Message

From: Marsh, Karen [Marsh.Karen@epa.gov]
Sent: 5/9/2018 2:12:56 PM
To: Felix Trujillo Jr. [FTrujillo@airquality.org]; Thompson, Lisa [Thompson.Lisa@epa.gov]
CC: Basinger, David [Basinger.David@epa.gov]
Subject: RE: Natural Gas Processing Plant Question

Hi Felix,

Thanks for your question. As you have identified, the definition of a natural gas processing plant in NSPS KKK (§60.631) is as follows:
"any processing site engaged in the extraction of natural gas liquids from field gas, fractionation of mixed gas liquids to natural gas products, or both."

Further, natural gas liquids are defined as:
"the hydrocarbons, such as ethane, propane, butane, and pentane, that are extracted from field gas."

The affected facility at a natural gas processing plant is the "process unit". A process unit is the "equipment assembled for the extraction of natural gas liquids from field gas, the fractionation of the liquids into natural gas products, or other operations associated with the processing of natural gas products. A process unit can operate independently if supplied with sufficient feed or raw materials and sufficient storage facilities for the products."

Your email indicates you are referencing a specific well pad, with no fractionation occurring at the well pad. The response provided here is for general assistance, and should not be considered a formal applicability determination of the requirements to this specific well pad. I would encourage you to work with David Basinger in the regional office should you need a formal determination for this site.

1. Would a well pad with a pressure separator and water/condensate tank be considered a natural gas processing plant (specifically to address Subpart KKK)? Typically, this would be considered a well site, and not a natural gas processing plant. The well site produces the field gas, which is transported to a processing plant in order to remove the natural gas liquids. These are typically standalone facilities that look similar to small refineries.
2. Would a site that includes a glycol dehydrator be considered a natural gas processing plant? Please keep in mind that we have no sites in Sacramento County that fractionize the natural gas liquids. The presence of a glycol dehydrator would not necessarily mean that the pad is a natural gas processing plant. Dehydrators are not designed to perform the extraction or fractionation of natural gas liquids from field gas on their own.

Again, if you have specific questions regarding the applicability of the standards to a specific site, I encourage you to reach out to the region, who was copied on your original email. Please let me know if you have any other general questions regarding the standards in NSPS KKK.

Thanks,
Karen

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From: Felix Trujillo Jr. [mailto:FTrujillo@airquality.org]
Sent: Wednesday, May 09, 2018 10:08 AM
To: Thompson, Lisa <Thompson.Lisa@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>
Cc: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Natural Gas Processing Plant Question

Hi Lisa,

I just got a response back from the California Air Resources Board that my two examples from my previous email are not natural gas processing plants as there is no fractionization occurring at the sites. So based on CARB's Methane Rule, it does not appear that we have any natural gas processing plants here in Sacramento County. The definition for natural gas processing plants is the same for the Federal regulations (Subpart KKK, LLL, OOOO and OOOOa). For Subparts OOOO and OOOOa, would you consider my two examples as being natural gas processing plants, per the Federal regulations? I am trying to finish up the draft evaluation and permits so I can submit them for review. We have already sent out the advisory to facilities and have given them a deadline of July 1, 2018 to submit their applications. So we need to have a template in place before then, so we can process the applications. Your help on this matter is greatly appreciated. Thank you.

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From: Thompson, Lisa [mailto:Thompson.Lisa@epa.gov]
Sent: Thursday, May 03, 2018 12:57 PM
To: Felix Trujillo Jr. <FTrujillo@airquality.org>; Marsh, Karen <Marsh.Karen@epa.gov>
Cc: Basinger, David <Basinger.David@epa.gov>
Subject: RE: Natural Gas Processing Plant Question

Hi Felix,

I'm copying my colleague Karen Marsh who should be able to answer you about KKK. Karen, if you're not the right person, can you let us know who is?

Thanks!
Lisa

From: Felix Trujillo Jr. [mailto:FTrujillo@airquality.org]
Sent: Thursday, May 3, 2018 3:21 PM
To: Thompson, Lisa <Thompson.Lisa@epa.gov>
Cc: bassinger.david@epa.gov
Subject: Natural Gas Processing Plant Question

Hi Lisa,

I am trying to see if you could help me out with what defines a natural gas processing plant. We are permitting the natural gas processing operations in Sacramento County, so I am looking at the NSPSs (Subpart KKK, LLL, OOOO and

OOOOa) to see if they apply. My main question is on Subpart KKK. This subpart states that it applies to affected facilities at natural gas processing plants only. The gas in Sacramento County is non-associated and does not require a lot of processing. The well pads mainly consist of the wellhead, a pressure separator and a tank (water/condensate). The definition for natural gas processing plant states it is "any processing site engaged in the extraction (by force) of natural gas liquids from field gas". The pad is a production site. The definition of natural gas liquids specifies the liquids as ethane, propane, and pentane. There is no fractionization occurring at this site. There was an EPA determination that I read from the EPA website that stated condensate should be included as a natural gas liquid. So my questions are the following:

1. Would a well pad with a pressure separator and water/condensate tank be considered a natural gas processing plant (specifically to address Subpart KKK)?
2. Would a site that includes a glycol dehydrator be considered a natural gas processing plant? Please keep in mind that we have no sites in Sacramento County that fractionize the natural gas liquids.

Thank you.

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