UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region08

OCT 18 2016

8ENF-AT

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Joseph Kuchinski
Vice President
DCP Midstream, LP
3026 4th Avenue
Greeley, Colorado 80631

Re: Supplemental Section 114(a) Request for Information for the DCP Midstream, LP Greeley Gas Plant located in Weld County, Colorado

Dear Mr. Kuchinski:

Pursuant to the authority under section 114 of the Clean Air Act (CAA), the EPA is seeking information so that a determination can be made as to whether DCP Midstream, LP (DCP) has been, and is, complying with the applicable leak detection and repair (LDAR) requirements at the above-referenced gas processing plant.

On August 31, 2016, the EPA issued DCP a Section 114 Request for Information (August 2016 Request) pursuant to section 114 of the CAA, 42 U.S.C. § 7414, to assess compliance with LDAR requirements at four gas processing plants in Weld County, Colorado: the Greeley, Kersey/Mewbourn, Platteville, and Roggen Plants. After consultation with counsel for DCP, the EPA has revised the Microsoft Excel workbook of the instances of possible noncompliance identified at the Greeley Plant. The EPA therefore rescinds the workbook associated with the Greeley Plant enclosed with the August 2016 Request. With this request, the EPA is seeking information based on the enclosed revised workbook for the Greeley Plant (Enclosure 2).

Pursuant to section 114(a) of the CAA, 42 U.S.C. § 7414(a), the Administrator of the EPA is authorized to require any person who owns or operates an emissions source to establish and maintain records, make reports, sample emissions (in accordance with the procedures and methods that the Administrator shall prescribe) and provide such other information as she may reasonably require for the purposes of determining whether such person is in violation of any provision of the CAA. This authority has been delegated to the undersigned official. In order for the EPA to determine whether a violation of the CAA has occurred, you are hereby required, pursuant to section 114(a) of the CAA, to provide responses to the requests in Enclosure 2 of the August 2016 Request using the enclosed revised workbook for the Greeley Plant. Accordingly, no later than January 15, 2017, you must provide responses with respect to the Greeley Plant to the requests in Enclosure 2 of the August 2016 Request. The Instructions and Definitions in Enclosure 1 of the August 2016 Request are incorporated by reference.

You are required to attach a properly executed Statement of Certification (Enclosure 1) to your response to this Request for Information. Enclosure 1 must be signed and dated by an individual who is authorized by DCP to respond to Requests for Information. You are under an obligation to preserve all documents requested in this letter until you receive further instructions from the EPA.

Failure to provide the required information is a violation of the CAA and may result in one or more of the following actions: 1) issuance of an administrative penalty order pursuant to section 113(d) of the CAA, 42 U.S.C. § 7413(d); 2) issuance of an order requiring compliance with this Request; 3) the initiation of a civil action pursuant to section 113(b) of the CAA, 42 U.S.C. § 7413(b); and/or 4) any other action authorized under the CAA. In addition, knowingly providing false information in response to this Request for Information may be actionable under section 113(c) of the Act, 42 U.S.C. § 7413(c), and 18 U.S.C. §§ 1001 and 1341. The information you provide may be used by the EPA in administrative, civil, and criminal proceedings.

Under section 114(c) of the Act, 42 U.S.C. § 7414(c), and pursuant to regulations at 40 C.F.R. Part 2, including 40 C.F.R. § 2.301, you are entitled to claim as confidential any information you provide to the EPA which involves trade secrets and is regarded as confidential business information by you. For such information, you may request that the EPA treat such information as confidential. Any such claim for confidentiality must conform to the requirements of 40 C.F.R. § 2.203(b). Note that emissions information is not considered confidential under section 114(c). For detailed instructions, please see Enclosure 4 to the August 2016 Request. Information you supply will be treated as confidential business information to the degree determined to be appropriate according to the regulations. If you fail to furnish a business confidentiality claim with your response to this Request for Information, the EPA will construe your failure as a waiver of that claim, and the information may be made available to the public without further notice to you.

<u>YOU MUST SUBMIT ALL RESPONSIVE INFORMATION</u>: Whether or not you make a claim of confidentiality.

Please submit your response to this Request to:

U.S. Environmental Protection Agency, Region 8
Air and Toxics Technical Enforcement Program (8ENF-AT)
Office of Enforcement, Compliance and Environmental Justice
1595 Wynkoop Street
Denver, Colorado 80202-1129
Attention: Joseph Wilwerding

If you have any questions regarding this Request for Information, please contact Joseph Wilwerding at 303-312-6729, or your counsel may contact Jessica Portmess, at 303-312-7026.

