5:34:12 PM
To: Shrestha, Jenesh (CGI Federal) [jenesh.shrestha@cgifederal.com]
Subject: RE: Jay, may I ask a question of you?
Attachments: Imported_NonResponders_Aug_13_2019.xlsx

This is the workbook I used for the data – the specific worksheet I used, I called ***email*** so it
can be easily identified when merging data.

THANKS!!!!!!

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Toxics Enforcement Section (ECDST)
Enforcement & Compliance Assurance Division (ECD)
U.S. EPA Region 6
Dallas, TX 75270
(214.665.8116)

From: Shrestha, Jenesh (CGI Federal) <jenesh.shrestha@cgifederal.com>
Sent: Thursday, August 22, 2019 12:10 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Jay, may I ask a question of you?

No I can definitely take a look. Can you forward me the excel sheet you are working with please if you don't mind

---

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Thursday, August 22, 2019 12:09 PM
To: Shrestha, Jenesh (CGI Federal) <jenesh.shrestha@cgifederal.com>
Subject: RE: Jay, may I ask a question of you?

Thanks Jay!!

Like I said – plain ole Word Mail merge
3 fields in Excel to input info into placeholders in Word document.

the Word doc looks fine, but when the merge happen it moves the text up into the header
area. Make any difference the letterhead is two pasted items?

If too off the wall, don't worry – am sure you have more important stuff to attend to.

I'll just live

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Toxics Enforcement Section (ECDST)
Enforcement & Compliance Assurance Division (ECD)
U.S. EPA Region 6
Dallas, TX 75270
(214.665.8116)

From: Shrestha, Jenesh (CGI Federal) <jenesh.shrestha@cgifederal.com>
Sent: Thursday, August 22, 2019 12:00 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Jay, may I ask a question of you?

Good Afternoon Mort
Wow that looks weird. Let me look into it and will get back to you Asap
Thanks Jay

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Thursday, August 22, 2019 11:28 AM
To: Shrestha, Jenesh (CGI Federal) <jenesh.shrestha@cgifederal.com>
Subject: Jay, may I ask a question of you?
Importance: High

When I sent out my last reminders – I used Word Mail Merge with data in Excel.

The Word document looked like this:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 Elm Street, Suite 500
Dallas, Texas 75270-2102

August 13, 2019

Dear [TechContact]:

This is a friendly reminder that the information requested from you, about your 2018 and/or 2017 Toxic Release Inventory (TRI) reports, on or about August 1, 2019, is due to EPA on or well before August 30, 2019. As of today, I have not received any response. If this is in error, would you please resend, somehow I missed that in my notifications; otherwise, we would appreciate your immediate attention to this information request.

The communication pertains to the TRI Program's 2018 data quality checks, to ensure your site's information is accurate before being included in the 2018 TRI National Analysis.

The facility I am referencing is:

TRIFID: [TRIFID]

Facility Name: [FacilityName]

However, after sending the email – something squirrely happened with spacing – people received this instead:

August 13, 2019

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 Elm Street, Suite 500
Dallas, Texas 75270-2102

Dear [CONNIE HARRISON]:

This is a friendly reminder that the information requested from you, about your 2018 and/or 2017 Toxic Release Inventory (TRI) reports, on or about August 1, 2019, is due to EPA on or well before August 30, 2019. As of today, I have not received any response. If this is in error, would you please resend, somehow I missed that in my notifications; otherwise, we would appreciate your immediate attention to this information request.

The communication pertains to the TRI Program's 2018 data quality checks, to ensure your site's information is accurate before being included in the 2018 TRI National Analysis.

The facility I am referencing is:

TRIFID: [77641KMCNC2450S]

Facility Name: [KMTEX LLC]

If you are no longer the TRI technical contact, please notify me immediately who has taken your place. Beside rectifying any issue(s) with your reporting form(s), if applicable, it is important that you also answer the questions via the link included in the original email, and reproduced below:

Have any ideas why I messed up? Would appreciate any advice or perhaps Ahmed knows or Sarah??

thanks Jay!

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Toxics Enforcement Section (ECDST)
Enforcement & Compliance Assurance Division (ECD)
U.S. EPA Region 6
Dallas, TX 75270
(214.665.8116)

From: Shrestha, Jenesh (CGI Federal) <jenesh.shrestha@cgifederal.com>
Sent: Thursday, August 22, 2019 10:53 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Morning Jay - are we up-to-date on non-responders for the main DQ analysis (not NAICS)?

Good morning Mort,
The email report is up to date.
Thanks,
Jay

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Thursday, August 22, 2019 10:27 AM
To: Shrestha, Jenesh (CGI Federal) <jenesh.shrestha@cgifederal.com>
Subject: Morning Jay - are we up-to-date on non-responders for the main DQ analysis (not NAICS)?

would like to send a reminder, but want to clear with you first!
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Toxics Enforcement Section (ECDST)
Enforcement & Compliance Assurance Division (ECD)
U.S. EPA Region 6
Dallas, TX 75270
(214.665.8116)

From: Shrestha, Jenesh (CGI Federal) <jenesh.shrestha@cgifederal.com>
Sent: Tuesday, August 20, 2019 11:00 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Mohamed, Ahmed (CGI Federal) <Ahmed.Mohamed@cgifederal.com>
Subject: RE: Toxics Release Inventory (TRI) 2018 Data Quality

Mort,

The non-responders report was updated yesterday and we will update it today as well. Let us know before you send out reminders and we can refresh it before that so you see the most updated list.
Thanks ,
jay

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Tuesday, August 20, 2019 10:51 AM
To: Shrestha, Jenesh (CGI Federal) <jenesh.shrestha@cgifederal.com>; Mohamed, Ahmed (CGI Federal) <Ahmed.Mohamed@cgifederal.com>
Subject: RE: Toxics Release Inventory (TRI) 2018 Data Quality

Appreciate you folks helping this guy out – ya'll know more about the "guts" of QuEST than ole Mort – smile.

Best week's wishes

Jay – is report for non-responders up to date? thinking I need to send another reminder thur or fri –
still have 33 that have not ansered

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Toxics Enforcement Section (ECDST)
Enforcement & Compliance Assurance Division (ECD)
U.S. EPA Region 6
Dallas, TX 75270
(214.665.8116)

From: Shrestha, Jenesh (CGI Federal) <jenesh.shrestha@cgifederal.com>
Sent: Tuesday, August 20, 2019 10:19 AM
To: Mohamed, Ahmed (CGI Federal) <Ahmed.Mohamed@cgifederal.com>; Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Toxics Release Inventory (TRI) 2018 Data Quality

I reached out to the user. He was able to fill in the questionnaire.

From: Mohamed, Ahmed (CGI Federal) <Ahmed.Mohamed@cgifederal.com>
Sent: Tuesday, August 20, 2019 10:19 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: Shrestha, Jenesh (CGI Federal) <jenesh.shrestha@cgifederal.com>
Subject: RE: Toxics Release Inventory (TRI) 2018 Data Quality

Hi Mort,

I think this user's network might be restricting access to certain pages. The application does not require log in or password.

Is he still having this issue?

-ahmed

Ahmed Mohamed, PMP
CGI Federal
Office: 703.227.5571 | Mobile: 703.598.0952
12601 Fair Lakes Circle | Fairfax, VA. 22033

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Monday, August 19, 2019 10:29 AM
To: Mohamed, Ahmed (CGI Federal) <Ahmed.Mohamed@cgifederal.com>; Cheng, Sarah C (CGI Federal) <sarah.cheng@cgifederal.com>
Subject: FW: Toxics Release Inventory (TRI) 2018 Data Quality

Can you tell why this guy is getting this message in QuEST?

Thanks,
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Toxics Enforcement Section (ECDST)
Enforcement & Compliance Assurance Division (ECD)
U.S. EPA Region 6
Dallas, TX 75270
(214.665.8116)

From: Roy Beckett <rbeckett@bop.gov>
Sent: Monday, August 19, 2019 8:46 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: Re: Toxics Release Inventory (TRI) 2018 Data Quality

Attached is a screen shot for me trying to do the survey.

Roy Beckett
Safety Compliance Specialist
FCI Texarkana
903-838-4587 ext: 197

>>> <wakeland.morton@epa.gov> 8/16/2019 8:25 AM >>>

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6

1201 Elm Street Suite 500 DALLAS, TX 75270-2102

Data Quality Questions for Facility (TRIFID: 7550WFDRLC41LEP) Regarding 2017 and 2018 Toxics Release Inventory (TRI) Reporting -- Due 8/22/2019

Dear ROY BECKETT:

You are listed as the technical contact on the following facility's Form R reports for **reporting year 2018.**

Facility Name: FEDERAL CORRECTIONAL INSTITUTION

TRIFID: 7550WFDRLC41LEP

Street Address

City, State Zipcode

Please use the link below to fill out your response. If you've done already - thanks.

How do I respond to this inquiry?

Please respond by answering the questions on the following questionnaire:

https://cdxnodengn.epa.gov/cdx-tri-quest/_ui/questionnaire.html#?survey=430b5a58-d2d9-4104-958f-d56b333d5bb3&target=d9621a4e-c5d8-4cdf-a8f6-31254c8ddf8a

If you would like to make any revisions, withdrawals or new submissions, **please send to EPA by Thursday, August 22, 2019**.

How do I submit a revision, a withdrawal or create a new submission?

Facilities must use TRI-MEweb to submit, revise, or withdraw TRI reporting forms (except for trade secret submissions, which facilities must submit on paper). EPA provides online tutorials on how to setup, prepare/revise/withdraw, transmit and certify a TRI reporting form using TRI-MEweb; links to common questions and answers; a troubleshooting guide to resolve access issues to TRI-MEweb; and a link to the CDX login page (CDX is used to access TRI-MEweb) https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms.

If you have any follow up questions, please contact Morton Wakeland at (214) 665-8116 or email at wakeland.morton@epa.gov.

Thank you for your attention to this matter.

Sincerely,

Morton Wakeland

US EPA Region 6

TRI Data Quality Program

1201 Elm Street Suite 500 DALLAS, TX 75270-2102

(214) 665-8116

wakeland.morton@epa.gov

::QUEST::DONOTDELETE::X-QUEST-EMAIL::ea8426e5-2d72-43f0-95e9-c610c3396412
::QUEST::DONOTDELETE::X-QUEST-TARGET::d9621a4e-c5d8-4cdf-a8f6-31254c8ddf8a
Proprietary/confidential information belonging to CGI Federal Inc. or its affiliates may be contained in this message. If you are not a recipient indicated or intended in this message (or responsible for the delivery of this message to such person), or if you think for any reason that this message may have been addressed to you in error, you may not use or copy or deliver this message to anyone else. In such case, you should destroy this message and are asked to notify the sender by reply email.

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 9/7/2017 3:54:58 PM
To: LaRocca, Paula [Paula.LaRocca@valero.com]
CC: Ramsey, Regina (Contractor) [Regina.Ramsey@contractor.valero.com]
Subject: RE: 2016 TRI Data Quality Checks

Good enough Paula...

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: LaRocca, Paula [mailto:Paula.LaRocca@valero.com]
Sent: Thursday, September 07, 2017 10:42 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: Ramsey, Regina (Contractor) <Regina.Ramsey@contractor.valero.com>
Subject: RE: 2016 TRI Data Quality Checks

Regina Ramsey is out at this time but is scheduled to be back next week, Sept 11. She will address this item as quickly soon thereafter.

Regards,
Paula

VALERO

Paula LaRocca
Manager, Environmental Engineering
Valero Port Arthur Refinery
Office: 409-985-1200
Cell: 409-284-6240

From: Wakeland, Morton [mailto:wakeland.morton@epa.gov]
Sent: Thursday, September 07, 2017 10:25 AM
To: LaRocca, Paula <Paula.LaRocca@valero.com>; Ramsey, Regina (Contractor) <Regina.Ramsey@contractor.valero.com>
Subject: RE: 2016 TRI Data Quality Checks

will mark as impacted – thank – however when ya'll get up and running, please attend to and let me know.

thanks, Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: LaRocca, Paula [mailto:Paula.LaRocca@valero.com]
Sent: Tuesday, September 05, 2017 1:05 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Ramsey, Regina (Contractor) <Regina.Ramsey@contractor.valero.com>
Subject: RE: 2016 TRI Data Quality Checks

Valero Port Arthur Refinery.

Regards,
Paula

VALERO

Paula LaRocca
Manager, Environmental Engineering
Valero Port Arthur Refinery
Office: 409-985-1200
Cell: 409-284-6240

From: Wakeland, Morton [mailto:wakeland.morton@epa.gov]
Sent: Tuesday, September 05, 2017 11:24 AM
To: Ramsey, Regina (Contractor) <Regina.Ramsey@contractor.valero.com>
Cc: LaRocca, Paula <Paula.LaRocca@valero.com>
Subject: RE: 2016 TRI Data Quality Checks

Understand – best of luck. Which facility so that I can denote "impacted by Harvey"
thanks,
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Ramsey, Regina (Contractor) [mailto:Regina.Ramsey@contractor.valero.com]
Sent: Saturday, September 02, 2017 11:04 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: LaRocca, Paula <Paula.LaRocca@valero.com>
Subject: RE: 2016 TRI Data Quality Checks

Mr. Wakeland,
We were impacted by Hurricane Harvey. We will look into the TRI question as soon as possible.

Regina Ramsey Project Technical
SAGE ATC ENVIRONMENTAL CONSULTING LLC
Friendly Service, No Surprises ®
Beaumont office
5550 Eastex Freeway, G
Beaumont, TX 77708
Valero ext 1911
Valero Office: 409-985-1911
Sage Office: 409-838-4800
Cell: 469-263-7098

From: Wakeland, Morton [mailto:wakeland.morton@epa.gov]
Sent: Wednesday, August 30, 2017 12:08 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: 2016 TRI Data Quality Checks
Importance: High

FIRST – IF YOU OR YOUR FACILITY HAS BEEN IMPACTED BY HARVEY – PLEASE LET ME KNOW – YOUR SAFETY AND HEALTH ARE MORE IMPORTANT AT THIS MOMENT

The issue we discovered relates to the facility you are listed as the technical contact. If you report for more than one facility, let me know and
I'll be happy to send you the specific site we are interested in.

Basically, with respect to dioxins.

You reported dioxins but did not report the individual members of the dioxin group – i.e., did not fill out a schedule 1.

If there is a legit reason, please let me know.

However, if you need to fill one out, then also let me know and please submit as soon as possible.

Again, if you've been impacted by Harvey, we can postpone this request until your facility and/or your family is back to normal.

Thanks for your cooperation in this matter.

Sincerely,
Mort Wakeland

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 4/4/2018 3:35:26 PM
To: Stuckey, Troy [Stuckey.Troy@epa.gov]; Roberts, Lou [Roberts.Lou@epa.gov]
Subject: 32 potential targets - these are RCRA LQG's as well.
Attachments: Troy's_Targets_Update_April_3.xlsx

Morton E. Wakeland, Jr., Ph.D.
EPCRA 313 Enforcement & TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, Texas
(214.665.8116)

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 4/3/2018 4:24:36 PM
To: Stuckey, Troy [Stuckey.Troy@epa.gov]
CC: Mansfield, William [Mansfield.William@epa.gov]; Riley, David [riley.david@epa.gov]; Lancaster, Stan [Lancaster.Stan@epa.gov]; Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Subject: Update list of 313 sites that are also RCRA LQG's
Attachments: Troy's_Targets_Update_April_3.xlsx

Importance: High

Realizing that every site will NOT be a "hit" I've gone back and added facilities.
There are 32 facilities attached.

These are RCRA LQG's as well as having TRI chemical reporting inconsistencies.

My email (Desktop, Show Cause, OTC, whatever you wanna call it) to the site shall only address
TRI, I am stating that a follow-up email will be sent regarding RCRA issues. I am not giving any
more information about what specifically will be asked regarding RCRA, so they cannot prepare
ahead of time. RCRA questioning is in ya'lls ball park, not mine.

I asked the TRI tech contact if they are also the RCRA contact, and if not, to send me the contact
information for the RCRA person. I will pass on that contact info to you folks so you can
contact them directly.

Best week's wishes,
Mort

Morton E. Wakeland, Jr., Ph.D.
EPCRA 313 Enforcement & TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, Texas
(214.665.8116)

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Sent: 10/19/2017 12:46:22 PM
To: Reisman, Larry [Reisman.Larry@epa.gov]; Devito, Steve [Devito.Steve@epa.gov]; Turk, David [Turk.David@epa.gov]
CC: Clark, Katherine [Clark.Katherine@epa.gov]; Senthil, Velu [Senthil.Velu@epa.gov]
BCC: Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: FW: Data Certification - Missing Lat Long Data and the Upcoming FRS Data Transfer
Attachments: Enf Actions Missing Lat Long - Linked FacV2 October 17.xlsx

As you know, my "baby" is to reinstate the collection of lat and lon on TRI.

If lat and lon were of no importance, then why the below email.

I reiterate – TRI management was misled by Ben Smith to think FRS collects lat and lon –
Yes, FRS collects lat and lon BUT THEY ONLY COLLECT IT FROM THE EPA PROGRAMS THEMSELVES!!!
FRS DOES NOT COLLECT LAT AND LON FROM FACILITIES DIRECTLY!!!!!

Confer with David Smith in FRS if you do not believe me.

Therefore, if a new TRI facility comes on board, and they do not have to supply a lat and lon under any other environmental
program – guess what – EPA HAS NO LAT LON ON THAT FACILITY. How much more clear can that be?

Furthermore, even if the facility does supply a lat lon under another environmental program, more than likely it is not in
alignment with TRI's definition of facility location (center of production / center of facility).

Say the facility comes under the CAA – their lat and lon's will be stack locations – NOT TRI LOCATIONS!!!

Thanks for listening!!
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Ruple, Rhonda
Sent: Wednesday, October 18, 2017 10:23 AM
To: Schaub, Lisa <Schaub.Lisa@epa.gov>; Evering, Elvia <evering.elvia@epa.gov>; Berry, Debra <Berry.Debra@epa.gov>; Wakeland, Morton <wakeland.morton@epa.gov>; Smalley, Bryant <smalley.bryant@epa.gov>; Fausel, Betsy <Fausel.Betsy@epa.gov>; Rogers, Elizabeth <rogers.elizabeth@epa.gov>; Twine, Dyiann <Twine.Dyiann@epa.gov>
Subject: Data Certification - Missing Lat Long Data and the Upcoming FRS Data Transfer

The FRS data transfer that is regularly scheduled for the third Friday of the month has been postponed to Saturday, October 21, 2017. This will ensure that ICIS is not shutdown on the day of annual data certification.

If your program has facilities listed on the attached ICIS report (Enf Actions Missing Lat Longs) **AND** the lat long data is in FRS, you do not need to enter the lat long data directly in ICIS. You may state on spreadsheet form that facilities with missing lat long data in ICIS should be resolved with Saturday's FRS data transfer to ICIS. HQ will re-run the ICIS Enf Actions Missing Lat Long report on Monday, October 23, 2017 to identify any remaining omissions.

If the lat and long data is NOT in FRS please update your programmatic id number or ICIS id number and annotate on the spreadsheet the lat and long. This information needs to be updated or annotated for EOY certification.

Rhonda Ruple
U.S. EPA Region 6
Region 6 ICIS System Administrator
Enforcement Division Planning Coordinator
Region 6 Audit Policy Coordinator
214-665-2710
Fax 214-665-7446
ruple.rhonda@epa.gov

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Sent: 7/11/2017 12:41:37 PM
To: Holthaus, Randy [Holthaus.Randy@epa.gov]
Subject: FW: Just thought of something
Attachments: RY2014-Non-Reporters_MASTER_LIST_Revised_2Oct2015.xlsx

Importance: High

cannot believe I sent this to myself – meant to reply to you.

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Wakeland, Morton
Sent: Tuesday, July 11, 2017 7:29 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: Just thought of something
Importance: High

A "cover story" for investigation, if you will + some more background knowledge for a better understanding of the situation.

Please feel free to call / write if something is not clear or makes no sense.
I do my level best to be an effective communicator in writing as well as orally.

With the new administration, we are to inform HQ's of enforcement cases which involved more than $500,000
I believe they are also deemed NSI – National Significant Issues

HQ's was informed about Valero and Thomas Petroleum – both of these are EPCRA 313 cases.
There are other cases I've head of (RCRA) which are also large.
I'm sure someplace there is a list of these cases.
To make the inquiry into Valero somewhat obscure – could simply say you are investigating the outcome of these high dollar cases.
Will be interesting to see if Valero is mentioned, and if so, what the rationale is/was for doing 0 penalty.

---------- some background info ----------

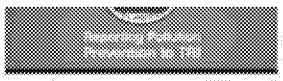
FYI – EPCRA 313 is the law (42 USC 11023) which makes facilities who meet 3 conditions report to EPA and the state
their releases of "toxic chemicals" to air, land, and water, and how those chemicals were waste managed.

The regulations are at 40 CFR Part 372

The database which houses the emissions and waste management data is called TRI – Toxic Release Inventory.

The TRI Program has a homepage: **https://www.epa.gov/toxics-release-inventory-tri-program**

There are some "training slides" for facilities to view to see if they have to report.
To access, click the far right pic on the initial homepage:



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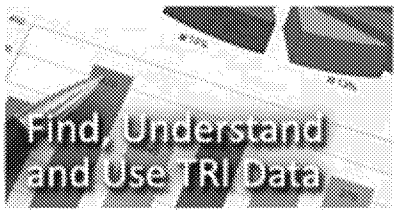

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Click the link to the training slides. I believe they also have audio.

Again, I try to settle the case up front without any formal documents being filed, that way there is no clock running with
the ALJ (Administrative Law Judge) in DC. One has XX days to settle a case once a Complaint is filed.

By negotiating up front you also save paper in that you only file a Consent Agreement and Final Order (CAFO).
Furthermore, when issuing Complaints you may find out an allegation is not valid and have to alter.
By negotiating up front you know everything about the case and the penalty is agreed to by both parties –
Once agreed to, a CAFO is drafted and sent to facility for their signature. They return to EPA, the Div Dir signs, the the RJO – Regional Judicial Officer,
Once all have signed the CAFO is filed with the Regional Hearing Clerk – Lorena Vaughn, and a copy is sent to facility.
The facility has 30 days from the filed-date stamp to pay the penalty, unless other arrangemetns have been made.

Whew...

For cases < $100,000 and no attorney involvement, we technical folks can negotiate and settle the case without major ORC involvement.
For cases > $100,000 and or if an attorney gets involved, regardless of penalty amount, we are obligated to get an attorney assigned.

This was the case with Valero since the penalty was both > $100,000 and they got their attorney involved.

Am attaching the workbook I received from HQ's which identified Valero as a non-reporter – Note the date of revision on the workbook is
Oct 2015. It was not until Nov 2015 that Valero finally got around to reporting which took them from being a non-reporter to a late-reporter.

Hope this may help a wee bit Randy and I did not cause confusion?
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Wakeland, Morton
Sent: Monday, July 10, 2017 8:41 AM
To: Holthaus, Randy <Holthaus.Randy@epa.gov>
Subject: RE: issue forwarded

Thanks Randy for your ear, and importantly, your understanding.

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
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Message

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Sent: 2/20/2019 4:03:43 PM
To: Taheri, Diane [Taheri.Diane@epa.gov]
CC: Durant, Jennah [Durant.Jennah@epa.gov]
BCC: Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: Here are Briefing Slides that TRI Program used for to brief OECA - keep internal please
Attachments: 2017_National Analysis_Briefing_Regions and OECA_12-12-18.pptx

Importance: High

To make "things" a lil more clear – Calendar year 2017 is the most recent TRI data.

What are the data "reported" – pounds of TRI chemicals released to air, land, and water, and pounds of the TRI chemical waste managed for a calendar year.

There is one report (Form R or Form A) for each chemical that has to be "reported" (3 criteria must be met to "report")

Why is 2017 the most recent and it's now 2019?
Because TRI collects emissions(chemical releases) and waste management amounts over an entire year, we give facilities from January 1 to July 1 to compile their data for the previous year.

Therefore, 2017 data was due to EPA July 1 2018.

We then begin to QC the data around Oct. Yes there are stragglers that report and revisions made for a time after July 1st.
So, for 2017, QC'ing data began around October 2018.
AFTER the data has been QC'd the analysis begins Nov2018 – Dec2018 and "internal" presentations start.

Once the "bugs" in the analysis are worked out internally, we have the press release – end February2019 to end March2019.

Hope this and the slides help? I'm pulling together just Region 6 data beginning NOW!!

If either of ya'll have questions, please let me know.

