

**From:** [Lundelius, Diana](#)  
**To:** [Wade Eveland](#)  
**Subject:** CEDRI Submission For Rules Not Listed  
**Date:** Friday, December 3, 2021 12:00:00 PM  
**Attachments:** [create\\_reports\\_job\\_aide.pdf](#)  
[image001.png](#)  
[image002.png](#)  
[image003.png](#)

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Okay, I heard back from Eric...

What you need to do to submit via CEDRI is:

1. Click Create Report
2. Select Report Type
3. Select State/Local/Tribal Rule or Permit
4. Select Other Report from the drop down menu
5. Name the report type in the data field – NESHAP FF Initial Notification etc
6. Upload the document(s)
7. Certify and submit

I highlighted additional text in the attached job aide document for reference.

Based on a quick review of Part 61 subpart A, the only notifications you need to submit to EPA via CEDRI are §61.09 Notification of startup and Appendix A compliance status. If you obtain/have a Title V permit, then continue to submit those reports via CEDRI also. All other reports go directly to TCEQ, no courtesy copies to EPA, except for compliance waivers and alternative monitoring/emission limits that TCEQ is not delegated. You should also submit to TCEQ via STEERS so that your documents are uploaded to the Central File room searchable document database.

You can find other information at <https://www.epa.gov/electronic-reporting-air-emissions/cedri#guide>, Job Aids and Frequent Questions.

Diana

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**From:** Lundelius, Diana  
**Sent:** Wednesday, December 1, 2021 10:34 AM  
**To:** Wade Eveland <[wade.eveland@oneatlas.com](mailto:wade.eveland@oneatlas.com)>  
**Cc:** Frey, Sarah <[frey.sarah@epa.gov](mailto:frey.sarah@epa.gov)>; [cedri@epa.gov](mailto:cedri@epa.gov); Flores, Carlos <[Flores.Carlos@epa.gov](mailto:Flores.Carlos@epa.gov)>  
**Subject:** RE: BWON Compliance Question

Hi Wade,

Thanks for the alert about the NESHAP FF issue for submitting via CEDRI.

It sounds like a submission portal has not been set up for that specific rule.

I am copying the CEDRI team at HQ, Casey Myers and Eric Goehl on this reply.

Hopefully they can advise you of an alternate submission selection in CEDRI or WebFire you might be able to use.

Once you have uploaded the initial notification letter to CEDRI, you may discontinue courtesy copies to EPA.

Also, Carlos Flores is no longer the benzene NESHAP FF rule lead here in Region 6 air enforcement. I anticipate that a new rule lead will be assigned before the end of this month. In the meantime, please contact me if there are further questions about a specific rule or state delegations, and I will ensure those questions are routed to someone who can assist.

Diana

Diana L Lundelius CHMM  
Senior Enforcement Officer  
Lean Six Sigma Black Belt / ICIS Team Leader  
CAA Consent Decree Tracking & Alternative Monitoring Coordinator  
Fellow of the Institute of Hazardous Materials Management  
USEPA Region 6  
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*"Leadership is the courage to proceed with positive change, even if the outcome is uncertain."*

Connect with me on Linked In, <https://www.linkedin.com/in/diana-l-lundelius-chmm-a6b98917/>.

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**From:** Wade Eveland <[wade.eveland@oneatlas.com](mailto:wade.eveland@oneatlas.com)>  
**Sent:** Wednesday, December 1, 2021 10:16 AM  
**To:** Lundelius, Diana <[Lundelius.Diana@epa.gov](mailto:Lundelius.Diana@epa.gov)>; Flores, Carlos <[Flores.Carlos@epa.gov](mailto:Flores.Carlos@epa.gov)>  
**Cc:** Frey, Sarah <[frey.sarah@epa.gov](mailto:frey.sarah@epa.gov)>  
**Subject:** RE: BWON Compliance Question

Hi Carlos/Diana, hope all is well since we last spoke.

In regards to the letter of initial BWON applicability for Alpha Omega Recycling facility in Longview (see attached), we had all agreed that TCEQ was the proper end recipient since BWON is delegated to the states. However, you had requested that we also upload a copy to the CEDRI platform to ensure this letter is filed with the EPA (see your comments in email below).

We finally got around to getting the client's CEDRI accounts set up, but when I went to upload I realized I don't see any place in CEDRI that allows for uploading notifications or reports regarding 40 CFR Part 61 Subpart FF. It seems there is no established path in CEDRI for submitting notifications/reports for this subpart.