Sincerely,

(for)

Suzanne J. Bohan
Assistant Regional Administrator
Office of Enforcement, Compliance
and Environmental Justice

Enclosures
1. Statement of Certification
2. Revised Greeley Plant Microsoft Excel Workbook File
3. August 31, 2016 Section 114 Request for Information

cc: Shannon McMillan, Colorado Department of Public Health and Environment (w/out Encl.)
Greg Fried, EPA, Air Enforcement Division, OECA (w/out Encl.)

ENCLOSURE 1

STATEMENT OF CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations pursuant to section 113(c)(2) of the Clean Air Act, and 18 U.S.C. §§ 1001 and 1341.

_____
(Signature)

_____
(Printed Name)

_____
(Title)

_____
(Date)

ENCLOSURE 3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
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8ENF-AT

AUG 31 2016

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Joseph Kuchinski
Vice President
DCP Midstream, LP
3026 4th Avenue
Greeley, Colorado 80631

Re: Section 114(a) Request for Information for the DCP Midstream, LP Greeley, Kersey/Mewbourn, Platteville, and Roggen Gas Plants all located in Weld County, Colorado

Dear Mr. Kuchinski:

The EPA has evaluated the Leak Detection and Repair (LDAR) database(s) provided by DCP Midstream, LP (DCP) in July 2015 for the Greeley, Kersey/Mewbourn, Platteville, and Roggen Gas Plants. Pursuant to the authority under section 114 of the Clean Air Act, the EPA is seeking information so that a determination can be made as to whether DCP has been, and is, complying with the applicable LDAR requirements at the four above-mentioned gas plants.

Pursuant to section 114(a) of the CAA, 42 U.S.C. § 7414(a), the Administrator of the EPA is authorized to require any person who owns or operates an emissions source to establish and maintain records, make reports, sample emissions (in accordance with the procedures and methods that the Administrator shall prescribe) and provide such other information as she may reasonably require for the purposes of determining whether such person is in violation of any provision of the CAA. This authority has been delegated to the undersigned official. In order for the EPA to evaluate DCP's compliance with the CAA, you are hereby required, pursuant to section 114(a) of the CAA, to provide responses to the following Request for Information regarding the facilities listed above. Accordingly, within thirty (30) calendar days from receipt of this Request for Information, you must provide responses to the requests in Enclosure 2. See the Instructions and Definitions in Enclosure 1 and the Information Requested in Enclosure 2.

You are required to attach a properly executed Statement of Certification (Enclosure 3) to your response to this Request for Information. Enclosure 3 must be signed and dated by an individual who is authorized by DCP to respond to Requests for Information. You are under an obligation to preserve all documents requested in this letter until you receive further instructions from the EPA.

Failure to provide the required information is a violation of the CAA and may result in one or more of the following actions: 1) issuance of an administrative penalty order pursuant to section 113(d) of the CAA, 42 U.S.C. § 7413(d); 2) issuance of an order requiring compliance with this Request for Information; 3) the initiation of a civil action pursuant to section 113(b) of the CAA, 42 U.S.C.

§ 7413(b); and/or 4) any other action authorized under the CAA. In addition, knowingly providing false information in response to this Request for Information may be actionable under section 113(c) of the CAA, 42 U.S.C. § 7413(c), and 18 U.S.C. §§ 1001 and 1341. The information you provide may be used by the EPA in administrative, civil, and criminal proceedings.

Under section 114(c) of the CAA, 42 U.S.C. § 7414(c), and pursuant to regulations at 40 C.F.R. Part 2, including 40 C.F.R. § 2.301, you are entitled to claim as confidential any information you provide to the EPA which involves trade secrets and is regarded as confidential business information by you. For such information, you may request that the EPA treat such information as confidential. Any such claim for confidentiality must conform to the requirements of 40 C.F.R. § 2.203(b). *Note that emissions information is not considered confidential under section 114(c).* For detailed instructions, please see Enclosure 4 to this letter. Information you supply will be treated as confidential business information to the degree determined to be appropriate according to the regulations. If you fail to furnish a business confidentiality claim with your response to this Request for Information, the EPA will construe your failure as a waiver of that claim, and the information may be made available to the public without further notice to you.

YOU MUST SUBMIT ALL RESPONSIVE INFORMATION: ***Whether or not you make a claim of confidentiality.***

Please submit your response to this Request for Information to:

U.S. Environmental Protection Agency, Region 8
Technical Enforcement Program (8ENF-AT)
Office of Enforcement, Compliance and Environmental Justice
1595 Wynkoop Street
Denver, Colorado 80202-1129
Attention: Joseph Wilwerding

If you have any questions regarding this Request for Information, please contact Joseph Wilwerding at 303-312-6729, or your counsel may contact Jessica Portmess, at 303-312-7026.