Best Week's Wishes,
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
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Sent: 3/29/2018 7:45:46 PM
To: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
BCC: Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: As Requested - air releases lead 2016 Region 6
Attachments: Region_6_Lead_AirEmissions_2016.xlsx

Importance: High

Questions – let me know.

We forgot one biggy – lead is reported to TRI as both elemental lead and as lead compounds!
So I search on "including lead" you have both elemental lead and lead compounds.

	D	E	
e	ReportYear	TRI Chemical	Address
	2016	LEAD COMPOUNDS	1701 JEFFERSON PKWY
	2016	LEAD COMPOUNDS	1701 JEFFERSON PKWY
	2016	LEAD	5100 IND US TRIAL DR S
	2016	LEAD	5411 IND US TRAL DR S
	2016	LEAD COMPOUNDS	5201 FAIRFIELD RD
	2016	LEAD COMPOUNDS	100 MILL SUPPLY RD
	2016	LEAD COMPOUNDS	100 MILL SUPPLY RD
	2016	LEAD	1103 S MAIN ST
	2016	LEAD	700 MILL RD
	2016	LEAD COMPOUNDS	5082 HWY 4 N
	2016	LEAD COMPOUNDS	810 W PINE ST
	2016	LEAD COMPOUNDS	688 HWY 278 BYPASS

Lead and Lead Compounds are classed as PBT's – Persistent Bioaccumulative Toxins – bad boys, threshold is only 100 lbs/year regardless of how it's used (manufactured, processed, or otherwise used)

"normal" thresholds are 25,000 lbs/yr and 10,000 lbs/yr

You can add worksheets and separate lead from lead compounds if you wish.

Use the Red Tab – previous tabs are less readable.

Freeze panes on.

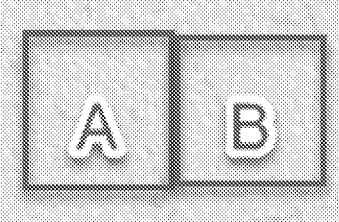
This tab is only sorted first by state, then by TRI ID #.

If you see two reports from same TRIFID (Toxic Release Inventory Facility Identification Number)

	TRI_ID_Number	Facility_Name	Primary_NAICS_Code	ReportYear	TRI Chemical	Address	City
2	71602GYLRD500NIC	MONDI BAGS USA LLC	322121	2016	LEAD COMPOUNDS	1701 JEFFERSON PKWY	PINE BLUFF
3	71602GYLRD560NIC	MONDI BAGS USA LLC	322121	2016	LEAD COMPOUNDS	1701 JEFFERSON PKWY	PINE BLUFF

It most likely means this is a multi-establishment facility that has elected to report by establishment vs reporting by a single entity.

Facility = Establishment A + Establishment B



Establishment A reports on one form and establishment B reports on another form but they use same TRIFID

They could have elected to have combined and reported only on one form.

The sum of emissions form A + B must be the whole facility

If A must report and B only uses a small amount (under threshold of lead), B still has to report because reporting is by Facility, and A+B = the facility.

Last 4 columns are your data (all units are pounds on a year basis):

	Q	R	S	T	U
ne	Fugitive_Air_Emissions	Stack_Air_Emissions	DQ_Check_Total_Air_Calculated_Here	Total_Air_From_FlatFiles	
1	0	88.5	88.5	88.5	
0	0	157	157	157	
4	0	0.108	0.108	0.108	
5	0	33	33	33	
2	1	0	1	1	
4	0.056	0	0.056	0.056	
9	0.04	0.0013	0.0413	0.0413	

We have a total air category in the Flat files, but I don't trust it, so I add in Excel manually, Stack + Fugitive = DQ Check #
Column S "should" = Column T

In case Cheryl, Steve or you wanna know type of facility the lead is being emitted from – have included the primary NAICS of reporter.

column C

	C	D
	Primary_NAICS_Code	ReportYea
	322121	2016
	322121	2016
	314994	2016
	332996	2016
	322121	2016
	325194	2016
	322121	2016
	333924	2016
	321918	2016
	322110	2016
	321113	2016
	321918	2016
	321918	2016

I think that does it Jeff – you may have questions.

Send me a note, I have to read a bunch on some stuff, so I'm staying home tomorrow.

Hope it's what you wanted?

Again, use the red tab.

Mort

Morton E. Wakeland, Jr., Ph.D.
EPCRA 313 Enforcement & TRI Program Coordinator
Waste Compliance III Section
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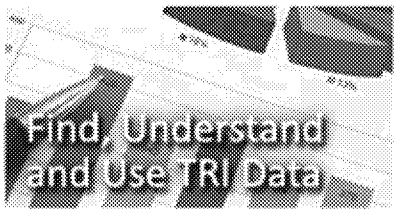

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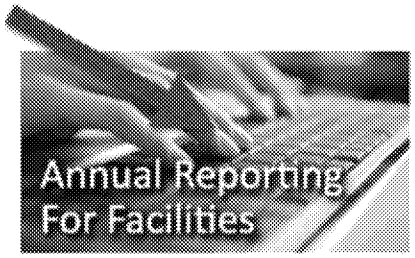

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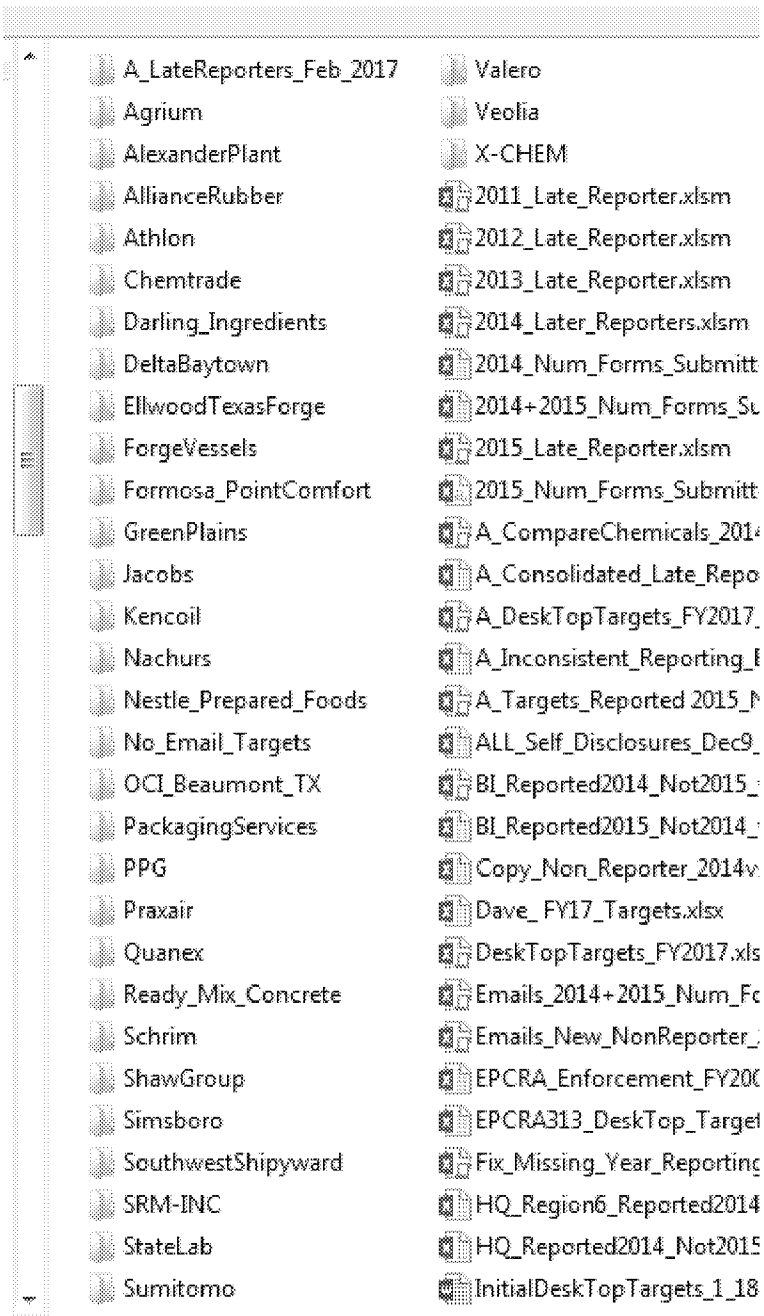
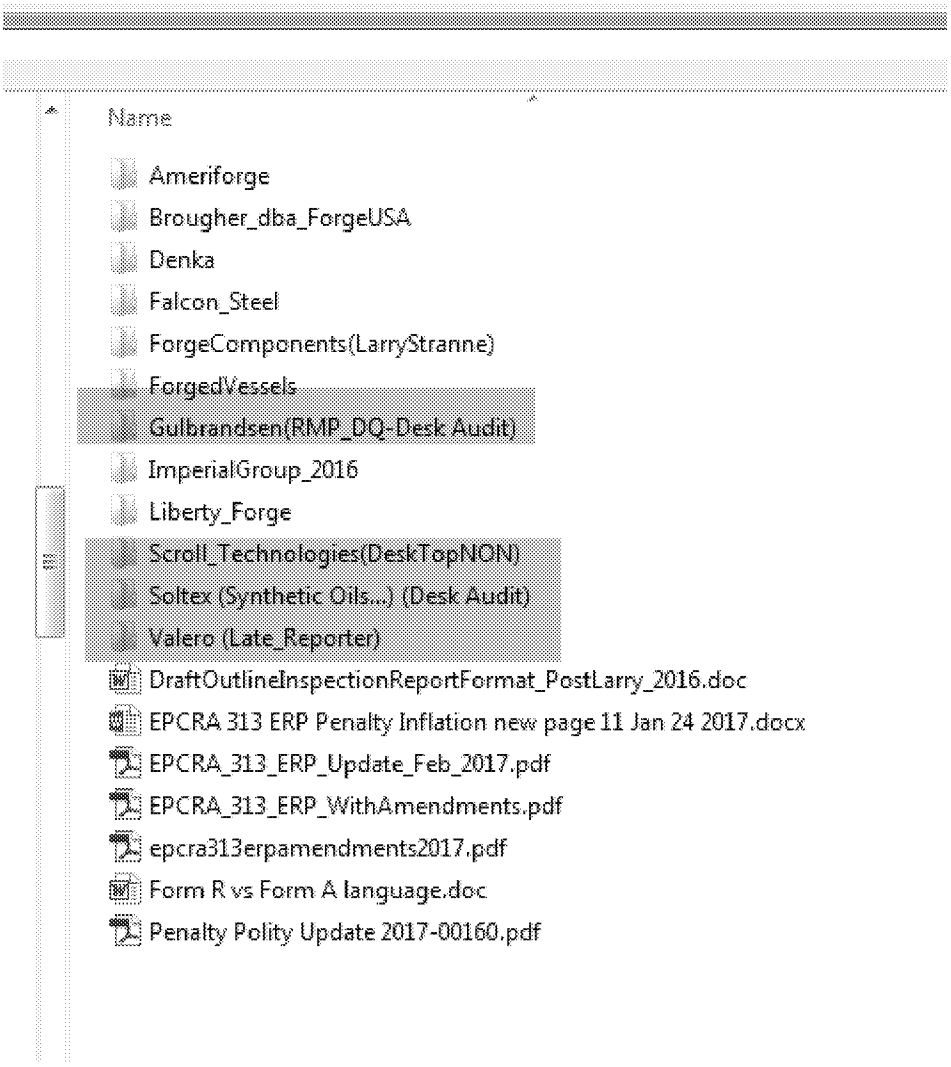
Sent: 3/23/2017 6:17:18 PM
To: Riley, David [riley.david@epa.gov]; Lancaster, Stan [Lancaster.Stan@epa.gov]
BCC: Stuckey, Troy [Stuckey.Troy@epa.gov]; Potts, Mark [Potts.Mark@epa.gov]
Subject: RE: question on desk audits
Attachments: 2011_Late_Reporter.xlsm; 2012_Late_Reporter.xlsm; 2013_Late_Reporter.xlsm; 2014_Later_Reporters.xlsm; 2015_Late_Reporter.xlsm; New_NonReporter_2014_Not_2015_Dec_18_2016.xlsm; Non_Reporter_2014_Not_2015.docx

Importance: High

Here are my desk audits to date I've done something with



And here are some I moved to my cases folder.



List will change, as I do different searches, I come up with new leads.....

I've done a list of late reporters and non-reporters, i.e., reported one year and not the other year.

Gonna attach several Excel worksheets with various lists with issues.
IF ANY OF YOU TAKE ACTION ON ANY OF THESE - DO PLEASE LET ME KNOW, SO I'LL KNOW NOT TO CONTACT.

Hope this helps? If not, let me know what you do need.

Best,

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Riley, David
Sent: Thursday, March 23, 2017 12:59 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Lancaster, Stan <Lancaster.Stan@epa.gov>
Subject: question on desk audits

Mort, I believe you are the only one of us who has been conducting these. Would you please provide me with the names and locations of any facilities you have audited (or plan to) for this fiscal year, along with the date the audit was initiated? I'm going to include those on a table of inspections and audits for this FY, just so we'll have it for quick reference.

***I will place our inspection/audit tables and enforcement case tables in the EPCRA folder on the share drive (H). They will be in a subfolder named "FY 2017". That way, we won't have to maintain our own separate files and hope that everyone is up to date.

Cheers!

David Riley
EPCRA 313 Enforcement Officer
US EPA Region 6 (EN-H3)
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Phone: (214) 665-7298
Fax: (214) 665-6655
e-mail: riley.david@epa.gov

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 7/1/2019 3:37:29 PM
To: jaraiza@continentalcarbon.com
Subject: FW: After some additional research...

Importance: High

Joe I searched emails all the way back to 2/21 – see below and do not have any emails from jtullier@spiritenv.com
unless someone else sent or she changed her email?

Thanks, Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Toxics Enforcement Section (ECDST)
Enforcement & Compliance Assurance Division (ECD)
U.S. EPA Region 6
Dallas, TX 75270
(214.665.8116)

From: Araiza, Joseph <jaraiza@continentalcarbon.com>
Sent: Thursday, February 21, 2019 1:40 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Jennifer Tullier <jtullier@spiritenv.com>
Subject: FW: After some additional research...
Importance: High

Jennifer, please see Mort's note below. Can you give him an estimate for getting all the info to him on the TRI?

Thanks,

Joe Araiza
EHS Manager
Continental Carbon Company
O: 281-647-3807
C: 713-818-3285 (temporary)

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Thursday, February 21, 2019 1:38 PM
To: Araiza, Joseph <jaraiza@continentalcarbon.com>
Subject: RE: After some additional research...
Importance: High

Joe

I think I missed this email –understand issues arise. Please document your investigations.

We are especially interested in how you determine thresholds vs just showing data from Form R.

How much more time do you think it will take to get the info to us?

Best week's wishes,
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Araiza, Joseph <jaraiza@continentalcarbon.com>
Sent: Tuesday, February 12, 2019 2:33 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: After some additional research...

Mort,
We've been working on your request and have identified some recordkeeping and calculation areas that need improvement. While there are no significant changes expected to reporting, we have identified some areas (including fugitive air releases) in which the facility has better information that impacts releases for 2017. Understanding you had requested all data by February 13, 2019, we request an extension to this date. We propose to have revised 2017 Form Rs and all supporting documentation/calculations submitted to you by COB, February 22, 2019. We will do our best to get it to you sooner but let me know if that new date works for you.

Thanks,

Joe Araiza
EHS Manager
Continental Carbon Company
O: 281-647-3807
C: 713-818-3285 (temporary)

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Tuesday, February 12, 2019 12:24 PM

To: Araiza, Joseph <jaraiza@continentalcarbon.com>
Subject: RE: After some additional research...

acknowledge receipt – thanks Joe
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Araiza, Joseph <jaraiza@continentalcarbon.com>
Sent: Tuesday, February 12, 2019 12:02 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: After some additional research...

Mort, attached is the safety data sheet for the oil that we receive from the Valero refinery. It is a refinery feedstock oil. Basically after the refinery starts with crude oil and extracts all of the gasolines, kerosene, diesels, jet fuels, etc., what's left over is this feedstock oil. It has no more value in the refining process so the refinery sends it to our plant and we use it to create carbon black.

The analysis I sent you is on this feedstock oil.

Thanks,

Joe Araiza
EHS Manager
Continental Carbon Company
O: 281-647-3807
C: 713-818-3285 (temporary)

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Tuesday, February 12, 2019 10:30 AM
To: Araiza, Joseph <jaraiza@continentalcarbon.com>
Subject: RE: After some additional research...

thanks Joe....did the lab test of other chemicals besides metals?
What exactly is this analysis on, i.e., type of oil, if oil?

thanks, Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program

Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Araiza, Joseph <jaraiza@continentalcarbon.com>
Sent: Tuesday, February 12, 2019 8:21 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: After some additional research...

Mort, here is the oil sample analysis you requested.

Thanks,

Joe Araiza
EHS Manager
Continental Carbon Company
O: 281-647-3807
C: 713-818-3285 (temporary)

From: Wakeland, Morton <wakeland.morton@epa.gov>
Sent: Monday, February 11, 2019 8:13 AM
To: Araiza, Joseph <jaraiza@continentalcarbon.com>
Subject: After some additional research...

Please be sure to include the type of oil the facility uses, and its chemical composition as weight percentages.

Thanks, Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program
Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Araiza, Joseph <jaraiza@continentalcarbon.com>
Sent: Wednesday, February 6, 2019 8:09 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: FW: TRI-MEweb submission has been certified and sent to EPA and a TRI Data Exchange member state.

Mort, see below that 2017 was submitted. I assume we are looking at some sort of penalty?

Thanks,

Joe Araiza
EHS Manager
Continental Carbon Company
O: 281-647-3807
C: 713-818-3285 (temporary)

From: no-reply@epacdx.net <no-reply@epacdx.net>
Sent: Wednesday, February 06, 2019 7:01 AM
To: Araiza, Joseph <jaraiza@continentalcarbon.com>; Bownds, Arlie <abounds@continentalcarbon.com>; Araiza, Joseph <jaraiza@continentalcarbon.com>
Subject: TRI-MEweb submission has been certified and sent to EPA and a TRI Data Exchange member state.

Dear JOSEPH Araiza, Arlie Bownds, Joe Araiza ,

The TRI-MEweb submission for the facility and chemical(s) listed below has been prepared, certified, and sent to EPA. You have reported that your facility is located in the state of Texas.

Please be aware that the state of Texas is participating in EPA's TRI Data Exchange. This certified submission will be electronically forwarded to Texas, satisfying your obligation to report to both EPA and the state in which the facility is located (Texas).

You may wish to print a copy of this receipt and keep it for your records. You may also print a copy of your state submission by navigating to the Submission History page. Do not send this receipt to EPA.

If you have any questions regarding this email, please contact the CDX Help Desk at the phone numbers listed below for further assistance. Please reference the information below when contacting the CDX Help Desk.

---- REFERENCE INFORMATION ----

TRI Facility ID: 79086WTCCRHCR1B
Facility: CONTINENTAL CARBON CO SUNRAY
11702 CARBON BLACK RD
SUNRAY, TX, 79086
Certifying Official Name: Arlie Bownds
Email: abownds@continentalcarbon.com
Transaction ID:_7a896aca-f8bd-4399-a3dd-2ec89f9646f2
Date Certified and Sent to EPA: 02/06/2019 8:00.

Chemical Name	RY	CAS	Form	Revision	Withdrawal	Prepared By	Preparation Completion Date
Polycyclic aromatic compounds	2017	N590	R	No	No	jaraiza@continentalcarbon.com	02/05/2019 16:24

Chemical Name	RY	CAS	Form	Revision	Withdrawal	Prepared By	Preparation Completion Date
Hydrogen Sulfide	2017	007783064	R	No	No	jaraiza@continentalcarbon.com	02/05/2019 16:24
Hydrogen cyanide	2017	000074908	R	No	No	jaraiza@continentalcarbon.com	02/05/2019 16:24
Carbonyl sulfide	2017	000463581	R	No	No	jaraiza@continentalcarbon.com	02/05/2019 16:24
Carbon disulfide	2017	000075150	R	No	No	jaraiza@continentalcarbon.com	02/05/2019 16:24
Benzo(g,h,i)perylene	2017	000191242	R	No	No	jaraiza@continentalcarbon.com	02/05/2019 16:24

---- CDX HELP DESK ----

Phone (toll-free): +1 (888) 890-1995
Phone (toll): (970) 494-5500
Email: helpdesk@epacdx.net
The CDX Help Desk is available Monday through Friday, 8:00 AM to 6:00 PM Eastern Time.

Access CDX Home: https://cdx.epa.gov/

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 12/3/2018 9:16:39 PM
To: Milton, Philip [Milton.Philip@epa.gov]
Subject: Getting there - am beat - Region 4 took a while too!
Attachments: Dec_Final_Region4_2013_to_2017.xlsx

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Milton, Philip
Sent: Monday, December 3, 2018 2:00 PM
To: Blake-Coleman, Wendy <Blake-Coleman.Wendy@epa.gov>; Presler, Amos <presler.amos@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>; Kabler, Lauren <Kabler.Lauren@epa.gov>; Reisman, Larry <Reisman.Larry@epa.gov>; Devito, Steve <Devito.Steve@epa.gov>; Senthil, Velu <Senthil.Velu@epa.gov>; Turk, David <Turk.David@epa.gov>; Latham, John <Latham.John@epa.gov>
Cc: Wakeland, Morton <wakeland.morton@epa.gov>; Antisdel, Timothy <Antisdel.Timothy@epa.gov>; Knipschild, Shane <Knipschild.Shane@epa.gov>; Parra, Juan <Parra.Juan@epa.gov>
Subject: RE: PLEASE REVIEW BY NOON -- DRAFT RESPONSE TO OIG Request For Assistance... (a lot of files attached)

Thanks for the clarification on the observations... I will do my best to incorporate them into my revised draft and cc everyone on the response to the OIG...

V/r

Phil

Philip L. Milton
Chemical Engineer I U.S. Environmental Protection Agency
Office of Enforcement & Compliance Assurance I Office of Civil Enforcement I Waste and Chemical Enforcement Division I Chemical Risk and Reporting Enforcement Branch
1200 Pennsylvania Avenue, NW I Mail Code: 2249A I WJC South Bldg Rm 3124-B I Washington, DC 20460
Milton.philip@epa.gov I phone: 202-564-5029 I fax: 202-564-0010

From: Blake-Coleman, Wendy
Sent: Monday, December 3, 2018 2:54 PM
To: Milton, Philip <Milton.Philip@epa.gov>; Presler, Amos <presler.amos@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>; Kabler, Lauren <Kabler.Lauren@epa.gov>; Reisman, Larry <Reisman.Larry@epa.gov>; Devito, Steve <Devito.Steve@epa.gov>; Senthil, Velu <Senthil.Velu@epa.gov>; Turk, David <Turk.David@epa.gov>; Latham, John <Latham.John@epa.gov>

Cc: Wakeland, Morton <wakeland.morton@epa.gov>; Antisdel, Timothy <Antisdel.Timothy@epa.gov>; Knipschild, Shane <Knipschild.Shane@epa.gov>; Parra, Juan <Parra.Juan@epa.gov>
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Hi Phil: The response looks l fine to me. I provided two observations from the TRI team earlier. Please contact Juan or Tim if you have questions on their comments. Sorry for the late response- An unusually busy Monday.

Wendy Blake-Coleman, Chief
Information Exchange Partnership Branch
Office of Environmental Information
U.S. Environmental Protection Agency
(202) 566-1709

From: Milton, Philip
Sent: Monday, December 03, 2018 8:49 AM
To: Presler, Amos <presler.amos@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>; Kabler, Lauren <Kabler.Lauren@epa.gov>; Reisman, Larry <Reisman.Larry@epa.gov>; Devito, Steve <Devito.Steve@epa.gov>; Senthil, Velu <Senthil.Velu@epa.gov>; Turk, David <Turk.David@epa.gov>; Latham, John <Latham.John@epa.gov>
Cc: Wakeland, Morton <wakeland.morton@epa.gov>; Blake-Coleman, Wendy <Blake-Coleman.Wendy@epa.gov>; Antisdel, Timothy <Antisdel.Timothy@epa.gov>; Knipschild, Shane <Knipschild.Shane@epa.gov>; Parra, Juan <Parra.Juan@epa.gov>
Subject: PLEASE REVIEW BY NOON -- DRAFT RESPONSE TO OIG Request For Assistance... (a lot of files attached)

Dear OECA/OCSPP/OEI –

Please find the draft response to the OIG below... For your information I have attached a draft email and the documents/links that I would like to send to Dwayne Crawford and his team before I leave today at 3pm.

