

From: Hambrick, Amy <Hambrick.Amy@epa.gov>

Sent: Tuesday, August 11, 2020 10:10 AM

To: Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>; Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>

Cc: Fruh, Steve <Fruh.Steve@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>

Subject: RE: EO12866 Oil and Gas Reconsideration (Technical AT54)

Thanks Elke.

From: Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>

Sent: Tuesday, August 11, 2020 9:40 AM

To: Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>

Cc: Hambrick, Amy <Hambrick.Amy@epa.gov>; Fruh, Steve <Fruh.Steve@epa.gov>

Subject: RE: EO12866 Oil and Gas Reconsideration (Technical AT54)

These rules are now no longer on reginfo.gov.

From: Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>

Sent: Monday, August 10, 2020 8:46 PM

To: Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>

Cc: Hambrick, Amy <Hambrick.Amy@epa.gov>; Fruh, Steve <Fruh.Steve@epa.gov>

Subject: RE: EO12866 Oil and Gas Reconsideration (Technical AT54)

Thanks, all. OMB concluded review.

From: Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>

Sent: Monday, August 10, 2020 8:46 PM

To: Kramer, Melissa <Kramer.Melissa@epa.gov>; Adams, Darryl <Adams.Darryl@epa.gov>

Cc: Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Eck, Janet <Eck.Janet@epa.gov>; Iglesias, Amber <Iglesias.Amber@epa.gov>; Chang, Alice <Chang.Alice@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>; South, Peter <South.Peter@epa.gov>; Manibusan, Mary <Manibusan.Mary@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>

Subject: RE: 2060-AT90 uploads completed

OMB concluded review. Thanks, everyone.

From: Adams, Darryl <Adams.Darryl@epa.gov>

Sent: Monday, August 10, 2020 5:46 PM

To: Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>

Cc: Kramer, Melissa <Kramer.Melissa@epa.gov>; Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Eck, Janet <Eck.Janet@epa.gov>; Iglesias, Amber <Iglesias.Amber@epa.gov>; Chang, Alice <Chang.Alice@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>; South, Peter <South.Peter@epa.gov>; Manibusan, Mary <Manibusan.Mary@epa.gov>; Hambrick, Amy

<Hambrick.Amy@epa.gov>

Subject: 2060-AT90 uploads completed

All,

I've completed the uploads for both RINs. Have a good evening.

The screenshot shows the EPA's Regulatory Information System (RIS) interface. The top navigation bar includes links for HOME, AGENDA/REGS, EO 13771, and ADMINISTRATION. Below this, there are icons for INBOX, RULES, AGENDA, SEARCH, AGENCY EO REVIEW, and REPORTS. The main content area displays the 'EO Review Package 2060-AT90' with a green checkmark indicating successful submission. The package details include: RIN: 2060-AT90 (202010), Stage of Rulemaking: Final Rule Stage, Title: Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Review. The submission information shows: Agency/Sub Agency: 2060 EPA/OAR, Submitted By: Darryl Adams, OMB Ref #: 2060-C215, Submitted Date: 05/29/2020. A green banner at the bottom states: 'EO Review Package was successfully submitted amendment at 08/10/2020 17:39:59 PM.'

Darryl Adams
Regulatory Management Division
Office of Policy, U.S. EPA
202 564-6569
Mail Code 1803A, Room 3512D WJC North

From: Adams, Darryl <Adams.Darryl@epa.gov>

Sent: Monday, August 10, 2020 5:32 PM

To: Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>

Cc: Kramer, Melissa <Kramer.Melissa@epa.gov>; Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Eck, Janet <Eck.Janet@epa.gov>; Iglesias, Amber <Iglesias.Amber@epa.gov>; Chang, Alice <Chang.Alice@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>; South, Peter <South.Peter@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>; Manibusan, Mary <Manibusan.Mary@epa.gov>

Subject: 2060-AT54 uploads completed

All,

This RIN is completed. I'm working on AT90 now.

