

Message

From: Roger Claff [Claff@api.org]
Sent: 6/8/2018 8:03:01 PM
To: Damico, Brian [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5293065367ab48c2bb2ebadcf992c0d6-BDamico]
CC: Wood, Robert [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b2676c137cf54db0a5d98df232901821-Wood, Robert]; Forsgren, Lee [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a055d7329d5b470fbaa9920ce1b68a7d-Forsgren, D]; Ross, David P [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=119cd8b52dd14305a84863124ad6d8a6-Ross, David]; Jeff Gunnulfsen [JGunnulfsen@afpm.org]
Subject: API/AFPM Detailed Comments on Refining ELGs Detailed Study and Refinery Self-Monitoring Program
Attachments: ATT00001.txt; RefiningEffluentGuidelinesLetter.pdf

Importance: High

Brian,

Please find attached our detailed comments on the refining effluent guidelines detailed study, and in particular on the refinery self-monitoring program. As we have discussed, API/AFPM believe refining ELG revisions are not warranted. Should EPA continue the detailed study, the refining self-monitoring program should be narrowly tailored to fill in data gaps, and we maintain naphthenic acids and alkylated PAHs should be removed from the detailed study.

We appreciate the on-going dialogue and cooperative relationship that has been forged on the detailed study. As suggested in the letter, we think perhaps a face-to-face meeting to discuss the attached would be a reasonable next step. Once you have had a chance to review the attached, please contact us to arrange such a meeting. We look forward to continuing the discussion with you.

Thanks!

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