Steve and Velu - Your items are #1 and 7..please make sure I've described properly

OECA/Mort our items are 2-6. Let me know if you see any concerns.

Please let me know if you have comments or need more time by noon today. Thanks in advance for your attention to this matter.

V/r

Phil

Good Afternoon Dwayne –

In follow-up to our meeting on Thursday, November 29th, I am providing the following information that was discussed at the meeting.

1) TRI Data Quality Assurance Plan - *provided by OCSPP*. Please keep internal, not to be distributed outside of EPA (it is marked as such).
2) Recent OECA NPM Guidance - *provided by OECA*.
    a. FY2016-2017 OECA NPM Guidance. Page 45 - 46 has the EPCRA 313 Toxics Release Inventory program specific guidance.

b. Final FY 2018-2019 Office of Enforcement and Compliance Assurance (OECA) NPM Guidance. Appendix A page 6 has the EPCRA ACS measures.

3) Link to EPCRA 313 Enforcement Response Policy- *provided by OECA.*
4) Information about the EPA's Audit Policy - *provided by OECA*. Please see the following link https://www.epa.gov/compliance/epas-audit-policy. List of disclosures from FY13 – present are provided. Please keep internal, not to be distributed outside of EPA (pages are marked 'Enforcement Confidential - Do Not Release').
    a. Standard report from eDisclosure of completed disclosures that included EPCRA §313 noncompliance and
    b. Standard report from ICIS that includes all disclosures from FY 2013 – 2018.
5) Regional Workbooks of possible late/nonreporting of chemicals developed by Morton Wakeland, EPCRA Section 313 Enforcement and TRI Program Coordinator, EPA Region 6 – *provided by OECA*. Mr. Wakeland shared these with the TRI Enforcement Call contacts via email on September 4, 2018. Please keep internal, not to be distributed outside of EPA (we marked the pages as 'Enforcement Confidential - Do Not Release').
    a. Document titled "Info to Accompany Workbook" – explains the workbooks
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7) Preliminary data runs on late reporters after the deadline (from RY2014-RY2017). MS-Excel spreadsheet – *provided by OCSPP.* The Table below summarizes what is in the Excel file. These results are preliminary and deliberative.

Year	July 5th-31st (2016 & 2017); July 2nd - 31st (2014 & 2015)			August 1st-31st			Sept 1st- Oct 20th (*)			
	Number of Reports	Total Release (lb)	Production Waste (lb)	Number of Reports	Total Release (lb)	Production Waste (lb)	Number of Reports	Total Release (lb)	Production Waste (lb)	Number of Reports
2017	765	7,507,011	102,495,699	212	1,001,584	7,328,869	88	1,089,654	4,227,361	NA
2016	726	6,112,199	63,131,858	136	631,577	6,116,925	63	35,500	4,295,923	810
2015	604	45,241,874	99,201,906	102	2,704,563	5,056,569	50	132,305	2,041,079	1234
2014	697	21,840,302	70,061,019	106	1,217,072	17,473,258	45	242,459	5,391,972	1805

(*) - For RY2017, this analysis includes submissions through Oct 9th.

If you have any additional questions or would like to discuss the information that we have provided, please do not hesitate to contact us.

Very respectfully,

Phil Milton

Philip L. Milton
Chemical Engineer I U.S. Environmental Protection Agency

Office of Enforcement & Compliance Assurance I Office of Civil Enforcement I Waste and Chemical Enforcement Division I Chemical Risk and Reporting Enforcement Branch
1200 Pennsylvania Avenue, NW I Mail Code: 2249A I WJC South Bldg Rm 3124-B I Washington, DC 20460
Milton.philip@epa.gov I phone: 202-564-5029 I fax: 202-564-0010

From: Crawford, Dwayne
Sent: Wednesday, November 14, 2018 3:30 PM
To: Weiner, Janet <Weiner.Janet@epa.gov>; Milton, Philip <Milton.Philip@epa.gov>
Cc: Spriggs, Gwendolyn <Spriggs.Gwendolyn@epa.gov>; Lovingood, Christina <Lovingood.Tina@epa.gov>; Beeson, Benjamin W. <Beeson.Benjamin@epa.gov>; Mulchandani, Roopa <Mulchandani.Roopa@epa.gov>; Hanna, Steve <Hanna.Steve@epa.gov>
Subject: OIG Request For Assistance...

Hello Janet/Philip,

The audit team provides our list of questions that we are seeking response to as part of our review. We would like to have OECA's written response to our questions prior to our meeting. By doing so, we believe that both side will be better prepared to discuss the responses. Given the time needed to provide your response will determine if we are able to meet prior to the Thanksgiving Holiday. If we are not able to meet prior to next Wednesday, we would definitely need to meet at your earliest convenience the week of November 26th. We thank you in advance for your assistance.

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 12/3/2018 8:59:11 PM
To: Milton, Philip [Milton.Philip@epa.gov]
Subject: Region 3 - 4, 8, 9 to go
Attachments: Dec_Final_Region3_2013_2017.xlsx

Importance: High

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Milton, Philip
Sent: Monday, December 3, 2018 2:00 PM
To: Blake-Coleman, Wendy <Blake-Coleman.Wendy@epa.gov>; Presler, Amos <presler.amos@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>; Kabler, Lauren <Kabler.Lauren@epa.gov>; Reisman, Larry <Reisman.Larry@epa.gov>; Devito, Steve <Devito.Steve@epa.gov>; Senthil, Velu <Senthil.Velu@epa.gov>; Turk, David <Turk.David@epa.gov>; Latham, John <Latham.John@epa.gov>
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	Number of Reports	Total Release (lb)	Production Waste (lb)	Number of Reports	Total Release (lb)	Production Waste (lb)	Number of Reports	Total Release (lb)	Production Waste (lb)	Number of Reports
2017	765	7,507,011	102,495,699	212	1,001,584	7,328,869	88	1,089,654	4,227,361	NA
2016	726	6,112,199	63,131,858	136	631,577	6,116,925	63	35,500	4,295,923	810
2015	604	45,241,874	99,201,906	102	2,704,563	5,056,569	50	132,305	2,041,079	1234
2014	697	21,840,302	70,061,019	106	1,217,072	17,473,258	45	242,459	5,391,972	1805

(*) - For RY2017, this analysis includes submissions through Oct 9th.

If you have any additional questions or would like to discuss the information that we have provided, please do not hesitate to contact us.

Very respectfully,

Phil Milton

Philip L. Milton
Chemical Engineer I U.S. Environmental Protection Agency
Office of Enforcement & Compliance Assurance I Office of Civil Enforcement I Waste and Chemical Enforcement Division I Chemical Risk and Reporting Enforcement Branch
1200 Pennsylvania Avenue, NW I Mail Code: 2249A I WJC South Bldg Rm 3124-B I Washington, DC 20460
Milton.philip@epa.gov I phone: 202-564-5029 I fax: 202-564-0010

From: Crawford, Dwayne
Sent: Wednesday, November 14, 2018 3:30 PM
To: Weiner, Janet <Weiner.Janet@epa.gov>; Milton, Philip <Milton.Philip@epa.gov>
Cc: Spriggs, Gwendolyn <Spriggs.Gwendolyn@epa.gov>; Lovingood, Christina <Lovingood.Tina@epa.gov>; Beeson, Benjamin W. <Beeson.Benjamin@epa.gov>; Mulchandani, Roopa <Mulchandani.Roopa@epa.gov>; Hanna, Steve <Hanna.Steve@epa.gov>
Subject: OIG Request For Assistance...

Hello Janet/Philip,

The audit team provides our list of questions that we are seeking response to as part of our review. We would like to have OECA's written response to our questions prior to our meeting. By doing so, we believe that both side will be better prepared to discuss the responses. Given the time needed to provide your response will determine if we are able to meet prior to the Thanksgiving Holiday. If we are not able to meet prior to next Wednesday, we would definitely need to meet at your earliest convenience the week of November 26th. We thank you in advance for your assistance.

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 12/3/2018 8:52:40 PM
To: Milton, Philip [Milton.Philip@epa.gov]
Subject: Region 2
Attachments: Dec_Final_Region2_2013_2017.xlsx

Importance: High

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Milton, Philip
Sent: Monday, December 3, 2018 2:00 PM
To: Blake-Coleman, Wendy <Blake-Coleman.Wendy@epa.gov>; Presler, Amos <presler.amos@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>; Kabler, Lauren <Kabler.Lauren@epa.gov>; Reisman, Larry <Reisman.Larry@epa.gov>; Devito, Steve <Devito.Steve@epa.gov>; Senthil, Velu <Senthil.Velu@epa.gov>; Turk, David <Turk.David@epa.gov>; Latham, John <Latham.John@epa.gov>
Cc: Wakeland, Morton <wakeland.morton@epa.gov>; Antisdel, Timothy <Antisdel.Timothy@epa.gov>; Knipschild, Shane <Knipschild.Shane@epa.gov>; Parra, Juan <Parra.Juan@epa.gov>
Subject: RE: PLEASE REVIEW BY NOON -- DRAFT RESPONSE TO OIG Request For Assistance... (a lot of files attached)

Thanks for the clarification on the observations... I will do my best to incorporate them into my revised draft and cc everyone on the response to the OIG...

V/r

Phil

Philip L. Milton
Chemical Engineer I U.S. Environmental Protection Agency
Office of Enforcement & Compliance Assurance I Office of Civil Enforcement I Waste and Chemical Enforcement Division I Chemical Risk and Reporting Enforcement Branch
1200 Pennsylvania Avenue, NW I Mail Code: 2249A I WJC South Bldg Rm 3124-B I Washington, DC 20460
Milton.philip@epa.gov I phone: 202-564-5029 I fax: 202-564-0010

From: Blake-Coleman, Wendy
Sent: Monday, December 3, 2018 2:54 PM
To: Milton, Philip <Milton.Philip@epa.gov>; Presler, Amos <presler.amos@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>; Kabler, Lauren <Kabler.Lauren@epa.gov>; Reisman, Larry <Reisman.Larry@epa.gov>; Devito, Steve <Devito.Steve@epa.gov>; Senthil, Velu <Senthil.Velu@epa.gov>; Turk, David <Turk.David@epa.gov>;

Latham, John <Latham.John@epa.gov>
Cc: Wakeland, Morton <wakeland.morton@epa.gov>; Antisdel, Timothy <Antisdel.Timothy@epa.gov>; Knipschild, Shane <Knipschild.Shane@epa.gov>; Parra, Juan <Parra.Juan@epa.gov>
Subject: RE: PLEASE REVIEW BY NOON -- DRAFT RESPONSE TO OIG Request For Assistance... (a lot of files attached)

Hi Phil: The response looks l fine to me. I provided two observations from the TRI team earlier. Please contact Juan or Tim if you have questions on their comments. Sorry for the late response- An unusually busy Monday.

Wendy Blake-Coleman, Chief
Information Exchange Partnership Branch
Office of Environmental Information
U.S. Environmental Protection Agency
(202) 566-1709

From: Milton, Philip
Sent: Monday, December 03, 2018 8:49 AM
To: Presler, Amos <presler.amos@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>; Kabler, Lauren <Kabler.Lauren@epa.gov>; Reisman, Larry <Reisman.Larry@epa.gov>; Devito, Steve <Devito.Steve@epa.gov>; Senthil, Velu <Senthil.Velu@epa.gov>; Turk, David <Turk.David@epa.gov>; Latham, John <Latham.John@epa.gov>
Cc: Wakeland, Morton <wakeland.morton@epa.gov>; Blake-Coleman, Wendy <Blake-Coleman.Wendy@epa.gov>; Antisdel, Timothy <Antisdel.Timothy@epa.gov>; Knipschild, Shane <Knipschild.Shane@epa.gov>; Parra, Juan <Parra.Juan@epa.gov>
Subject: PLEASE REVIEW BY NOON -- DRAFT RESPONSE TO OIG Request For Assistance... (a lot of files attached)

Dear OECA/OCSPP/OEI –

Please find the draft response to the OIG below... For your information I have attached a draft email and the documents/links that I would like to send to Dwayne Crawford and his team before I leave today at 3pm.

Steve and Velu - Your items are #1 and 7..please make sure I've described properly

OECA/Mort our items are 2-6. Let me know if you see any concerns.

Please let me know if you have comments or need more time by noon today. Thanks in advance for your attention to this matter.

V/r

Phil

Good Afternoon Dwayne –

In follow-up to our meeting on Thursday, November 29th, I am providing the following information that was discussed at the meeting.

1) TRI Data Quality Assurance Plan - *provided by OCSPP*. Please keep internal, not to be distributed outside of EPA (it is marked as such).
2) Recent OECA NPM Guidance - *provided by OECA*.

a. FY2016-2017 OECA NPM Guidance. Page 45 - 46 has the EPCRA 313 Toxics Release Inventory program specific guidance.
b. Final FY 2018-2019 Office of Enforcement and Compliance Assurance (OECA) NPM Guidance. Appendix A page 6 has the EPCRA ACS measures.

3) Link to EPCRA 313 Enforcement Response Policy- *provided by OECA*.
4) Information about the EPA's Audit Policy - *provided by OECA*. Please see the following link https://www.epa.gov/compliance/epas-audit-policy. List of disclosures from FY13 – present are provided. Please keep internal, not to be distributed outside of EPA (pages are marked 'Enforcement Confidential - Do Not Release').
   a. Standard report from eDisclosure of completed disclosures that included EPCRA §313 noncompliance and
   b. Standard report from ICIS that includes all disclosures from FY 2013 – 2018.
5) Regional Workbooks of possible late/nonreporting of chemicals developed by Morton Wakeland, EPCRA Section 313 Enforcement and TRI Program Coordinator, EPA Region 6 – *provided by OECA*. Mr. Wakeland shared these with the TRI Enforcement Call contacts via email on September 4, 2018. Please keep internal, not to be distributed outside of EPA (we marked the pages as 'Enforcement Confidential - Do Not Release').
   a. Document titled "Info to Accompany Workbook" – explains the workbooks
   b. Individual files for each region.
6) Link to ICIS Federal Enforcement and Compliance Dashboard – *provided by OECA*. Under the compliance monitoring tab at this Intranet site you can search EPCRA 313 Inspections (3 program area types "EPCRA 313 Data Quality", "EPCRA 313 non Data Quality", and "EPCRA 313 non Data Quality Off-Site Record Reviews") and download a detailed report that lists the facilities inspected. This new Dashboard allows EPA managers and staff to easily view current data on trends in enforcement activities, including the numbers of administrative and judicial cases initiated and completed, as well as enforcement case outcomes such as EPA penalty assessed, the value of complying actions ("injunctive relief"), environmental benefits, SEPs and compliance inspections. (Note: This Dashboard always displays current information since the entire data set is refreshed each morning, with the prior day's data from OECA's Integrated Compliance Information System.)
7) Preliminary data runs on late reporters after the deadline (from RY2014-RY2017). MS-Excel spreadsheet – *provided by OCSPP.* The Table below summarizes what is in the Excel file. These results are preliminary and deliberative.

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If you have any additional questions or would like to discuss the information that we have provided, please do not hesitate to contact us.

Very respectfully,

Phil Milton

Philip L. Milton
Chemical Engineer I U.S. Environmental Protection Agency
Office of Enforcement & Compliance Assurance I Office of Civil Enforcement I Waste and Chemical Enforcement Division I Chemical Risk and Reporting Enforcement Branch
1200 Pennsylvania Avenue, NW I Mail Code: 2249A I WJC South Bldg Rm 3124-B I Washington, DC 20460
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From: Crawford, Dwayne
Sent: Wednesday, November 14, 2018 3:30 PM
To: Weiner, Janet <Weiner.Janet@epa.gov>; Milton, Philip <Milton.Philip@epa.gov>
Cc: Spriggs, Gwendolyn <Spriggs.Gwendolyn@epa.gov>; Lovingood, Christina <Lovingood.Tina@epa.gov>; Beeson, Benjamin W. <Beeson.Benjamin@epa.gov>; Mulchandani, Roopa <Mulchandani.Roopa@epa.gov>; Hanna, Steve <Hanna.Steve@epa.gov>
Subject: OIG Request For Assistance...

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Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 8/24/2018 8:38:29 PM
To: Morton Wakeland [betterplanet@sbcglobal.net]
Subject: compare chemicals
Attachments: Chemical_Consolidation_2011_2016.xlsm

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 10/24/2018 12:30:25 PM
To: Crossmon, James [Crossmon.James@epa.gov]
Subject: Here ya go....spot check with info on raw downloaded worksheet
Attachments: Copy_Final_Region2_2013_to_2017.xlsx

Importance: High

The bright green background is for the late reporters – will see the date certified.

The [redacted] means the facility did not submit a report for that chemical for that calendar year.

So you kill two birds with one spreadsheet.

Let me know if you have any questions James,
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Crossmon, James
Sent: Wednesday, October 24, 2018 7:14 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: FYI - Innumerable enforcement targets - Regarding EPCRA 313 ESA's - Chronic Late Reporters - All Regions + Inconsistent Reporting,

No worries. None of this is your job anyway. Just wanted to make sure I wasn't crazy and doing something more stupid than usual.

From: Wakeland, Morton
Sent: Wednesday, October 24, 2018 8:13 AM
To: Crossmon, James <Crossmon.James@epa.gov>
Subject: RE: FYI - Innumerable enforcement targets - Regarding EPCRA 313 ESA's - Chronic Late Reporters - All Regions + Inconsistent Reporting,

You are correct, I simply forgot to complete that spreadsheet for some reason.

Let me get coffee and finish and will ship to you shortly.

I apologize, must have forgotten what I was doing with all 10 regions on my plate.

Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Crossmon, James
Sent: Wednesday, October 24, 2018 6:46 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: FYI - Innumerable enforcement targets - Regarding EPCRA 313 ESA's - Chronic Late Reporters - All Regions + Inconsistent Reporting,

Good morning, Mort. I thought I'd check out the R2 spreadsheet (attached), from the batch you created for chronic late reporters. It doesn't seem to be working for me. It does not display the same way as the other Region's sheets display when I open them. The last tab, the ChronicLateReporters tab, has headings but no data under them. Any ideas?
Thanks as always ☺
James

From: Wakeland, Morton
Sent: Tuesday, September 04, 2018 3:33 PM
To: Milton, Philip <Milton.Philip@epa.gov>; Nowak, April <Nowak.April@epa.gov>; Alkon, Margaret <Alkon.Margaret@epa.gov>; Baranco, Angela <Baranco.Angela@epa.gov>; Basinger, David <Basinger.David@epa.gov>; Blunk, Terri <Blunk.Terri@epa.gov>; Bookman, Robert <Bookman.Robert@epa.gov>; Bussey, Carol <Bussey.Carol@epa.gov>; Caplan, Robert W. <Caplan.Robert@epa.gov>; Chew, Andrew <Chew.Andrew@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>; Cobb, David <cobb.david@epa.gov>; Davis, Lauren O. <Davis.LaurenO@epa.gov>; Devito, Steve <Devito.Steve@epa.gov>; Dunn, Meghan <dunn.meghan@epa.gov>; Fudge, Shelley <Fudge.Shelley@epa.gov>; Gilrein, Stephen <gilrein.stephen@epa.gov>; Hamre, Martha <Hamre.Martha@epa.gov>; Kim, David <Kim.David@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Lancaster, Stan <Lancaster.Stan@epa.gov>; Miles, James <miles.james@epa.gov>; Myhre, John <myhre.john@epa.gov>; Nazar, Kristen <Nazar.Kristen@epa.gov>; Ndiaye, Fatimatou <Ndiaye.Fatimatou@epa.gov>; O'Donnell, Mary Jane <Odonnell.Maryjane@epa.gov>; O'Meara, Nidhi <Omeara.Nidhi@epa.gov>; Parra, Juan <Parra.Juan@epa.gov>; Poole, Vinson <Poole.Vinson@epa.gov>; Potts, Mark <Potts.Mark@epa.gov>; Rascher, Chris <rascher.chris@epa.gov>; Riley, David <riley.david@epa.gov>; Robinson, Janis <Robinson.Janis@epa.gov>; Salazar, Matt <Salazar.Matt@epa.gov>; Salisbury, Demetra <Salisbury.Demetra@epa.gov>; Schulz, Susan <Schulz.Susan@epa.gov>; Seager, Cheryl <Seager.Cheryl@epa.gov>; Senthil, Velu <Senthil.Velu@epa.gov>; Siegal, Tod <Siegal.Tod@epa.gov>; Stuckey, Troy <Stuckey.Troy@epa.gov>; Sullivan, Greg <Sullivan.Greg@epa.gov>; Tekrony, Linda <Tekrony.Linda@epa.gov>; Turk, David <Turk.David@epa.gov>; Velez, Ezequiel <Velez.Ezequiel@epa.gov>; Wakefield, Benjamin J. <wakefield.benjamin@epa.gov>; White, Erika <White.Erika@epa.gov>; Yaras, Michelle <Yaras.Michelle@epa.gov>; Yussen, Craig <Yussen.Craig@epa.gov>; Som, Kushal <som.kushal@epa.gov>; Ramirez, Steven A <ramirez.stevena@epa.gov>; Crossmon, James <Crossmon.James@epa.gov>; Knipschild, Shane <Knipschild.Shane@epa.gov>
Cc: Nelson, Victoria <nelson.victoria@epa.gov>; Werner, Jacqueline <Werner.Jacqueline@epa.gov>; Webster, Daniel <Webster.Daniel@epa.gov>; Pane, Vickie <Pane.Vickie@epa.gov>; Antisdel, Timothy <Antisdel.Timothy@epa.gov>;

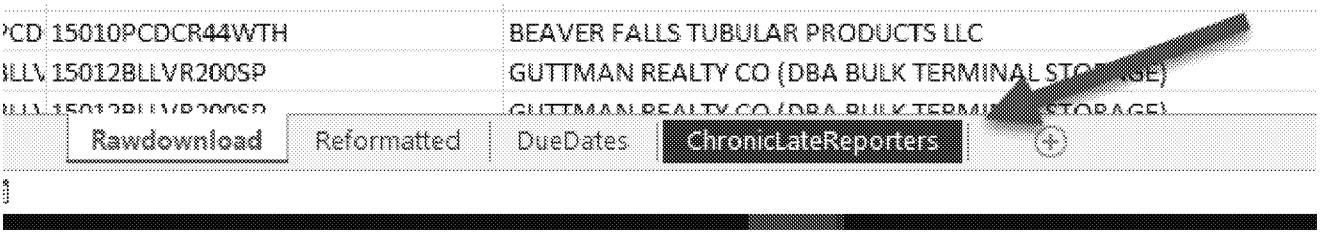
Senthil, Velu <Senthil.Velu@epa.gov>
Subject: FYI - Innumerable enforcement targets - Regarding EPCRA 313 ESA's - Chronic Late Reporters - All Regions + Inconsistent Reporting,
Importance: High

After some "hair pulling," and choice "rice paddy" language, I have been successful in tabulating all unique TRI chemicals ever reported <u>by each facility</u>, <u>in each region</u>, <u>over the most recent 5 consecutive years</u>, i.e., 2013-2017.

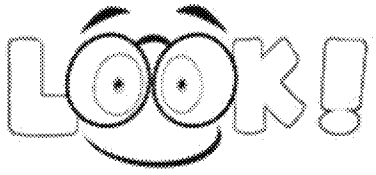
PLEASE SPOT CHECK THE RESULTS – I MAY HAVE MISSED SOMETHING IN THE CODE

You can read the accompanying <u>short</u> explanation of the workbook. Each Region has their own workbook. I'm including all regions in case HQ's wants to analyze all 10 regions.

<u>The last worksheet is what you want!!</u>
(only 4 worksheets in each workbook and they are all named the same, and in same order)



All you have to do is



on the last worksheet!

- **no code to run,**
- **no input boxes to fill in**
- **no formulas to calculate,**
- **no this or that to remember,**
- **just simple "eyeballing."**

The due dates I used are in each workbook, on a worksheet labeled: "DueDates" – hello! :)

The TRIFID, Facility_Name, and TRI_Chemical_Name are in the left-most 3 columns (A, B, C) on the last worksheet: *ChronicLateReporters*

	A	B	C	D	E	F	G	H
	TRIFID	Facility_Name	TRI_Chemical	2013	2014	2015	2016	2017
	15001NTDST1WOOD	US GYPSUM CO	LEAD COMPOUNDS	6/5/2014	6/22/2015	6/29/2016	6/15/2017	
	15001NTDST1WOOD	US GYPSUM CO	MERCURY COMPOUNDS	6/5/2014	6/22/2015	6/29/2016	6/15/2017	
	15001PRCSN2NDER	PRECISION KIDD STEEL CO	CHROMIUM	6/24/2014	6/29/2015	6/29/2016	6/27/2017	6/28/2018
	15001PRCSN2NDER	PRECISION KIDD STEEL CO	LEAD COMPOUNDS	6/24/2014	6/29/2015	6/29/2016	6/27/2017	6/28/2018
	15001PRCSN2NDER	PRECISION KIDD STEEL CO	MANGANESE	6/24/2014	6/29/2015	6/29/2016	6/27/2017	6/28/2018

Each Reporting year is in columns D:H on the last worksheet: *ChronicLateReporters*

SUPER EASY INTERPRETATION…I hope? If not – do please let me know how to improve!