Darryl

The screenshot shows the EPA's Regulatory Information System (RIS) interface. The top navigation bar includes links for HOME, AGENDA/REGS, EO 13771, and ADMINISTRATION. Below this, there are icons for INBOX, RULES, AGENDA, SEARCH, AGENCY EO REVIEW, and REPORTS. The main content area displays the 'EO Review Package 2060-AT54' with a green checkmark indicating successful submission. The package details include: RIN: 2060-AT54 (202010), Stage of Rulemaking: Final Rule Stage, Title: Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Reconsideration. The submission information shows: Agency/Sub Agency: 2060 EPA/OAR, Submitted By: Darryl Adams, OMB Ref #: 2060-C214, Submitted Date: 05/29/2020. A green banner at the bottom states: 'EO Review Package was successfully submitted amendment at 08/10/2020 17:27:00 PM.'

Darryl Adams
Regulatory Management Division
Office of Policy, U.S. EPA
202 564-6569
Mail Code 1803A, Room 3512D WJC North

From: Gilbreath, Jan <Gilbreath.Jan@epa.gov>
Sent: Monday, August 10, 2020 5:07 PM
To: Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>; Marsh, Karen <Marsh.Karen@epa.gov>
Cc: Hambrick, Amy <Hambrick.Amy@epa.gov>; Fruh, Steve <Fruh.Steve@epa.gov>
Subject: RE: EO12866 Oil and Gas Reconsideration (Technical AT54)

Upload is starting now, Darryl says. Should take a half hour to complete.

From: Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>
Sent: Monday, August 10, 2020 4:50 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>
Cc: Hambrick, Amy <Hambrick.Amy@epa.gov>; Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Fruh, Steve <Fruh.Steve@epa.gov>
Subject: Re: EO12866 Oil and Gas Reconsideration (Technical AT54)

Nope! Just get all of the final clean docs to OP including all the supporting docs and xls. And please ask OP to let me know when upload in ROCIS is complete. OMB signs off after that. When we are all done I will let you know. Thanks!

From: Marsh, Karen <Marsh.Karen@epa.gov>
Sent: Monday, August 10, 2020 4:47 PM
To: Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>
Cc: Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Fruh, Steve <Fruh.Steve@epa.gov>
Subject: RE: EO12866 Oil and Gas Reconsideration (Technical AT54)

Hi Elke,

The values in the versions you sent are correct. Do you want anything back from us beyond this confirmation?

Karen

Karen R. Marsh, PE
US EPA, OAQPS, Sectors Policies and Programs Division
Fuels and Incineration Group
109 TW Alexander Drive, Mail Code E143-05
Research Triangle Park, NC 27711
Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>
Sent: Monday, August 10, 2020 4:43 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>
Cc: Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Fruh, Steve <Fruh.Steve@epa.gov>; Kramer, Melissa <Kramer.Melissa@epa.gov>
Subject: RE: EO12866 Oil and Gas Reconsideration (Technical AT54)

Also, I know I'm mentioned already, but please upload all of the supporting memos, TSD, etc. into the supporting document section. Thanks!

From: Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>
Sent: Monday, August 10, 2020 4:31 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>
Cc: Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Fruh, Steve <Fruh.Steve@epa.gov>
Subject: RE: EO12866 Oil and Gas Reconsideration (Technical AT54)

These should be the annual numbers in Tables 1-1 and 1-2, but please do check before you upload to ROCIS. ROCIS is open for amendment as I mentioned already.

Best, Elke

From: Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>
Sent: Monday, August 10, 2020 4:22 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>
Cc: Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Fruh, Steve <Fruh.Steve@epa.gov>; Wesson, Karen <Wesson.Karen@epa.gov>; Wiggins, Lanelle <Wiggins.Lanelle@epa.gov>
Subject: RE: EO12866 Oil and Gas Reconsideration (Technical AT54)

Karen, Amy,

Let's start ROCIS upload with the final versions of the clean documents.

What goes into ROCIS for the economic spreadsheet tab is the annualized values in Tables 1-1 and 1-2 and not the PV totals, which are in the xls currently.

I see Mary is out, so adding Karen and Lanelle.

Elke

From: Marsh, Karen <Marsh.Karen@epa.gov>
Sent: Monday, August 10, 2020 3:57 PM
To: Hambrick, Amy <Hambrick.Amy@epa.gov>; Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>
Cc: Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Fruh, Steve <Fruh.Steve@epa.gov>
Subject: RE: EO12866 Oil and Gas Reconsideration (Technical AT54)

Hi Elke,

As discussed, the spreadsheets reflect \$million now.

