

Condensate Tank System–Wide Control and Reporting Requirements

(Regulation No. 7 Section XII)



Colorado Department
of Public Health
and Environment

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Introductions

- Rebecca Wilson – Oil & Gas Inspector
 - Joseph Wright– Oil & Gas Inspector
 - Jennifer Morse– Oil & Gas Enforcement/
Inspection Supervisor
 - Chris Laplante– Oil & Gas Team Supervisor
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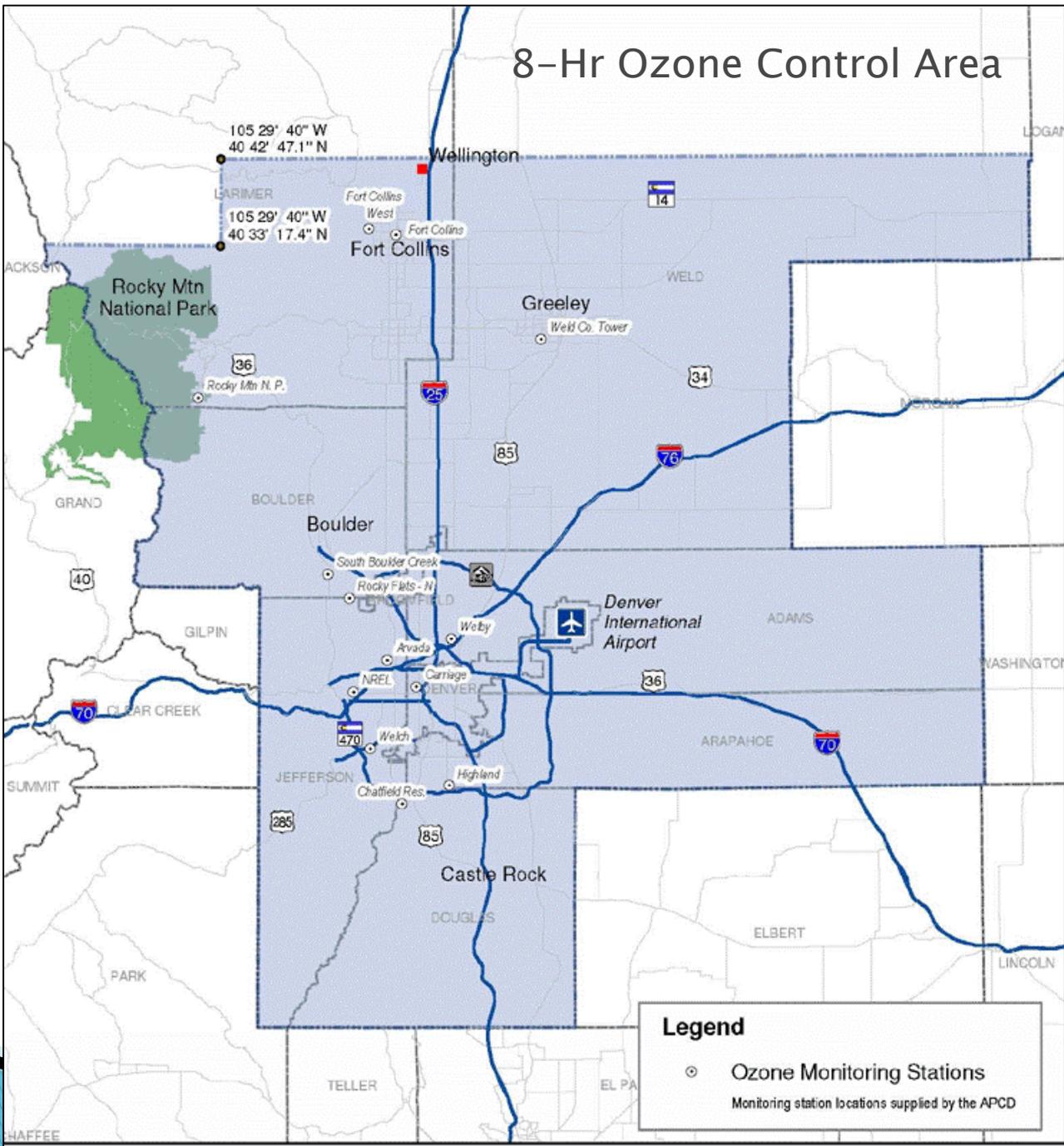
Training Overview

