TARGET
EMISSION SERVICES

LDAR Report

Mark West

Imperial

Annual Report

NSPS Subpart OOOOa

PERIOD: 2019

Prepared By:

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Report Generated on: Sep 06, 2019

SUMMARY

TARGET EMISSION SERVICES

Company:	Mark West		**Report:**	Annual LDAR	
District:	Liberty		**Regulation(s):**	NSPS Subpart OOOOa	
Facility Name:	Imperial		**Report Date:**	Sep 06, 2019	
GPS Coord.	40.380900	-80.284900	**Period:**	2019-Jan-01 TO 2019-Dec-31	

This report satisfies the requirements of 40 CFR §60.5420a(b)(7) for the collection of fugitive emissions components at the above referenced compressor station.

Information required to be reported per §60.5420a(b)(7)(i) - (vi)

Monitoring Quarter	**Q1**	**Q2**	**Q3**	**N/A**	**N/A**
Survey Start Date/Time	02/06/2019 10:30 AM	05/22/2019 12:00 PM	08/14/2019 9:00 AM	N/A	N/A
Survey End Date/Time	02/06/2019 1:00 PM	05/22/2019 3:00 PM	08/14/2019 12:00 PM	N/A	N/A
OGI Technician (see Appendix for OGI Technician Training and Experience)	Travis Schubert	James Crossley	Zachary Hudecek	N/A	N/A
Ambient Temp. (°F)	45	73	72	N/A	N/A
Sky Conditions	Overcast, >90% of the sky is covered by clouds	Mostly Cloudy, 50%-90% sky is clouds	Mostly Cloudy, 50%-90% sky is clouds	N/A	N/A
Max. Wind Speed (MPH)	4	8	6	N/A	N/A
LDAR Instrument	Optical Gas Imaging/GFX-320	Optical Gas Imaging/GFX-320	Optical Gas Imaging/GFX-320	N/A	N/A
§60.5420a(b)(7)(vi) Deviations from Monitoring Plan	No deviations from the Monitoring Plan	No deviations from the Monitoring Plan	No deviations from the Monitoring Plan	N/A	N/A
Deviation(s) Explanation	N/A	N/A	N/A	N/A	N/A

§60.5420a(b)(7)(vii) - Number and type of components for which fugitive emissions were detected

Valves			1		
Connectors	1	1	1		
Pressure Relief Devices					
Open-Ended Lines					
Flanges					
Compressors					
Instruments					
Meters					
Other					
Total No. of Leaks Detected	1	1	2		

§60.5420a(b)(7)(viii) - Number and type of fugitive emissions components that were not repaired as required in §60.5397a(h)

Valves					
Connectors					
Pressure Relief Devices					
Open-Ended Lines					
Flanges					
Compressors					
Instruments					
Meters					
Other					

§60.5420a(c)(15)(ii)(I)(7) – Number and type of components that were tagged as a result of not being repaired during the monitoring survey as required in §60.5397a(h)(3)(ii).

Valves			1		
Connectors	1	1	1		
Pressure Relief Devices					
Open-Ended Lines					
Flanges					
Compressors					
Instruments					
Meters					
Other					

§60.5420a(b)(7)(ix) - Number and type of difficult-to-monitor and unsafe-to-monitor fugitive emission components monitored

Valves					
Connectors					
Pressure Relief Devices					
Open-Ended Lines					
Flanges					
Compressors					
Instruments					
Meters					
Other					

§60.5420a(b)(7)(x) - Date of successful repair of the fugitive emission component (see Repair List).
§60.5420a(b)(7)(xi) - Number and type of fugitive emission components placed on delay of repair and explanation for each delay of repair (see DOR List).
§60.5420a(b)(7)(xii) - Type of instrument used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding (see Repair List).

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Fugitive Emissions Components Placed on DOR

This summary satisfies the annual reporting requirements of §60.5420a(b)(7)(xi), "number and type of fugitive emission components placed on delay of repair and explanation for each delay of repair".