Sincerely,

Suzanne J. Bohan
Assistant Regional Administrator
Office of Enforcement, Compliance
and Environmental Justice

Enclosures:

1) Instructions and Definitions
2) Information Requested
3) Statement of Certification
4) Confidential Business Information
5) Gas Plant Microsoft Excel Workbook Files

cc: Shannon McMillan, Colorado Department of Public Health and Environment
Greg Fried, EPA Air Enforcement Division, OECA

ENCLOSURE 1

A. INSTRUCTIONS

Based on the information contained in the LDAR database(s), the EPA has compiled Microsoft Excel workbooks of the instances of possible noncompliance. An electronic copy of the Microsoft Excel workbooks is enclosed with this section 114 Request for Information as Enclosure 5. The workbooks contain worksheet Tabs corresponding to specific questions in Enclosure 2 of this Request for Information.

Generally, in this Request for Information, the EPA requests that DCP provide information that demonstrates compliance was achieved with applicable LDAR standards. For each instance of potential noncompliance identified in Enclosure 5, the EPA requests that DCP annotate the Excel workbook, describing, if applicable, how DCP achieved compliance in the listed instance, and include any supporting documentation that demonstrates compliance was achieved.

Specifically, the EPA requests that DCP annotate the columns titled "Response" and "Documentation Reference" for each instance of potential noncompliance identified in Enclosure 5. Requested annotations to the "Response" columns are listed under each question in Enclosure 2. Under the "Documentation Reference" column, provide a reference to the supporting information submitted (e.g., "LDAR program records located at Mewbourn\Documentation\Tab2\ComponentID-12851"). If all supporting information was provided in the LDAR database files submitted to the EPA in July 2015, state which specific tables within the database contain the supporting information. The EPA requests that supporting documentation be provided in separate files in Portable Document Format (*.pdf) format, unless otherwise specified in Enclosure 2. Further guidance on information requested by the EPA is provided under each question in Enclosure 2.

Regulatory references throughout Enclosure 2 include regulatory provisions that may apply. Where regulatory citations are provided, citations are to the provisions cross-referenced in the applicable standards (for instance, citations are to Subpart VV as the applicable standard referenced in Subpart KKK).

B. DEFINITIONS

All terms used in this Request for Information will have their ordinary meaning unless such terms are defined in the CAA, other CAA implementing regulations (e.g. Subpart HH, Subpart VV, Subpart VVa, Subpart KKK, Subpart OOOO, or Subpart OOOOa), or otherwise defined herein.

1. The term "**Act**" or "**CAA**" shall mean the Clean Air Act, 42 U.S.C. §§ 7401 et seq.

2. The term "**affected facility**" shall mean, with reference to a stationary source, any apparatus to which a standard is applicable under the new source performance standards (NSPS) including, for example, Subparts KKK, NNN, RRR, or OOOO.

3. The term "**ancillary equipment**" means any of the following pieces of equipment: pumps, pressure relief devices, sampling connection systems, open-ended valves, or lines, valves, flanges, or other connectors.

4. The term "**difficult-to-monitor**" shall mean equipment cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface.

5. The term "**delay of repair**" shall mean use of provisions under §§ 60.482-9, 60.482a-9, or 61.242-10 to exempt leaking equipment from the requirement to repair within 15 days of identification of a leak.

6. The term "**drill and tap repair**" or "**drill and tap repair method**" shall mean a process by which injectable packing or sealant material is injected through an adapter into the stuffing box of a valve. The injectable packing/sealant can replace lost packing material and stop a leak. The valve does not need to be disassembled or taken out of service before the procedure is performed. To affix the adapter to the stuffing box of the valve, a hole is drilled into the stuffing box and tapped with threads, and the adapter is screwed into place.

7. The term "**EPA**" shall mean the United States Environmental Protection Agency.

8. The term "**equipment**" shall mean each pump, pressure relief device, open-ended valve or line, valve, compressor, sampling connection system, and flange or other connector that is **in VOC service** or **in wet gas service**.

9. The term "**first attempt at repair**" shall mean to take action for the purpose of stopping or reducing leakage of organic material to the atmosphere using best practices.

10. The term "**hazardous air pollutant (HAP)**" shall mean any air pollutant listed in or pursuant to section 112(b) of the CAA.