- Reg 7 Section XII
 - System-wide applicability and compliance
 - Reporting tools
 - Division spreadsheet template
 - Responsible Official Form
 - Guidance documents
 - Common Issues
 - Q&A
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System-Wide Definition (XII.B.14)

“...collective emissions and emission reductions from all atmospheric condensate storage tanks under common ownership within the 8-hour Ozone Control Area or other specific Ozone NAA or Attainment Maintenance Area for which uncontrolled actual VOC emissions are ≥ 2 tpy.”

8-Hr Ozone Control Area



XII.A: System-Wide Applicability

- Applies to condensate tanks:
 - In the NAA
 - Located at E&P, compressor stations, drip stations (upstream of gas plants)
 - That requires an APEN (permissible to include < 2 tpy tanks in your system)
 - Includes Grandfathered tanks
- 30 tpy exemption (XII.A.5):
 - Operator with system-wide emissions of < 30 tpy actual uncontrolled VOC in NAA (based on APENs) is exempt from system-wide requirements
 - Evaluate annually

XII: System–Wide Requirements

- XII.A.1.d(i): All tanks that began operation or were modified on or after 2/01/09 must be controlled during the first 90 days after the date of 1st production and comply with monitoring, recordkeeping, and reporting requirements

XII: System–Wide Requirements (continued)

- XII.C – General Provisions:
 - Tanks will minimize VOC leakage to environment
 - Flares shall be enclosed, have no visible emissions, and be designed so observer can visually determine proper operation
 - Auto–igniters required at all tanks controlled with flares
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XII: System–Wide Requirements (continued)

- XII.D – Emission Controls:
Contains system–wide control requirements in NAA
 - 90% during ozone season (May 1 – Sept 30)
 - 70% during off season

XII: System–Wide Requirements (continued)

- XII.E – Monitoring – If tanks controlled, source must:
 - Inspect control device and auto–igniter weekly
 - Record date, time, name of inspector, issues noted, corrective actions taken, thief hatch status, pilot light status, presence of smoke from flare
- XII.F – Recordkeeping:
 - AIRS ID shall be marked on tank and control device
 - Maintain reporting spreadsheet on weekly basis
 - Keep monitoring records for 5 years

XII: System–Wide Requirements (continued)

- XII.F – Reporting:
 - Monthly downtime reports
 - Submit by last day of month following month of downtime incident(s)
 - Control equipment status reports
 - Submit at least once per year (April 30 semi–annual report)
 - Submit by last day of month following month of control status change
 - Semi–annual reports (Nov 30 & Apr 30)

Reporting Tools

- Oil and Gas Webpage
 - Division report spreadsheet template
 - Semi-annual reports
 - One tab can be used for monthly downtime reports
 - Responsible Official Form
 - PS Memo 10-02 – Reg. 7, §XII Reporting
 - PS Memo 05-01 – Condensate Storage Tanks
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Spreadsheet – “Instructions” tab

- Read this sheet every year
- Provides various information:
 - How to complete and submit reports
 - Describes sheets that do not require input
 - Lists control efficiency requirement for time period
 - Describes changes from previous template

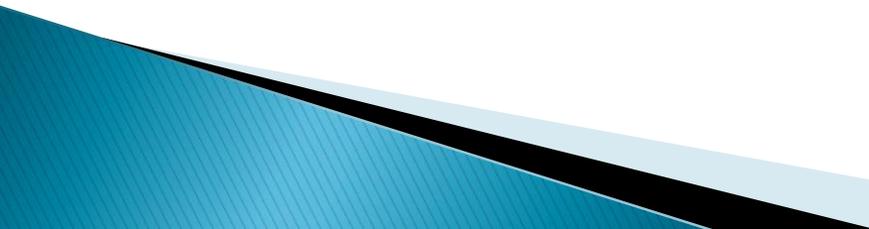
[Instructions](#)



