

The Power to Perform



NSPS subpart OOOO
Gas Compressor Association – April 2014

New Source Performance Standard Subpart 0000

- Establishes emissions standards and compliance schedules for the control of VOCs and SO₂ from affected facilities
- Affects non-engine related items
- Industry is regulated by segments
- Rule targets only “new” compressors and pneumatic controllers
- Additional equipment not discussed today include storage vessels and sweetening units

NSPS Subpart 0000

Background

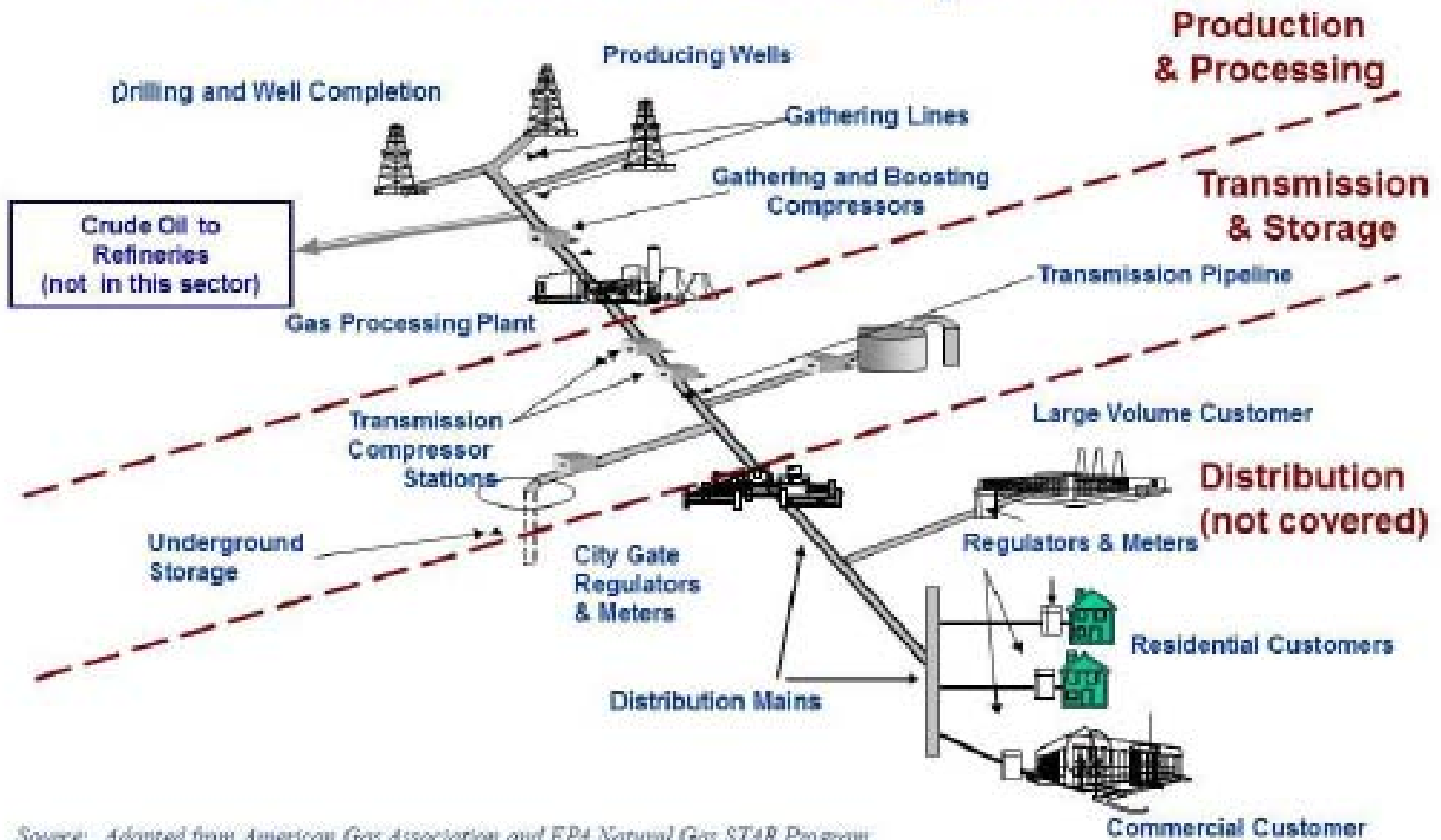
- Finalized April 17, 2012, Published 8/16/12, Effective 10/15/12, updated 9/23/13
- New = commenced construction on/after August 23, 2011
- Affected facilities
 - Centrifugal compressors with wet seals
 - High bleed pneumatic controllers
 - Reciprocating compressors
 - Other equipment such as tanks, process equipment, sweetening units, dehydrators, etc..
- NOT “affected facilities”
 - Centrifugal compressors with dry seals
 - Screw and liquid ring compressors
 - Compressors without packing
 - Low bleed or snap acting pneumatic controllers