11. The term "**in volatile organic compound (VOC) service**" shall mean that the piece of equipment contains or contacts a process fluid that is at least 10 percent VOC by weight. (The provisions of 40 C.F.R. §§ 60.485(d) or 60.485a(d) specify how to determine that a piece of equipment is not in VOC service.)

12. The term "**in volatile hazardous air pollutant (VHAP) service**" shall mean that a piece of equipment or compressor either contains or contacts a fluid (liquid or gas) which has a total VHAP concentration equal to or greater than 10 percent by weight as determined according to the provisions of 40 C.F.R. § 63.772(a).

13. The term "**in wet gas service**" shall mean that a piece of equipment contains or contacts the field gas before the extraction step in the process.

14. The term "**LDAR**" shall mean leak detection and repair.

15. The term "**Method 21**" shall mean the Test Method for Determination of volatile organic compound leaks at Appendix A-7 to 40 C.F.R. Part 60.

16. The term "**NSPS capital expenditure calculations**" shall mean any calculations performed to determine whether there has been an expenditure for a physical or operational change to an existing facility, as provided under Subpart OOOO, Subpart KKK, Subpart VV, and Subpart VVa.

17. The term "**process unit**" or "**process units**" shall mean equipment assembled for the extraction of natural gas liquids from field gas, the fractionation of the liquids into natural gas products, or other operations associated with the processing of natural gas products. A process unit can operate independently if supplied with sufficient feed or raw materials and sufficient storage facilities for the products.

18. The term "**process unit shutdown**" shall mean a work practice or operational procedure that stops production from a process unit or part of a process unit during which it is technically feasible to clear process material from a process unit or part of a process unit consistent with safety constraints and during which repairs can be accomplished. The following are not considered process unit shutdowns:

    (1) An unscheduled work practice or operational procedure that stops production from a process unit or part of a process unit for less than 24 hours.
    (2) An unscheduled work practice or operational procedure that would stop production from a process unit or part of a process unit for a shorter period of time than would be required to clear the process unit or part of the process unit of materials and start up the unit, and would result in greater emissions than **delay of repair** of leaking components until the next scheduled process unit shutdown.
    (3) The use of spare equipment and technically feasible bypassing of equipment without stopping production.

19. The term "**replacement cost**" shall mean the capital needed to purchase all the depreciable components in a facility.

20. The term "**Subpart HH**" shall mean the National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities, 40 C.F.R. §§ 63.760 et seq.

21. The term "**Subpart KKK**" shall mean the Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011, 40 C.F.R. §§ 60.630 et seq.

22. The term "**Subpart OOOO**" shall mean the Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for Which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or Before September 18, 2015, 40 C.F.R. §§ 60.5360 et seq.

23. The term "**Subpart OOOOa**" shall mean the Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015, 40 C.F.R. §§ 60.5360a et seq.

24. The term "**Subpart V**" shall mean the National Emission Standard for Equipment Leaks (Fugitive Emission Sources), 40 C.F.R. §§ 61.240 et seq.

25. The term "**Subpart VV**" shall mean the Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006, 40 C.F.R. §§ 60.480 et seq.

26. The term "**Subpart VVa**" shall mean the Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006, 40 C.F.R. §§ 60.480a et seq.

27. The term "**volatile organic compounds (VOC)**" shall mean, for the purposes of Subparts KKK and OOOO, any reactive organic compounds as defined in 40 C.F.R. § 60.2 Definitions.

28. The term "**volatile hazardous air pollutant (VHAP) concentration**" shall mean the fraction by weight of all hazardous air pollutants (HAP) contained in a material as determined in accordance with procedures specified in §63.772(a).

ENCLOSURE 2

INFORMATION REQUESTED:

1) Chemical Speciation Information (Excel workbook Tab 1)

For each of the process streams identified in Tab 1 that are associated with equipment in the facility LDAR program, provide the chemical composition (percentage contribution of each chemical) in weight percent in the stream, and provide the total **VHAP concentration** of the process stream.

The regulations, at 40 C.F.R. § 63.772, address the "[d]etermination of material VHAP or HAP concentration to determine the applicability of [] equipment leak standards." 40 C.F.R. § 63.772(a) states that "each piece of **ancillary equipment** and compressors are presumed to be **in VHAP service** or **in wet gas service** unless an owner or operator demonstrates that the piece of equipment is not **in VHAP service** or **in wet gas service**."

2) **First Attempt At Repair** (Excel workbook Tab 2)

Tab 2 entries are instances in which information could not be identified that indicates a **first attempt at repair** was performed within 5 days of identification of the leak, as required by 40 C.F.R. §§ 60.482-2 through 60.482-8, 60.482a-2 through 60.482a-8, 60.482-11a, or 61.242-2 through 61.242-8 For each entry in Tab 2, provide a justification/response and supporting documentation indicating how compliance with repair attempt requirements was achieved (for example, "Repair attempt performed by XX person using XX repair method within XX days of leak identification").