Spreadsheet – “Production” tab

- Enter company name
- Fill out each column for each tank battery
 - Column headings explained on “Instructions”
- AIRS ID column:
 - Enter county name if AIRS ID not assigned
 - AIRS IDs are assigned by Division after initial APEN submittal
- November report must contain data for weeks beginning May 1 through Sept 30

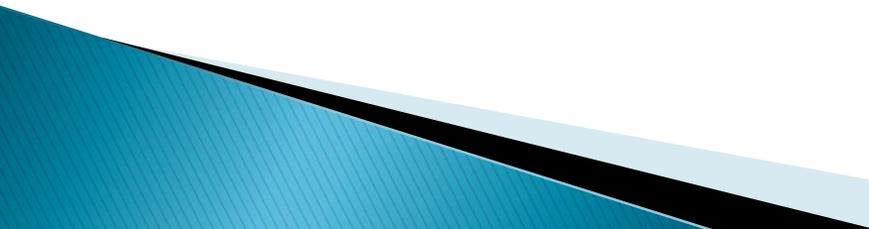
Production



Spreadsheet – “Production” tab (continued)

- Do not alter spreadsheet other than entering data
 - Copy/paste rather than cut/paste
 - Add comments to cover letter, not on spreadsheet
 - Do not add columns
- Control efficiency columns for show
 - “Summary” tab uses values from “controlcalcs” tab
 - If pasting over cells, recommend copying equations and moving back when done

Production



Spreadsheet – “Control Equipment Shutdown Log” tab

- Tab can be used for monthly downtime reports
- Use same APCD ID and battery name as on the “Production” tab
- Complete entire row (unscheduled or scheduled columns) for each downtime event
- Do not leave placeholders/blank cells
- Do not skip rows
- Do not provide extraneous comments

[Control Equipment Shutdown Log](#)



Spreadsheet – “controlcalcs” tab

- Auto-filled and password protected
- References “Production” tab
- Used by “Summary” tab
- APCD ID will auto-fill from “Production” tab
- Production data summary (Pw and Pdt) (check data entry and compare to log)

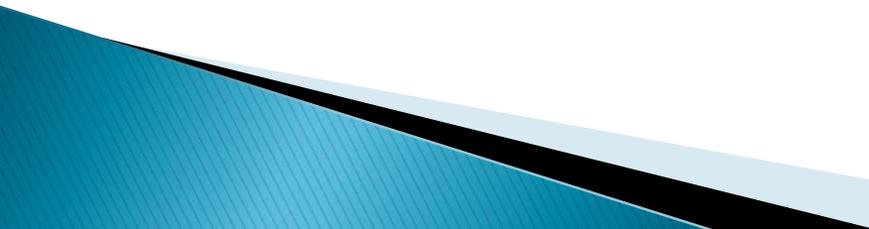
Controlcalcs



Spreadsheet – “Summary” tab

- Auto-filled and password protected
- References “Production” and “controlcalcs” tabs
- Determine if met control efficiency threshold using these tables
 - Offseason, monthly basis
 - Ozone season, weekly basis
- New in 2012 and future templates:
 - Control efficiency targets are in table titles

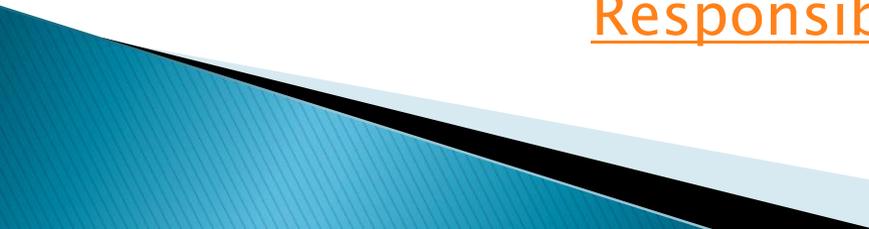
Summary



Responsible Official Form

- A. Circle either Nov 30 or April 30 and write in appropriate year
- B. Check one of the two boxes
 - Section refers to whether or not weekly or monthly system-wide control efficiency was met
 - Write in weeks/months that were not in compliance
- C. Completeness statement
- D. Provide general company information
- E. Responsible official signature block