Karen

Karen R. Marsh, PE
US EPA, OAQPS, Sectors Policies and Programs Division
Fuels and Incineration Group
109 TW Alexander Drive, Mail Code E143-05
Research Triangle Park, NC 27711
Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Hambrick, Amy
Sent: Monday, August 10, 2020 3:37 PM
To: Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>; Marsh, Karen <Marsh.Karen@epa.gov>
Cc: Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Fruh, Steve <Fruh.Steve@epa.gov>
Subject: RE: EO12866 Oil and Gas Reconsideration (Technical AT54)

Elke- Yes, please see attached. Thanks.

Amy

From: Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>
Sent: Monday, August 10, 2020 3:04 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>
Cc: Hambrick, Amy <Hambrick.Amy@epa.gov>; Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Fruh, Steve <Fruh.Steve@epa.gov>
Subject: RE: EO12866 Oil and Gas Reconsideration (Technical AT54)

Thanks! Can you switch the cost and benefits cells in the xls?

Cost savings should be in the cost column with negative signs and environmental disbenefits should be in the benefit column with negative signs. The spreadsheet they sent us has cost savings in the benefit column and disbenefits in the cost column.

From: Marsh, Karen <Marsh.Karen@epa.gov>
Sent: Monday, August 10, 2020 2:32 PM
To: Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>
Cc: Hambrick, Amy <Hambrick.Amy@epa.gov>; Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Fruh, Steve <Fruh.Steve@epa.gov>
Subject: EO12866 Oil and Gas Reconsideration (Technical AT54)

Hi Elke,

Attached is an updated preamble/rule and RIA for AT54 (Technical) reflecting 13771-cost savings estimates OMB requested this morning and other EPA edits. The RLSO compares Friday 8/7 to today. As a reminder the RIA is the same for AT90 (Policy) but labeled separately for each rule. There are a total of 5 attachments (clean and RLSO).

Thanks,
Karen

Karen R. Marsh, PE
US EPA, OAQPS, Sectors Policies and Programs Division
Fuels and Incineration Group
109 TW Alexander Drive, Mail Code E143-05
Research Triangle Park, NC 27711
Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Hambrick, Amy
Sent: Monday, August 10, 2020 2:29 PM
To: Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>
Cc: Marsh, Karen <Marsh.Karen@epa.gov>; Gilbreath, Jan <Gilbreath.Jan@epa.gov>
Subject: EO 12866 Oil and Gas Review and Reconsideration Rules (Policy)

Elke,

Attached is an updated preamble/rule and RIA for AT90 (Policy) reflecting 13771-cost savings estimates OMB requested this morning and other EPA edits. The RLSO compares Friday 8/7 to today. As a reminder the RIA is the same for AT54 (technical) but labeled separately for each rule. There are a total of 5 attachments (clean and RLSO).

Thanks,

Amy

From: Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>
Sent: Monday, August 10, 2020 11:46 AM
To: Macpherson, Alex <Macpherson.Alex@epa.gov>
Cc: Thomas, Amanda L. EOP/OMB <Amanda_L._Thomas@omb.eop.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>
Subject: Tables in preambles

Alex, it looks like EAV is listed in the rule preamble tables. Thank you for finding it!

Best, Elke

From: Macpherson, Alex <Macpherson.Alex@epa.gov>
Sent: Monday, August 10, 2020 10:46 AM
To: Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>; Griffiths, Charles <Griffiths.Charles@epa.gov>; Thomas, Amanda L. EOP/OMB <Amanda_L._Thomas@omb.eop.gov>; Morgan, Cynthia <Morgan.Cynthia@epa.gov>
Cc: Hambrick, Amy <Hambrick.Amy@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>
Subject: RE: calculating 13771 numbers for oil and gas

This timing should be fine

Alex

From: Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>
Sent: Monday, August 10, 2020 10:39 AM
To: Griffiths, Charles <Griffiths.Charles@epa.gov>; Macpherson, Alex <Macpherson.Alex@epa.gov>; Thomas, Amanda L. EOP/OMB <Amanda_L._Thomas@omb.eop.gov>; Morgan, Cynthia <Morgan.Cynthia@epa.gov>
Cc: Hambrick, Amy <Hambrick.Amy@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>
Subject: RE: calculating 13771 numbers for oil and gas

Thanks, everyone. It would be ideal if EPA could send OMB the final documents no later than 1pm so that we can start the multi hour clearance process then.