Could you please clarify how/where we should upload this letter to CEDRI.

Thanks in advance,



**Wade Eveland**  
Senior Project Manager  
**O: 217.549.4790**

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**From:** Lundelius, Diana <[Lundelius.Diana@epa.gov](mailto:Lundelius.Diana@epa.gov)>  
**Sent:** Thursday, October 7, 2021 3:40 PM  
**To:** Wade Eveland <[wade.eveland@oneatlas.com](mailto:wade.eveland@oneatlas.com)>  
**Cc:** Frey, Sarah <[frey.sarah@epa.gov](mailto:frey.sarah@epa.gov)>; Flores, Carlos <[Flores.Carlos@epa.gov](mailto:Flores.Carlos@epa.gov)>  
**Subject:** RE: BWON Compliance Question

Hello Wade,  
TCEQ is delegated for NESHAP FF, so you should address your original notification to TCEQ  
Air Permits Division MC-163  
Texas Commission on Environmental Quality  
PO Box 13087  
Austin, Texas 78711-3087

Before you submit anything to them, contact [airperm@tceq.texas.gov](mailto:airperm@tceq.texas.gov) or 512/239-1250 and ask TCEQ how they want you to submit.

They may ask you to register and submit via their online application STEERS.

They can provide instructions.

You will deal directly with TCEQ on any other additional requirements for complying with NESHAP FF (e.g. permitting).

For the courtesy copy of the notification to EPA Region 6, [you should submit electronically via CEDRI](#). Region 6 is no longer accepting paper copies of notifications or reports that can be submitted online electronically via CEDRI, <https://www.epa.gov/electronic-reporting-air-emissions/cedri#start>. If the facility is already registered with the EPA Central Data Exchange (CDX) for other reporting, then after logging in to CDX, request access to CEDRI. If the company/facility is not registered as a CDX user, go to <https://cdx.epa.gov/About/AboutRegulation> for instructions, or you may speak to the CDX Help Desk, <https://cdx.epa.gov/Help>.

Diana L Lundelius CHMM  
Senior Enforcement Officer  
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*"Leadership is the courage to proceed with positive change, even if the outcome is uncertain."*

Connect with me on Linked In, <https://www.linkedin.com/in/diana-l-lundelius-chmm-a6b98917/>.

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**From:** Wade Eveland <[wade.eveland@oneatlas.com](mailto:wade.eveland@oneatlas.com)>  
**Sent:** Thursday, October 7, 2021 2:56 PM  
**To:** Flores, Carlos <[Flores.Carlos@epa.gov](mailto:Flores.Carlos@epa.gov)>  
**Cc:** Simms, Gloria <[simms.gloria@epa.gov](mailto:simms.gloria@epa.gov)>  
**Subject:** RE: BWON Compliance Question

Hello again Mr. Flores,

We believe we are ready to submit our NESHAP FF (BWON) initial notification letter on behalf of our client (a TSDF facility that has never managed benzene wastes but is considering expanding their offerings). The letter covers our client's initial notification of applicability to BWON, demonstration of initial compliance, and demonstration of ongoing compliance. Since the facility has never managed benzene waste before, the ongoing compliance portion is dependent on a few things that are still TBD. Therefore, we have provided explanations of what ongoing compliance might entail should we go down a few different hypothetical avenues. We believe we've included everything that the Rule requires and then some just to be safe, so all that's left at this point is figuring out where to direct the submittal.

I was hoping you could tell me:

- Who I should address this letter to,
- Who should be included as a CC'd recipient, and
- Whether the preferred method of delivery is electronic or hard copy.

Please email or call me at the number below, and thanks for all of your help!



**Wade Eveland**  
Senior Project Manager

**O: 217.549.4790**

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**From:** Flores, Carlos <[Flores.Carlos@epa.gov](mailto:Flores.Carlos@epa.gov)>  
**Sent:** Monday, September 13, 2021 9:12 AM  
**To:** Wade Eveland <[wade.eveland@oneatlas.com](mailto:wade.eveland@oneatlas.com)>  
**Subject:** [EXTERNAL] Re: BWON Compliance Question

**[External Email]** This email originated from outside of the Atlas mail system. Please use caution when opening attachments.

Please call me when you get a chance.

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**From:** Wade Eveland <[wade.eveland@oneatlas.com](mailto:wade.eveland@oneatlas.com)>  
**Sent:** Friday, September 10, 2021 2:49 PM  
**To:** Flores, Carlos <[Flores.Carlos@epa.gov](mailto:Flores.Carlos@epa.gov)>  
**Subject:** RE: BWON Compliance Question

Hello again Mr. Flores,

When we last spoke about a week ago, you had mentioned you were planning to look into some of my BWON questions (see forwarded email) but I haven't heard back since. I tried calling just a bit ago, but I only got your voicemail.