3) Final Repairs or Placement on **Delay of Repair** (Excel workbook Tab 3)

Tab 3 entries are instances in which information could not be identified that indicates final repair was performed within 15 days of identification of the leak, as required by 40 C.F.R. §§ 60.482-2 through 60.482-8, 60.482-2a through 60.482-8a, 60.482-11a, or 61.242-2 through 61.242-8, or that repairs were exempted under applicable **delay of repair** provisions under 40 C.F.R. §§ 60.482-9, 60.482-9a, or 61.242-10. For each entry in Tab 3, provide a justification/response and supporting documentation indicating how compliance with repair requirements was achieved (for example, "Repair performed by XX person on XX date, and re-monitoring performed by XX person within XX days of leak identification").

4) **Delay of Repair** Exemption and Justification (Excel workbook Tabs 4, 5, and 6)

a. Tab 4 entries are periods in which leaking **equipment** placed on **delay of repair** pursuant to 40 C.F.R. §§ 60.482-9, 60.482-9a, or 61.242-10 was repaired outside the next reported **process unit shutdown**. For each piece of **equipment** on **delay of repair** that was repaired during the calendar quarters shown in Tab 4, explain why a **process unit shutdown** was not needed to repair the **equipment**.

b. Tab 5 entries are instances in which **equipment** was placed on **delay of repair** pursuant to 40 C.F.R. §§ 60.482-9, 60.482-9a, or 61.242-10 when repairs may have been technically feasible without a **process unit shutdown**. For each entry in Tab 5 in which DCP used "waiting for parts" as the justification for repair delay, state, under the Response column, whether the **equipment** would have been technically feasible to repair if parts had been sufficiently stocked.

If the **equipment** was still technically infeasible to repair without a **process unit shutdown**, provide supporting information which demonstrates the repair was still technically-infeasible.

c. Tab 6 entries are instances in which pumps and/or control valves were placed on **delay of repair** pursuant to 40 C.F.R. §§ 60.482-9, 60.482-9a, or 61.242-10 for repair at the next **process unit shutdown**, and continued to leak beyond the 15-day repair requirement. For each entry in Tab 6, state, under the Response column, whether piping and/or equipment existed at the plant that would have allowed the leaking **equipment** to be bypassed and removed from service for repair (for example, "No spare pump existed to allow leaking pump to be bypassed"). Provide supporting information, such as process and instrumentation diagrams showing the location of the leaking **equipment** and surrounding piping/equipment, which demonstrates no bypass piping and/or equipment existed.

5) Periodic Monitoring for Valves and Pumps (Excel workbook Tab 7)

Tab 7 entries are instances in which information could not be identified that indicates **equipment** was monitored during the appropriate monthly or quarterly period, as required by 40 C.F.R. §§ 60.482-2, 60.482-7, 60.482-2a, 60.482-7a, 61.242-2, or 61.242-7. For each entry in Tab 7, provide a justification/response and supporting documentation indicating how compliance with applicable monitoring requirements was achieved (for example, "Monitoring performed by XX person on XX date with monitoring reading of XX ppm").

6) **Method 21** (Excel workbook Tabs 8, 9, 10, and 11)

a. Tab 8 entries are instances in which monitoring technicians monitored over 500 pieces of **equipment** in a single day, and often in a fraction of a day. Describe, for each of the listed instances, how the monitoring route completed by the technician compares to the same or similar routes performed by other technicians at the site, in terms of length of time required to complete monitoring of the **equipment**.

b. Tab 9 entries are instances in which monitoring technicians monitored over 200 pieces of **equipment** in a single hour, and often in a fraction of an hour. Describe, for each of the listed instances, how the monitoring route completed by the technician compares to the same or similar routes performed by other technicians at the site, in terms of length of time required to complete monitoring of the **equipment**.

c. Tab 10 entries are instances in which less than 8 seconds elapsed between the previous inspection and the inspection event identified in Tab 10, for inspections performed by the same inspector/monitoring technician and when an elevated monitoring reading was detected, which may indicate monitoring failures. For each entry in Tab 10, describe how compliance with **Method 21** requirements was achieved, especially as regards to minimum required time needed to inspect all leak interfaces for the size and type/subtype of component being monitored, and the location of the component as compared to the previously inspected component and time required to move between the components.

d. Tab 11 entries are instances in which **Method 21** may not have been performed correctly, based upon length of inspection and/or travel time required for the monitoring technician to physically move to the piece of **equipment**. For each of the monitoring inspections listed in Tab 11, describe

how compliance with **Method 21** requirements was achieved, especially as regards to minimum required time needed to inspect all leak interfaces for the size and type/subtype of component being monitored, and the location of the component as compared to the previously inspected component and time required to move between the components.