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Industry Segments

- Production and Processing
 - Drilling and Completion
 - Producing Wells
 - Gathering Lines
 - Compressor Stations
 - Processing Plants
- Transmission and Storage
- Distribution

Oil and Natural Gas Operations



Source: Adapted from American Gas Association and EPA Natural Gas STAR Program

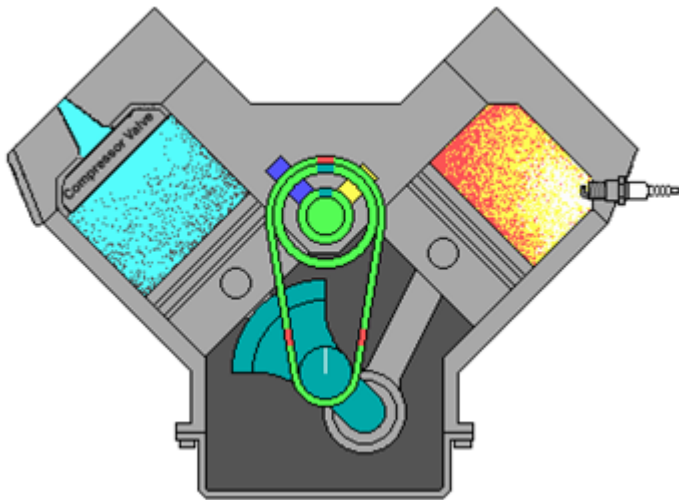
Figure 2-1. Oil and Natural Gas Operations

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Exclusions

- Screw Compressors are not covered by definition..
- 60.5430...Centrifugal compressor means any machine for raising the pressure of a natural gas by drawing in low pressure natural gas and discharging significantly higher pressure natural gas by means of mechanical rotating vanes or impellers. Screw, sliding vane, and liquid ring compressors are not centrifugal compressors for the purposes of this subpart.

NSPS subpart 0000 Exclusions



- Compressors that do not have rod packing can't be subject to the rule.
- Awaiting clarification from EPA regarding recordkeeping requirements

