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Subject: Canceled: NSPS OOOO Implementation Workgroup

Start: 9/18/2019 7:00:00 PM
End: 9/18/2019 8:00:00 PM
Show Time As: Free

Importance: High

Recurrence: (none)

All –

I will be on work travel and so unavailable for this call.

***** FYI – Claudia Smith and I provided an answer to an applicability question from a state last week *****

QUESTION:

I am stumped on whether or not Subpart OOOOa is applicable to a Gas Compressor Station, and after going the rounds with folks here in Utah (some of which think it does apply, some don't), and the source (who doesn't think it applies) I thought I would come to the experts.

The Compressor Station is adding new pressurized equipment to an existing system, not an entire overhaul but a significant increase in number of components, from the applicability section, OOOOa would definitely apply to the new equipment. Here is where the questions start:

- When it comes to an LDAR inspection, how do you do an LDAR inspection on half of a pressurized system?
    - Would that indicate that the entire facility or pressurized system is now applicable to OOOOa?
- The additional equipment doesn't account for more than 50% of the existing system so would you then say that OOOOa doesn't apply to any of it?
- The overall question would be does OOOOa apply or not?
    - If it does apply to what part of the facility? The new equipment or the entire facility?

I hope this makes sense I tried to keep it simple enough so you didn't have to read a novel.

ANSWER:

Claudia and I took a look at previous Q&As as well as the rule, preamble.

Please note that this is not a formal determination of applicability for any specific source or scenario. We'd need to understand site-specific information to do so. We do have these questions/confirmations:

- Confirm this question concerns Gas Compressor Station, not a gas processing plant?
- Is this at an existing CS – confirm pre-dates OOOOa?
- What is "pressurized equipment"?

1. If pressurized equipment <u>does not</u> include the addition/replacement of a compressor, then the addition of the pressurized equipment would not be a modification for the collection of fugitive emission components … as the rule reads:

   §60.5365a Am I subject to this subpart?

   (j) The collection of fugitive emissions components at a compressor station, as defined in §60.5430a, is an affected facility. For purposes of §60.5397a, a "modification" to a compressor station occurs when:

   (1) An additional compressor is installed at a compressor station; or

   (2) One or more compressors at a compressor station is replaced by one or more compressors of greater total horsepower than the compressor(s) being replaced. When one or more compressors is replaced by one or more compressors of an equal or smaller total horsepower than the compressor(s) being replaced, installation of the replacement compressor(s) does not trigger a modification of the compressor station for purposes of §60.5397a.

2. If pressurized equipment <u>does</u> include the addition/replacement of a compressor (after September 18, 2015), the <u>entire</u> compressor station is now subject to the fugitive emissions monitoring provisions of §60.5397a of Subpart OOOOa.

   Section 60.5365a(j) discusses when a replacement is not a modification. The discussion on page 35864 of the preamble of final rule in section V.F.2.h. (Modifications for Compressor Stations) may be helpful. Also, note the following in that discussion -
   From the June 3, 2016, FRN on page 35864:
   "Unlike the affected facilities for purposes of standards for centrifugal and reciprocating compressors themselves, the affected facility for purposes of the fugitive emission requirements is the collection of fugitive

emissions components at a compressor station, not the fugitive emissions components associated with a single compressor. Therefore, if a compressor is added to an existing compressor station, the entire compressor station is subject to the fugitive emissions monitoring program." Therefore, if the addition of the compressor meets the modification definition in 60.5365a(j), the collection of fugitive emissions components at the compressor station are required to be monitored on a quarterly basis.

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