Schena, Cristeen

From: Christopher Marchesi <cmarchesi@tritonenvironmental.com>
Sent: Tuesday, March 27, 2018 4:05 PM
To: Olivier, Tom
Cc: Rapp, Steve; Sansevero, Christine; Mohamoud, Abdi
Subject: RE: Tilcon Connecticut, Inc./Clean Air Act Reporting Requirement - January 3, 2018

Importance: High

Hello Tom – We have made a lot of progress gathering the information to respond to the reporting requirement for Tilcon as referenced above. Nevertheless, we are expecting that a further extension will be necessary. This is, in part, based on the fact that there are thirty four (34) separate properties involved (originally thought to be 25) and due to the complexity of many of the sites. Further hampering our efforts is the difficulty in locating records for facilities acquired over the years from other operators. We feel fairly comfortable that we will be able to respond comprehensively by our currently agreed upon date for all questions/items except 6 and 7 as further described below.

Item 6 appears to be extremely broad, requiring significant details for "all process and support equipment, including: mineral processing equipment, such as rock crushers; screening devices; and conveyors; as well fuel pumps; storage tanks; etc….". This item seems to be irrespective as to whether or not the site(s) is subject to NSPS Subpart OOO and could also be interpreted to cover any and all equipment at a facility (loaders, haul trucks, pumps, boilers, engines, etc.). The actual amount of time to gather and assemble this much information for the thirty four (34) properties is not known. If item 6 was rephrased to only apply to those properties subject to Subpart OOO, the list of sites would be significantly less. As an example, based on our understanding that 60.670 (a)(2) provides an exemption for sites without crushers (confirmed by EPA staff), the list of sites subject to the reporting requirement would be significantly less. Without such specificity, we would be required to provide information about every conveyor, screen, tank, fuel pump, etc. for all of the properties despite not being subject to Subpart OOO. Can you please clarify if this is the intention of the EPA or whether we can filter out those sites and equipment not subject to Subpart OOO based on one of the standard exemptions.

Once we receive your response, we can better estimate the time involved in gathering the information in order to respond to items 6 and 7. In the meantime, we can respond to items 1-5 by April 9, but could use an extra week to chase down elusive information on a few of the sites. I would appreciate your response on both issues.

Thank you,

-C

Ref No. Project Number.XX.XX.18-Description

TRITON ENVIRONMENTAL

Christopher E. Marchesi, Triton Environmental, Inc.
385 Church Street, Suite 201, Guilford, CT 06437
203.458.7200 | fax 203.458.7201 | www.tritonenvironmental.com

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From: Christopher Marchesi [mailto:cmarchesi@tritonenvironmental.com]
Sent: Thursday, February 08, 2018 5:14 PM
To: 'Olivier, Tom'
Cc: 'Rapp, Steve'; 'Sansevero, Christine'; 'Mohamoud, Abdi'
Subject: RE: Tilcon Connecticut, Inc./Clean Air Act Reporting Requirement - January 3, 2018

Thank you Tom.

-C

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From: Olivier, Tom [mailto:olivier.tom@epa.gov]
Sent: Thursday, February 08, 2018 5:03 PM
To: Christopher Marchesi
Cc: Rapp, Steve; Sansevero, Christine; Mohamoud, Abdi
Subject: RE: Tilcon Connecticut, Inc./Clean Air Act Reporting Requirement - January 3, 2018

Chris: In light of the circumstances you describe below, EPA Region 1 agrees to extend the due date for the Tilcon Reporting Requirement to April 9, 2018.

Sincerely,

Tom Olivier
Senior Enforcement Counsel
EPA Region 1

From: Christopher Marchesi [mailto:cmarchesi@tritonenvironmental.com]
Sent: Thursday, February 08, 2018 2:53 PM
To: Olivier, Tom <olivier.tom@epa.gov>
Subject: RE: Tilcon Connecticut, Inc./Clean Air Act Reporting Requirement - January 3, 2018

Thank you.

-C

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From: Olivier, Tom [mailto:olivier.tom@epa.gov]
Sent: Thursday, February 08, 2018 2:35 PM
To: Christopher Marchesi
Subject: RE: Tilcon Connecticut, Inc./Clean Air Act Reporting Requirement - January 3, 2018

Got it. I'll be in touch.

Tom

From: Christopher Marchesi [mailto:cmarchesi@tritonenvironmental.com]
Sent: Thursday, February 08, 2018 2:02 PM
To: Olivier, Tom <olivier.tom@epa.gov>; Olivier, Tom <olivier.tom@epa.gov>
Subject: RE: Tilcon Connecticut, Inc./Clean Air Act Reporting Requirement - January 3, 2018

Tom – please see below and confirm receipt. Thank you.

-C

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From: Christopher Marchesi [mailto:cmarchesi@tritonenvironmental.com]
Sent: Wednesday, February 07, 2018 2:59 PM
To: 'oliver.tom@epa.gov'
Subject: Tilcon Connecticut, Inc./Clean Air Act Reporting Requirement - January 3, 2018

Hello Tom – We represent Tilcon on the above referenced matter. The reporting requirement requires submittal of significant documentation pertaining to compliance with NESHAP, NSPS, and federally enforceable Connecticut State Implementation Plan. We are in the process of gathering and assembling the required information, but request that an

extension be provided for submittal. The subject requirement covers twenty-five (25) separate properties with complex operations involving quarrying, aggregate processing, and asphalt and concrete production.

Given the number of properties, complexity of the operations, and breadth of information being requested, we request that the submittal date be extended out an additional 45 days, which corresponds to April 9, 2018.

Please let me know if this is acceptable. If you would like to discuss this matter further, I can be reached at 203.458.7200.

Thank you in advance.

-C

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