If the facility reported for the chemical, but reported late, the background is red, with the <u>original submission date included!</u> See above example. Always use orig_postmark so you don't make a mistake with a *revision!*

REMEMBER TOO – A FACILITY MAY HAVE SELF-DISCLOSED – SO CHECK EDISCLOSURES AS WELL IN CDX

On the other hand, if the facility failed to report the chemical at all, in the year in question (yellow header), then only the background is red with no date! See below example.
Again, there could be a reasonable explanation why they did not report – up to you to find out if it was a "woops"

	A	B	C	D	E	F	G	H
	TRIFID	Facility_Name	TRI_Chemical	2013	2014	2015	2016	2017
0	15003HHRBR14THS	CENTRIA	XYLENE (MIXED ISOMERS)	6/26/2014	6/23/2015	7/1/2016	6/30/2017	6/29/2018
1	15003LLGHN231DU	ALLEGHENY PETROLEUM PRODUCTS CC	ZINC COMPOUNDS	6/24/2014	6/16/2015	6/27/2016	6/21/2017	6/22/2018
2	15003WRLDC21CEN	WORLDCLASS PROCESSING CORP	HYDROCHLORIC ACID (1995 AND AFTE	5/9/2014	3/10/2015			
3	15009KMMNF685ST	KMA MANUFACTURING LLC	CHROMIUM	6/25/2014				
4	15009KMMNF685ST	KMA MANUFACTURING LLC	NICKEL	6/25/2014				
5	15009WSTNGONETU	EATON CORP	COPPER	6/30/2014	6/30/2015	6/29/2016	5/5/2017	6/20/2018
6	15009WNLSTL2975D	O'NEAL STEEL INC	MANGANESE	6/30/2014	6/25/2015	6/30/2016	6/21/2017	6/29/2018
7	15010BRGHT51045	BRIGHTON ELECTRIC STEEL CASTING C	CHROMIUM	5/6/2014	4/30/2015			
8	15010BRGHT51045	BRIGHTON ELECTRIC STEEL CASTING C	NICKEL	5/6/2014	4/30/2015			
9	15010LTVST2207T	KEYSTONE PROFILES LTD	CHROMIUM COMPOUNDS(EXCEPT CHR(	6/27/2014	6/26/2015	6/23/2016		
0	15010LTVST2207T	KEYSTONE PROFILES LTD	LEAD COMPOUNDS	6/27/2014	6/26/2015	6/23/2016	6/26/2017	6/28/2018
1	15010LTVST2207T	KEYSTONE PROFILES LTD	NICKEL COMPOUNDS	6/27/2014	6/26/2015	6/23/2016		
2	15010PCDCR44WTH	BEAVER FALLS TUBULAR PRODUCTS LL(	MANGANESE COMPOUNDS	6/20/2014	6/29/2015	6/14/2016	6/9/2017	6/20/2018
3	15010PCDCR44WTH	BEAVER FALLS TUBULAR PRODUCTS LL(	ZINC COMPOUNDS	6/20/2014	6/29/2015	6/14/2016		6/20/2018
4	15012BLLVR200SP	GUTTMAN REALTY CO (DBA BULK TERM	ETHYLBENZENE	6/27/2014	6/25/2015	5/19/2016	5/15/2017	6/19/2018

and talk about those chronic late reports…..

	A	B	C	D	E	F	G	H	I
1	TRIFID	Facility_Name	TRI_Chemical	2013	2014	2015	2016	2017	
823	1566WQNNRG11TEC	AQUION ENERGY INC	MANGANESE COMPOUNDS	7/1/2014	6/25/2015	6/27/2016	6/29/2017		
824	15681BRZND100AE	NORMA PENNSYLVANIA	CHROMIUM						
825	15681BRZND100AE	NORMA PENNSYLVANIA	MANGANESE						
826	15681BRZND100AE	NORMA PENNSYLVANIA	NICKEL						
827	15683BLWKNBRIDG	DURALOY TECHNOLOGIES INC	CHROMIUM	6/16/2014	6/16/2015	6/14/2016	6/20/2017	6/15/2018	
828	15683BLWKNBRIDG	DURALOY TECHNOLOGIES INC	MANGANESE	6/16/2014	6/16/2015	6/14/2016	6/20/2017	6/15/2018	

9	15697PWRXNHILLI	POWEREX INC	NITRIC ACID	6/30/2014	6/24/2015	6/30/2016	6/30/2017	[redacted]
1	15698MLLSRCEMET	MAX ENVIRONMENTAL -- YUKON FACILI	ARSENIC COMPOUNDS	[redacted]			6/30/2017	6/21/2018
2	15698MLLSRCEMET	MAX ENVIRONMENTAL -- YUKON FACILI	BARIUM COMPOUNDS	[redacted]				
3	15698MLLSRCEMET	MAX ENVIRONMENTAL -- YUKON FACILI	CHROMIUM COMPOUNDS(EXCEPT CHR	[redacted]			6/30/2017	[redacted]
4	15698MLLSRCEMET	MAX ENVIRONMENTAL -- YUKON FACILI	COPPER COMPOUNDS	[redacted]			6/30/2017	6/21/2018
5	15698MLLSRCEMET	MAX ENVIRONMENTAL -- YUKON FACILI	LEAD COMPOUNDS	[redacted]			6/30/2017	6/21/2018
6	15698MLLSRCEMET	MAX ENVIRONMENTAL -- YUKON FACILI	NICKEL COMPOUNDS	[redacted]			6/30/2017	6/21/2018
7	1569WNCDST21LCU	YOUNGWOOD-BWE LLC	ZINC COMPOUNDS	[redacted]			6/22/2017	5/24/2018
8	15701MCCRR1600W	SPECIALTY TIRES OF AMERICA INC	ZINC COMPOUNDS	6/13/2014	6/17/2015	6/10/2016	6/6/2017	6/5/2018
9	15715STRBNMITCH	STAR IRON WORKS INC	MANGANESE	5/9/2014	5/22/2015	5/13/2016	5/11/2017	5/25/2018

	A	B	C	D	E	F	G	H	I
1	TRIFID	Facility_Name	TRI_Chemical	2013	2014	2015	2016	2017	
32	57005LVRNT1200E	CURT GROUP	MANGANESE	6/19/2014	6/17/2015	6/28/2016	6/26/2017	[redacted]	
33	57005LVRNT1200E	CURT GROUP	NICKEL	6/19/2014	6/17/2015	6/28/2016	6/26/2017	[redacted]	
34	57005TLSHY7ERED	GATES CORP	LEAD	6/23/2014	[redacted]			6/14/2018	
35	57005TLSHY7ERED	GATES CORP	MANGANESE	[redacted]					
36	57006DKTRN33132	DAKTRONICS INC	LEAD	6/9/2014	6/24/2015	6/9/2016	6/2/2017	6/20/2018	

	A	B	C	D	E	F	G	H
1	TRIFID	Facility_Name	TRI_Chemical	2013	2014	2015	2016	2017
17	59025SPRNGLAKES	SPRING CREEK COAL LLC	MERCURY COMPOUNDS	5/30/2014	[redacted]			
18	59034HRDNGSUGAR	HARDIN GENERATING STATION	AMMONIA	[redacted]			5/17/2017	[redacted]
19	59034HRDNGSUGAR	HARDIN GENERATING STATION	BARIUM COMPOUNDS	6/4/2014	5/19/2015	6/30/2016	5/17/2017	4/4/2018
20	59034HRDNGSUGAR	HARDIN GENERATING STATION	COPPER COMPOUNDS	6/4/2014	5/19/2015	6/30/2016	5/17/2017	4/4/2018

	A	B	C	D	E	F	G	H	I
1	TRIFID	Facility_Name	TRI_Chemical	2013	2014	2015	2016	2017	
364	5027WGRLQD252VA	AGROLIQUID - WILLIAMS	MANGANESE COMPOUNDS	[redacted]					
365	5027WGRLQD252VA	AGROLIQUID - WILLIAMS	NITRATE COMPOUNDS	[redacted]			6/6/2017	5/17/2018	
366	5027WGRLQD252VA	AGROLIQUID - WILLIAMS	ZINC COMPOUNDS	[redacted]			6/6/2017	[redacted]	
367	50301KMNNDBOX70	KEMIN INDUSTRIES INC	AMMONIA	6/18/2014	6/26/2015	6/30/2016	6/26/2017	6/28/2018	
368	50306RMSTR23455F	TITAN TIRE CORP	LEAD COMPOUNDS	6/26/2014	6/23/2015	6/27/2016	6/29/2017	6/29/2018	

Questions or comments or suggestions, please let me know.

Best week's wishes to everyone,
Mort

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 12/3/2018 8:46:51 PM
To: Milton, Philip [Milton.Philip@epa.gov]
Subject: Region 6 took forever also....on to next one
Attachments: Dec_Final_Region6_2013_to_2018.xlsx

Was on call center for close to 2 hours to figure this out...

El Morto :)

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Milton, Philip
Sent: Monday, December 3, 2018 2:00 PM
To: Blake-Coleman, Wendy <Blake-Coleman.Wendy@epa.gov>; Presler, Amos <presler.amos@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>; Kabler, Lauren <Kabler.Lauren@epa.gov>; Reisman, Larry <Reisman.Larry@epa.gov>; Devito, Steve <Devito.Steve@epa.gov>; Senthil, Velu <Senthil.Velu@epa.gov>; Turk, David <Turk.David@epa.gov>; Latham, John <Latham.John@epa.gov>
Cc: Wakeland, Morton <wakeland.morton@epa.gov>; Antisdel, Timothy <Antisdel.Timothy@epa.gov>; Knipschild, Shane <Knipschild.Shane@epa.gov>; Parra, Juan <Parra.Juan@epa.gov>
Subject: RE: PLEASE REVIEW BY NOON -- DRAFT RESPONSE TO OIG Request For Assistance... (a lot of files attached)

Thanks for the clarification on the observations... I will do my best to incorporate them into my revised draft and cc everyone on the response to the OIG...

V/r

Phil

Philip L. Milton
Chemical Engineer I U.S. Environmental Protection Agency
Office of Enforcement & Compliance Assurance I Office of Civil Enforcement I Waste and Chemical Enforcement Division I Chemical Risk and Reporting Enforcement Branch
1200 Pennsylvania Avenue, NW I Mail Code: 2249A I WJC South Bldg Rm 3124-B I Washington, DC 20460
Milton.philip@epa.gov I phone: 202-564-5029 I fax: 202-564-0010

From: Blake-Coleman, Wendy
Sent: Monday, December 3, 2018 2:54 PM
To: Milton, Philip <Milton.Philip@epa.gov>; Presler, Amos <presler.amos@epa.gov>; Clark, Katherine

<Clark.Katherine@epa.gov>; Kabler, Lauren <Kabler.Lauren@epa.gov>; Reisman, Larry <Reisman.Larry@epa.gov>; Devito, Steve <Devito.Steve@epa.gov>; Senthil, Velu <Senthil.Velu@epa.gov>; Turk, David <Turk.David@epa.gov>; Latham, John <Latham.John@epa.gov>
Cc: Wakeland, Morton <wakeland.morton@epa.gov>; Antisdel, Timothy <Antisdel.Timothy@epa.gov>; Knipschild, Shane <Knipschild.Shane@epa.gov>; Parra, Juan <Parra.Juan@epa.gov>
Subject: RE: PLEASE REVIEW BY NOON -- DRAFT RESPONSE TO OIG Request For Assistance... (a lot of files attached)

Hi Phil: The response looks l fine to me. I provided two observations from the TRI team earlier. Please contact Juan or Tim if you have questions on their comments. Sorry for the late response- An unusually busy Monday.

Wendy Blake-Coleman, Chief
Information Exchange Partnership Branch
Office of Environmental Information
U.S. Environmental Protection Agency
(202) 566-1709

From: Milton, Philip
Sent: Monday, December 03, 2018 8:49 AM
To: Presler, Amos <presler.amos@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>; Kabler, Lauren <Kabler.Lauren@epa.gov>; Reisman, Larry <Reisman.Larry@epa.gov>; Devito, Steve <Devito.Steve@epa.gov>; Senthil, Velu <Senthil.Velu@epa.gov>; Turk, David <Turk.David@epa.gov>; Latham, John <Latham.John@epa.gov>
Cc: Wakeland, Morton <wakeland.morton@epa.gov>; Blake-Coleman, Wendy <Blake-Coleman.Wendy@epa.gov>; Antisdel, Timothy <Antisdel.Timothy@epa.gov>; Knipschild, Shane <Knipschild.Shane@epa.gov>; Parra, Juan <Parra.Juan@epa.gov>
Subject: PLEASE REVIEW BY NOON -- DRAFT RESPONSE TO OIG Request For Assistance... (a lot of files attached)

Dear OECA/OCSPP/OEI –

Please find the draft response to the OIG below... For your information I have attached a draft email and the documents/links that I would like to send to Dwayne Crawford and his team before I leave today at 3pm.

Steve and Velu - Your items are #1 and 7..please make sure I've described properly

OECA/Mort our items are 2-6. Let me know if you see any concerns.

Please let me know if you have comments or need more time by noon today. Thanks in advance for your attention to this matter.

V/r

Phil

Good Afternoon Dwayne –

In follow-up to our meeting on Thursday, November 29th, I am providing the following information that was discussed at the meeting.

1) TRI Data Quality Assurance Plan - *provided by OCSPP*. Please keep internal, not to be distributed outside of EPA (it is marked as such).

2) Recent OECA NPM Guidance - *provided by OECA*.
    a. FY2016-2017 OECA NPM Guidance. Page 45 - 46 has the EPCRA 313 Toxics Release Inventory program specific guidance.
    b. Final FY 2018-2019 Office of Enforcement and Compliance Assurance (OECA) NPM Guidance. Appendix A page 6 has the EPCRA ACS measures.
3) Link to EPCRA 313 Enforcement Response Policy- *provided by OECA*.
4) Information about the EPA's Audit Policy - *provided by OECA*. Please see the following link https://www.epa.gov/compliance/epas-audit-policy. List of disclosures from FY13 – present are provided. Please keep internal, not to be distributed outside of EPA (pages are marked 'Enforcement Confidential - Do Not Release').
    a. Standard report from eDisclosure of completed disclosures that included EPCRA §313 noncompliance and
    b. Standard report from ICIS that includes all disclosures from FY 2013 – 2018.
5) Regional Workbooks of possible late/nonreporting of chemicals developed by Morton Wakeland, EPCRA Section 313 Enforcement and TRI Program Coordinator, EPA Region 6 – *provided by OECA*. Mr. Wakeland shared these with the TRI Enforcement Call contacts via email on September 4, 2018. Please keep internal, not to be distributed outside of EPA (we marked the pages as 'Enforcement Confidential - Do Not Release').
    a. Document titled "Info to Accompany Workbook" – explains the workbooks
    b. Individual files for each region.
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7) Preliminary data runs on late reporters after the deadline (from RY2014-RY2017). MS-Excel spreadsheet – *provided by OCSPP.* The Table below summarizes what is in the Excel file. These results are preliminary and deliberative.

Year	July 5th-31st (2016 & 2017); July 2nd - 31st (2014 & 2015)			August 1st-31st			Sept 1st- Oct 20th (*)			
	Number of Reports	Total Release (lb)	Production Waste (lb)	Number of Reports	Total Release (lb)	Production Waste (lb)	Number of Reports	Total Release (lb)	Production Waste (lb)	Number of Reports
2017	765	7,507,011	102,495,699	212	1,001,584	7,328,869	88	1,089,654	4,227,361	NA
2016	726	6,112,199	63,131,858	136	631,577	6,116,925	63	35,500	4,295,923	810
2015	604	45,241,874	99,201,906	102	2,704,563	5,056,569	50	132,305	2,041,079	1234
2014	697	21,840,302	70,061,019	106	1,217,072	17,473,258	45	242,459	5,391,972	1805

(*) - For RY2017, this analysis includes submissions through Oct 9th.

If you have any additional questions or would like to discuss the information that we have provided, please do not hesitate to contact us.

Very respectfully,

Phil Milton

Philip L. Milton
Chemical Engineer I U.S. Environmental Protection Agency
Office of Enforcement & Compliance Assurance I Office of Civil Enforcement I Waste and Chemical Enforcement Division I Chemical Risk and Reporting Enforcement Branch
1200 Pennsylvania Avenue, NW I Mail Code: 2249A I WJC South Bldg Rm 3124-B I Washington, DC 20460
Milton.philip@epa.gov I phone: 202-564-5029 I fax: 202-564-0010

From: Crawford, Dwayne
Sent: Wednesday, November 14, 2018 3:30 PM
To: Weiner, Janet <Weiner.Janet@epa.gov>; Milton, Philip <Milton.Philip@epa.gov>
Cc: Spriggs, Gwendolyn <Spriggs.Gwendolyn@epa.gov>; Lovingood, Christina <Lovingood.Tina@epa.gov>; Beeson, Benjamin W. <Beeson.Benjamin@epa.gov>; Mulchandani, Roopa <Mulchandani.Roopa@epa.gov>; Hanna, Steve <Hanna.Steve@epa.gov>
Subject: OIG Request For Assistance...

Hello Janet/Philip,

The audit team provides our list of questions that we are seeking response to as part of our review. We would like to have OECA's written response to our questions prior to our meeting. By doing so, we believe that both side will be better prepared to discuss the responses. Given the time needed to provide your response will determine if we are able to meet prior to the Thanksgiving Holiday. If we are not able to meet prior to next Wednesday, we would definitely need to meet at your earliest convenience the week of November 26th. We thank you in advance for your assistance.

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 12/3/2018 8:03:53 PM
To: Milton, Philip [Milton.Philip@epa.gov]
Subject: Memory overload - office 365 new is taking up much more memrory
Attachments: Dec_Final_Region5_2013_to_2017.xlsx; Dec_Final_Region1_2013_to_2017.xlsx; Dec_Final_Region10_2013_to_2017.xlsx

Importance: High

Why it worked before and not now.

Region 5 took 45 minutes to compile and run – find attached – compare with other ones to see if same
anserws if not let me know

I'm beat

Will begin on other regions...

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Milton, Philip
Sent: Monday, December 3, 2018 9:47 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: Clark, Katherine <Clark.Katherine@epa.gov>; Presler, Amos <presler.amos@epa.gov>
Subject: RE: PLEASE REVIEW BY NOON -- DRAFT RESPONSE TO OIG Request For Assistance... (a lot of files attached)

Mort –

This is great... I will edit the write-up in the email to explain what we are providing and I can edit the headers and footers to indicate the information is not for release.

If you want to edit the word document too that would be fine

V/r

Phil

Philip L. Milton

Chemical Engineer I U.S. Environmental Protection Agency
Office of Enforcement & Compliance Assurance I Office of Civil Enforcement I Waste and Chemical Enforcement Division I Chemical Risk and Reporting Enforcement Branch
1200 Pennsylvania Avenue, NW I Mail Code: 2249A I WJC South Bldg Rm 3124-B I Washington, DC 20460
Milton.philip@epa.gov I phone: 202-564-5029 I fax: 202-564-0010

From: Wakeland, Morton
Sent: Monday, December 3, 2018 10:42 AM
To: Milton, Philip <Milton.Philip@epa.gov>
Cc: Clark, Katherine <Clark.Katherine@epa.gov>; Presler, Amos <presler.amos@epa.gov>
Subject: RE: PLEASE REVIEW BY NOON -- DRAFT RESPONSE TO OIG Request For Assistance... (a lot of files attached)

Will be done shortly – here's Region 1

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Milton, Philip
Sent: Monday, December 3, 2018 9:40 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: Clark, Katherine <Clark.Katherine@epa.gov>; Presler, Amos <presler.amos@epa.gov>
Subject: RE: PLEASE REVIEW BY NOON -- DRAFT RESPONSE TO OIG Request For Assistance... (a lot of files attached)

Mort –

That is above and beyond. If you want to do it would be most helpful to the OIG (and everyone else too)... I would very much like to get this information request off my plate, is this something that can be done today? And if so, would you be able to include the headers and footers that I inserted on all the files to make sure the files don't get released outside of EPA?

Please let me know...

V/r

Phil

Philip L. Milton
Chemical Engineer I U.S. Environmental Protection Agency
Office of Enforcement & Compliance Assurance I Office of Civil Enforcement I Waste and Chemical Enforcement Division I Chemical Risk and Reporting Enforcement Branch
1200 Pennsylvania Avenue, NW I Mail Code: 2249A I WJC South Bldg Rm 3124-B I Washington, DC 20460
Milton.philip@epa.gov I phone: 202-564-5029 I fax: 202-564-0010

From: Wakeland, Morton
Sent: Monday, December 3, 2018 10:35 AM

To: Milton, Philip <Milton.Philip@epa.gov>
Subject: RE: PLEASE REVIEW BY NOON -- DRAFT RESPONSE TO OIG Request For Assistance... (a lot of files attached)

Don't like the single red color – prefer what I did for 2 green and red.

Am going to rerun all regions except 2 and label them Dec – you can change the name for fit Region 2's format.

OK, let me get started – may revise the Word Doc too? Will do spreadsheets first!!

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Milton, Philip
Sent: Monday, December 3, 2018 8:45 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Presler, Amos <presler.amos@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>; Kabler, Lauren <Kabler.Lauren@epa.gov>; Reisman, Larry <Reisman.Larry@epa.gov>; Devito, Steve <Devito.Steve@epa.gov>; Senthil, Velu <Senthil.Velu@epa.gov>; Turk, David <Turk.David@epa.gov>; Latham, John <Latham.John@epa.gov>
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Subject: RE: PLEASE REVIEW BY NOON -- DRAFT RESPONSE TO OIG Request For Assistance... (a lot of files attached)

Mort –

Thank you for looking after me. I appreciate it.

TRIPD has indicated that items 1 and 7 are good to go... just want to ensure folks know what we are sending (and are ok with it) to the OIG.

Best for your Holidays as well.

V/r

Phil

Philip L. Milton
Chemical Engineer I U.S. Environmental Protection Agency
Office of Enforcement & Compliance Assurance I Office of Civil Enforcement I Waste and Chemical Enforcement Division I Chemical Risk and Reporting Enforcement Branch
1200 Pennsylvania Avenue, NW I Mail Code: 2249A I WJC South Bldg Rm 3124-B I Washington, DC 20460

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Subject: RE: PLEASE REVIEW BY NOON -- DRAFT RESPONSE TO OIG Request For Assistance... (a lot of files attached)
Importance: High

Thanks Phil...I'm sure all is OK for the OIG that's from me, but I'll still review and get back with you this morning.

Will put all else on "hold"

Happy Holidays Phil to you and the family,

Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Milton, Philip
Sent: Monday, December 3, 2018 7:49 AM
To: Presler, Amos <presler.amos@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>; Kabler, Lauren <Kabler.Lauren@epa.gov>; Reisman, Larry <Reisman.Larry@epa.gov>; Devito, Steve <Devito.Steve@epa.gov>; Senthil, Velu <Senthil.Velu@epa.gov>; Turk, David <Turk.David@epa.gov>; Latham, John <Latham.John@epa.gov>
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2016	**726**	**6,112,199**	**63,131,858**	**136**	**631,577**	**6,116,925**	**63**	**35,500**	**4,295,923**	**810**
2015	**604**	**45,241,874**	**99,201,906**	**102**	**2,704,563**	**5,056,569**	**50**	**132,305**	**2,041,079**	**1234**
2014	**697**	**21,840,302**	**70,061,019**	**106**	**1,217,072**	**17,473,258**	**45**	**242,459**	**5,391,972**	**1805**

(*) - For RY2017, this analysis includes submissions through Oct 9th.

If you have any additional questions or would like to discuss the information that we have provided, please do not hesitate to contact us.

