Message

From: Chad Powell [cpowell@ltenv.com]
Sent: 7/25/2019 8:29:10 PM
To: Ostrand, Laurie [Ostrand.Laurie@epa.gov]
CC: Beeler, Cindy [Beeler.Cindy@epa.gov]; North, Alexis [North.Alexis@epa.gov]; Wilwerding, Joseph [Wilwerding.Joseph@epa.gov]; Ostrand, Laurie [Ostrand.Laurie@epa.gov]
Subject: Re: Subpart OOOOa questions

Thank you!

Chad Powell
Senior Air Quality Scientist
(303) 962-5555

From: Ostrand, Laurie <Ostrand.Laurie@epa.gov>
Sent: Thursday, July 25, 2019 1:20:37 PM
To: Chad Powell <cpowell@ltenv.com>
Cc: Beeler, Cindy <Beeler.Cindy@epa.gov>; North, Alexis <North.Alexis@epa.gov>; Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>; Ostrand, Laurie <Ostrand.Laurie@epa.gov>
Subject: RE: Subpart OOOOa questions

Hi Chad

See my responses below.

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

From: Chad Powell <cpowell@ltenv.com>
Sent: Tuesday, July 16, 2019 10:21 AM
To: Ostrand, Laurie <Ostrand.Laurie@epa.gov>
Cc: Beeler, Cindy <Beeler.Cindy@epa.gov>; North, Alexis <North.Alexis@epa.gov>; Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>
Subject: RE: Subpart OOOOa questions

Thanks, Laurie. I appreciate everyone coordinating these efforts.

Regarding the semiannual report, what is the due date? In this specific example, we have a gas processing plant that started operations on April 1st, 2019. Six months would put the end of the semiannual period at September 30th. When is the report due? October 30th? End of year? I can't find anything in the rule to indicate when the report must be submitted. Please clarify.

I would agree that the first semiannual report would be due by October 30, 2019.

For the OGI question, it would appear that an onshore natural gas processing plant subject to Subpart OOOOa cannot use the current AWP since it must comply with the no detectable emissions standard. Therefore, an operator must use M21 only to conduct their inspections on a monthly basis. Correct?

A natural gas processing plant subject to Subpart OOOOa can opt into using the AWP (annual M21 with monthly/bimonthly OGI). The entire gas plant would not be designated as NDE, leakless, or a CVS. Therefore, for all components that are "normal to monitor" (anything not designated as difficult or unsafe to monitor), can use OGI with the annual M21. Because there is an annual M21 requirement and NDE, leakless, and CVS components are only monitored annually, they would just monitor these components during that annual M21 inspection anyway.

Thanks,

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From: Ostrand, Laurie <Ostrand.Laurie@epa.gov>
Sent: Tuesday, July 16, 2019 9:57 AM
To: Chad Powell <cpowell@ltenv.com>
Cc: Beeler, Cindy <Beeler.Cindy@epa.gov>; North, Alexis <North.Alexis@epa.gov>; Ostrand, Laurie <Ostrand.Laurie@epa.gov>; Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>
Subject: FW: Subpart OOOOa questions

Hi Chad

Cindy requested that I respond to your OOOOa gas processing plant LDAR monitoring questions. See below.

OGI question:

The EPA has promulgated an alternative monitoring method, termed the alternative work practices (AWP), to Method 21 (M21). The current AWP is contained in 40 C.F.R. §§ 60.18(g), (h), and (i), 63.11(c), (d), and (e), and 65.7(e), (f), and (g). The EPA does not require facilities that opt into the current AWP to obtain EPA approval so long as you adopt the AWP as written in §§ 60.18(g), (h), and (i), 63.11(c), (d), and (e), or 65.7(e), (f), and (g).

Among other things, the current AWP requires: (1) OGI monitoring monthly, bimonthly, or semi quarterly – depending on the g/hr threshold that is selected; (2) replacing one of those OGI events with M21 monitoring each year; (3) keeping video records of the entire OGI survey; and (4) submitting the annual M21 records to ccg-awp@epa.gov. Also, the current AWP excludes the use of the OGI for closed vent systems, equipment designated as leakless, and equipment identified in the applicable subpart as having no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background. The AWP, at §§ 60.18(h)(2), 63.11(d)(2), and 65.7(f)(2), requires that any leak identified using the OGI camera must be repaired. Since the OGI camera can detect methane, ethane, etc., for the purpose of the AWP the instrument used for the annual M21 monitoring, or to confirm that a leak was repaired, must also be able to detect the same compounds as the OGI camera.

