

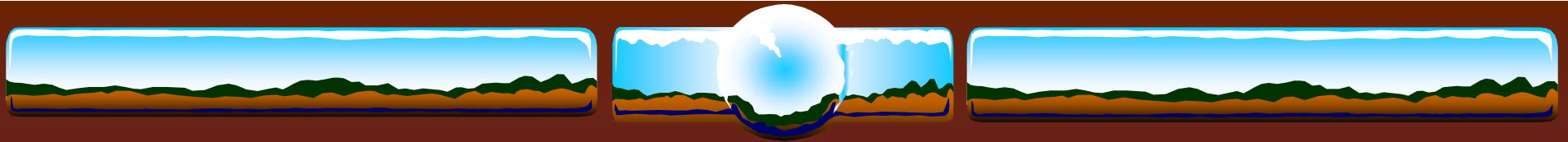
(8-Hour) Ozone Regulatory Plan: Early Action Compact and Beyond

Ozone Matters Workshop

April 25, 2007

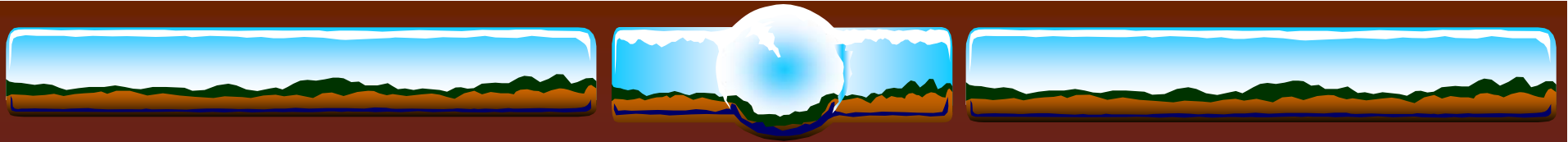
Lisa Silva

Air Pollution Control Division, CDPHE



Regulations Number 7 and Ozone Action Plan Revisions from December '06

- ❖ Regulation Number 7, *Emissions of Volatile Organic Compounds*
- ❖ More stringent regulation of VOC “flash” emissions from condensate tanks in the oil and gas exploration & production industry
- ❖ More stringent regulation of NO_x emissions from reciprocating internal combustion engines in the field.



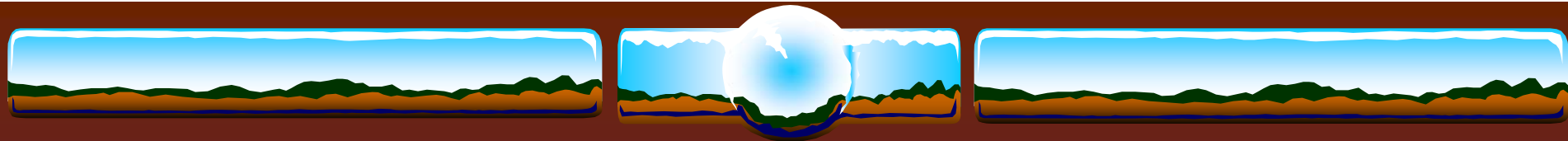
Inventory, Regulatory Revisions to be incorporated into Ozone Action Plan

- ❖ Latest flash emission inventory numbers based on most recent APEN filings, growth factors
- ❖ New flash emissions estimated for official EAC Control Area, as determined by EPA



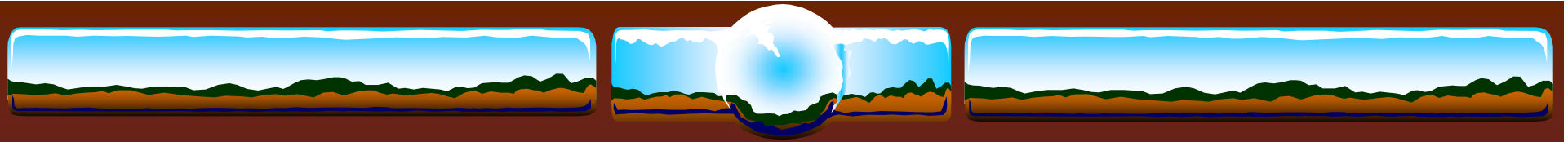
Condensate Tank Flash Emissions

- ❖ Provisions adopted by AQCC require a 75% overall reduction in EAC area flash emissions to achieve a 91.3 tons/day controlled level for ozone season beginning May, 2007
- ❖ 78% overall reduction in EAC area required beginning May, 2012
- ❖ Control technology must achieve a 95% reduction in VOC emissions



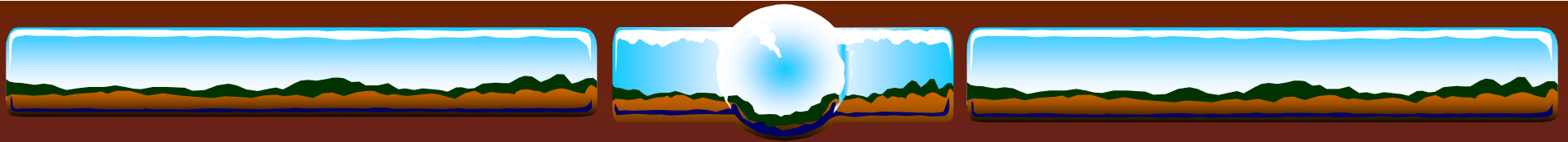
Regulation Number 7

- ❖ Engine controls: New natural gas-fired reciprocating internal combustion engines and those relocated to Colorado must achieve emissions standards equivalent to new federal standards for such engines for NO_x, CO and non-methane hydrocarbons
- ❖ Phased in 2007 to 2011
- ❖ Applicable in EAC area, as well.
- ❖ All incorporated into Ozone Action Plan



Administrative

- ❖ Revised Ozone Action Plan to be submitted to EPA after Legislative and Governor review, prior to July 1, 2007
- ❖ EPA likely to approve revisions by mid-2008.



