From:	Helmlinger, Andrew
To:	Nixon, Donald
Cc:	Lawrence, Kathryn
Subject:	RE: CBI Substantiation Process for Valero 114
Date:	Monday, September 11, 2017 1:13:54 PM

Yes.

J. Andrew Helmlinger
Attorney-Advisor
Office of Regional Counsel
U.S. EPA Region IX
d: (415) 972-3904
f: (415) 947-3570

From: Nixon, Donald
Sent: Monday, September 11, 2017 1:06 PM
To: Helmlinger, Andrew <Helmlinger.Andrew@epa.gov>
Cc: Lawrence, Kathryn <Lawrence.Kathryn@epa.gov>
Subject: RE: CBI Substantiation Process for Valero 114

Hi Andrew;

Do you concur with the final version (rev 1)?

Thanks,

Don

From: Helmlinger, Andrew
Sent: Monday, September 11, 2017 10:08 AM
To: Nixon, Donald <Nixon.Donald@epa.gov>; Lawrence, Kathryn <Lawrence.Kathryn@epa.gov>
Subject: RE: CBI Substantiation Process for Valero 114

I cleaned up a little more, probably errors grown among the redlining process. This should be good to go now, and thanks, Don.

J. Andrew Helmlinger
Attorney-Advisor
Office of Regional Counsel
U.S. EPA Region IX
d: (415) 972-3904
f: (415) 947-3570

From: Nixon, Donald

Sent: Monday, September 11, 2017 9:57 AM
To: Helmlinger, Andrew <Helmlinger.Andrew@epa.gov>; Lawrence, Kathryn <Lawrence.Kathryn@epa.gov>
Subject: RE: CBI Substantiation Process for Valero 114

Andrew/Kay;

Attached are the cleaned copy along with your red-line. I will insert the certified mail numbers later.

Thanks,

Don Nixon, CHMM, CSP
Chemical Accident Prevention Program
EPA Region IX, SFD-9-3, Superfund Division
Emergency Prevention & Preparedness Section
75 Hawthorne Street
San Francisco, CA 94105
415-972-3123

From: Helmlinger, Andrew
Sent: Monday, September 11, 2017 9:46 AM
To: Nixon, Donald <Nixon.Donald@epa.gov>; Lawrence, Kathryn <Lawrence.Kathryn@epa.gov>
Subject: RE: CBI Substantiation Process for Valero 114

Don,
Here are some suggestions on the CBI substantiation letter. Thanks for taking the first cut at this, Don!

J. Andrew Helmlinger
Attorney-Advisor
Office of Regional Counsel
U.S. EPA Region IX
d: (415) 972-3904
f: (415) 947-3570

From: Nixon, Donald
Sent: Thursday, September 7, 2017 5:05 PM
To: Lawrence, Kathryn <Lawrence.Kathryn@epa.gov>
Cc: Helmlinger, Andrew <Helmlinger.Andrew@epa.gov>
Subject: RE: CBI Substantiation Process for Valero 114

Hi;

Attached is a draft CBI substantiation letter using the website form letter, with modifications, to ask Valero for CBI substantiation.

Please review and comment, but keep in mind that they still owe us a PHA, P&IDs, and a list of PRDs with flow rates. These will constitute the bulk of the response to the RFI.

Thanks,

Don

From: Lawrence, Kathryn
Sent: Thursday, September 07, 2017 3:41 PM
To: Nixon, Donald <Nixon.Donald@epa.gov>
Cc: Helmlinger, Andrew <Helmlinger.Andrew@epa.gov>
Subject: CBI Substantiation Process for Valero 114

Hi Don

We need to start the substantiation process for the CBI that Valero claimed with their response to our CAA 114.

Andrew has kindly provided the following link for the forms we need to use:

bottom right: http://intranet.epa.gov/9online/sites/foia/index.html#

He advises that before the letter goes out, we call Valero and let them know that it is coming, and ask if there is any information that Valero would release from its CBI claim early, as that would simplify the process.
As a first step it would be good if you can review their response and determine if you see anything that would likely not be justified as CBI. That way we could make some suggestions to Tesoro re: what would likely not pass the test and get those cleared early.