[Responsible Official Form](#)



Responsible Official Definition

- Definition in Reg 3, Part A, Section I.B.40
- Responsible Official varies for:
 - Corporations – Includes delegation to duly authorized responsible representative
 - Partnerships/Sole proprietorships – general partner or proprietor
 - Public agencies – Principal executive officer or ranking elected official
- Delegation of authority shall be approved in advance by Division if corporation has <250 employees or <25 MM\$ gross annual sales

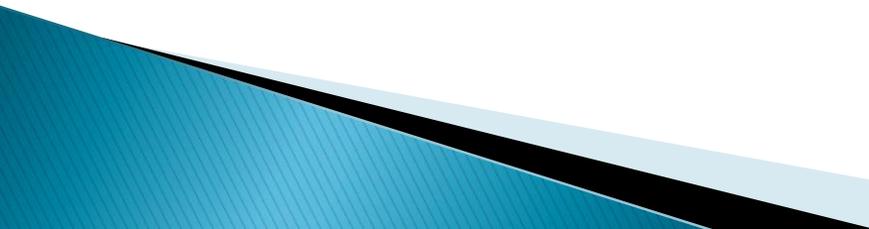
PS Memo 10-02

- Memo available on Division website
 - Originally issued on 9/27/10
 - Revision 1 issued on 4/30/12
 - Revision 2 issued on 10/04/13
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- Guidance document specifically developed to provide help with system-wide reporting requirements
 - Reporting spreadsheet
 - Responsible Official form
 - Monthly downtime reports
 - Control equipment status reports
 - Condensate tank systems
 - Control equipment downtime
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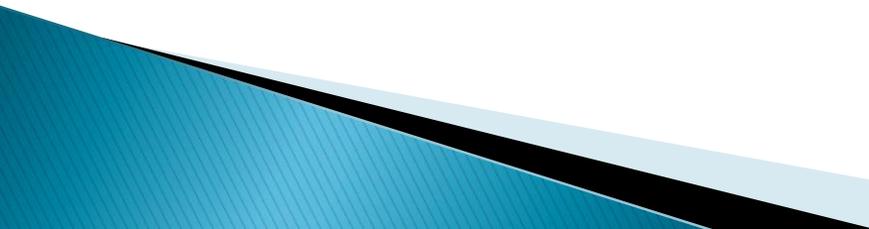
Common Reporting Issues

- Current spreadsheet template and responsible official form should be used
 - All assigned AIRS IDs should be included
 - Downtime production listed on the semi-annual “shutdown log” tab should match downtime production listed on the semi-annual report “production” tab
 - Downtime reports should include all required information
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Common Reporting Issues (continued)

- Only requested information should be provided in spreadsheet; notes of explanation may be provided in report cover letter
 - List of tanks on “production” tab should be consistent between November and April reports unless tanks were added or removed after September 30 or unless APENs were revised during the calendar year; again, notes of explanation may be provided in report cover letter
 - Proof of report submittal company’s responsibility
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Common Field Issues

- Condensate tank thief hatches should be closed and latched
 - Flash emissions should be fully captured and routed to control device (if battery is controlled)
 - AIRS IDs should be marked on condensate tanks and control devices
 - Should be able to see pilot light via visual observation
 - No visible emissions should be observed from the flare
 - Over pressuring of tanks which may lead to visible emissions from the thief hatch and/or PRV
 - Site access
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Additional Resources

- Division website: <http://www.colorado.gov/cs/Satellite/CDPHE-AP/CBON/1251582562056>
- Reporting spreadsheet, Responsible Official Form: <http://www.colorado.gov/cs/Satellite/CDPHE-AP/CBON/1251597644148>
- PS Memos: <http://www.colorado.gov/cs/Satellite/CDPHE-AP/CBON/1251597387439>
- Sign up for listserve: <http://www.colorado.gov/cs/Satellite/CDPHE-AP/CBON/1251596441882>
- Rebecca Wilson: rebecca.wilson@state.co.us; 303-692-3185
- Joseph Wright: joseph.wright@state.co.us; 303-692-3145

Thank you EnCana and Crestone
Peak Resources for providing the
meeting location!



Questions?

