From:	Colecchia, Annamaria
To:	Stacy, Andrea
Cc:	Shepherd, Don; King, Kirsten L; Notar, John; Sareen, Neha
Subject:	RE: [EXTERNAL] Class I Area AQRV Discussion Re Limetree Bay
Date:	Wednesday, June 3, 2020 8:01:18 AM
Attachments:	ENV_ENFORCEMENT-#1857600-v1-HOVENSA__Filed_Complaint_.PDF

Hi. I got a copy of the original consent decree. It's attached. Thanks again!
Annamaria

From: Stacy, Andrea <Andrea_Stacy@nps.gov>
Sent: Tuesday, June 02, 2020 5:44 PM
To: Colecchia, Annamaria <Colecchia.Annamaria@epa.gov>
Cc: Shepherd, Don <Don_Shepherd@nps.gov>; King, Kirsten L <kirsten_king@nps.gov>; Notar, John <John_Notar@nps.gov>
Subject: RE: [EXTERNAL] Class I Area AQRV Discussion Re Limetree Bay

Thanks Annamaria. I'll let you know if I run into any road blocks with finding a DPNR contact.

From: Colecchia, Annamaria <Colecchia.Annamaria@epa.gov>
Sent: Tuesday, June 2, 2020 3:41 PM
To: Stacy, Andrea <Andrea_Stacy@nps.gov>
Cc: Shepherd, Don <Don_Shepherd@nps.gov>; King, Kirsten L <kirsten_king@nps.gov>; Notar, John <John_Notar@nps.gov>
Subject: RE: [EXTERNAL] Class I Area AQRV Discussion Re Limetree Bay

Ok, I will ask our enforcement person for more information on the CD. You may need to actually speak to a person in DPNR. I would be surprised if the emission data is on their website.

From: Stacy, Andrea <Andrea_Stacy@nps.gov>
Sent: Tuesday, June 02, 2020 5:34 PM
To: Colecchia, Annamaria <Colecchia.Annamaria@epa.gov>
Cc: Shepherd, Don <Don_Shepherd@nps.gov>; King, Kirsten L <kirsten_king@nps.gov>; Notar, John <John_Notar@nps.gov>
Subject: RE: [EXTERNAL] Class I Area AQRV Discussion Re Limetree Bay

Annamaria,
I thought someone asked about visibility trends, it appears I mistakenly thought it was you. My apologies, there were a lot of calls that week and it's a bit of a blur.

Anyway, yes, we do have an IMPROVE monitor at the park, I've used that for pulling the visibility trends (trend and composition charts were at the end of the doc I sent last week). (As an aside, hurricane Irma destroyed the site in 2017 and it was not back up until the end of 2018.)

I am more interested in emission trends at the facility. I will see what I can find on the DPNR website.

As to the CD related information, I had the EPA website, but I didn't see the original complaint there. I was looking for the document that outlines the specifics of the alleged violations that the CD addressed (what happened and when).

I hope this clarifies my question. Thanks.

From: Colecchia, Annamaria <Colecchia.Annamaria@epa.gov>
Sent: Tuesday, June 2, 2020 12:21 PM
To: Stacy, Andrea <Andrea_Stacy@nps.gov>
Cc: Shepherd, Don <Don_Shepherd@nps.gov>; King, Kirsten L <kirsten_king@nps.gov>
Subject: RE: [EXTERNAL] Class I Area AQRV Discussion Re Limetree Bay

Let me know if this link answers your question on the complaint:

https://www.epa.gov/enforcement/hovensa-llc-clean-air-act-settlement

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From: Colecchia, Annamaria
Sent: Tuesday, June 02, 2020 2:04 PM
To: 'Stacy, Andrea' <Andrea_Stacy@nps.gov>
Cc: Shepherd, Don <Don_Shepherd@nps.gov>; King, Kirsten L <kirsten_king@nps.gov>
Subject: RE: [EXTERNAL] Class I Area AQRV Discussion Re Limetree Bay

Hi Andrea,

I had to think but I don't believe that I ask about visibility monitoring. I think there is an IMPROVE site in the Class I area. I mentioned that we are requiring ambient monitors for SO2, NO2, and PM2.5 in the vicinity of the facility so that we could use that information to reopen the PAL in the future if there is a threat to the NAAQS, increment, or Class I area AQRV (per the PAL provisions). The ambient monitoring would not be a means to monitor visibility per se but I was wondering if perhaps it could be used as a gauge of ambient concentrations that threat visibility such as SO2, NO2 or PM2.5? That plus any information gained through the Regional Haze work and future visibility modeling.

We do not have actual emission data from 2008 to 2012. The baseline emissions on the Table that was included in the invite contains the 2 year actual annual emissions from 2009 to 2010 (the highest emissions before the shutdown) which are now the PAL's annual limits. The 2008 to present emission information is reported to the State, VI Dept of Planning and Natural Resource (DPNR). If you don't find a contact, I can find one.

I'll ask our enforcement people to forward you the original complaint regarding the consent decree.