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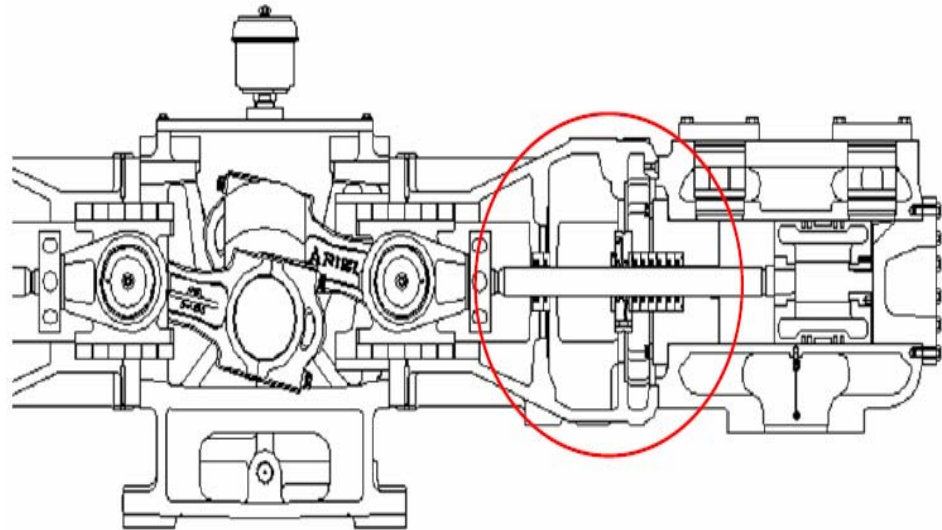
Reciprocating Compressors

- 60.5365(c) Reciprocating Compressor applicability
 - Single reciprocating compressors between the wellhead and the Transmission/Storage segments (after 8/23/11)
 - Reciprocating compressors located at a well site, or an adjacent well site servicing more than one well site is not an affected facility.
- *60.5430 Well site* means one or more areas that are directly disturbed during the drilling and subsequent operation of, or affected by, production facilities directly associated with any oil well, gas well, or injection well and its associated well pad.

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Reciprocating Compressor Requirements

- Change rod packing for affected facilities
 - 26,000 hours
 - 36 months
- Initial and annual reports
- Recordkeeping



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Reciprocating Compressors Reporting and Records

40 CFR 60.5420(b), (c)(3)

- Report due 90 days after Initial compliance period ends then annually
- Annual report Information - 60.5420(b)(1-6)
 - General Information
 - i. Company Name and address of affected facility (lat/long????)
 - ii. An identification of each affected facility (s/n???)
 - iii. Beginning and ending dates of reporting period
 - iv. Certification statement by responsible official: “...based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.”

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Reciprocating Compressor Reporting, cont'd

- Notification requirement under 60.7(a) was removed
- List each compressor constructed, modified or reconstructed since last reporting period
- Cumulative hours or months since later of:
 - Startup
 - October 15, 2012
 - Last packing replacement
- Maintain records per 60.5420(c)(3)
 - Record deviations of non-compliance

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Pneumatic Controllers

- Commenced construction after August 23, 2011
- Oil and Natural gas production segment
 - Continuous bleed natural gas over 6 SCFH are covered
 - Snap acting or low bleed controllers are not affected facilities
- Natural Gas Processing Plants
 - All continuous bleed devices are affected (use air)
 - Must have ID tag with install date

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Pneumatic Controllers

- 60.5390(a) allows exemption for devices with greater than the applicable standard based on functional needs except for the processing segment.
 - Response time
 - Safety
 - Positive actuation
 - Must be tagged with install date and ID for records
 - Maintain records according to 60.5420(c)(4)(ii)

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Pneumatic Controllers Compliance

- Affected devices with high bleed
 - Notifications under 60.7(a)(1),(3), and (4) not required
 - Identification of controller according to 60.5390(b)(2) or (c)(2)
 - Documentation for controllers with greater than 6 SCFH flow.
 - Submit annual report
 - List affected facilities
 - Records of deviation
 - Report can be combined for multiple owned facilities

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Summary of Requirements

	Pneumatic Controllers	Centrifugal Compressors	Reciprocating compressors
Well Site	Must be less than 6 scfh	Not covered	Not covered
Production & Compressor Stations	Must be less than 6 scfh	Wet seals reduce by 95% Dry seals not covered	Change rod packing 26,000 hours or 36 months
Processing	0 scfh = no bleed with gas (use air)	Wet seals reduce by 95% Dry seals not covered	Change rod packing 26,000 hours or 36 months
Transmission & Storage	Not covered	Not covered	Not covered
Distribution	Not covered	Not covered	Not covered

Owner and Operator



Questions?