From: Griffiths, Charles <Griffiths.Charles@epa.gov>
Sent: Monday, August 10, 2020 10:35 AM
To: Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>; Macpherson, Alex <Macpherson.Alex@epa.gov>; Thomas, Amanda L. EOP/OMB <Amanda.L.Thomas@omb.eop.gov>; Morgan, Cynthia <Morgan.Cynthia@epa.gov>
Cc: Hambrick, Amy <Hambrick.Amy@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>
Subject: Re: calculating 13771 numbers for oil and gas

Cynthia Morgan (added here) are happy to help with this request.

From: Thomas, Amanda L. EOP/OMB <Amanda_L._Thomas@omb.eop.gov>
Sent: Monday, August 10, 2020 10:38 AM
To: Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>; Macpherson, Alex <Macpherson.Alex@epa.gov>
Cc: Griffiths, Charles <Griffiths.Charles@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>
Subject: RE: calculating 13771 numbers for oil and gas

Wonderful! Thank you very much!

From: Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>
Sent: Monday, August 10, 2020 10:31 AM
To: Macpherson, Alex <Macpherson.Alex@epa.gov>; Thomas, Amanda L. EOP/OMB <Amanda.L.Thomas@omb.eop.gov>
Cc: Griffiths, Charles <Griffiths.Charles@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>
Subject: RE: calculating 13771 numbers for oil and gas

Works for me.

From: Macpherson, Alex <Macpherson.Alex@epa.gov>
Sent: Monday, August 10, 2020 10:28 AM
To: Thomas, Amanda L. EOP/OMB <Amanda.L.Thomas@omb.eop.gov>
Cc: Griffiths, Charles <Griffiths.Charles@epa.gov>; Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>
Subject: RE: calculating 13771 numbers for oil and gas

OK, so my suggestion is to put sentence at end of RIA sections 2.2.8 (policy), 3.2.9 (technical), and 4.2.6 (combined). And we'll put into the clean version of the last version of the RIA we sent to you.

Sound good?
Alex

From: Thomas, Amanda L. EOP/OMB <Amanda_L.Thomas@omb.eop.gov>
Sent: Monday, August 10, 2020 10:22 AM
To: Macpherson, Alex <Macpherson.Alex@epa.gov>
Cc: Griffiths, Charles <Griffiths.Charles@epa.gov>; Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>
Subject: RE: calculating 13771 numbers for oil and gas

Hi Alex, thanks for agreeing to do this!

Ideally, we could have 3 sentences—one for the policy, one for the technical and one combined. Otherwise, we can have one for the policy and one for the technical and add them at a later point. Does that work for you?

From: Macpherson, Alex <Macpherson.Alex@epa.gov>
Sent: Monday, August 10, 2020 10:17 AM
To: Thomas, Amanda L. EOP/OMB <Amanda_L.Thomas@omb.eop.gov>
Cc: Griffiths, Charles <Griffiths.Charles@epa.gov>; Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>
Subject: RE: calculating 13771 numbers for oil and gas

Hi Amanda

Yes, we can do this. I guess we'll need to add a pair of estimates, one for each of the packages. Does it make sense to add the two 13711 estimates together in the 'combined' section of the RIA?

Alex

From: Thomas, Amanda L. EOP/OMB <Amanda_L.Thomas@omb.eop.gov>
Sent: Monday, August 10, 2020 9:35 AM
To: Macpherson, Alex <Macpherson.Alex@epa.gov>
Cc: Griffiths, Charles <Griffiths.Charles@epa.gov>; Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>
Subject: calculating 13771 numbers for oil and gas

Hi Alex,

I'm wondering if EPA can calculate the 13771 cost savings estimates consistent with the guidance for the oil and gas package. You'll need to use \$2016, discounted to 2016 and annualized/amortized over perpetuity time horizon.

I gave Charles Griffiths a heads up about this matter as he is the point person for 13771 estimates.

This should not take long (less than 30 minutes).

Is it possible to calculate the estimate and put in a sentence into the RIA this morning?

Thanks very much for your help.

Amanda