Message

From: William Spencer Holm [wholm@ramboll.com]
Sent: 4/19/2018 9:58:45 PM
To: Smith, Claudia [Smith.Claudia@epa.gov]
CC: Loren Fuller [loren.fuller@mcpoperating.com]; Michael "Mike-O" Faulk [michael.faulk@mcpoperating.com]; Nat Griffith [Nathan.Griffith@mcpoperating.com]; King, Bob [Robert.King@wpxenergy.com]; Schwartz, Colin [Schwartz.Colin@epa.gov]; Alan S Shimada [AShimada@ramboll.com]
Subject: RE: Registration Application for New Flare
Attachments: Andeavor CDP Application April 2018 v3.pdf

Flag: Follow up

Good afternoon Claudia,

Attached please find the updated registration application for the new flare we are planning on incorporating into the Andeavor CDP (formerly known as the Whiting CDP) located on the Fort Berthold Indian Reservation. Per our phone conversation and your questions below, we have prepared a Part I application for this facility and included additional information that identify the changes at the facility. In addition, we conducted an evaluation of ecological and cultural resources. Correspondence with SHPO indicated that due to the Project's location within the FBIR; therefore, SHPO could not comment on the potential for impacts to cultural resources. At this time THPO has not responded; however, when received, we will forward THPO's response.

We will give you a call on Monday the 23rd to address and questions you might have.

Thanks,
Bill

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Newark, NJ

From: Smith, Claudia [mailto:Smith.Claudia@epa.gov]
Sent: Friday, March 23, 2018 2:59 PM
To: Alan S Shimada <AShimada@ramboll.com>
Cc: Loren Fuller <loren.fuller@mcpoperating.com>; michael.faulk@mcpoperating.com; nathan.griffith@mcpoperating.com; King, Bob <Robert.King@wpxenergy.com>; Schwartz, Colin <Schwartz.Colin@epa.gov>
Subject: RE: Registration Application for New Flares

Alan,

I'm hoping you can help clarify a few things for me. I cannot find any record of a Part 1 registration or an existing source registration (form REG) having been submitted for an Andeavor CDP or a Whiting CDP. Your email cover indicates the Part 2 applies to a modification of an existing source, and the package submitted states that the source is an existing facility that had potential emissions below the registration thresholds in the Tribal NSR rule since it was built by Zenergy in December 2010 and the operation is being changed and is expected to exceed the registration threshold. It appears we may be missing some crucial notifications or may require some revised information.

A Part 1 registration must precede a Part 2 registration for each modification of an existing source, regardless of if the originally constructed source was not previously required to register under the existing source registration program at 40 CFR 49.160 or was required to register and submitted a form REG.

Additionally, the NSR program is project based and the emissions of each project should be evaluated for applicability to NSR requirements. It is unclear from the submittal whether the potential emissions reported (and associated emissions units) are just for the project to add the new flares or whether they are the facility-wide potential emissions including the units that previously existed at the facility before the modification project. In other words, the emissions reported on the Part 2 registration should only be for the modification project. It can be helpful if the submittal makes the distinction between the facility PTE before the modification and the estimated PTE of the modification in the supporting information.

Thank you,

Claudia

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From: Alan S Shimada [mailto:AShimada@ramboll.com]
Sent: Friday, March 23, 2018 10:39 AM
To: Smith, Claudia <Smith.Claudia@epa.gov>
Cc: Loren Fuller <loren.fuller@mcpoperating.com>; michael.faulk@mcpoperating.com; nathan.griffith@mcpoperating.com; King, Bob <Robert.King@wpxenergy.com>
Subject: Registration Application for New Flares

Hi Claudia,

On behalf of Van Hook Gathering Services, LLC, we are submitting the attached registration application for the new flares we are planning on incorporating into the Andeavor CDP (formerly known as the Whiting CDP) located on the Fort Berthold Indian Reservation. We have included our emission calculations (using the North Dakota spreadsheet) and assuming the new flares achieve 98% control efficiency of the VOCs.

Please let me know if you have any questions or comments on the application.

Regards,
Alan Shimada

Alan Shimada
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