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CC: Loiacono, Sara [loiacono.sara@epa.gov]; Loiacono, Sara [loiacono.sara@epa.gov]

Location: Skype Meeting

Start: 8/15/2018 7:00:00 PM
End: 8/15/2018 8:00:00 PM

Recurrence: (none)

8/14/18 update – added Newfield Question …
****
8/3/18 update – added Topinka Question …
****
AGENDA:

1) VYAS question:

From: Vyas, Himanshu
Sent: Wednesday, July 25, 2018 1:11 PM
To: OOOO Implementation Workgroup
Subject: RE: NSPS OOOO Implementation Workgroup

I have a new question/clarification from West Virginia:

A booster station handling wet gas between multiple well pads and a gas processing plant has been permitted to construct and operate, among other things, a stabilizer unit. As part of this unit there are two recompressors on the VRU. Are these subject to the rod packing and other requirements of the NSPS OOOO? Or do those requirements only apply to prime mover compressors that are pressurizing and moving the gas? I think it applies to all compressors that meet the applicability if they are "centrifugal" or "reciprocating", as the case may be.

In this particular instance, the source got the permit and months later is now constructing it, but due to a backlog on ordered recip compressors at the manufacturer, they are now claiming they will order a screw-style compressor; these seem to be explicitly excluded in the definition of "centrifugal" compressor. It is not exactly clear whether indeed the facility will construct a recip compressor or a screw compressor. The permit writer wants to be extra clear with the facility about what the facility is permitted to construct and therefore what it is subject to.

§60.5365 Am I subject to this subpart?

(b) Each centrifugal compressor affected facility, which is a single centrifugal compressor using wet seals that is located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. A centrifugal compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

(c) Each reciprocating compressor affected facility, which is a single reciprocating compressor located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. A reciprocating compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

Centrifugal compressor means any machine for raising the pressure of a natural gas by drawing in low pressure natural gas and discharging significantly higher pressure natural gas by means of mechanical rotating vanes or impellers. Screw, sliding vane, and liquid ring compressors are not centrifugal compressors for the purposes of this subpart.

Reciprocating compressor means a piece of equipment that increases the pressure of a process gas by positive displacement, employing linear movement of the driveshaft.

Himanshu Vyas

2) TOPINKA question:

I have a small storage vessel facility that became an affected facility at its inception, with potential for VOC emissions above 6 tpy. They have since dropped below the 4 tpy rolling 12-month average threshold, but there have been months afterward where their (both monthly and 12-month average) have risen back above 4 tpy.

My question is, what provisions of OOOO continue to apply?

Per 60.5395(d)(2)(ii), if they go back above 4 tpy, it's clear they have to comply with 60.5395(d)(1) and reduce VOC emissions by 95%, but (d)(2)(ii) is silent on what other parts of OOOO (i.e. supporting requirements to demonstrate compliance with the 95% reduction) still apply:

(d)(2)(ii) If the monthly emissions determination required in this section indicates that VOC emissions from your storage vessel affected facility increase to 4 tpy or greater and the increase is not associated with fracturing or refracturing of a well feeding the storage vessel affected facility, you must comply with paragraph (d)(1) of this section within 30 days of the monthly calculation.

[(d)(1) Reduce VOC emissions by 95.0 percent according to the schedule specified in (d)(1)(i) and (ii) of this section.]

60.5365(e)(2) says "A storage vessel affected facility that subsequently has its potential for VOC emissions decrease to less than 6 tpy shall remain an affected facility under this subpart." That seems to mean once in always in as a storage vessel "affected facility," yes?

For a storage vessel whose monthly emissions increase back above 4 tpy, the possible interpretations are, in order of stringency, are:

1) 60.5365(e)(2) means that all the provisions applicable to "storage vessel affected facilities" remain applicable indefinitely except for the requirement to reduce by 95%, which can be avoided if uncontrolled emissions are maintained below the 4 tpy. Remaining applicable provisions would include the closed vent system and cover requirements, as well as inspections and recordkeeping.**[I believe a straight reading of the rule points to this option]**
2) The provisions at 60.5395(d)(2), pointing to (d)(1), is the trigger where, if you go back above 4 tpy, all the other storage vessel affected facility come back into play because they are necessary to demonstrate compliance with the 95% reduction requirement at (d)(1**). [this interpretation is inferred].**
3) If a storage vessel goes back up above 4 tpy, then only 60.5395(d)(1) would kick back in. **[This interpretation requires you to ignore 60.5365(e)(2), and may be difficult to advocate for because it is nonsensical to have an emissions reduction requirement without any supporting monitoring and recordkeeping provisions for demonstrating the reduction is met].**

Which is it?

The answer to the above will inform me as to the timing of requirements if the facility is bouncing above and below 4 tpy from month to month.

Thanks!
Natalie

3) NEWFIELD Reporting Question:

From: Devin Koele <dkoele@newfield.com>
Sent: Tuesday, August 14, 2018 10:39 AM
To: R8EISC
Subject: Question about NSPS OOOOa annual reporting

Newfield Exploration Company is an oil and gas exploration and production company subject to the requirements of NSPS OOOOa. I am responsible for compliance with the reporting requirements of this regulation, specifically the annual reporting requirement found in 60.5420a(b).

In talking with counterparts at peer companies in the industry, there seems to be some confusion over the reporting format for the annual NSPS OOOOa report due at the end of October 2018. Language on EPA's website seems to imply that CEDRI "may" and "can" be used to submit reports. This would be different then "must" which would apply no other options allowed.

Other peer companies operating in different regions (**specifically, region 6**) have received clarification that submittal via e-mail is acceptable as the CEDRI "template" is not yet FINAL.

Would like some clarification on this issue as soon as possible in order to organize information in the proper submittal format.|

Thank you for your attention to this matter.

Devin Koele, P.E. (Texas)

Sr. Air Quality Specialist

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