Very respectfully,

Phil Milton

Philip L. Milton
Chemical Engineer I U.S. Environmental Protection Agency
Office of Enforcement & Compliance Assurance I Office of Civil Enforcement I Waste and Chemical Enforcement Division I Chemical Risk and Reporting Enforcement Branch
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Milton.philip@epa.gov I phone: 202-564-5029 I fax: 202-564-0010

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To: Weiner, Janet <Weiner.Janet@epa.gov>; Milton, Philip <Milton.Philip@epa.gov>
Cc: Spriggs, Gwendolyn <Spriggs.Gwendolyn@epa.gov>; Lovingood, Christina <Lovingood.Tina@epa.gov>; Beeson, Benjamin W. <Beeson.Benjamin@epa.gov>; Mulchandani, Roopa <Mulchandani.Roopa@epa.gov>; Hanna, Steve <Hanna.Steve@epa.gov>
Subject: OIG Request For Assistance...

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Sent: 12/3/2018 4:44:27 PM
To: Milton, Philip [Milton.Philip@epa.gov]
Subject: Region 10 redo with lines
Attachments: Dec_Region10_2013_to_2017.xlsx

Morton E. Wakeland, Jr., Ph.D. ("Mort")
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Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
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If you have any additional questions or would like to discuss the information that we have provided, please do not hesitate to contact us.

Very respectfully,

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Sent: 9/13/2018 1:33:10 PM
To: Clark, Katherine [Clark.Katherine@epa.gov]; Milton, Philip [Milton.Philip@epa.gov]
Subject: You may wish to do your own analysis
Attachments: A_Revised_and_Easier_Explanation_ChronicLateReporters.docx; A_Run_VBA_Code_Chronic_Late_Reporters_September_12_2018.xlsm; Test-on-Region4.xlsx

Importance: High

A TSCA colleague in Region 4 wanted a copy of the code – So, I took time to write an explanation of what the code does.

Going to attach those instructions. (Word file)

Going to attach the code workbook. (A_Run_Code....)

Going to attach Region 4 where you can run your own test on this with the code. (Test-on-Region4)

Suggest only have these two Excel workbooks open: #1 Code workbook, and #2 Regio4 test workbook.

If you have questions let me know.
If you want other analyses done, let me know what you'd like done.

Best week's wishes,
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
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Region 10

Damn computer having reboot

Trying to get underlines between facilities – will get green/red first
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This is great... I will edit the write-up in the email to explain what we are providing and I can edit the headers and footers to indicate the information is not for release.

If you want to edit the word document too that would be fine

V/r

Phil

Philip L. Milton
Chemical Engineer I U.S. Environmental Protection Agency
Office of Enforcement & Compliance Assurance I Office of Civil Enforcement I Waste and Chemical Enforcement Division I Chemical Risk and Reporting Enforcement Branch
1200 Pennsylvania Avenue, NW I Mail Code: 2249A I WJC South Bldg Rm 3124-B I Washington, DC 20460
Milton.philip@epa.gov I phone: 202-564-5029 I fax: 202-564-0010

From: Wakeland, Morton
Sent: Monday, December 3, 2018 10:42 AM
To: Milton, Philip <Milton.Philip@epa.gov>
Cc: Clark, Katherine <Clark.Katherine@epa.gov>; Presler, Amos <presler.amos@epa.gov>
Subject: RE: PLEASE REVIEW BY NOON -- DRAFT RESPONSE TO OIG Request For Assistance... (a lot of files attached)

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Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Milton, Philip
Sent: Monday, December 3, 2018 9:40 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: Clark, Katherine <Clark.Katherine@epa.gov>; Presler, Amos <presler.amos@epa.gov>
Subject: RE: PLEASE REVIEW BY NOON -- DRAFT RESPONSE TO OIG Request For Assistance... (a lot of files attached)

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To: Milton, Philip <Milton.Philip@epa.gov>
Subject: RE: PLEASE REVIEW BY NOON -- DRAFT RESPONSE TO OIG Request For Assistance... (a lot of files attached)

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Dear OECA/OCSPP/OEI –

Please find the draft response to the OIG below... For your information I have attached a draft email and the documents/links that I would like to send to Dwayne Crawford and his team before I leave today at 3pm.

Steve and Velu - Your items are #1 and 7..please make sure I've described properly

OECA/Mort our items are 2-6. Let me know if you see any concerns.

Please let me know if you have comments or need more time by noon today. Thanks in advance for your attention to this matter.

V/r

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Good Afternoon Dwayne –

In follow-up to our meeting on Thursday, November 29th, I am providing the following information that was discussed at the meeting.

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	Number of Reports	Total Release (lb)	Production Waste (lb)	Number of Reports	Total Release (lb)	Production Waste (lb)	Number of Reports	Total Release (lb)	Production Waste (lb)	Number of Reports
2017	765	7,507,011	102,495,699	212	1,001,584	7,328,869	88	1,089,654	4,227,361	NA
2016	726	6,112,199	63,131,858	136	631,577	6,116,925	63	35,500	4,295,923	810

2015	604	45,241,874	99,201,906	102	2,704,563	5,056,569	50	132,305	2,041,079	1234
2014	697	21,840,302	70,061,019	106	1,217,072	17,473,258	45	242,459	5,391,972	1805

(*) - For RY2017, this analysis includes submissions through Oct 9th.

If you have any additional questions or would like to discuss the information that we have provided, please do not hesitate to contact us.

Very respectfully,

Phil Milton

Philip L. Milton
Chemical Engineer I U.S. Environmental Protection Agency
Office of Enforcement & Compliance Assurance I Office of Civil Enforcement I Waste and Chemical Enforcement Division I Chemical Risk and Reporting Enforcement Branch
1200 Pennsylvania Avenue, NW I Mail Code: 2249A I WJC South Bldg Rm 3124-B I Washington, DC 20460
Milton.philip@epa.gov I phone: 202-564-5029 I fax: 202-564-0010

From: Crawford, Dwayne
Sent: Wednesday, November 14, 2018 3:30 PM
To: Weiner, Janet <Weiner.Janet@epa.gov>; Milton, Philip <Milton.Philip@epa.gov>
Cc: Spriggs, Gwendolyn <Spriggs.Gwendolyn@epa.gov>; Lovingood, Christina <Lovingood.Tina@epa.gov>; Beeson, Benjamin W. <Beeson.Benjamin@epa.gov>; Mulchandani, Roopa <Mulchandani.Roopa@epa.gov>; Hanna, Steve <Hanna.Steve@epa.gov>
Subject: OIG Request For Assistance...

Hello Janet/Philip,

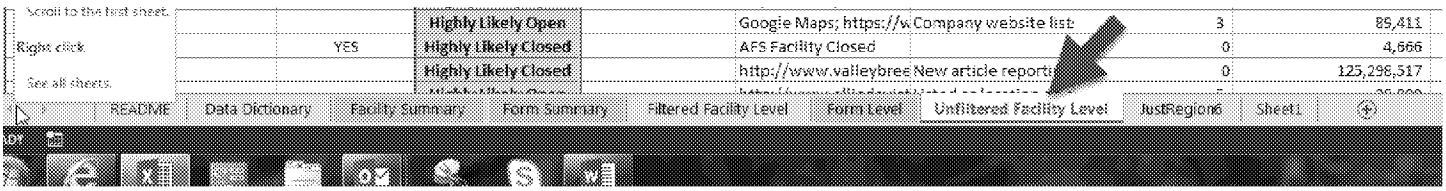
The audit team provides our list of questions that we are seeking response to as part of our review. We would like to have OECA's written response to our questions prior to our meeting. By doing so, we believe that both side will be better prepared to discuss the responses. Given the time needed to provide your response will determine if we are able to meet prior to the Thanksgiving Holiday. If we are not able to meet prior to next Wednesday, we would definitely need to meet at your earliest convenience the week of November 26th. We thank you in advance for your assistance.

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 12/21/2017 1:32:04 PM
To: Cynthia Gould [Cynthia_Gould@abtassoc.com]
CC: Davis, Wayne [Davis.Wayne@epa.gov]
Subject: RE: Using RSEI with non-reporters
Attachments: A_HQ_Original_RY16 Non-Reporters_11-30-2017_Revised_v.1.1.xlsx

You're the Best Cindi

Here's the workbook, and the worksheet is



I honestly have no idea what the numbers mean nor how to use when filtering for targeting facilities.

Let me read what you sent and see if I can make "heads or tails" out of it.

THANK YOU AND...

Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Cynthia Gould [mailto:Cynthia_Gould@abtassoc.com]
Sent: Tuesday, December 19, 2017 4:22 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: Davis, Wayne <Davis.Wayne@epa.gov>
Subject: Using RSEI with non-reporters

Hi Mort- Wayne asked me to contact you about the non-reporters sheet and RSEI. This link might help with the background information on score and hazard: https://www.epa.gov/rsei/understanding-rsei-results

Generally, in this kind of exercise the score and hazard are there for cases where there are a lot of facilities, to help highlight where there might be more potential for human health impacts. So if you had 20 facilities to look into, you might sort them in descending order by score and look at the one with the highest score first. And then do the same with hazard- hazard casts a wider net than the RSEI score, and may highlight some additional facilities that may be worth looking at.

RSEI Hazard and RSEI Score are both provided because RSEI only models certain kinds of releases and transfers (direct air releases, direct water releases, and transfers off-site to POTWs and off-site incineration), whereas Hazard can be calculated for any kind of releases and transfers reported to TRI, even if there may not be any expected potential for human exposure.

Hazard is calculating by multiplying the pounds of chemical released or transferred by the RSEI toxicity weight, but without any of the fate and transport or exposure factors that are considered in calculating the score. For instance, off-site transfers to recycling sometimes show high hazard numbers if the chemical is very toxic, but there may not be much cause for concern in terms of human health because the chemical is not released into the environment. Generally, lower hazard numbers mean that the volumes being released or transferred are either very small or relatively less toxic.

There are no absolute benchmarks for what is "low" for either metric; they're inherently relative, and used only for screening and sorting for prioritization. They can't be used to say some situation is "safe" or "not safe."

Hope this helps. I'd also be happy to talk through this with you, at your convenience. I'm free this evening or tomorrow.

Thanks,
Cindy

This message may contain privileged and confidential information intended solely for the addressee. Please do not read, disseminate or copy it unless you are the intended recipient. If this message has been received in error, we kindly ask that you notify the sender immediately by return email and delete all copies of the message from your system.

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Attachments: Dec_Final_Region1_2013_to_2017.xlsx

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Milton.philip@epa.gov I phone: 202-564-5029 I fax: 202-564-0010

From: Crawford, Dwayne
Sent: Wednesday, November 14, 2018 3:30 PM
To: Weiner, Janet <Weiner.Janet@epa.gov>; Milton, Philip <Milton.Philip@epa.gov>
Cc: Spriggs, Gwendolyn <Spriggs.Gwendolyn@epa.gov>; Lovingood, Christina <Lovingood.Tina@epa.gov>; Beeson, Benjamin W. <Beeson.Benjamin@epa.gov>; Mulchandani, Roopa <Mulchandani.Roopa@epa.gov>; Hanna, Steve <Hanna.Steve@epa.gov>
Subject: OIG Request For Assistance...

Hello Janet/Philip,

The audit team provides our list of questions that we are seeking response to as part of our review. We would like to have OECA's written response to our questions prior to our meeting. By doing so, we believe that both side will be better prepared to discuss the responses. Given the time needed to provide your response will determine if we are able to meet prior to the Thanksgiving Holiday. If we are not able to meet prior to next Wednesday, we would definitely need to meet at your earliest convenience the week of November 26th. We thank you in advance for your assistance.

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 7/24/2018 8:15:39 PM
To: Scott Genzer [sgenzer@rapidminer.com]
Subject: Been one hell of a day Scott
Attachments: 2016_TRI_Data_All_Regions_USA.xlsx

Importance: High

OK, I pulled chemical release data from our Envirofacts database for 2016 – reports due July 1, 2017
2017 data is not uploaded yet, was due July 1, 2018

THIS IS PUBLIC INFORMATION SO NOT TO WORRY

This is for all 10 EPA Regions
About 80,000 records because each facility can report multiple chemicals
Each record represent a chemical and it associated info like releases.

02830CNSTT1575S	OCEAN STATE POWER	2016	B

Total number of records returned from your query: 79595
Number of Records shown on this page: 1000 ***
Records remaining to be viewed: 78595

Next 1000 Records | Output to CSV File

***The result set above presents a list of *unique* data in the output.
If you would like to run the query again and obtain a result set that lists all da

Downloaded as CSV and I save to xlsx

The first worksheet is the raw downloaded data
The second worksheet is reformatted for easier viewing. I edited the headers from SQL on worksheet 1

THCTB24ONE	ADHESIVE APPLICATIONS INC - O'NEILL ST E/
THCTB24	ADHESIVE AP CATIONS INC - O'NEILL ST E/
THCTB24	ADHESIVE A ATIONS INC - O'NEILL ST E/

2016_TRI_Data_All_Regions_USA | Reformatted

Like all REAL data there are missing data points.

The headers

	A	B	C	D	E	F	G
1	TRI_ID_#	Facility_Name	Report_Year	TRI_Chemical_Reported	Address	City	State
2	01007NRTHS201OL	NORTHEAST TREATERS INC	2016	COPPER COMPOUNDS	201 OLD SPRINGFIELD RD	BELCHERTOWN	MA
3	01007NVRSL149BA	UFP BELCHERTOWN LLC	2016	COPPER COMPOUNDS	155 BAY RD	BELCHERTOWN	MA
4	01013HRCLS1111G	SOLENIS LLC	2016	AMMONIA	1111 GRATTAN ST	CHICOPEE	MA
5	01013HRCLS1111G	SOLENIS LLC	2016	EPICHLOROHYDRIN	1111 GRATTAN ST	CHICOPEE	MA
6	01013HRCLS1111G	SOLENIS LLC	2016	FORMIC ACID	1111 GRATTAN ST	CHICOPEE	MA

the ID # is unique, it will be the same for the same facility
the reporting year = 2016 = constant
Note the chemical name
address
city
state

next columns over

	I	J	K	L	M	N	O
	Region	Fugitive Air Emissions	Section 8.1A Releases	Section 8.1B Releases	Section 8.1C Releases	Section 8.1D Releases	Stack Total Releases
07	1						
07	1						
13	1						
13	1	671		696	0	0	25
13	1	608		608.33			0.33
13	1	0		1			1
13	1	0			0	106160	0

the region where the facilities are located – may be useful to see what regions has what?

Fugitive air emissions –
8.1A is also releases of various kinds
B, C, and D are similar..
Stack releases

Last attributes or do you call examples for columns?

	P	Q	R	S
ases	Water Body 1 Releases	Water Body 2 Releases	Primary NAICS Code	
			321114	
			321114	
			325211	
25	0		325211	
0.33	0		325211	
1	0		339920	
0	0		339920	
0	0		339112	
0	0		327320	
247	0		325510	
594	0		325510	
665	0		322299	
0	0		331420	

the NAICS is what the facility does
North American Industry Classification System
may be neat to see if anything can be said NAICS and chemicals and amounts released.

Now let's see if this sucker will send?

Take notes on what you did, I'd like to duplicate or try to do so at least….

This will be cool, NO ONE HAS EVER ATTEMPTED SUCH AN ANALYSIS!
COULD GET AN ATTA BOY – LAUGH

Mort

Morton E. Wakeland, Jr., Ph.D.
EPCRA 313 Enforcement & TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, Texas
(214.665.8116)

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 9/12/2018 9:16:40 PM
To: Timsina, Gopal [Timsina.Gopal@epa.gov]
BCC: Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: Now just two clicks and you are done.
Attachments: A_Revised_and_Easier_Explanation_ChronicLateReporters.docx; A_Run_VBA_Code_Chronic_Late_Reporters_September_12_2018.xlsm; Test-on-Region4.xlsx

Importance: High

New code workbook attached
Explanation of how to do analysis from downloaded data.

Region4test data set to try it out on.

All you do is click once – get data formatted for doing investigation, then click again to get results.

Have both workbooks open, however be in region 4's workbook to run code.

Let me know if issues,
Mort

From: Timsina, Gopal
Sent: Tuesday, September 11, 2018 11:39 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Have tweeked a lot - will send revised workbook

Thank you Mort

From: Wakeland, Morton
Sent: Tuesday, September 11, 2018 12:31 PM
To: Timsina, Gopal <Timsina.Gopal@epa.gov>
Subject: Have tweeked a lot - will send revised workbook

when done – most likely tomorrow – have "stuff" to complete this afternoon.

99% automated now

Mort

From: Timsina, Gopal
Sent: Monday, September 10, 2018 2:11 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: Here you go Gopal

Thank you Mort. Really Appreciated!

From: Wakeland, Morton
Sent: Monday, September 10, 2018 3:09 PM
To: Timsina, Gopal <Timsina.Gopal@epa.gov>
Subject: Here you go Gopal
Importance: High

Text write-up
Code workbook
Test workbook

Read Text first. If questions let me know.

Again, this is for TRI data from EZ-Query (Envirofacts – Flat Files) but can be adjusted for other databases.

Best always and have a super week,
Mort

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 11/29/2018 5:20:55 PM
To: Milton, Philip [Milton.Philip@epa.gov]
Subject: RE: FYI - Innumerable enforcement targets - Regarding EPCRA 313 ESA's - Chronic Late Reporters - All Regions + Inconsistent Reporting,
Attachments: A_Revised_and_Easier_Explanation_ChronicLateReporters.docx; A_Code_For_Chronic_Late_Reporters.xlsm

Use this write-up I think better, but you be the judge
and here is the code workbook....it has all the VBA code in it. note the extension .xlsm – means it has code in it
ALWAYS MAKE COPIES AND WORK FROM COPIES

Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Milton, Philip
Sent: Thursday, November 29, 2018 10:00 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: FW: FYI - Innumerable enforcement targets - Regarding EPCRA 313 ESA's - Chronic Late Reporters - All Regions + Inconsistent Reporting,
Importance: High

Mort –

We had our big OIG meeting today. I committed to providing them a copy of the workbooks you shared with the Regions. I do not intend on sending your email, but rather referencing it in my response to the OIG. I am going to mark the files as Enforcement Confidential and request that they not be released. I noticed that the Region 2 spreadsheet does not appear to have records in the chroniclatereporters tab, do you have that information?

I told the OIG that I would provide the information to them early next week, if you can provide the full Region 2 info that would be great, please don't expend a lot of effort.

V/r

Phil

Philip L. Milton
Chemical Engineer I U.S. Environmental Protection Agency
Office of Enforcement & Compliance Assurance I Office of Civil Enforcement I Waste and Chemical Enforcement Division I Chemical Risk and Reporting Enforcement Branch
1200 Pennsylvania Avenue, NW I Mail Code: 2249A I WJC South Bldg Rm 3124-B I Washington, DC 20460
Milton.philip@epa.gov I phone: 202-564-5029 I fax: 202-564-0010

From: Wakeland, Morton
Sent: Tuesday, September 4, 2018 3:33 PM
To: Milton, Philip <Milton.Philip@epa.gov>; Nowak, April <Nowak.April@epa.gov>; Alkon, Margaret <Alkon.Margaret@epa.gov>; Baranco, Angela <Baranco.Angela@epa.gov>; Basinger, David <Basinger.David@epa.gov>; Blunk, Terri <Blunk.Terri@epa.gov>; Bookman, Robert <Bookman.Robert@epa.gov>; Bussey, Carol <Bussey.Carol@epa.gov>; Caplan, Robert W. <Caplan.Robert@epa.gov>; Chew, Andrew <Chew.Andrew@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>; Cobb, David <cobb.david@epa.gov>; Davis, Lauren O. <Davis.LaurenO@epa.gov>; Devito, Steve <Devito.Steve@epa.gov>; Dunn, Meghan <dunn.meghan@epa.gov>; Fudge, Shelley <Fudge.Shelley@epa.gov>; Gilrein, Stephen <gilrein.stephen@epa.gov>; Hamre, Martha <Hamre.Martha@epa.gov>; Kim, David <Kim.David@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Lancaster, Stan <Lancaster.Stan@epa.gov>; Miles, James <miles.james@epa.gov>; Myhre, John <myhre.john@epa.gov>; Nazar, Kristen <Nazar.Kristen@epa.gov>; Ndiaye, Fatimatou <Ndiaye.Fatimatou@epa.gov>; O'Donnell, Mary Jane <Odonnell.Maryjane@epa.gov>; O'Meara, Nidhi <omeara.nidhi@epa.gov>; Parra, Juan <Parra.Juan@epa.gov>; Poole, Vinson <Poole.Vinson@epa.gov>; Potts, Mark <Potts.Mark@epa.gov>; Rascher, Chris <rascher.chris@epa.gov>; Riley, David <riley.david@epa.gov>; Robinson, Janis <Robinson.Janis@epa.gov>; Salazar, Matt <Salazar.Matt@epa.gov>; Salisbury, Demetra <Salisbury.Demetra@epa.gov>; Schulz, Susan <Schulz.Susan@epa.gov>; Seager, Cheryl <Seager.Cheryl@epa.gov>; Senthil, Velu <Senthil.Velu@epa.gov>; Siegal, Tod <Siegal.Tod@epa.gov>; Stuckey, Troy <Stuckey.Troy@epa.gov>; Sullivan, Greg <Sullivan.Greg@epa.gov>; Tekrony, Linda <Tekrony.Linda@epa.gov>; Turk, David <Turk.David@epa.gov>; Velez, Ezequiel <Velez.Ezequiel@epa.gov>; Wakefield, Benjamin J. <wakefield.benjamin@epa.gov>; White, Erika <White.Erika@epa.gov>; Yaras, Michelle <Yaras.Michelle@epa.gov>; Yussen, Craig <Yussen.Craig@epa.gov>; Som, Kushal <som.kushal@epa.gov>; Ramirez, Steven A <ramirez.stevena@epa.gov>; Crossmon, James <Crossmon.James@epa.gov>; Knipschild, Shane <Knipschild.Shane@epa.gov>
Cc: Nelson, Victoria <nelson.victoria@epa.gov>; Werner, Jacqueline <Werner.Jacqueline@epa.gov>; Webster, Daniel <Webster.Daniel@epa.gov>; Pane, Vickie <Pane.Vickie@epa.gov>; Antisdel, Timothy <Antisdel.Timothy@epa.gov>; Senthil, Velu <Senthil.Velu@epa.gov>
Subject: FYI - Innumerable enforcement targets - Regarding EPCRA 313 ESA's - Chronic Late Reporters - All Regions + Inconsistent Reporting,
Importance: High

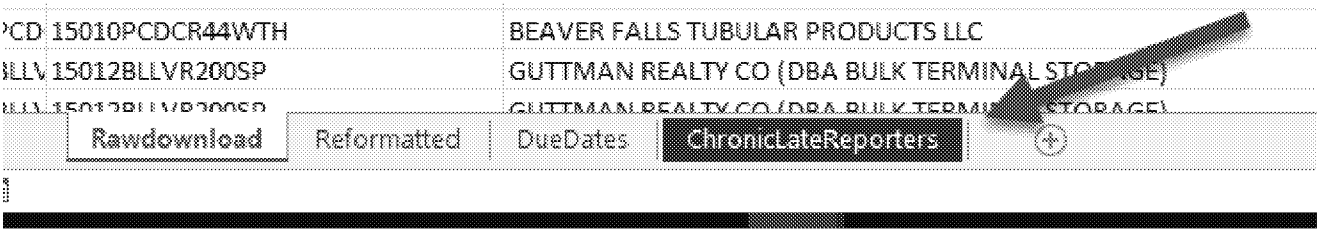
After some "hair pulling," and choice "rice paddy" language, I have been successful in tabulating all unique TRI chemicals ever reported <u>by each facility,</u> <u>in each region</u>, <u>over the most recent 5 consecutive years</u>, i.e., 2013-2017.

PLEASE SPOT CHECK THE RESULTS – I MAY HAVE MISSED SOMETHING IN THE CODE

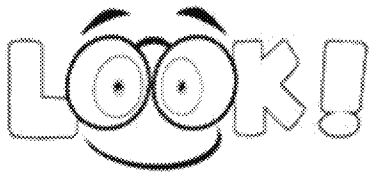
You can read the accompanying <u>short</u> explanation of the workbook. Each Region has their own workbook. I'm including all regions in case HQ's wants to analyze all 10 regions.

<u>The last worksheet is what you want!!</u>

(only 4 worksheets in each workbook and they are all named the same, and in same order)



All you have to do is



on the last worksheet!