Semiannual report question:

40 C.F.R. § 60.5422a, What are my additional reporting requirements for my affected facility subject to GHG and VOC requirements for onshore natural gas processing plants?, requires that initial and semiannual reports OOOOa reports be submitted to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI).

40 C.F.R. §60.487a, Reporting requirements, indicates:

(a) Each owner or operator subject to the provisions of this subpart shall submit semiannual reports to the Administrator beginning 6 months after the initial startup date.

Also, 40 C.FF.R. § 60.19, General notification and reporting requirements, indicates:

(d) If an owner or operator of an affected facility in a State with delegated authority is required to submit periodic reports under this part to the State, and if the State has an established timeline for the submission of periodic reports that is consistent with the reporting frequency(ies) specified for such facility under this part, the owner or operator may change the dates by which periodic reports under this part shall be submitted (without changing the frequency of reporting) to be consistent with the State's schedule by mutual agreement between the owner or operator and the State. The allowance in the previous sentence applies in each State beginning 1 year after the affected facility is required to be in compliance with the applicable subpart in this part. Procedures governing the implementation of this provision are specified in paragraph (f) of this section.

That being said, the majority of natural gas processing plant LDAR semiannual reports that I see are submitted in January (for the semiannual period from 7/1 to 12/31) and in July (for the semiannual period from 1/1 to 6/30).

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From: Chad Powell <cpowell@ltenv.com>
Sent: Monday, July 15, 2019 3:58 PM
To: Beeler, Cindy <Beeler.Cindy@epa.gov>
Cc: North, Alexis <North.Alexis@epa.gov>
Subject: RE: Subpart OOOOa questions

Hi Cindy,

I hope you had a great weekend and have made progress on your deadlines. I have an additional question for you regarding Subpart OOOOa. I'm going to add it to the list and when possible, can you answer all 3 questions? The additional question is:

- Onshore natural gas processing plants subject to Subpart OOOOa require Method 21 monitoring (cross-referenced with Subpart VVa). Are operators allowed to use Method 21 annually (i.e. once per year) and use OGI cameras to conduct their inspections the other 11 months as an alternative means of compliance with the regulation? Based on Section 60.18(g), I don't think this is allowed. But my interpretation may be off.

Thanks,

Chad Powell
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From: Beeler, Cindy <Beeler.Cindy@epa.gov>
Sent: Tuesday, July 09, 2019 1:43 PM
To: Chad Powell <cpowell@ltenv.com>
Cc: North, Alexis <North.Alexis@epa.gov>
Subject: RE: Subpart OOOOa questions

Chad – I am in the middle of some pressing work with deadlines – I will look into your questions soon and get back to you.

Cindy Beeler
US EPA Region 8
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From: Chad Powell <cpowell@ltenv.com>
Sent: Tuesday, July 9, 2019 1:19 PM
To: Beeler, Cindy <Beeler.Cindy@epa.gov>
Cc: North, Alexis <North.Alexis@epa.gov>
Subject: Subpart OOOOa questions

Hi Cindy,

Alexis asked that I reach out to you regarding a couple Subpart OOOOa questions. Here we go:

- I couldn't find a due date for Subpart OOOOa semi-annual reports for onshore natural gas processing plants. While the regulation stipulates semi-annual reporting, I don't see whether the report is due within 30 days of the end of the period or some other timeframe. Can you please clarify this?
- Under the upstream production segment, a 2-hour Method 22 test is required when initially evaluating the flare/combustor. Subsequent testing should be performed monthly but for 15 minutes (instead of 2-hours). However, Section 60.5412a(a)(3) requires that a flare be designed and operated to comply with Section 60.18(b). Section 60.18(f)(1) requires 2-hour Method 22s each time. Does this conflict? Does one part of the regulation take precedent over the other? Please clarify.

If you have any questions for me, please let me know.

Thanks,

LT Environmental, Inc.
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