



Compliance Strategies for Storage Tank Controls in the Uinta Basin Subpart 0000

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Permitting Authorities

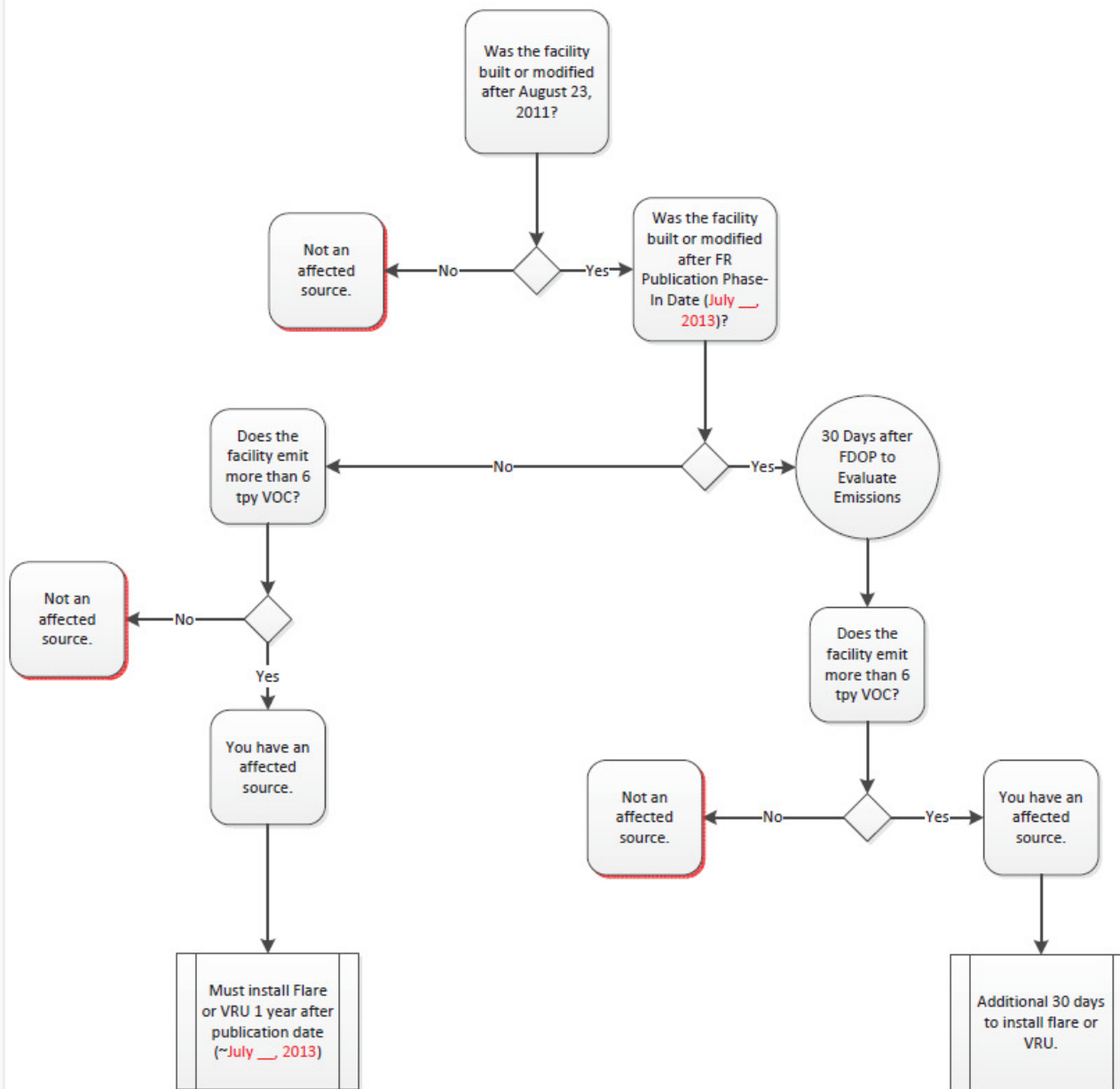
- Tribal Airshed
- Major Sources
 - *Criteria Pollutants*
 - *HAPS*
- Minor Sources
 - *Tribal NSR*
 - *OOOO (federal enforceability)*
- Company-specific agreements
 - *EIS*
 - *Consent Decree*



Initial Compliance Checklist

1. *Identify all storage tanks installed after August 23, 2011*
2. *Calculate VOC emissions > 6tpy*
3. *Secure control equipment*
 - a. Get in line.
4. *Maintain good records for both applicable and non-applicable affected facilities*
 - a. How do we prove that the emissions were below 6tpy
 - b. Actual emissions, projected emissions, should we include a decline analysis, etc.

40 C.F.R. Part 60, Subpart OOOO Flare/VRU installation Requirement Summary





Where is APC (Uinta Operations)?