7) Follow-Up Monitoring for Leaking Valves (Excel workbook Tab 12)

Tab 12 entries are instances in which information could not be identified that indicates the valve was monitored monthly—after being found leaking above applicable leak definitions—until the **equipment** was shown not to leak for two consecutive months, as required by required by 40 C.F.R. §§ 60.482-7(c)(2), 60.482-7a(c)(2), or 61.242-7(c)(2). For each entry in Tab 12, provide a justification/response and supporting documentation indicating the date of each monitoring event and the monitoring result until the component was shown not to leak above applicable thresholds for two consecutive months. If the **equipment** could not be monitored during the period, describe the activity which prevented the **equipment** from being monitored, the start and end date of the activity which prevented the **equipment** from being monitored, and state whether the activity or outage was reported on semiannual **LDAR** reports. Provide supporting documentation for your responses.

8) New **LDAR** Program **Equipment** (Excel workbook Tab 13)

Tab 13 entries are counts of **equipment** that were added to (and/or removed from) **process units** under the **LDAR** program during one or more calendar quarters evaluated.

a. As the **LDAR** database(s) provided by DCP included **LDAR** data only through part of 2015, update Tab 13 with the count of each type of **equipment** added to (and/or removed from) each **process unit** under the **LDAR** program during each quarter, through the last complete calendar quarter prior to receipt of this Request for Information.

b. For any **process units** with **equipment in VOC service, in VHAP service**, or **in wet gas service** which were not included in the **LDAR** database at the time DCP provided a copy of its database(s) to EPA in 2015, include those **process units** in Tab 12, and provide the count of each type of **equipment** added to (and/or removed from) the **process unit** during each quarter, from January 1, 2012 through the last complete calendar quarter prior to receipt of this Request for Information.

c. After updating Tab 13 with the latest **LDAR** program information, for each quarter and **process unit** in which **equipment** was added to the **LDAR** program, state, under the Response column, whether the **equipment** added during the quarter was "Existing **equipment** newly added to the **LDAR** program," "Newly installed **equipment** added to the **LDAR** program," or "New and existing **equipment** newly added to the **LDAR** program." Provide supporting information that documents/demonstrates the following:

i. For existing **equipment** newly added to the **LDAR** program during that quarter:
   1. The date the added **equipment** was physically installed in the **process unit** and a count of each type of **equipment** (e.g., valve, pump, connector) installed on that date, and
   2. The date the added **equipment** was placed **in VOC service**, placed **in VHAP service**, or placed **in wet gas service** in the **process unit**, and a count of each type of **equipment** (e.g., valve, pump, connector) placed into service on that date.

ii. For newly installed **equipment** added to the **LDAR** program, calculate the emission rate increase for the **process unit** showing:
   1. The **LDAR** identification number for each piece of **equipment** added and removed;
   2. The service type for each piece of **equipment** added and removed;
   3. The type and subtype of each piece of **equipment** added and removed;
   4. The emission factor used for each piece of **equipment** added and removed, and
   5. The emission calculations, provided in an editable Excel Spreadsheet.

iii. For newly installed **equipment** added to the **LDAR** program which result in an emission rate increase, **NSPS capital expenditure calculations** information for the **process unit** showing:
   1. The cost and **LDAR** identification number of each piece of **equipment** added;
   2. The replacement cost of the affected facility where the **equipment** was added;
   3. Year of construction for the **process unit**; and
   4. The **NSPS capital expenditure calculation**, provided in an editable Excel spreadsheet.

9) Initial Monitoring for Valves Within 30 Days (Excel workbook Tab 14)

Tab 14 entries are instances in which information could not be identified which indicates equipment was monitored within 30 days of being placed into service, as required by 40 C.F.R. §§ 60.482-7(a)(1) or 60.482a(a)(1) and considering also the EPA's applicability determination Number 1200052, dated October 28, 2011 and titled "Request for Clarification of Initial Monitoring Requirement for Pumps and Valves." For each entry in Tab 14, provide a justification/response and supporting documentation indicating the number of days after being placed into service the equipment was monitored, and the date of initial monitoring (for example, "28 days, 3/15/2014").

