Message

From: Ostrand, Laurie [Ostrand.Laurie@epa.gov]
Sent: 7/2/2018 6:19:02 PM
To: Carissa Money - CDPHE [carissa.money@state.co.us]
CC: North, Alexis [North.Alexis@epa.gov]; Wilwerding, Joseph [Wilwerding.Joseph@epa.gov]; Ostrand, Laurie [Ostrand.Laurie@epa.gov]
Subject: RE: Fugitive equipment requirements for MACT HH

Hi Carissa

While the requirements of NSPS OOOO and OOOOa are the same for affected facilities at an onshore natural gas processing plan, MACT HH must be implemented and permitted as written. Therefore, we believe the permit has to identify §63.769 as an applicable requirement, in addition to the applicable requirements in NSPS OOOOa. As a practical matter, we do not see an issue with allowing the source to report compliance with the fugitive emissions standards in MACT HH by referencing their NSPS OOOOa report.

Thanks

Laurie Ostrand
U.S. Environmental Protection Agency
8ENF-AT
1595 Wynkoop Street
Denver, Colorado 80202
303-312-6437

From: Carissa Money - CDPHE [mailto:carissa.money@state.co.us]
Sent: Thursday, June 28, 2018 3:24 PM
To: Ostrand, Laurie <Ostrand.Laurie@epa.gov>
Cc: North, Alexis <North.Alexis@epa.gov>; Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>
Subject: Re: Fugitive equipment requirements for MACT HH

Laurie,

I agree that MACT HH doesn't reference NSPS OOOOa. I'm struggling because the fugitive equipment requirements for a gas processing plant appear to be identical between NSPS OOOO and NSPS OOOOa. For example, I don't readily see any differences between the fugitive requirements in 40 CFR 60.5400 and 60.5401 and the requirements in 40 CFR 60.5400(a) and 60.5401(a). I would like to make sure I'm understanding the requirements correctly. So, even though the requirements appear to be identical for a gas plant, a newer gas plant subject to NSPS OOOOa would still have to be subject to MACT HH fugitive requirements even though an "older" plant subject to NSPS OOOO would be exempt?

The application I'm reviewing is for a new train at an existing gas plant. The existing trains are subject to NSPS OOOO for fugitives and thus exempt from MACT HH fugitives. However, the new proposed train would be subject to fugitive requirements under NSPS OOOOa and MACT HH even though both trains are following identical requirements. Is that correct? Are there more stringent standards for fugitives at gas plants under NSPS OOOO than NSPS OOOOa?

Thanks,

Carissa Money
Oil and Gas Permit Engineer

COLORADO
Department of Public Health & Environment

4300 Cherry Creek Drive South, Denver, CO 80246-1530
office: 303.692.3229
email: carissa.money@state.co.us

On Thu, Jun 28, 2018 at 2:58 PM Ostrand, Laurie <Ostrand.Laurie@epa.gov> wrote:

Hi Carissa

MACT HH indicates, at 40 C.F.R. 63.679(b), that 63.679 does not apply to ancillary equipment and compressors for which a source is subject to and controlled under 40 C.F.R. part 60, Subpart OOOO.

40 C.F.R. 63.679(b) does not reference Subpart OOOOa. Therefore, OOOOa equipment would be subject to MACT HH requirements.

Laurie Ostrand

U.S. Environmental Protection Agency

8ENF-AT

1595 Wynkoop Street

Denver, Colorado 80202

303-312-6437

From: Carissa Money - CDPHE [mailto:carissa.money@state.co.us]
Sent: Thursday, June 28, 2018 2:45 PM
To: North, Alexis <North.Alexis@epa.gov>
Cc: Ostrand, Laurie <Ostrand.Laurie@epa.gov>
Subject: Re: Fugitive equipment requirements for MACT HH

Alex and Laurie,

Thank you for the quick reply. I don't know if you could shed a little more light. When you say there would still be NSPS OOOOa applicability, do you mean similar to NSPS OOOO where there are reporting requirements? Or would there be additional applicable requirements under MACT HH for ancillary equipment subject to NSPS OOOOa?

Thanks again!

Carissa Money

Oil and Gas Permit Engineer

COLORADO
Department of Public
Health & Environment

4300 Cherry Creek Drive South, Denver, CO 80246-1530

office: 303.692.3229

email: carissa.money@state.co.us

On Wed, Jun 27, 2018 at 12:49 PM North, Alexis <North.Alexis@epa.gov> wrote:

Hi Carissa,

In a strict reading of NSPS OOOOa there is nothing that exempts ancillary equipment.

We checked with our headquarters folks and they are sure that there will still be NSPS OOOOa applicability.

I'm cc'ing Laurie Ostrand on this as she was instrumental in getting this answer for you.

Thanks,

Alex

Alexis North, Environmental Scientist

Office of Enforcement, Compliance & Environmental Justice

EPA Region 8

1595 Wynkoop Street (8ENF-AT)

Denver, CO 80202-1129

Phone: 303-312-7005

Email: north.alexis@epa.gov

From: Carissa Money - CDPHE [mailto:carissa.money@state.co.us]
Sent: Tuesday, June 26, 2018 6:38 AM
To: North, Alexis <North.Alexis@epa.gov>
Subject: Fugitive equipment requirements for MACT HH

Hi Alex,

I'm working on a permit application for a new gas plant in Colorado. Fugitive components at the gas plant will be subject to NSPS OOOOa. The plant will also be major for HAPs and thus, the fugitive components will also be subject to MACT HH. Currently, MACT HH exempts ancillary equipment and compressors subject to NSPS OOOO (63.769(b)). Is fugitive equipment subject to NSPS OOOOa also exempt from MACT HH?

Thank you for your help,

Carissa Money

Oil and Gas Permit Engineer

COLORADO
Department of Public Health & Environment

4300 Cherry Creek Drive South, Denver, CO 80246-1530

office: 303.692.3229

email: carissa.money@state.co.us