At this point, we've drafted up a letter of notification that we believe addresses all of the initial compliance requirements, but I was hoping to bounce some thoughts off of you. On top of that, we aren't sure whether the letter should go to the TCEQ/EPA/both and whether there are any specific people or offices/branches it should be directed to.

If you could please give me a call at 217-549-4790 to discuss, I would very much appreciate your input.

Thanks in advance,



**Wade Eveland**  
Senior Project Manager  
**O: 217.549.4790**

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**From:** Wade Eveland  
**Sent:** Monday, August 30, 2021 12:13 PM  
**To:** [Flores.carlos@epa.gov](mailto:Flores.carlos@epa.gov)

**Cc:** [simms.gloria@epa.gov](mailto:simms.gloria@epa.gov)

**Subject:** FW: BWON Compliance Question

Hello Mr. Flores,

I'm reaching out to you regarding a Benzene Waste Operations NESHAPs (BWON) question, which you can find summarized in the forwarded email. I originally reached out to Gloria Simms, but Beverly Murray said you may be better suited to help as you are the NESHAPs subject matter expert.

Ms. Murray also gave me the number to your direct phone line, so I'll probably give you a call shortly to discuss my questions in more detail. If you happen to find yourself free and ready to discuss, please don't hesitate to reach out to me first at 217-549-4790.

Thank in advance,



**Wade Eveland**  
Senior Project Manager  
**O: 217.549.4790**

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**From:** Wade Eveland  
**Sent:** Friday, August 27, 2021 5:20 PM  
**To:** [simms.gloria@epa.gov](mailto:simms.gloria@epa.gov)  
**Subject:** BWON Compliance Question

Hello Ms. Simms,

I have a few questions regarding demonstration of initial and ongoing compliance with the Benzene Waste Operations NESHAPs rule. I spoke with your admin Christina, and she suggested I reach out to you. Christina said you were out until Monday so I'll be sure to call then, but please don't hesitate to call me at the number below if you have availability before then.

**FYI for our eventual call...**

I'm working with a TSD facility that has never received or managed any benzene laden waste but are considering expanding their offerings to include benzene wastes. We are trying to help them understand the initial/ongoing compliance requirements associated with managing BWON applicable wastes, and while my colleagues and I are very familiar with BWON we've never helped bring a TSD into initial compliance with the Rule under these circumstances. I assume we'll need to submit an initial notification to the EPA to establish applicability, but we aren't sure what kind of initial compliance demonstration is required. For a refinery or chemical plant, the main demonstration of compliance with the Rule would be established by calculating the total annual benzene quantity (TAB) and if necessary the uncontrolled benzene quantity (BQ) to show that the

facility complies with the 10MG (mega grams, i.e.  $10^6$  grams), 2BQ, or 6BQ compliance option. The difference is, our client has never managed benzene wastes before, so while we are confident the total annual benzene quantity (TAB) for the facility is <10MG we don't have any historical data with which to calculate benzene quantities (BQ). Moreover, because our client has yet to market benzene waste managing capabilities, they can't forecast the types/volumes of benzene waste that may come in and even then the wastes streams won't necessarily be predictable/consistent. We can talk more details over the phone, but my main questions boil down to:

- For the initial notification, would statement citing the historical lack of benzene waste at the facility suffice in demonstrating that we are initially in compliance with the 10MG compliance option (i.e. total annual benzene quantity or "TAB" across all waste streams < 10 mega grams or metric tons)?
- If so, how soon after the initial notification would we be required to have established actual calculations and records to demonstrate ongoing compliance with the 10MG compliance option? We planned to create these records and calculations as the BWON wastes started coming in since I'm not sure how we could do so before then, but barring an audit or special EPA request, the first time we would have to provide these records in any fashion would be the first annual report (TAB report) right?
- Would the first TAB report cover the period between the initial notification and the end of the calendar year, or would it cover the 365 days following the initial notification?
- Would the TAB due date still be April 7<sup>th</sup> (date of rule promulgation), or some other date roughly 3 months after the reporting year window?
- I'd also like to discuss if there will be any augmented recordkeeping/reporting requirements since the waste streams won't necessarily be predictable/consistent even after they've passed the initial phase.

**Wade Eveland**  
Senior Project Manager



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