Annamaria

From: Stacy, Andrea <Andrea_Stacy@nps.gov>
Sent: Monday, June 01, 2020 1:34 PM
To: Colecchia, Annamaria <Colecchia.Annamaria@epa.gov>
Cc: Shepherd, Don <Don_Shepherd@nps.gov>; King, Kirsten L <kirsten_king@nps.gov>
Subject: RE: [EXTERNAL] Class I Area AQRV Discussion Re Limetree Bay

Annamaria,

On our call last week you inquired about the visibility monitoring data at Virgin Islands & tracking trends over time. We are looking into this question. In looking at this, there are a couple pieces of information that could be helpful . . . could EPA share with NPS:

1. Facility-wide emissions data from 2008 up until the shutdown in 2012 (including any upsets)?
2. The original complaint that was filed leading up to the 2011 consent decree? (I can find the CD online, but not the original complaint.)

Thanks!

From: Colecchia, Annamaria <Colecchia.Annamaria@epa.gov>
Sent: Friday, May 29, 2020 12:30 PM
To: Stacy, Andrea <Andrea_Stacy@nps.gov>; Notar, John <John_Notar@nps.gov>; Shepherd, Don <Don_Shepherd@nps.gov>; Cheek, Denesia <Denesia_Cheek@nps.gov>; King, Kirsten L <kirsten_king@nps.gov>; Peters, Melanie <Melanie_Peters@nps.gov>; Hillis-Starr, Zandy <Zandy_Hillis-Starr@nps.gov>; Worthington, Dave J <Dave_Worthington@nps.gov>
Cc: Wieber, Kirk <Wieber.Kirk@epa.gov>; Castro, Marina <Castro.Marina@epa.gov>; Hammad, Omar <hammad.omar@epa.gov>; McHale, Mary <McHale.Mary@epa.gov>
Subject: RE: [EXTERNAL] Class I Area AQRV Discussion Re Limetree Bay

Hi National Park Service contacts.

I know that I replied to this email yesterday thanking you for the clarification regarding visibility verses other AQRVs. I am replying again to that email since we also said that we would connect you with our Regional Haze program team. They are copied here for your convenience.

Thanks again.
Annamaria

From: Stacy, Andrea <Andrea_Stacy@nps.gov>
Sent: Thursday, May 28, 2020 3:13 PM
To: Colecchia, Annamaria <Colecchia.Annamaria@epa.gov>; Notar, John <John_Notar@nps.gov>; Shepherd, Don <Don_Shepherd@nps.gov>; Cheek, Denesia <Denesia_Cheek@nps.gov>; King, Kirsten L <kirsten_king@nps.gov>; Peters, Melanie <Melanie_Peters@nps.gov>; Hillis-Starr, Zandy

<Zandy_Hillis-Starr@nps.gov>; Worthington, Dave J <Dave_Worthington@nps.gov>
Cc: Sareen, Neha <sareen.neha@epa.gov>; Siegel, Joseph <Siegel.Joseph@epa.gov>
Subject: RE: [EXTERNAL] Class I Area AQRV Discussion Re Limetree Bay

Hi Annamaria,
Likewise, we appreciate EPA taking the time to discuss this with us last week. Your summary looks good with one minor distinction – we will address *visibility* through the RH process, NOT AQRVs. If there are pollutant deposition concerns, RH will not address those, but item #3 could.

I thought it might be helpful to provide EPA with our NPS ARD review/summary status of the Limetree (formerly Hovensa) facility. We used the draft of this document in preparing for our discussion last week. I thought it may jumpstart conversations with the EPA RH team, as it outlines our summary conclusions discussed during our call along with detailed information that is the basis of those conclusions. Thanks & please let me know if you have any questions.

Regards,
Andrea

From: Colecchia, Annamaria <Colecchia.Annamaria@epa.gov>
Sent: Wednesday, May 27, 2020 11:38 AM
To: Notar, John <John_Notar@nps.gov>; Stacy, Andrea <Andrea_Stacy@nps.gov>; Shepherd, Don <Don_Shepherd@nps.gov>; Cheek, Denesia <Denesia_Cheek@nps.gov>; King, Kirsten L <kirsten_king@nps.gov>
Cc: Sareen, Neha <sareen.neha@epa.gov>; Siegel, Joseph <Siegel.Joseph@epa.gov>
Subject: [EXTERNAL] Class I Area AQRV Discussion Re Limetree Bay

Hi All.

Thank you for the helpful discussion we had on May 21, 2020 regarding the Limetree Bay restart and the Class I area AQRV analysis for the Virgin Islands National Park in St. John including Hassel Island near St. Thomas. Below please find a brief summary of our call. Please let us know if you have any additions, deletions or changes to this summary of our conversation.

1. EPA Region 2's PSD permitting team will connect you with the EPA team working on the Regional Haze FIP and Reasonable Progress analysis so that you can discuss with them incorporating AQRVs into the Regional Haze process;
2. The FLM will not assess the Class I area AQRVs through the PAL permit issuance process;
3. EPA has discretion to reopen the PAL and consult with the FLM in the event that a Class I area AQRV problem is identified after permit issuance.

Please let us know if you have any questions.
Thanks again.
Annamaria