New Air Quality Regulation
“NSPS OOOO”
Oil and Natural Gas Industry Workshop
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NSPS OOOO

- New Source Performance Standard ("NSPS") - Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution

- Published August 16, 2012

- Compliance Date October 15, 2012
Well Completions

* Applies to each hydraulically fractured/refractured well drilled (commenced construction, modification, or reconstruction) after **August 23, 2011**

* Hydraulically fractured/refractured includes wells fractured w/ Water, Nitrogen, and/or Carbon Dioxide
Well Completions

- Each well drilled after 8/23/11 and before 1/1/2015
- Flowback Operations - reduce VOC emissions with a completion combustion device (typically a flare) on or after October 15, 2012
- Completion Combustion Devices must be equipped with a “reliable continuous ignition source”
- Sources have a general duty to safely maximize resource recovery and minimize releases to the atmosphere
Completion Combustion Devices (aka Flares)
Well Completions

* Wells drilled **on or after January 1, 2015**

* "**Green Completions**" - route recovered liquids into storage vessels or re-inject the liquids into the well or another well and route recovered gas into a gas flow line, collection system, re-inject into the well or another well, or use as fuel, "**with no direct release to the atmosphere**"

* Salable quality gas must be routed to the flow line
Well Completions

* Two (2) day Notification - prior to commencement of each well completion beginning October 15, 2012

* Electronically Notify DEP and EPA by using DEPOilandGasSector@wv.gov and r3wellcompletion@epa.gov

* Instructions and form available on DAQ’s website www.dep.wv.gov/daq
Well Completions

- Must maintain a **daily log** for each well completion operation
- Records of duration of flow into a line; duration of combustion; duration of venting
- Specific reasons for venting in lieu of capture or combustion
- Digital photographs of all the equipment used during flowback with specific location
Well Completions

* **Annual report - for each well** the report must provide any deviations where well completion operations were not performed in compliance

* Must be certified by the responsible official
Storage Vessels

- **Storage Vessels** - installed after 8/23/11 with VOC emissions of six (6) tons/year or greater (each vessel) and that are located at the well site more than 180 consecutive days.

- Install air pollution control equipment to reduce VOC emissions by 95% and monitor this equipment by **October 15, 2013**

- DAQ’s permitting threshold is **6 lbs VOC/hr (144 lbs/day)** for the entire well site “**Potential Emissions Not Actual Emissions**”
Storage Vessel – Combustor Control Device “Thermal Vapor Incinerator”

(aka Enclosed Flare)
Pneumatic Controllers

* Pneumatic controllers - installed after 8/23/2011 (extraction) & 10/15/2013 (wellhead to extraction)

* Reduce VOC emissions at wells (6 scf/hr or less bleed rate) and processing plants (zero bleed rate) by using a low bleed or no bleed design by **October 15, 2013**

* **Exemption** based on functional needs, including but not limited to response time, safety and positive actuation
Reciprocating compressors before extraction - reduce emissions by the replacement of rod packing (every 26,000 hours of operation or 3 years) *well site engines are exempt

Centrifugal compressors (Wet Seal) - required to install air pollution control equipment to reduce emissions by 95% and to monitor this equipment
Other Big Changes

* MACT Subpart HH – Dehydration Unit Updates
  * Annually update Wet Gas Analysis and GLYCalc determination; if the station’s actual emissions are greater than 50% of major source thresholds (storage vessels included, not engines)
  * Updated samples and GLYCalc determinations by **October 12, 2012** or within one year prior
  * Must use the maximum designed glycol pump recirculation rate when determining major source status
  * Must include storage vessels in determining major source status of HAPs (excludes surge control vessels and knockout vessels)
Other Big Changes

- **NSPS KKK Replaced with NSPS OOOO**

- LDAR requirements at Extraction Plants that commenced construction, modification, or reconstruction after August 23, 2011

- Lowered some leak definitions
EPA intends to conduct administrative reconsideration process for NSPS just issued 1/16/2013

- Sign by March 29, 2013, a notice of proposed rulemaking addressing certain NSPS issues on an expedited basis;

- Take final action with respect to those issues by July 31, 2013;
- Compliance dates have changed
- New exemption for existing engines defined as “Remote” stationary RICE
- Remote RICE exempt from most emission testing requirements
- Must evaluate the status of their “Remote” stationary RICE every 12 months
Questions?

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