Message

From: Woods, Clint [woods.clint@epa.gov]
Sent: 8/9/2018 7:27:53 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]; Gunasekara, Mandy [Gunasekara.Mandy@epa.gov]
Subject: Fwd: Subpart OOOOa Monitoring

FYI

Begin forwarded message:

From: "Traylor, Patrick" <traylor.patrick@epa.gov>
Date: August 9, 2018 at 3:17:11 PM EDT
To: "Woods, Clint" <woods.clint@epa.gov>
Subject: Subpart OOOOa Monitoring

Clint:

I double-checked with my staff on the monitoring interval at compressors that would ensure adequate enforceability. I understand that OMB is asking whether an annual monitoring interval would be appropriate versus our semi-annual proposal. Here are two matters for OAR's consideration.

First, unlike emission standards that are independent (e.g., expressed in #/MMBtu) and against which emissions are periodically monitored, the compressor station monitoring *is itself* the standard. Without other compliance-related data (e.g., parametric monitoring), assessing compliance only once a year runs contrary to a body of practice that requires more frequent compliance monitoring for practical enforceability. This is a factor that is, of course, not decisive, but perhaps informative to OAR's decision.

Second, enforcement notes that quite often there are tanks co-located with compressors (e.g., knock-out tanks that could hold VOCs). I'm advised that the rule allows the leak detection frequency at co-located tanks to follow the compressor leak detection monitoring interval. Because it is (at least in the enforcement practice) much more likely to detect leaks from tanks than compressors, reducing the monitoring interval for tanks to annual seems unwise. Again, this is not dispositive, but perhaps instructive.

I hope this helps.

Best,
Patrick

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