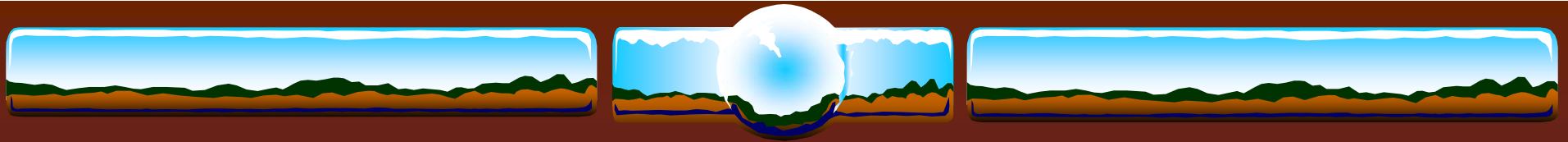
Regulatory Compliance

- ❖ Through September 2006 (then) required 47.5% emission reductions target met on a daily basis overall
- ❖ However, some individual companies failed to meet the percentage reduction requirement, and are being evaluated for enforcement this year
- ❖ Industry forecast for 2007 ozone season is that most will be in compliance with new 75% reduction requirement
- ❖ Division to verify via reports and inspections.



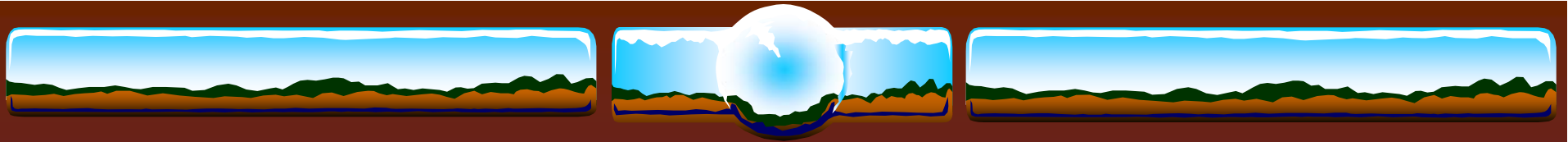
Ozone Precursor Inventory Work

- ❖ More robust inventory of oil & gas E&P industry needed
- ❖ APCD currently assessing evaporation ponds and soils that receive process water and other materials; could indicate whether additional controls needed
- ❖ Contractor reviewing literature for EI data
- ❖ Division and EPA plan to monitor emissions from additional source points in Garfield County, perhaps elsewhere in State this year, looking at drill rigs, well completions, heater-treaters, waste pits, fugitive leaks, etc.



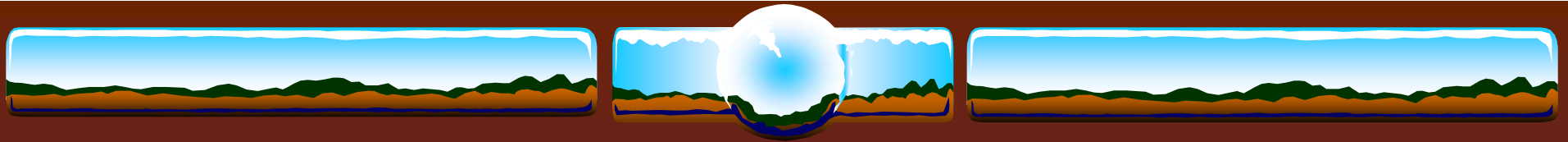
Motor Vehicle Emissions: RAQC and APCD's Evolving Remote Sensing Program

- ❖ High-emitter identifications increasing:
 - ❖ Participation rates 22%, up to 30% in some mailings
 - ❖ 375 vehicles have been repaired since 2003
 - ❖ Currently using more strongly worded initial letter and three follow-ups
 - ❖ Increased incentives free emissions testing, \$40 gas coupon, free car rental while repairs are made and up to \$1,000 in repairs.



HB 1302/Evolving High-Emitter Program

- ❖ Requires a mandatory remote sensing program be developed; may replace current I/M program by EOY 2010, provided no violation of federal standards will result
- ❖ Penalties for non-compliance to include suspension of vehicle registration
- ❖ APCD to have a pilot scale mandatory high-emitter program by 2008, funded by Colorado vehicle registration fees, possibly concurrent with RAQC Repair Your Air.



SIP Development

- ❖ Maintenance Plan development has begun, with inventory work from latest APEN filings and compliance reports to be reconciled by mid-June; anticipate draft inventory to be presented to Commission September.
- ❖ Division, RAQC and EPA are ascertaining SIP requirements in the event of a non-attainment designation.