- **no code to run,**
- **no input boxes to fill in**
- **no formulas to calculate,**
- **no this or that to remember,**
- **just simple "eyeballing."**

The due dates I used are in each workbook, on a worksheet labeled: "DueDates" – hello! :)

The TRIFID, Facility_Name, and TRI_Chemical_Name are in the left-most 3 columns (A, B, C) on the last worksheet: *ChronicLateReporters*

A	B	C	D	E	F	G	H
TRIFID	Facility_Name	TRI_Chemical	2013	2014	2015	2016	2017
15001NTDST1WOOD	US GYPSUM CO	LEAD COMPOUNDS	6/5/2014	6/22/2015	6/29/2016	6/15/2017	
15001NTDST1WOOD	US GYPSUM CO	MERCURY COMPOUNDS	6/5/2014	6/22/2015	6/29/2016	6/15/2017	
15001PRCSN2NDER	PRECISION KIDD STEEL CO	CHROMIUM	6/24/2014	6/29/2015	6/29/2016	6/27/2017	6/28/2018
15001PRCSN2NDER	PRECISION KIDD STEEL CO	LEAD COMPOUNDS	6/24/2014	6/29/2015	6/29/2016	6/27/2017	6/28/2018
15001PRCSN2NDER	PRECISION KIDD STEEL CO	MANGANESE	6/24/2014	6/29/2015	6/29/2016	6/27/2017	6/28/2018

Each Reporting year is in columns D:H on the last worksheet: *ChronicLateReporters*

SUPER EASY INTERPRETATION…I hope? If not – do please let me know how to improve!

If the facility reported for the chemical, but reported late, the background is red, with the <u>original submission date included!</u> See above example. Always use orig_postmark so you don't make a mistake with a *revision!*

REMEMBER TOO – A FACILITY MAY HAVE SELF-DISCLOSED – SO CHECK EDISCLOSURES AS WELL IN CDX

On the other hand, if the facility failed to report the chemical at all, in the year in question (yellow header), then only the background is red with no date! See below example.
Again, there could be a reasonable explanation why they did not report – up to you to find out if it was a "woops"

	A	B	C	D	E	F	G	H
	TRIFID	Facility_Name	TRI_Chemical	2013	2014	2015	2016	2017
0	15003HHRBR14THS	CENTRIA	XYLENE (MIXED ISOMERS)	6/26/2014	6/23/2015	7/1/2016	6/30/2017	6/29/2018
1	15003LLGHN231DU	ALLEGHENY PETROLEUM PRODUCTS CO	ZINC COMPOUNDS	6/24/2014	6/16/2015	6/27/2016	6/21/2017	6/22/2018
2	15003WRLDC21CEN	WORLDCLASS PROCESSING CORP	HYDROCHLORIC ACID (1995 AND AFTE	5/9/2014	3/10/2015			
3	15009KMMNF685ST	KMA MANUFACTURING LLC	CHROMIUM	6/25/2014				
4	15009KMMNF685ST	KMA MANUFACTURING LLC	NICKEL	6/25/2014				
5	15009WSTNGONETU	EATON CORP	COPPER	6/30/2014	6/30/2015	6/29/2016	5/5/2017	6/20/2018
6	15009WNLSTL2975D	O'NEAL STEEL INC	MANGANESE	6/30/2014	6/25/2015	6/30/2016	6/21/2017	6/29/2018
7	15010BRGHT51045	BRIGHTON ELECTRIC STEEL CASTING C	CHROMIUM	5/6/2014	4/30/2015			
8	15010BRGHT51045	BRIGHTON ELECTRIC STEEL CASTING C	NICKEL	5/6/2014	4/30/2015			
9	15010LTVST2207T	KEYSTONE PROFILES LTD	CHROMIUM COMPOUNDS(EXCEPT CHR(	6/27/2014	6/26/2015	6/23/2016		
0	15010LTVST2207T	KEYSTONE PROFILES LTD	LEAD COMPOUNDS	6/27/2014	6/26/2015	6/23/2016	6/26/2017	6/28/2018
1	15010LTVST2207T	KEYSTONE PROFILES LTD	NICKEL COMPOUNDS	6/27/2014	6/26/2015	6/23/2016		
2	15010PCDCR44WTH	BEAVER FALLS TUBULAR PRODUCTS LL(	MANGANESE COMPOUNDS	6/20/2014	6/29/2015	6/14/2016	6/9/2017	6/20/2018
3	15010PCDCR44WTH	BEAVER FALLS TUBULAR PRODUCTS LL(	ZINC COMPOUNDS	6/20/2014	6/29/2015	6/14/2016		6/20/2018
4	15012BLLVR200SP	GUTTMAN REALTY CO (DBA BULK TERM	ETHYLBENZENE	6/27/2014	6/25/2015	5/19/2016	5/15/2017	6/19/2018

and talk about those chronic late reports.....

	A	B	C	D	E	F	G	H
1	TRIFID	Facility_Name	TRI_Chemical	2013	2014	2015	2016	2017
823	1566WQNNRG11TEC	AQUION ENERGY INC	MANGANESE COMPOUNDS	7/1/2014	6/25/2015	6/27/2016	6/29/2017	
824	15681BRZND100AE	NORMA PENNSYLVANIA	CHROMIUM					
825	15681BRZND100AE	NORMA PENNSYLVANIA	MANGANESE					
826	15681BRZND100AE	NORMA PENNSYLVANIA	NICKEL					
827	15683BLWKNBRIDG	DURALOY TECHNOLOGIES INC	CHROMIUM	6/16/2014	6/16/2015	6/14/2016	6/20/2017	6/15/2018
828	15683BLWKNBRIDG	DURALOY TECHNOLOGIES INC	MANGANESE	6/16/2014	6/16/2015	6/14/2016	6/20/2017	6/15/2018

0	15697PWRXNHILLI	POWEREX INC	NITRIC ACID	6/30/2014	6/24/2015	6/30/2016	6/30/2017	
1	15698MLLSRCEMET	MAX ENVIRONMENTAL -- YUKON FACILI	ARSENIC COMPOUNDS				6/30/2017	6/21/2018
2	15698MLLSRCEMET	MAX ENVIRONMENTAL -- YUKON FACILI	BARIUM COMPOUNDS					
3	15698MLLSRCEMET	MAX ENVIRONMENTAL -- YUKON FACILI	CHROMIUM COMPOUNDS(EXCEPT CHR(				6/30/2017	
4	15698MLLSRCEMET	MAX ENVIRONMENTAL -- YUKON FACILI	COPPER COMPOUNDS				6/30/2017	6/21/2018
5	15698MLLSRCEMET	MAX ENVIRONMENTAL -- YUKON FACILI	LEAD COMPOUNDS				6/30/2017	6/21/2018
6	15698MLLSRCEMET	MAX ENVIRONMENTAL -- YUKON FACILI	NICKEL COMPOUNDS				6/30/2017	6/21/2018
7	1569WNCDST21LCU	YOUNGWOOD-BWE LLC	ZINC COMPOUNDS				6/22/2017	5/24/2018
8	15701MCCRR1600W	SPECIALTY TIRES OF AMERICA INC	ZINC COMPOUNDS	6/13/2014	6/17/2015	6/10/2016	6/6/2017	6/5/2018
9	15715STRBNMTTCH	STAR IRON WORKS INC	MANGANESE	5/9/2014	5/22/2015	5/13/2016	5/11/2017	5/25/2018

	A	B	C	D	E	F	G	H
1	TRIFID	Facility_Name	TRI_Chemical	2013	2014	2015	2016	2017
12	57005LVRNT1200E	CURT GROUP	MANGANESE	6/19/2014	6/17/2015	6/28/2016	6/26/2017	
13	57005LVRNT1200E	CURT GROUP	NICKEL	6/19/2014	6/17/2015	6/28/2016	6/26/2017	
14	57005TLSHY7ERED	GATES CORP	LEAD	6/23/2014				6/14/2018
15	57005TLSHY7ERED	GATES CORP	MANGANESE					
16	57006DKTRN33132	DAKTRONICS INC	LEAD	6/9/2014	6/24/2015	6/9/2016	6/2/2017	6/20/2018

	A	B	C	D	E	F	G	H
	TRIFID	Facility_Name	TRI_Chemical	2013	2014	2015	2016	2017
7	59025PRNGLAKES	SPRING CREEK COAL LLC	MERCURY COMPOUNDS	6/30/2014				
8	59034HRDNGSUGAR	HARDIN GENERATING STATION	AMMONIA				5/17/2017	
9	59034HRDNGSUGAR	HARDIN GENERATING STATION	BARIUM COMPOUNDS	6/4/2014	5/19/2015	6/30/2016	5/17/2017	4/4/2018
0	59034HRDNGSUGAR	HARDIN GENERATING STATION	COPPER COMPOUNDS	6/4/2014	5/19/2015	6/30/2016	5/17/2017	4/4/2018

	A	B	C	D	E	F	G	H
1	TRIFID	Facility_Name	TRI_Chemical	2013	2014	2015	2016	2017
364	5027WGRLQD252VA	AGROLIQUID - WILLIAMS	MANGANESE COMPOUNDS					
365	5027WGRLQD252VA	AGROLIQUID - WILLIAMS	NITRATE COMPOUNDS				6/6/2017	5/17/2018
366	5027WGRLQD252VA	AGROLIQUID - WILLIAMS	ZINC COMPOUNDS				6/6/2017	
367	50301KMNNDBOX70	KEMIN INDUSTRIES INC	AMMONIA	6/18/2014	6/28/2015	6/30/2016	6/28/2017	6/28/2018
368	50306RMSTR23455	TITAN TIRE CORP	LEAD COMPOUNDS	6/25/2014	6/23/2015	6/27/2016	6/29/2017	6/29/2018

Questions or comments or suggestions, please let me know.

Best week's wishes to everyone,
Mort

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 11/29/2018 5:11:40 PM
To: Milton, Philip [Milton.Philip@epa.gov]
Subject: RE: FYI - Innumerable enforcement targets - Regarding EPCRA 313 ESA's - Chronic Late Reporters - All Regions + Inconsistent Reporting,
Attachments: Copy_Final_Region2_2013_to_2017.xlsx

Here ya go buds – this one is better for I have 2 colors

Green if reported late with date
and
Red if not reported at all – no date showing

6/30/2014	7/1/2015	6/30/2016	6/19/2017	6/28/2018
7/10/2014	6/8/2015			
6/25/2014	6/26/2015	6/23/2016	6/26/2017	7/13/2018
6/18/2014	6/30/2015	6/29/2016	6/30/2017	6/29/2018
6/18/2014				
6/25/2014	6/29/2015	7/1/2016	6/29/2017	
6/25/2014	6/29/2015	7/1/2016	6/29/2017	
3/13/2015	6/29/2015	7/1/2016	6/29/2017	
6/26/2014				
6/26/2014	6/26/2015	6/14/2016	6/28/2017	6/19/2018
6/26/2014	6/26/2015	6/14/2016	6/28/2017	6/19/2018
6/26/2014	6/26/2015	6/14/2016	6/28/2017	6/19/2018

Let me know what else ya might need Phil

Finally got a card for Kath and hope to get into mail today.

Happy Holidays, Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
Compliance Assurance & Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
(214.665.8116)

From: Milton, Philip
Sent: Thursday, November 29, 2018 10:00 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: FW: FYI - Innumerable enforcement targets - Regarding EPCRA 313 ESA's - Chronic Late Reporters - All Regions + Inconsistent Reporting,
Importance: High

Mort –

We had our big OIG meeting today. I committed to providing them a copy of the workbooks you shared with the Regions. I do not intend on sending your email, but rather referencing it in my response to the OIG. I am going to mark the files as Enforcement Confidential and request that they not be released. I noticed that the Region 2 spreadsheet does not appear to have records in the chroniclatereporters tab, do you have that information?

I told the OIG that I would provide the information to them early next week, if you can provide the full Region 2 info that would be great, please don't expend a lot of effort.

V/r

Phil

Philip L. Milton
Chemical Engineer I U.S. Environmental Protection Agency
Office of Enforcement & Compliance Assurance I Office of Civil Enforcement I Waste and Chemical Enforcement Division I Chemical Risk and Reporting Enforcement Branch
1200 Pennsylvania Avenue, NW I Mail Code: 2249A I WJC South Bldg Rm 3124-B I Washington, DC 20460
Milton.philip@epa.gov I phone: 202-564-5029 I fax: 202-564-0010

From: Wakeland, Morton
Sent: Tuesday, September 4, 2018 3:33 PM
To: Milton, Philip <Milton.Philip@epa.gov>; Nowak, April <Nowak.April@epa.gov>; Alkon, Margaret <Alkon.Margaret@epa.gov>; Baranco, Angela <Baranco.Angela@epa.gov>; Basinger, David <Basinger.David@epa.gov>; Blunk, Terri <Blunk.Terri@epa.gov>; Bookman, Robert <Bookman.Robert@epa.gov>; Bussey, Carol <Bussey.Carol@epa.gov>; Caplan, Robert W. <Caplan.Robert@epa.gov>; Chew, Andrew <Chew.Andrew@epa.gov>; Clark, Katherine <Clark.Katherine@epa.gov>; Cobb, David <cobb.david@epa.gov>; Davis, Lauren O. <Davis.LaurenO@epa.gov>; Devito, Steve <Devito.Steve@epa.gov>; Dunn, Meghan <dunn.meghan@epa.gov>; Fudge, Shelley <Fudge.Shelley@epa.gov>; Gilrein, Stephen <gilrein.stephen@epa.gov>; Hamre, Martha <Hamre.Martha@epa.gov>; Kim, David <Kim.David@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Lancaster, Stan <Lancaster.Stan@epa.gov>; Miles, James <miles.james@epa.gov>; Myhre, John <myhre.john@epa.gov>; Nazar, Kristen <Nazar.Kristen@epa.gov>; Ndiaye, Fatimatou <Ndiaye.Fatimatou@epa.gov>; O'Donnell, Mary Jane <Odonnell.Maryjane@epa.gov>; O'Meara, Nidhi <omeara.nidhi@epa.gov>; Parra, Juan <Parra.Juan@epa.gov>; Poole, Vinson <Poole.Vinson@epa.gov>; Potts, Mark <Potts.Mark@epa.gov>; Rascher, Chris <rascher.chris@epa.gov>; Riley, David <riley.david@epa.gov>; Robinson, Janis <Robinson.Janis@epa.gov>; Salazar, Matt <Salazar.Matt@epa.gov>; Salisbury, Demetra <Salisbury.Demetra@epa.gov>; Schulz, Susan <Schulz.Susan@epa.gov>; Seager, Cheryl <Seager.Cheryl@epa.gov>; Senthil, Velu <Senthil.Velu@epa.gov>; Siegal, Tod <Siegal.Tod@epa.gov>; Stuckey, Troy <Stuckey.Troy@epa.gov>; Sullivan, Greg <Sullivan.Greg@epa.gov>; Tekrony, Linda <Tekrony.Linda@epa.gov>; Turk, David <Turk.David@epa.gov>; Velez, Ezequiel <Velez.Ezequiel@epa.gov>; Wakefield, Benjamin J. <wakefield.benjamin@epa.gov>; White, Erika <White.Erika@epa.gov>; Yaras, Michelle <Yaras.Michelle@epa.gov>; Yussen, Craig <Yussen.Craig@epa.gov>; Som, Kushal <som.kushal@epa.gov>; Ramirez, Steven A <ramirez.stevena@epa.gov>; Crossmon, James <Crossmon.James@epa.gov>; Knipschild, Shane <Knipschild.Shane@epa.gov>
Cc: Nelson, Victoria <nelson.victoria@epa.gov>; Werner, Jacqueline <Werner.Jacqueline@epa.gov>; Webster, Daniel <Webster.Daniel@epa.gov>; Pane, Vickie <Pane.Vickie@epa.gov>; Antisdel, Timothy <Antisdel.Timothy@epa.gov>;

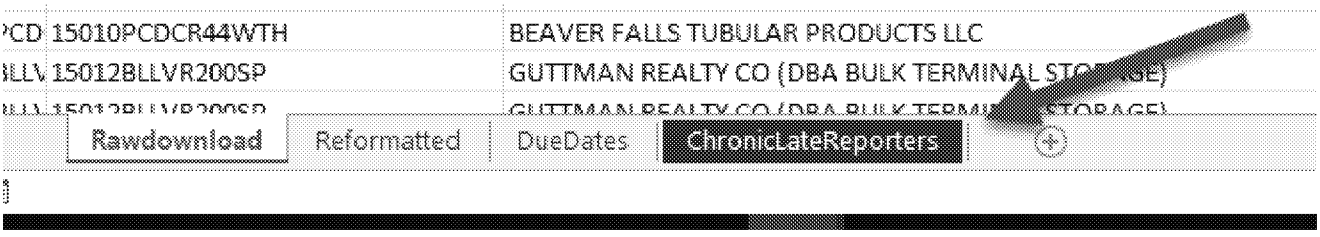
Senthil, Velu <Senthil.Velu@epa.gov>
Subject: FYI - Innumerable enforcement targets - Regarding EPCRA 313 ESA's - Chronic Late Reporters - All Regions + Inconsistent Reporting,
Importance: High

After some "hair pulling," and choice "rice paddy" language, I have been successful in tabulating all unique TRI chemicals ever reported <u>by each facility</u>, <u>in each region</u>, <u>over the most recent 5 consecutive years</u>, i.e., 2013-2017.

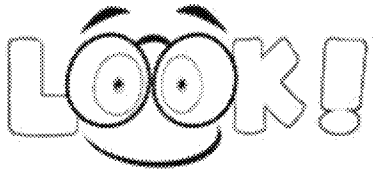
PLEASE SPOT CHECK THE RESULTS – I MAY HAVE MISSED SOMETHING IN THE CODE

You can read the accompanying <u>short</u> explanation of the workbook. Each Region has their own workbook. I'm including all regions in case HQ's wants to analyze all 10 regions.

<u>The last worksheet is what you want!!</u>
(only 4 worksheets in each workbook and they are all named the same, and in same order)



All you have to do is



on the last worksheet!

- **no code to run,**
- **no input boxes to fill in**
- **no formulas to calculate,**
- **no this or that to remember,**
- **just simple "eyeballing."**

The due dates I used are in each workbook, on a worksheet labeled: "DueDates" – hello! :)

The TRIFID, Facility_Name, and TRI_Chemical_Name are in the left-most 3 columns (A, B, C) on the last worksheet: *ChronicLateReporters*

	A	B	C	D	E	F	G	H
	TRIFID	Facility_Name	TRI_Chemical	2013	2014	2015	2016	2017
	15001NTDST1WOOD	US GYPSUM CO	LEAD COMPOUNDS	6/5/2014	6/22/2015	6/29/2016	6/15/2017	
	15001NTDST1WOOD	US GYPSUM CO	MERCURY COMPOUNDS	6/5/2014	6/22/2015	6/29/2016	6/15/2017	
	15001PRCSN2NDER	PRECISION KIDD STEEL CO	CHROMIUM	6/24/2014	6/29/2015	6/29/2016	6/27/2017	6/28/2018
	15001PRCSN2NDER	PRECISION KIDD STEEL CO	LEAD COMPOUNDS	6/24/2014	6/29/2015	6/29/2016	6/27/2017	6/28/2018
	15001PRCSN2NDER	PRECISION KIDD STEEL CO	MANGANESE	6/24/2014	6/29/2015	6/29/2016	6/27/2017	6/28/2018

Each Reporting year is in columns D:H on the last worksheet: *ChronicLateReporters*

SUPER EASY INTERPRETATION…I hope? If not – do please let me know how to improve!

If the facility reported for the chemical, but reported late, the background is red, with the <u>original submission date included!</u> See above example. Always use orig_postmark so you don't make a mistake with a *revision!*

REMEMBER TOO – A FACILITY MAY HAVE SELF-DISCLOSED – SO CHECK EDISCLOSURES AS WELL IN CDX

On the other hand, if the facility failed to report the chemical at all, in the year in question (yellow header), then only the background is red with no date! See below example.
Again, there could be a reasonable explanation why they did not report – up to you to find out if it was a "woops"

	A	B	C	D	E	F	G	H
	TRIFID	Facility_Name	TRI_Chemical	2013	2014	2015	2016	2017
0	15003HHRBR14THS	CENTRIA	XYLENE (MIXED ISOMERS)	6/26/2014	6/23/2015	7/1/2016	6/30/2017	6/29/2018
1	15003LLGHN231DU	ALLEGHENY PETROLEUM PRODUCTS CC	ZINC COMPOUNDS	6/24/2014	6/16/2015	6/27/2016	6/21/2017	6/22/2018
2	15003WRLDC21CEN	WORLDCLASS PROCESSING CORP	HYDROCHLORIC ACID (1995 AND AFTE	5/9/2014	3/10/2015			
3	15009KMMNF685ST	KMA MANUFACTURING LLC	CHROMIUM	6/25/2014				
4	15009KMMNF685ST	KMA MANUFACTURING LLC	NICKEL	6/25/2014				
5	15009WSTNGONETU	EATON CORP	COPPER	6/30/2014	6/30/2015	6/29/2016	5/5/2017	6/20/2018
6	15009WNLSTL2975D	O'NEAL STEEL INC	MANGANESE	6/30/2014	6/25/2015	6/30/2016	6/21/2017	6/29/2018
7	15010BRGHT51045	BRIGHTON ELECTRIC STEEL CASTING C	CHROMIUM	5/6/2014	4/30/2015			
8	15010BRGHT51045	BRIGHTON ELECTRIC STEEL CASTING C	NICKEL	5/6/2014	4/30/2015			
9	15010LTVST2207T	KEYSTONE PROFILES LTD	CHROMIUM COMPOUNDS(EXCEPT CHR(	6/27/2014	6/26/2015	6/23/2016		
0	15010LTVST2207T	KEYSTONE PROFILES LTD	LEAD COMPOUNDS	6/27/2014	6/26/2015	6/23/2016	6/26/2017	6/28/2018
1	15010LTVST2207T	KEYSTONE PROFILES LTD	NICKEL COMPOUNDS	6/27/2014	6/26/2015	6/23/2016		
2	15010PCDCR44WTH	BEAVER FALLS TUBULAR PRODUCTS LL(	MANGANESE COMPOUNDS	6/20/2014	6/29/2015	6/14/2016	6/9/2017	6/20/2018
3	15010PCDCR44WTH	BEAVER FALLS TUBULAR PRODUCTS LL(	ZINC COMPOUNDS	6/20/2014	6/29/2015	6/14/2016		6/20/2018
4	15012BLLVR200SP	GUTTMAN REALTY CO (DBA BULK TERM	ETHYLBENZENE	6/27/2014	6/25/2015	5/19/2016	5/15/2017	6/19/2018

and talk about those chronic late reports…..