10) Initial Monitoring to Demonstrate Non-Leak Performance for Valves (Excel workbook Tab 15)

Tab 15 entries are instances in which information could not be identified that indicates the valve was monitored monthly—after being placed into service—unless the valve was shown not to leak above applicable thresholds for two consecutive months, as required by 40 C.F.R. §§ 60.482-7(a)(1), 60.482a-7(a)(1), or 61.242-7(a). For each entry in Tab 15, provide a justification/response documenting the date the valve was placed into service, and the date of each monitoring event and the monitoring result until the valve was shown not to leak above applicable thresholds for two consecutive months. Provide supporting information that demonstrates that the monitoring activity was performed as required, considering also the EPA's applicability determination Number 1200052, dated October 28, 2011 and titled "Request for Clarification of Initial Monitoring Requirement for Pumps and Valves."

11) **Difficult-To-Monitor** Exemption and Inspections (Excel workbook Tab 16)

a. Tab 16 entries are instances in which greater than 3% of valves in a **process unit** were listed as **difficult-to-monitor equipment** and exempted from monthly and/or quarterly monitoring requirements under 40 C.F.R. §§ 60.482-7(h)(2) or 60.482-7a(h)(2). For each entry in Tab 16, provide the date the **process** unit commenced construction and a justification/response indicating how compliance with the **difficult-to-monitor** provisions was achieved. Provide supporting information that shows, for each valve designated as **difficult-to-monitor** in a **process unit**, the

date of each monitoring event performed in the 5 years prior to this Request for Information, and the monitoring reading from each monitoring event.

b. Tab 17 entries are instances in which information could not be identified that indicates **difficult-to-monitor equipment** was monitored at least annually, as required by 40 C.F.R. §§ 60.482-7(h)(3), 60.482-7a(h)(3), or 61.242-7(h)(3). For each entry in Tab 17, provide a justification/response and supporting documentation indicating how compliance with applicable monitoring requirements was achieved (for example, "Monitoring performed by XX person on XX date with monitoring reading of XX ppm"). If the **equipment** could not be monitored during the period, describe the activity which prevented the **equipment** from being monitored, the start and end date of the activity which prevented the **equipment** from being monitored, and state whether the activity or outage was reported on semiannual **LDAR** reports. Provide supporting documentation for your responses.

12) **Drill and Tap Repairs**

a. State whether DCP or its contractors have used the **drill and tap repair method** on any valve or component in steam, hydrocarbon, or other product service at the Greeley, Kersey/Mewbourn, Platteville, and Roggen Gas Plants in the 5 years prior to this request.

b. If you answered "yes" with regard to question 12.a., please provide the following:

   i. The date the **drill and tap repair** was performed;
   ii. The name of the company, contractor, and individual(s) that performed the **drill and tap repair**;
   iii. The type of valve or equipment on which the **drill and tap repair method** was performed;
   iv. The type of product or material service for the valve or equipment where the **drill and tap repair** was performed (hydrocarbon, steam, etc);
   v. The cost billed for the **drill and tap repair** if performed by a contractor; and
   vi. Information provided by the equipment manufacturer stating the **drill and tap repair** had invalidated product warranties for the equipment which received the repair.

c. If you answered "no" with regard to question 12.a, please provide the following:

   i. Copies of all communications with **drill and tap repair** service providers about performing **drill and tap repairs** at the facility;
   ii. The reason, if a **drill and tap repair** service provider was consulted on a repair, why the **drill and tap repair** was not performed; and
   iii. The title and level of the facility position at which the decision was ultimately made not to perform the **drill and tap repair**.

d. Provide any written company policies or guidance created or adopted by DCP regarding use or implementation of the **drill and tap repair method** in the last 5 years, and the date the policy or guidance was created or adopted.

e. State whether any DCP representative consulted on DCP's response to this Request for Information has any knowledge of a **drill and tap repair** performed at a natural gas processing plant that caused and/or was a factor in a safety-related incident at the facility.

f. If you answered question 12.e. in the affirmative, provide the basis of any knowledge and a detailed explanation of the safety-related incident that resulted from the use of the **drill and tap repair method**. Please include the name of the facility where the incident occurred, and the information requested under questions 12 b.i-iv. for the **drill and tap repair**.

13) Provide a summary and general history of each Plant (the Greeley, Kersey/Mewbourn, Platteville, and Roggen Gas Plants), including the various processes (for example inlet, dehydration, fractionation, extraction, amine unit, storage, separation, etc.), the year that each process was added, and the products produced. Indicate how the feed enters, and products exit, each Plant, e.g., truck, pipeline, etc. Provide the design capacity and average throughput through each Plant over the past six months in million standard cubic feet per day (MMscfd). Provide a plot plan and block flow diagram for each Plant.

