



Colorado Department of Public Health and Environment  
Air Pollution Control Division

## **Guidance for Completing the Leak Detection and Repair (LDAR) Recordkeeping Form**

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The Air Pollution Control Division (Division) developed a form to maintain records of the initial and periodic Leak Detection and Repair (LDAR) inspections required under Regulation No. 7, Section XVII.F. While use of the Division form is not required, operators are encouraged to utilize the Division LDAR Recordkeeping Form or use it as a checklist for developing an independent form for maintaining the required records as specified in Section XVII.F.8.

Below is a description of individual elements in the Division's LDAR Recordkeeping Form and guidance for filling out each section. For further assistance, please contact 303-692-3150 and ask to be transferred to the oil and gas unit.

### **Section 1 - Site Information**

This section includes general information about the facility, date of inspection, type of inspection and the method used for the inspection. Not every facility subject to the LDAR monitoring requirements will be assigned an AIRS ID by the Division. In the event the facility does not have an AIRS ID, leave this information blank and provide location information based on either the latitude and longitude GPS coordinates or "Section, Township, Range".

The date of the inspection, inspection type, and method of inspection must be included in the form or on an individually developed form as this information is specifically required in Section XVII.F.8. New well production facilities are required to document the occurrence of the "Initial AIMM". Check the inspection type box "Initial AIMM" for this purpose. For inspections that are required on a periodic frequency, check the box "Periodic". A place for the name of the person or persons completing the LDAR monitoring inspection has been provided but is not a required field.

### **Section 2 - Summary of Leaking Components**

This section includes Table 1 titled "Summary of Leaking Components" which should contain the summary of the number of leaking components found for each component type. The definition of components subject to the LDAR monitoring requirements may be found in Regulation 7, Section XVII.A.5. Components at the facility that are not included in the definition may be monitored and repaired by the owner/operator, but are not required to be included in this table.

### **Section 3 - Leaking Components Details**

This section contains Table 2 titled "Monitoring and Repair of Leaking Components" which is completed to identify each specific component found to be leaking during the inspection.

The "Component ID" should be the name or number used by the owner/operator to identify the specific component.



The “Component Type” is the general category the component belongs to as identified in Table 1.

The “Monitoring Method Used” should identify the specific method used to identify the leak and for remonitoring.

The “Date of 1<sup>st</sup> Repair Attempt” is the date when the operator completes the first attempt at repair. If remonitoring indicates the first attempt at repair was not successful, the operator must document the “Date(s) of Additional Repair Attempts” in addition to the “Date(s) of Remonitoring”. For each remonitoring event, the operator must provide a description of the remonitoring results under “Result(s) of Remonitoring”. When remonitoring demonstrates the repair was successful at eliminating the leak, the operator shall document the “Date of Successful Repair”.

If a specific component is added to Table 3 delay of repair list in Section 4, check the box in Table 2 under the “Repair Delayed?” column.

If more leaking components are detected than can be added to the table please use the Table 2 Addendum which can be found on the last page of the Recordkeeping Form.

Pursuant to Regulation No. 7, Section XVII.F.7, the first attempt to repair a leak must be made within five (5) business days of detecting the leak, unless the parts are unavailable, the equipment requires a shutdown to complete the repair, or other good cause exists. Within fifteen (15) working days of repairing the leak, the leak must be re-monitored to verify the repair was effective.

In the event that the parts are unavailable, the equipment requires a shutdown to complete the repair, or other good cause exists, the component shall be added to the Delay of Repair List (see Section 4).

#### **Section 4 - Delay of Repair List**

This section contains Table 3 titled “List of Components added to Delay of Repair List” which should identify each specific component found to be leaking during the inspection but where the owner/operator is not able to repair the leak, because the parts are unavailable, the equipment requires a shutdown to complete the repair, or other good cause exists.

Pursuant to Regulation No. 7, Section XVII.F.7.a, if parts are unavailable, they must be ordered promptly and the repair made within fifteen (15) working days of receipt of the parts. If a shutdown of the equipment is required, the leak must be repaired during the next scheduled shutdown. If a delay is attributed to other good cause, repairs must be completed within fifteen (15) working days after the cause of delay ceases to exist.

Operators must describe the reason for why the leaking component was added to the Delay of Repair List. Additionally, there is space provided for the date the delay ceased to exist. This information may be helpful to operators when reporting repair delays on the annual report required under Regulation 7, Section XVII.F.9.e.

#### **Section 5 - Unsafe, Difficult, or Inaccessible to Monitor**

This section contains Table 4 titled “List of Components Identified as Unsafe, Difficult, or Inaccessible” which should identify each specific component that meets the definition of unsafe, difficult or inaccessible to monitor as described in Section XVII.F.5. Pursuant to



Regulation No. 7, Section XVII.F.5, monitoring of a component designated as unsafe, difficult or inaccessible to monitor is not required until it becomes feasible to do so.

An explanation stating why the component is unsafe, difficult or inaccessible to monitor must be included for each component. Additionally, a plan for monitoring of the component must also be included.