	A	B	C	D	E	F	G	H	I
1	TRIFID	Facility_Name	TRI_Chemical	2013	2014	2015	2016	2017	
823	1566WQNNRG11TEC	AQUION ENERGY INC	MANGANESE COMPOUNDS	7/1/2014	6/25/2015	6/27/2016	6/29/2017		
824	15681BRZND100AE	NORMA PENNSYLVANIA	CHROMIUM						
825	15681BRZND100AE	NORMA PENNSYLVANIA	MANGANESE						
826	15681BRZND100AE	NORMA PENNSYLVANIA	NICKEL						
827	15683BLWKNBRIDG	DURALOY TECHNOLOGIES INC	CHROMIUM	6/16/2014	6/16/2015	6/14/2016	6/20/2017	6/15/2018	
828	15683BLWKNBRIDG	DURALOY TECHNOLOGIES INC	MANGANESE	6/16/2014	6/16/2015	6/14/2016	6/20/2017	6/15/2018	

9	15697PWRXNHILLI	POWEREX INC	NITRIC ACID	6/30/2014	6/24/2015	6/30/2016	6/30/2017	[redacted]
1	15698MLLSRCEMET	MAX ENVIRONMENTAL -- YUKON FACILI	ARSENIC COMPOUNDS	[redacted]			6/30/2017	6/21/2018
2	15698MLLSRCEMET	MAX ENVIRONMENTAL -- YUKON FACILI	BARIUM COMPOUNDS	[redacted]				
3	15698MLLSRCEMET	MAX ENVIRONMENTAL -- YUKON FACILI	CHROMIUM COMPOUNDS(EXCEPT CHR	[redacted]			6/30/2017	[redacted]
4	15698MLLSRCEMET	MAX ENVIRONMENTAL -- YUKON FACILI	COPPER COMPOUNDS	[redacted]			6/30/2017	6/21/2018
5	15698MLLSRCEMET	MAX ENVIRONMENTAL -- YUKON FACILI	LEAD COMPOUNDS	[redacted]			6/30/2017	6/21/2018
6	15698MLLSRCEMET	MAX ENVIRONMENTAL -- YUKON FACILI	NICKEL COMPOUNDS	[redacted]			6/30/2017	6/21/2018
7	1569WNCDST21LCU	YOUNGWOOD-BWE LLC	ZINC COMPOUNDS	[redacted]			6/22/2017	5/24/2018
8	15701MCCRR1600W	SPECIALTY TIRES OF AMERICA INC	ZINC COMPOUNDS	6/13/2014	6/17/2015	6/10/2016	6/6/2017	6/5/2018
9	15715STRBNMITCH	STAR IRON WORKS INC	MANGANESE	5/9/2014	5/22/2015	5/13/2016	5/11/2017	5/25/2018

	A	B	C	D	E	F	G	H	I
1	TRIFID	Facility_Name	TRI_Chemical	2013	2014	2015	2016	2017	
32	57005LVRNT1200E	CURT GROUP	MANGANESE	6/19/2014	6/17/2015	6/28/2016	6/26/2017	[redacted]	
33	57005LVRNT1200E	CURT GROUP	NICKEL	6/19/2014	6/17/2015	6/28/2016	6/26/2017	[redacted]	
34	57005TLSHY7ERED	GATES CORP	LEAD	6/23/2014	[redacted]			6/14/2018	
35	57005TLSHY7ERED	GATES CORP	MANGANESE	[redacted]					
36	57006DKTRN33132	DAKTRONICS INC	LEAD	6/9/2014	6/24/2015	6/9/2016	6/2/2017	6/20/2018	

	A	B	C	D	E	F	G	H
17	TRIFID	Facility_Name	TRI_Chemical	2013	2014	2015	2016	2017
18	59025SPRNGLAKES	SPRING CREEK COAL LLC	MERCURY COMPOUNDS	6/30/2014	[redacted]			
19	59034HRDNGSUGAR	HARDIN GENERATING STATION	AMMONIA	[redacted]			5/17/2017	[redacted]
20	59034HRDNGSUGAR	HARDIN GENERATING STATION	BARIUM COMPOUNDS	6/4/2014	5/19/2015	6/30/2016	5/17/2017	4/4/2018
21	59034HRDNGSUGAR	HARDIN GENERATING STATION	COPPER COMPOUNDS	6/4/2014	5/19/2015	6/30/2016	5/17/2017	4/4/2018

	A	B	C	D	E	F	G	H	I
364	TRIFID	Facility_Name	TRI_Chemical	2013	2014	2015	2016	2017	
365	5027WGRLQD252VA	AGROLIQUID - WILLIAMS	MANGANESE COMPOUNDS	[redacted]					
366	5027WGRLQD252VA	AGROLIQUID - WILLIAMS	NITRATE COMPOUNDS	[redacted]			6/6/2017	5/17/2018	
367	5027WGRLQD252VA	AGROLIQUID - WILLIAMS	ZINC COMPOUNDS	[redacted]			6/6/2017	[redacted]	
368	50301KMNNDBOX70	KEMIN INDUSTRIES INC	AMMONIA	6/18/2014	6/26/2015	6/30/2016	6/26/2017	6/28/2018	
369	50306RMSTR23455F	TITAN TIRE CORP	LEAD COMPOUNDS	6/26/2014	6/23/2015	6/27/2016	6/29/2017	6/29/2018	

Questions or comments or suggestions, please let me know.

Best week's wishes to everyone,
Mort

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 9/10/2018 7:09:21 PM
To: Timsina, Gopal [Timsina.Gopal@epa.gov]
Subject: Here you go Gopal
Attachments: A_Code_For_Chronic_Late_Reporters.xlsm; Test-on-Region4.xlsx; Easier_Methodology_Chronic_LateReporters.docx

Importance: High

Text write-up
Code workbook
Test workbook

Read Text first. If questions let me know.

Again, this is for TRI data from EZ-Query (Envirofacts – Flat Files) but can be adjusted for other databases.

Best always and have a super week,
Mort

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 8/16/2017 6:00:01 PM
To: Bernota, Carolyn [Bernota.Carolyn@epa.gov]
Subject: FW: From Mort Wakeland, EPA Region 6
Attachments: NON CBI 2016 CDR EMAIL.xlsx

Carolyn

Hope you are doing fine today...

If OK, may I ask you a question?

Is this the current list of non-CBI TSCA chemicals? If so the CRD = Public TSCA Inventory?

I keep reading there are 60,000+ chemicals but unclear if that is all TSCA chemicals (public + CBI) or just public.

the worksheet only has 40,000+ chemicals

thanks
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Timsina, Gopal
Sent: Monday, July 17, 2017 11:27 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: From Mort Wakeland, EPA Region 6

Mort:
Please see the 2016 CDR Public Report. Please let me know if you have any questions.

Thank you
Gopal

From: George, Verne
Sent: Monday, July 17, 2017 9:03 AM

To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: Timsina, Gopal <Timsina.Gopal@epa.gov>
Subject: RE: From Mort Wakeland, EPA Region 6

Morton

I will not be attending. Contact Gopal for information on the TSCA Inventory in excel.

From: Wakeland, Morton
Sent: Monday, July 17, 2017 8:40 AM
To: George, Verne <George.Verne@epa.gov>
Subject: FW: From Mort Wakeland, EPA Region 6
Importance: High

Verne are you going to this training if Philly?
Think it would be worth me going to?

Thanks for your comments.

Just downloaded the Compliance Monitoring Strategy – gonna begin reading.
What else do you recommend for me to do?

Oh, wanted to asked is the public TSCA inventory available in Excel format??
If so do you have a link.

Best week's wishes and again thanks for all your help.

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Bean, Mark
Sent: Tuesday, July 11, 2017 9:20 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Pelletier, Valarie <pelletier.valarie@epa.gov>
Cc: Schulz, Susan <Schulz.Susan@epa.gov>
Subject: RE: From Mort Wakeland, EPA Region 6

Hey Mort

Attached is the draft agenda. It will most likely end up being the final but should be sufficient. Hope you can make it.

Mark

Mark Bean

U.S. Environmental Protection Agency – Region 2
Pesticides & Toxic Substances Branch
2890 Woodbridge Avenue
Edison, NJ 08837
Phone: 732-321-6606; Fax: 732-321-6788

From: Wakeland, Morton
Sent: Tuesday, July 11, 2017 9:57 AM
To: Bean, Mark <Bean.Mark@epa.gov>
Subject: RE: From Mort Wakeland, EPA Region 6

Good Morning Mark

Before I request – might you provide an agenda for the training?

Will it deal solely with core TSCA or other aspects of TSCA?

As much info as you can provide will help me justify...

thanks much,
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Bean, Mark
Sent: Friday, July 07, 2017 12:02 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: From Mort Wakeland, EPA Region 6

Mort

I'm conducting an intensive training in Philadelphia Aug. 1-3 if you can make it. It's at the EPA building 1650 Arch St.

Mark Bean
U.S. Environmental Protection Agency – Region 2
Pesticides & Toxic Substances Branch
2890 Woodbridge Avenue
Edison, NJ 08837
Phone: 732-321-6606; Fax: 732-321-6788

From: Wakeland, Morton
Sent: Wednesday, May 03, 2017 11:06 AM

To: Bean, Mark <Bean.Mark@epa.gov>
Cc: George, Verne <George.Verne@epa.gov>; Walker, Yolaanda <Walker.Yolaanda@epa.gov>; Bernota, Carolyn <Bernota.Carolyn@epa.gov>; Brewer, Eric <Brewer.Eric@epa.gov>; Moseley, Pamela <Moseley.Pamela@epa.gov>; Schulz, Susan <Schulz.Susan@epa.gov>
Subject: RE: From Mort Wakeland, EPA Region 6

wow...thanks much Mark...

OK, will get on the training right away by studying the CBI TSCA Training manual.

I work with and have known Chris Rascher up there as well as Dwight Peavy up there in 2 under EPCRA 313, aka
Toxic Release Inventory Reporting.

Am hoping I can get a better feel for "tha core" as I'm lost at the moment – smile.

Thanks for helping and all the links – will be useful!!!
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Bean, Mark
Sent: Wednesday, May 03, 2017 9:12 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: George, Verne <George.Verne@epa.gov>; Walker, Yolaanda <Walker.Yolaanda@epa.gov>; Bernota, Carolyn <Bernota.Carolyn@epa.gov>; Brewer, Eric <Brewer.Eric@epa.gov>; Moseley, Pamela <Moseley.Pamela@epa.gov>; Schulz, Susan <Schulz.Susan@epa.gov>
Subject: RE: From Mort Wakeland, EPA Region 6

Hi Mort –Welcome to Core. I'm happy to assist in whatever way I can. Don't worry about the initial confusion your experiencing. It clears up for two days every weekend.

I didn't find your name on the most recent TSCA CBI cleared list. You will need to read the TSCA CBI manual, fill out EPA form 7740-6, and send a scan of it to Pam Moseley in HQ to obtain clearance.

Obtaining your credential for Core TSCA inspector under EPA 1500.1 is going to be a logistical issue for OJT. My Section Chief is Susan Schulz. Have your supervisor contact her if you want to observe any inspections in R2.

Once credentialed and CBI cleared, you may want to speak with Verne George in Region 4. He's a long-time Core inspector and they are using IRLs to conduct some inspections in lieu of 'boots on the ground'. Yolaanda Walker in HQ can help you with ACE/ITDS. Also, identify yourself to Carolyn Bernota to get on the practitioners group email list. And,

you will need to have your TSCA DCO request a 2016 CDR targeting cd from Eric Brewer (if he is still the right contact) when it becomes available.

In the meantime, I recommend the following bookmarks:

https://www.federalregister.gov/
https://ssoprod.epa.gov/sso/jsp/ICIS_Login.jsp
https://www.ecfr.gov/cgi-bin/ECFR?page=browse
https://java.epa.gov/oppt_chemical_search/
https://www.epa.gov/sites/production/files/documents/erp8_12r.pdf
https://www.epa.gov/sites/production/files/2016-06/documents/amendedtscasection5-erp.pdf
https://www.epa.gov/tsca-import-export-requirements
https://www.epa.gov/tsca-inventory/how-access-tsca-inventory#download
https://www.epa.gov/ejscreen
https://www.epa.gov/sites/production/files/documents/tscasec4ruleserp-052886.pdf
https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/sunset-dates-chemicals-subject-final-tsca-section-4-test
https://www3.epa.gov/enviro/facts/multisystem.html
https://www.usitc.gov/tata/hts/index.htm
https://www.census.gov/eos/www/naics/

Best of luck. Feel free to contact me with any questions.

Regards,

Mark

Mark Bean
U.S. Environmental Protection Agency – Region 2
Pesticides & Toxic Substances Branch
2890 Woodbridge Avenue
Edison, NJ 08837
Phone: 732-321-6606; Fax: 732-321-6788

From: Wakeland, Morton
Sent: Tuesday, May 02, 2017 8:57 AM
To: Bean, Mark <Bean.Mark@epa.gov>
Subject: From Mort Wakeland, EPA Region 6
Importance: High

Good Tuesday Morn Mark!

I reviewed my Case Development Training Schedule and saw you were a presenter of TSCA. Wish I had known back then Region 6 would be
taking on *core TSCA* and that it would be falling into moi's lap. I've overseen the EPCRA 313 / TRI Programs for the past 23 years for Region 6,
so this is going to be a whole new ball game for me.

Any assistance you may offer in how best to approach learning & implementing this law would be most appreciated. Again, I'm told of the different parts of TSCA,

I shall only be implementing the *core TSCA part*. I think(?) this is referred to as the *new and existing chemicals part*. Right now, the more I read,
the more confusing it is to me due to all the different parts or *core TSCA*, e.g., *premanufacturing rules, significant new use rules, assume there are more?*

Thanks again Mark for your helpfulness.
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 8/16/2017 5:51:10 PM
To: Dunn, Meghan [dunn.meghan@epa.gov]
Subject: FW: From Mort Wakeland, EPA Region 6
Attachments: NON CBI 2016 CDR EMAIL.xlsx

Is this the chem list Meg?

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Timsina, Gopal
Sent: Monday, July 17, 2017 11:27 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: From Mort Wakeland, EPA Region 6

Mort:
Please see the 2016 CDR Public Report. Please let me know if you have any questions.

Thank you
Gopal

From: George, Verne
Sent: Monday, July 17, 2017 9:03 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: Timsina, Gopal <Timsina.Gopal@epa.gov>
Subject: RE: From Mort Wakeland, EPA Region 6

Morton

I will not be attending. Contact Gopal for information on the TSCA Inventory in excel.

From: Wakeland, Morton
Sent: Monday, July 17, 2017 8:40 AM
To: George, Verne <George.Verne@epa.gov>
Subject: FW: From Mort Wakeland, EPA Region 6
Importance: High

Verne are you going to this training if Philly?
Think it would be worth me going to?

Thanks for your comments.

Just downloaded the Compliance Monitoring Strategy – gonna begin reading.
What else do you recommend for me to do?

Oh, wanted to asked is the public TSCA inventory available in Excel format??
If so do you have a link.

Best week's wishes and again thanks for all your help.

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Bean, Mark
Sent: Tuesday, July 11, 2017 9:20 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Pelletier, Valarie <pelletier.valarie@epa.gov>
Cc: Schulz, Susan <Schulz.Susan@epa.gov>
Subject: RE: From Mort Wakeland, EPA Region 6

Hey Mort

Attached is the draft agenda. It will most likely end up being the final but should be sufficient. Hope you can make it.

Mark

Mark Bean
U.S. Environmental Protection Agency – Region 2
Pesticides & Toxic Substances Branch
2890 Woodbridge Avenue
Edison, NJ 08837
Phone: 732-321-6606; Fax: 732-321-6788

From: Wakeland, Morton
Sent: Tuesday, July 11, 2017 9:57 AM
To: Bean, Mark <Bean.Mark@epa.gov>
Subject: RE: From Mort Wakeland, EPA Region 6

Good Morning Mark

Before I request – might you provide an agenda for the training?

Will it deal solely with core TSCA or other aspects of TSCA?

As much info as you can provide will help me justify...

thanks much,
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Bean, Mark
Sent: Friday, July 07, 2017 12:02 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: From Mort Wakeland, EPA Region 6

Mort

I'm conducting an intensive training in Philadelphia Aug. 1-3 if you can make it. It's at the EPA building 1650 Arch St.

Mark Bean
U.S. Environmental Protection Agency – Region 2
Pesticides & Toxic Substances Branch
2890 Woodbridge Avenue
Edison, NJ 08837
Phone: 732-321-6606; Fax: 732-321-6788

From: Wakeland, Morton
Sent: Wednesday, May 03, 2017 11:06 AM
To: Bean, Mark <Bean.Mark@epa.gov>
Cc: George, Verne <George.Verne@epa.gov>; Walker, Yolaanda <Walker.Yolaanda@epa.gov>; Bernota, Carolyn <Bernota.Carolyn@epa.gov>; Brewer, Eric <Brewer.Eric@epa.gov>; Moseley, Pamela <Moseley.Pamela@epa.gov>; Schulz, Susan <Schulz.Susan@epa.gov>
Subject: RE: From Mort Wakeland, EPA Region 6

wow...thanks much Mark....

OK, will get on the training right away by studying the CBI TSCA Training manual.

I work with and have known Chris Rascher up there as well as Dwight Peavy up there in 2 under EPCRA 313, aka
Toxic Release Inventory Reporting.

Am hoping I can get a better feel for "tha core" as I'm lost at the moment – smile.

Thanks for helping and all the links – will be useful!!!
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Bean, Mark
Sent: Wednesday, May 03, 2017 9:12 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: George, Verne <George.Verne@epa.gov>; Walker, Yolaanda <Walker.Yolaanda@epa.gov>; Bernota, Carolyn <Bernota.Carolyn@epa.gov>; Brewer, Eric <Brewer.Eric@epa.gov>; Moseley, Pamela <Moseley.Pamela@epa.gov>; Schulz, Susan <Schulz.Susan@epa.gov>
Subject: RE: From Mort Wakeland, EPA Region 6

Hi Mort –Welcome to Core. I'm happy to assist in whatever way I can. Don't worry about the initial confusion your experiencing. It clears up for two days every weekend.

I didn't find your name on the most recent TSCA CBI cleared list. You will need to read the TSCA CBI manual, fill out EPA form 7740-6, and send a scan of it to Pam Moseley in HQ to obtain clearance.

Obtaining your credential for Core TSCA inspector under EPA 1500.1 is going to be a logistical issue for OJT. My Section Chief is Susan Schulz. Have your supervisor contact her if you want to observe any inspections in R2.

Once credentialed and CBI cleared, you may want to speak with Verne George in Region 4. He's a long-time Core inspector and they are using IRLs to conduct some inspections in lieu of 'boots on the ground'. Yolaanda Walker in HQ can help you with ACE/ITDS. Also, identify yourself to Carolyn Bernota to get on the practitioners group email list. And, you will need to have your TSCA DCO request a 2016 CDR targeting cd from Eric Brewer (if he is still the right contact) when it becomes available.

In the meantime, I recommend the following bookmarks:

https://www.federalregister.gov/
https://ssoprod.epa.gov/sso/jsp/ICIS_Login.jsp
https://www.ecfr.gov/cgi-bin/ECFR?page=browse
https://java.epa.gov/oppt_chemical_search/
https://www.epa.gov/sites/production/files/documents/erp8_12r.pdf
https://www.epa.gov/sites/production/files/2016-06/documents/amendedtscasection5-erp.pdf
https://www.epa.gov/tsca-import-export-requirements
https://www.epa.gov/tsca-inventory/how-access-tsca-inventory#download
https://www.epa.gov/ejscreen
https://www.epa.gov/sites/production/files/documents/tscasec4ruleserp-052886.pdf
https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/sunset-dates-chemicals-subject-final-tsca-section-4-test

https://www3.epa.gov/enviro/facts/multisystem.html
https://www.usitc.gov/tata/hts/index.htm
https://www.census.gov/eos/www/naics/

Best of luck. Feel free to contact me with any questions.

Regards,

Mark

Mark Bean
U.S. Environmental Protection Agency – Region 2
Pesticides & Toxic Substances Branch
2890 Woodbridge Avenue
Edison, NJ 08837
Phone: 732-321-6606; Fax: 732-321-6788

From: Wakeland, Morton
Sent: Tuesday, May 02, 2017 8:57 AM
To: Bean, Mark <Bean.Mark@epa.gov>
Subject: From Mort Wakeland, EPA Region 6
Importance: High

Good Tuesday Morn Mark!

I reviewed my Case Development Training Schedule and saw you were a presenter of TSCA. Wish I had known back then Region 6 would be taking on *core TSCA* and that it would be falling into moi's lap. I've overseen the EPCRA 313 / TRI Programs for the past 23 years for Region 6, so this is going to be a whole new ball game for me.

Any assistance you may offer in how best to approach learning & implementing this law would be most appreciated. Again, I'm told of the different parts of TSCA, I shall only be implementing the *core TSCA part*. I think(?) this is referred to as the *new and existing chemicals part*. Right now, the more I read, the more confusing it is to me due to all the different parts or *core TSCA*, e.g., *premanufacturing rules, significant new use rules, assume there are more?*

Thanks again Mark for your helpfulness.
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division

Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 6/6/2017 5:41:03 PM
To: Russell.Hatton@vitalyst.com
Subject: Me thinks I found it Russ
Attachments: TestFor_Russ.xlsm

Importance: High

Hope you can follow my ramblings

Works after revision I think, however, this code takes like 2+ minutes and dat's a long time!!! Could be 3+?

Remember yesterday I said I had no clue why

If the 1st group of data is A:E

```
Sub LineUpMultiColumns()

Dim lCounter As Long

lCounter = 2 'set this to the first row number

'All C's = F's
'All E's = J's
'All B's = D's
'Assumes data are grouped in columns A,B,C,D,E
'And F,G,H,I,J
'Test for likeness is on A and F

Do While Range("A" & lCounter).Value <> "" And Range("F" & lCounter).Value <> ""
    If Range("A" & lCounter).Value <> Range("F" & lCounter) Then
        If Range("A" & lCounter).Value < Range("F" & lCounter) Then
            Range("F" & lCounter & ":J" & lCounter).Insert Shift:=xlDown
        Else
            Range("A" & lCounter & ":D" & lCounter).Insert Shift:=xlDown
        End If
    End If
lCounter = lCounter + 1
Loop
End Sub

Sub LineUp_Three_Columns()
```

Why the last part of the code, after the Else, is only A:D

I think maybe I altered this code WITHOUT EDITING THE COMMENT STATEMENT
The comment statement should have read....

```
'All C's = F's
'All E's = J's
'All B's = D's
'Assumes data are grouped in columns A,B,C,D,
'And F,G,H,I,J
'Test for likeness is on A and F

Do While Range("A" & lCounter).Value <> "" And Rang
```

Once you think about it...you have to move the entire data set –

If columns A, B, C, D, E make up 2014
F, G, H, I, J make up 2015

You have to move up and down A:E and F:J if you want them to align across from one another

when I only moved A and B, row C stayed put – God I'm a dummy....

Valero has 2 more chemicals reported in 2015 than 2014
After running the BAD code

	A	B	C	D	E	F
1	COMBINED COLUMN(S)[4]	TECH EMAIL	TOTAL WATER[4]	COMBINED COLUMN(S)[5]	TECH EMAIL	TOTAL WATER
118	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCNICKEL COMPOUNDS	ANDRE.MARQUETTE@VALERO.COM	5	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCNICKEL COMPOUNC	ANDRE.MARQUETTE@VALERO.COM	
119	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCNITRATE COMPOUNDS	ANDRE.MARQUETTE@VALERO.COM	1903	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCNITRATE COMPOUN	ANDRE.MARQUETTE@VALERO.COM	
121			31	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCPHENANTHRENE	ANDRE.MARQUETTE@VALERO.COM	
122	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCPHENOL	ANDRE.MARQUETTE@VALERO.COM	6	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCPHENOL	ANDRE.MARQUETTE@VALERO.COM	
123	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCPOLYCYCLIC AROMATIC COMP	ANDRE.MARQUETTE@VALERO.COM	7	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCPOLYCYCLIC AROMA	ANDRE.MARQUETTE@VALERO.COM	
124	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCPROPYLENE	ANDRE.MARQUETTE@VALERO.COM	0	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCPROPYLENE	ANDRE.MARQUETTE@VALERO.COM	
125			11013	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCSTYRENE	ANDRE.MARQUETTE@VALERO.COM	
126	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCSULFURIC ACID (1994 AND AFT	ANDRE.MARQUETTE@VALERO.COM	17	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCSULFURIC ACID (19	ANDRE.MARQUETTE@VALERO.COM	

The chemicals align perfectly the reasons there are blanks in A,
row 121 and 125 is that Valero did not report for
70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCPHENANTHRENE
or
70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCSTYRENE

in 2014!!
But we see there are numbers in column C implying Valero reported for these chemicals in 2014 but that
is impossible.....

