From:	LaVigna, Gaetano
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Cc:	jrinker@lbenergy.com; <u>mdelaquil@bakerlaw.com; mthurlow@bakerlaw.com; JP.Oriol@dpnr.vi.gov;</u> Austin.Callwood@dpnr.vi.gov; Villatora, Liliana; Pierce, Jennifer; Froikin, Sara; LaPosta, Dore; Buettner, Robert; Patel, Harish; Rivera, Alex; Myles.Flint@usdoj.gov
Subject:	EPA Approval of Limetree Bay's Phase 2 Hydrocarbon Purge Plan to Commence on August 27, 2021
Date:	Thursday, August 26, 2021 11:39:37 AM

Dear Messrs. Charles and Morgan:

On August 23, 2021, EPA issued to Limetree a notification of pending approval of Limetree's Phase 2 Plan (August 23 EPA Pending Approval Letter) with a list of items EPA required in order to approve the Phase 2 Plan. Limetree submitted the following additional documents to EPA:

- A document with the file name "8.25.2021 Addendum to Phase 2 Flaring Plan.pdf" submitted by Limetree on August 25, 2021 (Phase 2 Plan Summary Addendum); and
- Attachments 1A through 4A submitted by Limetree on August 25, 2021.

In addition to the documents previously submitted by Limetree and listed in the August 23 EPA Pending Approval Letter, the above-listed documents complete the Phase 2 Plan. By this email, EPA is approving Limetree to commence Phase 2 beginning on Friday, August 27, 2021. Limetree must also submit the following information to EPA per the deadlines outlined for each of items listed below:

- Within one business day of unblinding flare #8, Limetree must submit a final, completed Pre-startup Review (PSR) for flare #8. EPA provided comments on the PSR to Limetree on August 25, 2021, and Limetree assured EPA that it would incorporate EPA's comments into the final version of the PSR prior to submittal to EPA.
- 2. Every Monday by 6 p.m. EST until the conclusion of the phase 2 purge process, Limetree must submit a revised Phase 2 Plan Schedule or an email confirming that the Phase 2 Plan Schedule has not changed since the last submission.
- 3. On an ongoing basis throughout phase 2, Limetree will operate in compliance with its submitted Phase 2 Plan, including any attachments.
- 4. On a daily basis during Phase 2, Limetree will notify EPA at the end of every day shift at approximately 6 p.m. whether purging operations will continue into the night shift and will identify a point of contact operator who will be staffed on the night shift. If purging operations pause during the night shift, the night shift operator will notify EPA when that occurs.

EPA notes that Limetree is responsible for implementing the phase 2 purge plan in a safe manner that is compliant with the Clean Air Act and ensures that the facility will not present an imminent and substantial endangerment to public or welfare, or the environment.

Any information required to be submitted to EPA pursuant to this email should be provided to Robert Buettner (<u>buettner.robert@epa.gov</u>), Harish Patel (<u>patel.harish@epa.gov</u>), Alex Rivera (<u>rivera.alex@epa.gov</u>), Sara Froikin (<u>froikin.sara@epa.gov</u>), Jennifer Pierce (<u>pierce.jennifer@epa.gov</u>), Liliana Villatora (<u>villatora.liliana@epa.gov</u>), and Myles Flint

(myles.flint@usdoj.gov).

If you have any questions, please contact Harish Patel of my staff at 212-637-4046 or patel.harish@epa.gov.

Sincerely,

Gaetano La Vigna, Chief Stationary Source Compliance Section Air Compliance Branch U.S. EPA Region 2 290 Broadway, 21st Floor New York, New York 10007-1866 Phone (212) 637-4069 Email LaVigna.Gaetano@epa.gov

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