Initial Compliance Checklist	Status
1. Identify storage tanks	Currently gathering info
2. Calculate VOC emissions	Developing an emission factor
3. Secure emission control equipment	Few resources have been secured. Working with design teams to begin including flare installations with initial construction. Pesco, Cimarron, Leed
4. Maintain records	<ul style="list-style-type: none">• Evaluating maintenance and documentation requirements.• Concurrently gathering emission records with Tribal NSR registrations. APC has a good handle on the emissions produced from well-sites that began production after August 30, 2011 (compliance date for Tribal NSR).



Compliance Challenges

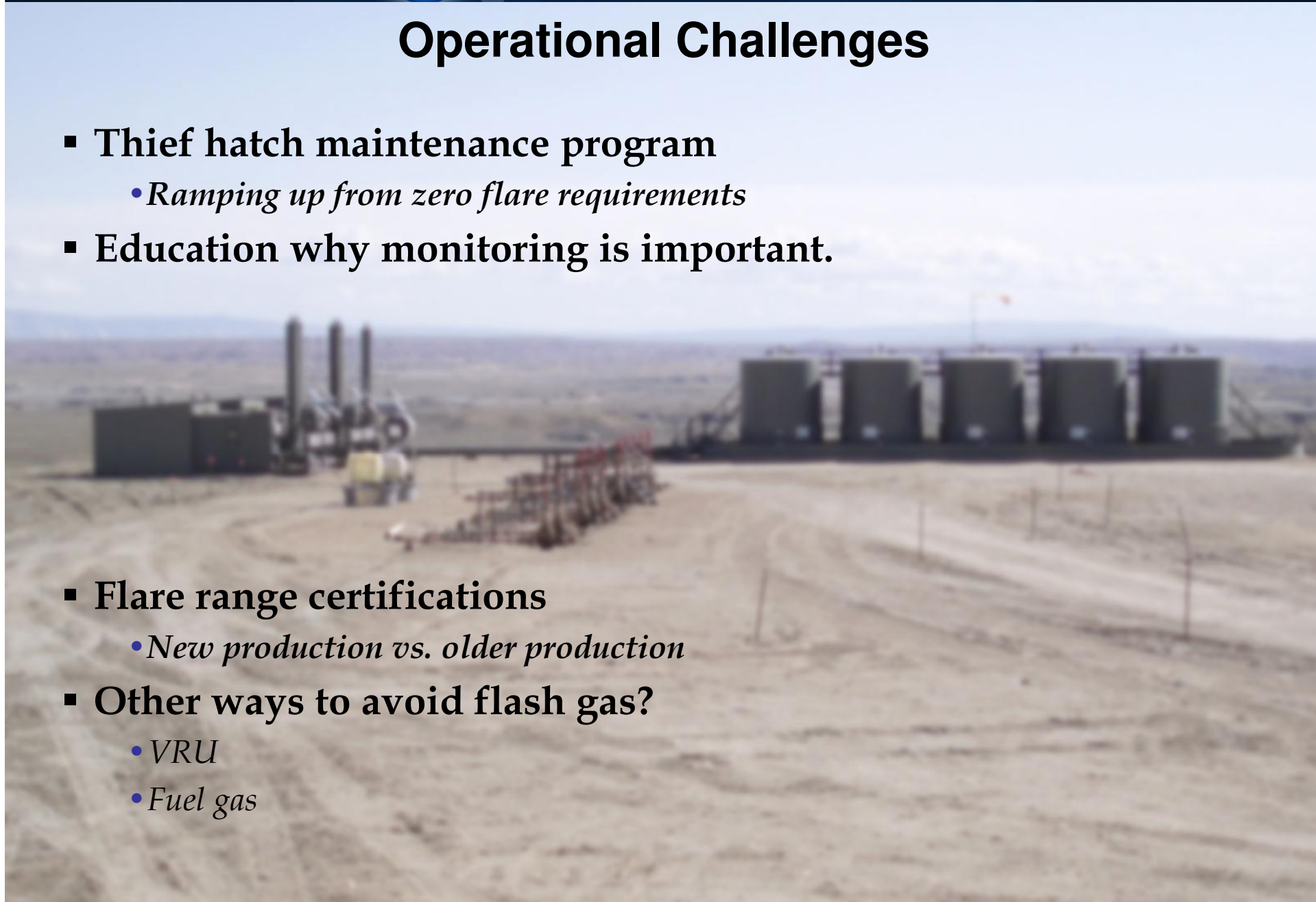
- Install controls within 60 days of new production (30 days of evaluation, 30 days to install).
- Retrofit facilities >6tpy VOC within 1 year from publication in the federal register.
 - *APC has approximately 60 sites that will require retrofits in the Uinta Basin.*
- Proving destruction efficiency
 - *Manufacturer certification for combustion devices*
 - *Testing each combustion devices individually*
- Monitoring gas flow rate to the flare
 - *Accurate within 2%? Is this reasonable?*
- Monitoring thermocouple
 - *Is it consistent/reliable?*
- Method 22 for each flare



Operational Challenges

- Thief hatch maintenance program
 - *Ramping up from zero flare requirements*
- Education why monitoring is important.

- Flare range certifications
 - *New production vs. older production*
- Other ways to avoid flash gas?
 - VRU
 - Fuel gas





Questions