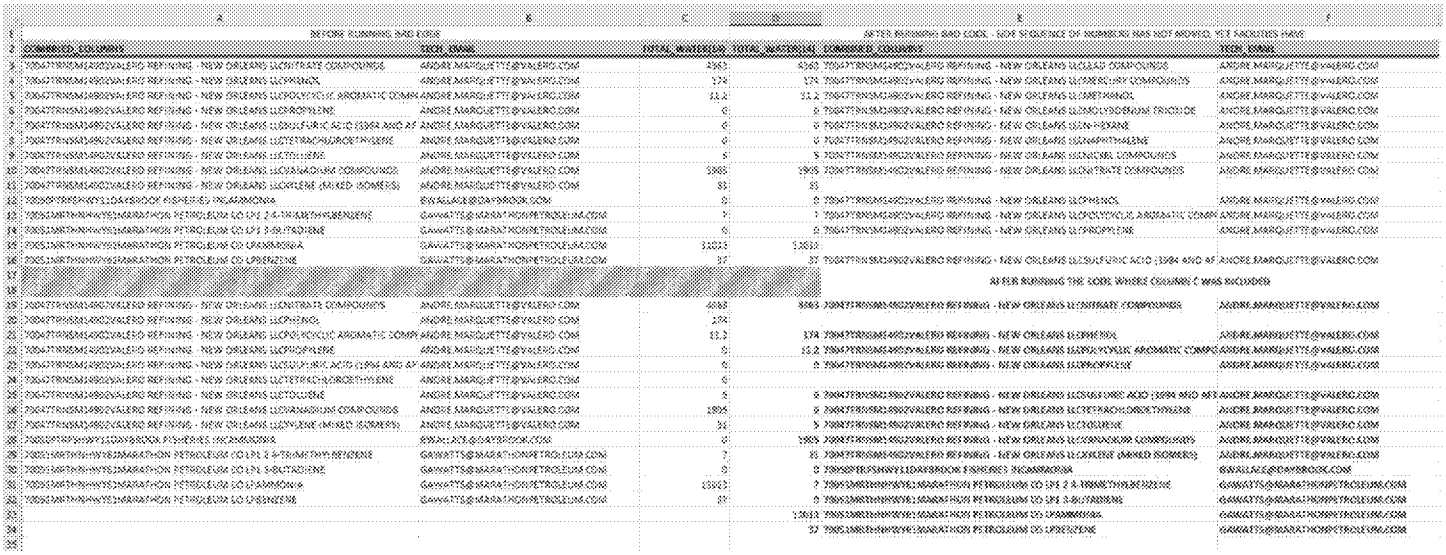
if we look at the original list of Valero chemicals, before running code, we see that the 31 and 11013 are associated with these companies/chemicals:

	A	B	C	
1	COMBINED_COLUMNS	TECH_EMAIL	TOTAL_WATER(14)	COMBINED
110	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCN-HEXANE	ANDRE.MARQUETTE@VALERO.COM	5	70047TRNS
111	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCNAPHTHALENE	ANDRE.MARQUETTE@VALERO.COM	5	70047TRNS
112	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCNICKEL COMPOUNDS	ANDRE.MARQUETTE@VALERO.COM	0	70047TRNS
113	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCNITRATE COMPOUNDS	ANDRE.MARQUETTE@VALERO.COM	4363	70047TRNS
114	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCPHENOL	ANDRE.MARQUETTE@VALERO.COM	174	70047TRNS
115	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCPOLYCYCLIC AROMATIC COMP	ANDRE.MARQUETTE@VALERO.COM	11.2	70047TRNS
116	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCPROPYLENE	ANDRE.MARQUETTE@VALERO.COM	0	70047TRNS
117	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCSULFURIC ACID (1994 AND AFT	ANDRE.MARQUETTE@VALERO.COM	0	70047TRNS
118	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCTETRACHLOROETHYLENE	ANDRE.MARQUETTE@VALERO.COM	0	70047TRNS
119	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCTOLUENE	ANDRE.MARQUETTE@VALERO.COM	5	70047TRNS
120	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCVANADIUM COMPOUNDS	ANDRE.MARQUETTE@VALERO.COM	1905	70047TRNS
121	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCXYLENE (MIXED ISOMERS)	ANDRE.MARQUETTE@VALERO.COM	31	70047TRNS
122	70050PTRFSHWY11DAYBROOK FISHERIES INCAMMONIA	BWALLACE@DAYBROOK.COM	0	70047TRNS
123	70051MRTHNHWY61MARATHON PETROLEUM CO LP1 2 4-TRIMETHYLBENZENE	GAWATTS@MARATHONPETROLEUM.COM	7	70050PTRF
124	70051MRTHNHWY61MARATHON PETROLEUM CO LP1 3-BUTADIENE	GAWATTS@MARATHONPETROLEUM.COM	0	70051MRTH
125	70051MRTHNHWY61MARATHON PETROLEUM CO LPAMMONIA	GAWATTS@MARATHONPETROLEUM.COM	11013	70051MRTH
126	70051MRTHNHWY61MARATHON PETROLEUM CO LPBENZENE	GAWATTS@MARATHONPETROLEUM.COM	37	70051MRTH
127	70051MRTHNHWY61MARATHON PETROLEUM CO LPBENZO(G H I)PERYLENE	GAWATTS@MARATHONPETROLEUM.COM	37.4	70051MRTH

Note that the sequence of the numbers for 2014 has not changed from 2014 before code
to 2014 after code CAUSE I DID NOT INCLUDE COLUMN C, for the #'s, IN THE CODE
However the facilty (A) and emails (B) did move cause those columns were in the code.

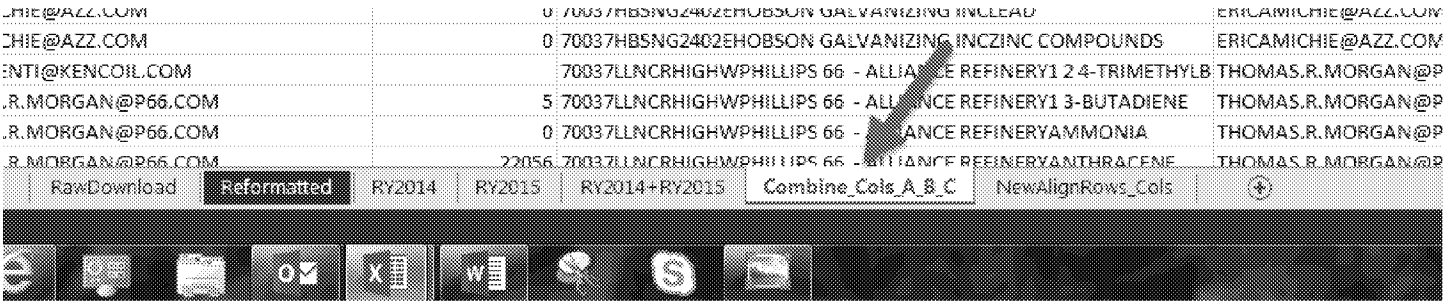
	A	B	C	D	E	F	G
1	BEFORE RUNNING BAD CODE				AFTER RUNNING BAD CODE - NOT BECAUSE OF NUMBERS THAT MOVED, BUT FIGURES THAT		
2	COMBINED_COLUMNS	TECH_EMAIL	TOTAL_WATER(14)	TOTAL_WATER(14)	COMBINED_COLUMNS	TECH_EMAIL	
3	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCNITRATE COMPOUNDS	ANDRE.MARQUETTE@VALERO.COM	4363	4363	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCLEAD COMPOUNDS	ANDRE.MARQUETTE@VALERO.COM	
4	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCPHENOL	ANDRE.MARQUETTE@VALERO.COM	174	174	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCMERCURY COMPOUNDS	ANDRE.MARQUETTE@VALERO.COM	
5	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCPOLYCYCLIC AROMATIC COMP	ANDRE.MARQUETTE@VALERO.COM	11.2	11.2	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCBETHANOL	ANDRE.MARQUETTE@VALERO.COM	
6	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCPROPYLENE	ANDRE.MARQUETTE@VALERO.COM	0	0	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCMOLYBDENUM TRIOXIDE	ANDRE.MARQUETTE@VALERO.COM	
7	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCSULFURIC ACID (1994 AND AF	ANDRE.MARQUETTE@VALERO.COM	0	0	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCN-HEXANE	ANDRE.MARQUETTE@VALERO.COM	
8	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCTETRACHLOROETHYLENE	ANDRE.MARQUETTE@VALERO.COM	0	0	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCNAPHTHALENE	ANDRE.MARQUETTE@VALERO.COM	
9	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCTOLUENE	ANDRE.MARQUETTE@VALERO.COM	5	5	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCNICKEL COMPOUNDS	ANDRE.MARQUETTE@VALERO.COM	
10	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCVANADIUM COMPOUNDS	ANDRE.MARQUETTE@VALERO.COM	1905	1905	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCNITRATE COMPOUNDS	ANDRE.MARQUETTE@VALERO.COM	
11	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCXYLENE (MIXED ISOMERS)	ANDRE.MARQUETTE@VALERO.COM	31	31			
12	70050PTRFSHWY11DAYBROOK FISHERIES INCAMMONIA	BWALLACE@DAYBROOK.COM	0	0	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCPHENOL	ANDRE.MARQUETTE@VALERO.COM	
13	70051MRTHNHWY61MARATHON PETROLEUM CO LP1 2 4-TRIMETHYLBENZENE	GAWATTS@MARATHONPETROLEUM.COM	7	7	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCPOLYCYCLIC AROMATIC COMP	ANDRE.MARQUETTE@VALERO.COM	
14	70051MRTHNHWY61MARATHON PETROLEUM CO LP1 3-BUTADIENE	GAWATTS@MARATHONPETROLEUM.COM	0	0	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCPROPYLENE	ANDRE.MARQUETTE@VALERO.COM	
15	70051MRTHNHWY61MARATHON PETROLEUM CO LPAMMONIA	GAWATTS@MARATHONPETROLEUM.COM	11013	11013			
16	70051MRTHNHWY61MARATHON PETROLEUM CO LPBENZENE	GAWATTS@MARATHONPETROLEUM.COM	37	37	70047TRNSM14902VALERO REFINING - NEW ORLEANS LLCSULFURIC ACID (1994 AND AF	ANDRE.MARQUETTE@VALERO.COM	
17							
18							
19							
20							

After editing the code to include column C



HOWEVER, need to find a faster way to do this – any ideas?

The attached workbook has the data sheet to operate on



The results of running the code (Line_Up_Three_Columns) is found on last worksheet: NewAlignRows_Cols

Code Matches Column A to Column D
Column A = A&B&C from 2014
Column D = A&B&C from 2015

Before concatenating – the data is sorted first by year, then by TRIFID, then by chemical name

In both years 2014 and 2015
A = Toxic Release Inventory (TRI) Facility Identification Number = TRIFID
B = the facility name
C = the TRI chemical reported

TRIFID	Facility_Name	Chemical_Name
70037CHVRNHIGHW	CHEVRON ORONITE CO LLC	HYDROGEN SULFIDE

Because not every chemical is reported every year one has to adjust the the chemical/year
up and down to align the rows – whole purpose of this exercise to compare one year to another
Eventually would like to compare up to 5 years, now it just two.

If I chemical is not reported in one year or the other, that equates to a blank cell after running code, not row, for it was reported in the other year. Below:

	A	B	C	D	
1	COMBINED COLUMNS	TECH EMAIL	TOTAL WATER(14)	COMBINED COLUMNS	TECH_
42	70037LNCRHIGHW/PHILLIPS 66 - ALLIANCE REFINERYCARBON DISULFIDE	THOMAS.R.MORGAN@P66.COM	0	70037LNCRHIGHW/PHILLIPS 66 - ALLIANCE REFINERYCARBON DISULFIDE	THOM
43	70037LNCRHIGHW/PHILLIPS 66 - ALLIANCE REFINERYCARBONYL SULFIDE	THOMAS.R.MORGAN@P66.COM	0	70037LNCRHIGHW/PHILLIPS 66 - ALLIANCE REFINERYCARBONYL SULFIDE	THOM
44				70037LNCRHIGHW/PHILLIPS 66 - ALLIANCE REFINERYCERTAIN GLYCOL ETHERS	THOM
45	70037LNCRHIGHW/PHILLIPS 66 - ALLIANCE REFINERYCHLORINE DIOXIDE	THOMAS.R.MORGAN@P66.COM	0		
46	70037LNCRHIGHW/PHILLIPS 66 - ALLIANCE REFINERYCOBALT COMPOUNDS	THOMAS.R.MORGAN@P66.COM	234		
47	70037LNCRHIGHW/PHILLIPS 66 - ALLIANCE REFINERYCRESOL (MIXED ISOMERS)	THOMAS.R.MORGAN@P66.COM	0	70037LNCRHIGHW/PHILLIPS 66 - ALLIANCE REFINERYCRESOL (MIXED ISOMERS)	THOM

Alliance Reported for Carbonyl Sulfide in 15 but not 14
whereas
Alliance reported for Chlorine Dioxide and Cobalt Compounds in 14 but not 15

See? Did I explain OK??

Thanks Russ,
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Russell.Hatton@vitalyst.com [mailto:Russell.Hatton@vitalyst.com]
Sent: Tuesday, June 06, 2017 8:10 AM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Subject: RE: I'm double checking....

Good luck.

Russell Hatton
Productivity Consultant

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From: Wakeland, Morton [mailto:wakeland.morton@epa.gov]
Sent: June 06, 2017 8:59 AM
To: Russell Hatton <Russell.Hatton@vitalyst.com>
Subject: RE: I'm double checking....

putting out some brush fires that just arose,

once I get those done, I can devote my brain cells totally to this....

God, I hope it's something simple and I messed up only with this analysis and not previous ones.

Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 6/5/2017 2:54:30 PM
To: Russell.Hatton@vitalyst.com
Subject: RE: Quick clarification...on testing blanks...
Attachments: Compare_8.1c_2014_2015.xlsm

Importance: High

Yep, sorta thought that after seeing the other ranges...

```
'sWSData is worksheet with data that is to be filtered
'sWFilter is worksheet on which filtered data is to be displayed
'sRData is output range for filtered data
'sRCrit is the criteria range
'match column headers from source to output to criteria range, with one exeception regarding blanks
'  if info is on same row = AND
'  if info is on a different row = OR
'  to test blanks must use a formula but no header, e.g., worksheetname!C1<>""
'sRExtr is output filtered data range - appears to include header row 1

'Use variables so code is more flexible

sWSData = "Test..."
sWSFilter = "Filtered Data"
sRData = "A:G"
sRCrit = "J1:R2"
sRExtr = "A1:G1"

Sheets(sWSData).Columns(sRData).AdvancedFilter Action:=xlFilterCopy, _
    CriteriaRange:=Sheets(sWSFilter).Range(sRCrit), CopyToRange:=Sheets(sWSFilter).Range(sRExtr), Unique:=False
d Sub
```

Woops, I just noted when adding verbiage to code, the blank formula did not work (workbook attached)

Note the results show blanks,

	A	B	C	D	E	F	G
1	Combined	TECH_EMAIL	8.1c(2014)	Combined2	TECH_EMAIL	8.1c(2015)	Delta 2014to2015
2	700947YRND18RIVEVONIK CYRO LLCMETHANOL	JAMIE.WILLIAMS@CORNERSTONECHEMCO.COM		700947YRND18RIVEVONIK CYRO LLCMETHANOL	JAMIE.WILLIAMS@CORNERSTONECHEMCO.COM	2003647	2,003,647.00
3	700698VSTLRIVERBD LAPLACE LLCZINC COMPOUNDS	WENDY.STEHLING@BAYOUSTEEL.COM		700698VSTLRIVERBD LAPLACE LLCZINC COMPOUNDS	WENDY.STEHLING@BAYOUSTEEL.COM	1729550	1,729,550.00
4	77630NVSTS355AFINVISTA SARL - ORANGE SITENICKEL COMPOUNDS	RAVI.KAGGAL@INVISTA.COM		77630NVSTS355AFINVISTA SARL - ORANGE SITENICKEL COMPOUNDS	RAVI.KAGGAL@INVISTA.COM	660000	660,000.00
5	70775CBGGYRIVERSYNGENTA CROP PROTECTION LLC SAINT GABRIEL FACIL	TOMMY.MENUET@SYNGENTA.COM		70775CBGGYRIVERSYNGENTA CROP PROTECTION LLC SAINT GABRIEL	TOMMY.MENUET@SYNGENTA.COM	552886	552,886.00
6	77013MTLPL10685METALPLATE GALVANIZING LPZINC COMPOUNDS	CDEEC@AGL.COM		77013MTLPL10685METALPLATE GALVANIZING LPZINC COMPOUNDS	CDEEC@AGL.COM	357690	357,690.00
7	77541BSFOR802COBASF CORP - FREEPORT SITEMOLYBDENUM TRIOXIDE	SCOTT.KOLB@BASF.COM		77541BSFOR802COBASF CORP - FREEPORT SITEMOLYBDENUM TRIOXI	SCOTT.KOLB@BASF.COM	230000	230,000.00
8	75692ZTCMNHWY80AZZ GALVANIZING SERVICES-WASKOMZINC COMPOUN	ERICAMCHIE@AZZ.COM	1	75692ZTCMNHWY80AZZ GALVANIZING SERVICES-WASKOMZINC COM	ERICAMCHIE@AZZ.COM	213941.2	213,940.15
9	77501MBLMN2001JPCI NITROGEN LLCVANADIUM COMPOUNDS	RJOHNSON@PCICORP.NET		77501MBLMN2001JPCI NITROGEN LLCVANADIUM COMPOUNDS	RJOHNSON@PCICORP.NET	208482	208,482.00
10	76734LDSGHWY31HONEYWELL INTERNATIONAL INC GEISMAR PLANTARSE	TODD.HARTER@HONEYWELL.COM		76734LDSGHWY31HONEYWELL INTERNATIONAL INC GEISMAR PLAN	TODD.HARTER@HONEYWELL.COM	105045.6	105,045.60
11	77536RHMND6600LROHM & HAAS TEXAS INCBUTYL ACRYLATE	ESTEGER@DOW.COM	13.75	77536RHMND6600LROHM & HAAS TEXAS INCBUTYL ACRYLATE	ESTEGER@DOW.COM	99231	99,217.25
12	700698VSTLRIVERBD LAPLACE LLCCOPPER COMPOUNDS	WENDY.STEHLING@BAYOUSTEEL.COM		700698VSTLRIVERBD LAPLACE LLCCOPPER COMPOUNDS	WENDY.STEHLING@BAYOUSTEEL.COM	98298	98,298.00
13	77064NRTHM9103FAZZ GALVANIZING SERVICES - HOUSTON WESTZINC CO	ERICAMCHIE@AZZ.COM		77064NRTHM9103FAZZ GALVANIZING SERVICES - HOUSTON WESTZI	ERICAMCHIE@AZZ.COM	72732.16	72,732.16
14	77545CHMPN3130HNALCO CHAMPIONNAPHTHALENE	MESHA.COVINGTON@CHAMP-TECH.COM		77545CHMPN3130HNALCO CHAMPIONNAPHTHALENE	MESHA.COVINGTON@CHAMP-TECH.COM	59983	59,983.00
15	77012XDNCR1010COHUNTSMAN INTERNATIONAL LLCETHYLENE GLYCOL	ANDY_ADAMS@HUNTSMAN.COM		77012XDNCR1010COHUNTSMAN INTERNATIONAL LLCETHYLENE GLYCO	ANDY_ADAMS@HUNTSMAN.COM	53674	53,674.00
16	77073TRLLB192RATRELLEBORG OFFSHORE US RANKIN ROAD FACILITYPHI	MIKE.DAVENPORT@TRELLEBORG.COM		77073TRLLB192RATRELLEBORG OFFSHORE US RANKIN ROAD FACILI	MIKE.DAVENPORT@TRELLEBORG.COM	52400	52,400.00
17							
18							

There should be data in both columns C and F like the old way I did with just filter.

	A	B	C	D	E	F	G	H
1	Facilityname	TECH_EMAIL	8.1a_2012		TECH_EMAIL	8.1a_2013	Data 2012 (lb/yr)	Data 20
2	77536LBRZCKFCOLUBRIZOL CORP DEER PARK FACILITYZINC COMPOUNDS	NORMAN.MOLLER@LUBRIZOL.COM	522,987	77536LBRZLKFCOLUBRIZOL CORP DEER PARK FACILITYZINC COMPOUNDS	KORMAN.MOLLER@LUBRIZOL.COM	522,987	522,987	
3	70706BSDFRNBRSNDENTA CHEM PRODECTION LLC SAINT GABRIEL FACILITYFATRAZINE	TOMMY.MENUET@BRINDENTA.COM	1,375.00	70706BSDFRNBRSNDENTA CHEM PRODECTION LLC SAINT GABRIEL FACILITYF	TOMMY.MENUET@BRINDENTA.COM	602,868	602,868	
4	77503MTRPLJ6RSSDETALPLATE CORPMINCTING LEDINC COMPOUNDS	CDERC@AOL.COM	6.14	77503MTRPLJ6RSSDETALPLATE CORPMANCFACING LEDINC COMPOUNDS	CDERC@AOL.COM	330,570	330,570	
5	75602ECMRHHGRSALCO CORPLANCTING SERVICES INCRONCINC COMPOUNDS	ERICLANCHE@ALZ.COM	1.90	75602ECMRHHGRSALCO CORPLANCTING SERVICES INCRONCINC COMPOUNDS	ERICLANCHE@ALZ.COM	213,540	213,540	
6								
7	77536RHMNDE60LRONM & HAAS TEXAS INCBUTYL ACRYLATE	ESTEGER@DOW.COM	10.23	77536RHMNDE60LRONM & HAAS TEXAS INCBUTYL ACRYLATE	ESTEGER@DOW.COM	95,733	95,733	
8	77542BSFCRSEJCOBASF CORP - FREEPORT SITEZINC COMPOUNDS	SCOTT.KOLB@BASF.COM	9.12	77542BSFCRSEJCOBASF CORP - FREEPORT SITEZINC COMPOUNDS	SCOTT.KOLB@BASF.COM	93,600	93,600	
9	77587NLCOH7701UNALCO CO LLCZINC COMPOUNDS	THERESA.CRAIG@NALCO.COM	3.00	77587NLCOH7701UNALCO CO LLCZINC COMPOUNDS	THERESA.CRAIG@NALCO.COM	56,830	56,347	
10	77536GNTMCL515MINEOS USA LLCAMMONIA	COURTNEY.NOVAK@INEOS.COM	750.00	77536GNTMCL515MINEOS USA LLCAMMONIA	COURTNEY.NOVAK@INEOS.COM	66,179	53,428	
11	77545CHMPN3130HNALCO CHAMPIONMETHANOL	MESHA.LOVINGTON@CHAMP-TECH.COM	1,297.00	77545CHMPN3130HNALCO CHAMPIONMETHANOL	MESHA.LOVINGTON@CHAMP-TECH.COM	65,662	54,835	
12	77643WSTMNHWY73VEOLIA ES TECHNICAL SOLUTIONS LLC PORT ARTHUR FACILITYZINC COMPOI	RANDA.COFFEY@VEOLIAES.COM	918.50	77643WSTMNHWY73VEOLIA ES TECHNICAL SOLUTIONS LLC PORT ARTHUR FACI	RANDA.COFFEY@VEOLIAES.COM	35,792	35,176	
13								
14								

Thanks Russ…sorry, I failed to note that when were were chatting.
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
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Dallas, Texas 75202
214.665.8116

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 3/6/2019 8:22:35 PM
To: Riley, David [riley.david@epa.gov]; Lancaster, Stan [Lancaster.Stan@epa.gov]
CC: Stuckey, Troy [Stuckey.Troy@epa.gov]
Subject: RE: Dave's ten EPCRA desktop investigations
Attachments: HQ-NonReporters-Region-6.xlsx

Importance: High

I marked David's from HQ in Green on attached worksheet – stan choose a color and find you some sites and then save and send to us all so we don't duplicate effort…

Thanks

I'll be looking into Huntsman in Port Neches

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EPCRA Section 313 Enforcement and TRI Program Coordinator
Waste Compliance III Section
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From: Riley, David
Sent: Monday, March 4, 2019 5:10 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>; Lancaster, Stan <Lancaster.Stan@epa.gov>
Cc: Stuckey, Troy <Stuckey.Troy@epa.gov>
Subject: Dave's ten EPCRA desktop investigations

Here are my facilities: six from Mort's non-reporter list, and four I targeted in FY'18 that appear to still have data quality or non-reporting issues.

#	TRIFID	Name	Location	Issues
1	7912WMRLLP43CLI	Amarillo Products Terminal (Phillips 66)	Amarillo, TX	Possible non-reporting issue for 2017
2	79107PLNSD300NT	Plains Dairy LLC	Amarillo, TX	Possible data quality/non-reporting issues for 2015 - onward
3	79415GFFRD1624M	Forterra Pressure Pipe - Lubbock	Lubbock, TX	Possible non-reporting issue for 2017
4	79404BFFTP11E33	Fresh Acquisitions LLC, dba Dynamic Foods	Lubbock, TX	Possible data quality/non-reporting issues for 2015 - onward

5	76384TYSNP7WHEE	Tyson Refrigerated Processed Meats Inc.	Vernon, TX	Possible data quality/non-reporting issues for 2015 - onward
6	72917GRBRP4301H	Gerber Products Co.	Ft. Smith, AR	Possible data quality issues for 2015 - onward
7	88201CHRST3911S	Christmas By Krebs Inc	Roswell, NM	Possible non-reporting issue for 2017
8	70719TRNTY7555C	Trinity Marine Products Inc Plt 48	Brusly, LA	Possible non-reporting issue for 2017
9	70560MGNTC101IR	ARSC Energy Services Omega LLC	New Iberia, LA	Possible non-reporting issue for 2017
10	7009WNTRGY1617R	Entergy Louisiana LLC – Nine Mile Point Plant	Westwego, LA	Possible non-reporting issue for 2017

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e-mail: riley.david@epa.gov

Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 6/27/2019 9:13:34 PM
To: Morton Wakeland [betterplanet@sbcglobal.net]
Subject: workbook
Attachments: Mort2019_Final_Region6_2013_to_2018-Red+Green.xlsm

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