14) Provide a description of the entities that own and operate each Plant (the Greeley, Kersey/Mewbourn, Platteville, and Roggen Gas Plants), including a description of the relationships between any entities involved in ownership or operation.

15) Identify whether you have withheld any documents or portions of documents otherwise responsive to this Request for Information on grounds of privilege. If so, identify the author of the document, all recipients of the document, the date the document was created, the subject of the document, the request that the document is responsive to, and the grounds for the privilege asserted.

ENCLOSURE 3

STATEMENT OF CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations pursuant to section 113(c)(2) of the Clean Air Act, and 18 U.S.C. §§ 1001 and 1341.

_____
(Signature)

_____
(Printed Name)

_____
(Title)

_____
(Date)

ENCLOSURE 4

Confidential Business Information (CBI)
Assertion and Substantiation Requirements

You may assert a business confidentiality claim covering all or part of the information you provide in response to this Request for Information for any business information entitled to confidential treatment under section 114(c) of the Clean Air Act (CAA), 42 U.S.C. § 7414, and 40 C.F.R. Part 2, subpart B. Under section 114(c) of the CAA, you are entitled to confidential treatment of information that would divulge methods or processes entitled to protection as trade secrets. Under 40 C.F.R. Part 2, subpart B, business confidentiality means "the concept of trade secrecy and other related legal concepts which give (or may give) a business the right to preserve the confidentiality of business information and to limit its use or disclosure by others in order that the business may obtain or retain business advantages it derives from its rights in the information." See 40 C.F.R. § 2.201(e).

Information covered by a claim of business confidentiality will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in section 114(c) of the CAA and 40 C.F.R. Part 2, subpart B. If you fail to furnish a business confidentiality claim with your response to this Request for Information, the EPA will construe your failure as a waiver of that claim, and the information may be made available to the public without further notice to you.

To assert a business confidentiality claim, you must place on (or attach to) all information you desire to assert as business confidential either a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential" at the time you submit your response to this Request for Information. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by the EPA. You should indicate if you desire confidential treatment only until a certain date or until the occurrence of a certain event.

The criteria the EPA will use in determining whether material you claim as business confidential is entitled to confidential treatment are set forth at 40 C.F.R. §§ 2.208 and 2.301. These regulations provide, among other things, that you must satisfactorily show that: (1) the information is within the scope of business confidentiality as defined at 40 C.F.R. § 2.201(e); (2) you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; (3) the information is not and has not been reasonably obtainable by legitimate means without your consent; and (4) the disclosure of the information is likely to cause substantial harm to your business's competitive position. See 40 C.F.R. § 2.208 (a)-(e). Emission data, as defined at 40 C.F.R. § 2.301(a)(2), is expressly not entitled to confidential treatment under 40 C.F.R. Part 2, subpart B. See 42 U.S.C. § 7414(c); 40 C.F.R. § 2.301(e).

If you assert a claim of business confidentiality in connection with information and documents forwarded in response to this Request for Information the EPA is requesting, in accordance with 40 C.F.R. § 2.204(e)(4), that you answer the following questions with respect to any information or document for which you assert a claim of business confidentiality:

1. What specific portions of the information are alleged to be entitled to confidential treatment? Specify by page, paragraph, and sentence when identifying the information subject to your claim.

2. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you have specified.

3. What measures have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?

4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?

5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.

6. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Is there any other explanation you deem relevant to the EPA's determination of your business confidentiality claim that is not covered in the preceding questions? If so, you may provide such additional explanation.

Submit your answers to the above questions concurrently with your response to this information request if you have claimed any information as business confidential. See 40 C.F.R. § 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline. The EPA will construe your failure to furnish timely comments as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1). Please submit your comments to:

Jessica Portmess
U.S. EPA Region 8
1595 Wynkoop Street (ENF-L)
Denver, CO 80202-1129
303-312-7026

Pursuant to 40 C.F.R. § 2.205(c), you are hereby advised that information you submit as part of your comments may be regarded by the EPA as entitled to confidential treatment if, when it is received by the EPA, it is marked in accordance with 40 C.F.R. § 2.203(b). You may assert a business confidentiality claim covering all or part of your response to the above questions, as provided in 40 C.F.R. § 2.203(b). See 40 C.F.R. § 2.204(e)(6). Information covered by such a claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in section 114(c) of the CAA and 40 C.F.R. Part 2. The EPA will construe the failure to furnish a confidentiality claim with your comments as a waiver of that claim, and the information may be made available to the public without further notice to you.