Message

From: Hambrick, Amy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=787B0A3376944FCABAED4F018432CF44-AHAMBRIC]
Sent: 8/6/2019 6:21:47 PM
To: Carney, Jonathan W [Jonathan.W.Carney@wv.gov]
Subject: RE: OOOOa Question

Jonathan,

Can you tell me more information about this facility? Specifically:

- When the compressor was installed in 2017 was the compressor station newly built at the time OR was the 2007 compressor replacing a compressor at the compressor station?
- If it was a replacement, was it a 1 for 1 replacement with the same unit specification or was horsepower capacity increased?
- When the compressor was installed were other components installed as well?

Thanks,

Amy

Amy Hambrick
U.S. Environmental Protection Agency
(919)541-0964

From: Hambrick, Amy
Sent: Thursday, August 01, 2019 2:17 PM
To: Carney, Jonathan W <Jonathan.W.Carney@wv.gov>
Subject: RE: OOOOa Question

Jonathan-

Thanks for your email. I don't think I fully appreciated the nuance of your question the first time you wrote. My apologies. Let me dig into the "relocation" aspect and get back to you.

Regards,

Amy

Amy Hambrick
U.S. Environmental Protection Agency
(919)541-0964

From: Carney, Jonathan W <Jonathan.W.Carney@wv.gov>
Sent: Tuesday, July 30, 2019 8:55 AM
To: Hambrick, Amy <Hambrick.Amy@epa.gov>
Subject: RE: OOOOa Question

Ms. Hambrick,

After re-reading my previous e-mail I thought I made it seem like this was the initial installation of the compressor so I thought I should offer more detail about this situation.

The applicant has installed a compressor that was manufactured in 2007. The applicant is assuming that the compressor was installed at another facility some time shortly after this date in 2007 (pre-OOOOa applicability date) by the original purchaser and is arguing that the compressor is not subject to OOOOa. The applicant provided me with an EPA determination letter (see attachment). In the footnote number one (1) of this letter it is cited that the purchase and ship dates and installation/operation dates were provided. I have requested that the applicant provide evidence of the date when the original purchaser executed the purchase contract of the compressor and evidence that the compressor was not modified or reconstructed at any time in which it may have become an affected facility. I assert that if the applicant is unable to provide this information then the compressor is subject to the rod packing and fugitive emissions requirements at 40 CFR Part 60 Subpart OOOOa. Do you agree with this assertion?

Sincerely,

Jonathan Carney, P.E.

WV Department of Environmental Protection
Jonathan.W.Carney@wv.gov
(304)926-0499 ext. 1203
601 57th Street SE
Charleston, WV 25304

From: Hambrick, Amy <Hambrick.Amy@epa.gov>
Sent: Monday, July 15, 2019 4:55 PM
To: Carney, Jonathan W <Jonathan.W.Carney@wv.gov>
Subject: RE: OOOOa Question

Jonathan,

Thank you for your inquiry. Based on the information you shared, the compressor (located at a compressor station) would have to be in compliance with the rod packing and fugitive emissions requirements at 40 CFR part 60 subpart OOOOa.

Regards,

Amy Hambrick
U.S. Environmental Protection Agency
(919)541-0964

From: Carney, Jonathan W <Jonathan.W.Carney@wv.gov>
Sent: Monday, July 08, 2019 2:16 PM
To: Hambrick, Amy <Hambrick.Amy@epa.gov>
Subject: OOOOa Question

Ms. Hambrick,

An applicant has installed a reciprocating compressor at a compressor station. This is the initial construction of the compressor station and this is the only compressor located at this site. The manufactured date of the compressor is July 2007. The compressor was installed at the site in 2017. Is the compressor subject to the OOOOa rod packing requirements?

Jonathan Carney