Message

From: Marsh, Karen [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=03408BEA5D5B4030BE80FA390ED47026-MARSH, KARE]
Sent: 9/19/2018 7:14:35 PM
To: Jamie Nease [jnease@hlpengineering.com]
Subject: RE: NSPS-OOOOa Fugitive Emissions; change in compliance status

Hi Jamie,

Based on the definition of compressor station in 60.5430a, if the compressors are permanently removed, then the facility would no longer meet the definition of compressor station. Therefore, our guidance would be that the facility no longer meets the affected facility definition and fugitive monitoring would not be applicable for a compressor station. Since this appears to be a specific site, we would recommend that they request a formal applicability determination from the applicable delegated authority (likely the regional office). Let me know if you need a contact for the region.

Thanks,
Karen

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Karen R. Marsh, PE
US EPA, OAQPS, Sectors Policies and Programs Division
Fuels and Incineration Group
109 TW Alexander Drive, Mail Code E143-05
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Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Jamie Nease [mailto:jnease@hlpengineering.com]
Sent: Friday, August 17, 2018 10:08 AM
To: Marsh, Karen <Marsh.Karen@epa.gov>
Subject: RE: NSPS-OOOOa Fugitive Emissions; change in compliance status

Thanks, Karen.

The compressor station is between wellsite segment and processing. Specifically, gas from many wellsite locations is routed to this facility for treatment. At this facility, there was compression, an amine unit and glycol dehydration. Now that compression is gone, it is only amine treatment and glycol dehydration. Gas leaves and is sold. I would imagine it goes downstream for further processing.

Let me know if that clears it up.

Jamie

From: Marsh, Karen [mailto:Marsh.Karen@epa.gov]
Sent: Friday, August 17, 2018 8:44 AM
To: Jamie Nease <jnease@hlpengineering.com>
Subject: RE: NSPS-OOOOa Fugitive Emissions; change in compliance status

Hi Jamie,

I did get your other email as well and hope to have a response. At least one of your questions gets fully answered in the proposal we have currently at OMB but I can't share what is in there until that is signed. Hopefully soon.

In the meantime, I wanted to ask a few additional questions on this particular topic. Where in the segment is this compressor station located? Is it pre or post processing plant? What equipment is still at the station?

I'm sure I'll think of some others but I know these would be important for helping us provide a response.
Thanks!
Karen

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From: Jamie Nease [mailto:jnease@hlpengineering.com]
Sent: Thursday, August 09, 2018 12:51 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>
Subject: NSPS-OOOOa Fugitive Emissions; change in compliance status

Karen-

If a facility is applicable to the leak detection under OOOOa is subject as a compressor station, and all compressors get removed, is the facility no longer subject to the leak detection portion of the rule since the site is technically no longer a compressor station.

Thanks!
Jamie N. Nease

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