Component					
Quarter	Q1	Q2	Q3	N/A	N/A
Survey Date	2/6/2019	5/22/2019	8/14/2019		
Valves					
Connectors					
Pressure Relief Devices					
Open-Ended Lines					
Flanges					
Compressors					
Instruments					
Meters					
Other					
Total No. of Leaks on DOR	0				

Date Surveyed	Emission ID #	Component Type	Current Repair Status	Delay of Repair Explanation / Justification

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Fugitive Emissions Components Repaired During Reporting Period

This summary satisfies the annual reporting requirements of §60.5420a(b)(7)(x), "date of successful repair of the fugitive emission component" and §60.5420a(b)(7)(xii), "type of instrument used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding".

Date Surveyed	Emission ID #	Date of Successful Repair	Repair Confirmation Method / Instrument
2019-02-06	25010424	2019-Feb-07	Snoop
2019-05-22	27310512	2019-May-29	Snoop
2019-08-14	27910094	2019-Aug-15	Snoop
2019-08-14	27910095	2019-Aug-15	Snoop

OGI Technician Training and Experience

Monitoring surveys are performed by personnel that are trained in the proper operation of the OGIC (Optical Gas Imaging Camera) to be used in the monitoring survey and that have prior experience using OGICs for the purposes of identifying fugitive emissions. Additionally, monitoring personnel are familiar with the types of equipment located at a natural gas compressor station. All monitoring personnel review each site specific monitoring plan prior to performing monitoring surveys at the Facility.

All Monitoring Technicians follow a protocol containing technical procedures, training requirements, and individual and team performance audits. This protocol ensures that each crew member follows a prescriptive training program. The training program includes minimum required field times for each module. Each module uses both written testing and on-site work performance audits to evaluate the crew member on their work performance.

Each crew member must successfully complete their training modules to be allowed to work as a member of the main field crew. The protocol also includes an audit program to evaluate work performance on an on-going basis. This system ensures that each crew member is adhering to the procedures and guidelines of the protocol.

Each monitoring technician:

1) holds a strong knowledge of oil and gas operations and has a detailed understanding of the various processes that are involved in the transportation and processing on natural gas.
2) is trained (certified) and experienced in the use of fugitive emission detection and measurement equipment;
3) has a minimum of 1000 hours of experience on the use of optical gas imaging, ultrasonic leak detection and emission flow rate measurement
4) maintains required safety training and strong understanding of applicable TARGET Safe Operating Procedures; and
5) received performance audits to ensure compliance to our prescriptive fugitive emission assessment protocol

The protocol contains technical procedures, training requirements, and individual and team performance audits. The purpose of our assessment protocol is to:

1) Maintain a high degree of Quality Control;
2) Ensure that all sources of fugitive emissions are identified;
3) Ensure that all source data is consistently recorded to provide reliable and effective emission reduction recommendations.

This protocol eliminates the common problems and barriers that cause many programs to fail. Our staff are trained and audited to avoid many of the common fugitive emission program problems. Some of these common problems include:

- Inexperienced with camera use and the concepts of infrared thermography
- Not using multiple camera angles
- Constantly moving the camera from scene to scene without pausing in each view to look for gas images
- Many leaks are missed by relying solely on the automatic mode (manual mode can be more effective in certain situations)
- Scanning too fast and missing components

Accurate data collection and entry is crucial to maintaining an effective Fugitive Emission Management Program. The data management protocol includes a data QA/QC review process that contains three levels of evaluation:

1) Technician Self Check – at the end of each assessment the technician must review each emission entry to locate and remediate any data inconsistencies
2) Team Lead Review – at the end of each work day the Team Lead will run a QA/QC evaluation on each assessment and emission to ensure that data has been entered following the TARGET Protocol.
3) Project Manager Evaluation – on a weekly basis the project manager will run all emission data through a QA/QC data evaluation to detect and eliminate any inconsistencies.

OGI Technician Training and Experience

Survey Date	OGI Technician	Certification Date	Months of OGI Experience
2019-Feb-06	Travis Schubert	2018-Jul-24	8
2019-May-22	James Crossley	2017-Sep-05	21
2019-Aug-14	Zachary Hudecek	2019-Jul-31	2