

Stationary Source Draft Ozone Reduction Strategies

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Outline of Presentation

- Overview of stakeholder process
- Stationary Source Strategies
- Next Steps

Draft – please provide comments

SS/O&G Stakeholder Meeting History

- December 14, 2007 (SS/O&G)
- February 26, 2008 (2006 base case Inventory/O&G)
- March 5, 2008 (SS Inventory/Strategies)

**Presentation and
Issue Papers are posted at:**

www.ozoneaware.org

Stationary Source Strategies

- Reconsider current APEN exemptions
- Expand Regulation 7 to entire ozone non-attainment area
- Clarify case-by-case RACT applicability
- Set presumptive RACT for minor sources/categories

Air Pollutant Emission Notices (APENs) & Categorical Exemptions

- 1 ton/year of NO_x and VOCs
- Some exemptions are based on type of equipment or activity rather than specific emission rates (categorical exemptions)

Exemption Reconsideration Reasoning

- IPAMs Data
- Clarify &/or limit scope
- Other information

Exemption Reconsideration: IPAMs Data

- Internal combustion engines on drill rigs
- Crude oil truck loading equipment
- Oil/gas production wastewater tanks
- Oil and gas production activities including: well drilling, workovers and completions
- Stationary Internal Combustion Engines meeting horsepower and hours of operation restrictions
- Condensate tanks with production 730 BBL/year or less
- Fuel burning equipment (includes heater treaters, separators, and dehydrator reboilers)

Exemption Reconsideration: Clarify &/or Limit Scope

- Chemical Storage Tanks
- Gasoline stations and refueling outside of the 1 hour ozone non-attainment area

Exemption Reconsideration: Other Information

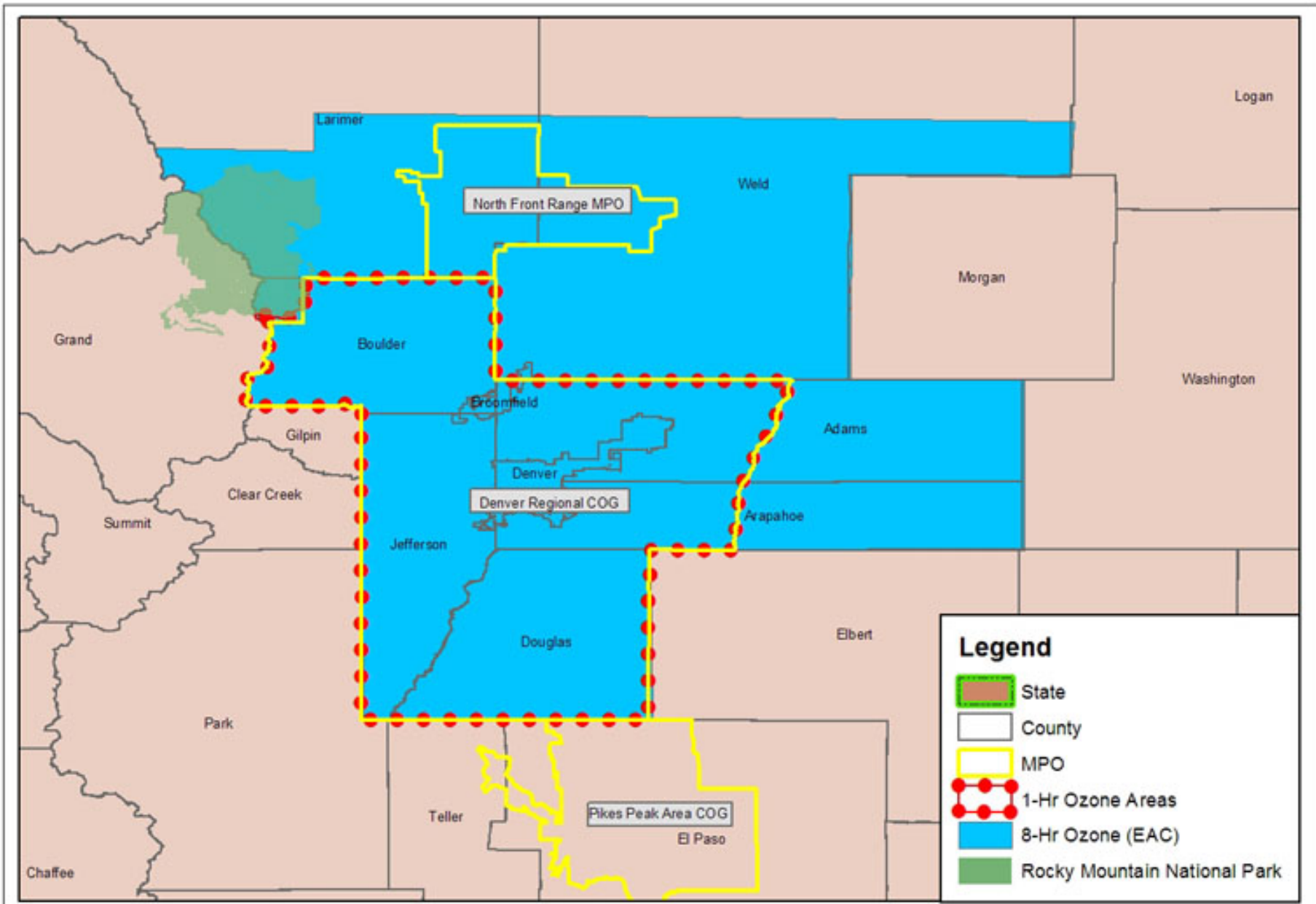
- Petroleum industry flares less than 5 tons per year (tpy) emissions
- Storage of butane, propane, LPG
- Crude oil storage tanks
- Surface water storage impoundment
- Emergency power generators
- Venting of natural gas lines for safety purposes
 - If exemption is removed, APENs would not be required until after an event occurs.

Expand Regulation 7 to the entire Ozone Non-attainment area (NAA)







- 1-hour ozone NAA to ozone NAA
- Based on equity
- General RACT

Examples of Source Categories Subject to General RACT in Regulation 7

- Surface Coating Operations
- Use of Solvents for Degreasing and Cleaning
- Use of Cutback Asphalt



Legend

-  State
-  County
-  MPO
-  1-Hr Ozone Areas
-  8-Hr Ozone (EAC)
-  Rocky Mountain National Park



Denver-Boulder-Greenly-Ft Collins-Love, CO (EAC)

October 2004

Clarify Case-by-Case RACT Applicability

- Regulation 3 and 7 RACT Inconsistency
- Regulation 3
 - triggers RACT at permit levels for new and modified sources (Part B, Section III.D.2.)
- Regulation 7
 - triggers RACT by source category or at 100 tpy (Section II.c.1.a(1))

Set Presumptive RACT for Minor Sources/Categories

- Front Range
 - Condensate tanks
 - Pneumatics
- Statewide*
 - Condensate tanks
 - Dehydrators
 - Pneumatics
 - RICE

*Will be discussed at a future Stakeholder Meeting

Largest Emitting Facilities Discussion

- Today's focus
 - Ozone NAA
 - SS other than condensate tanks/tank batteries that may be controlled in May 2008
- State-wide Largest Emitting Facilities to be discussed in future stakeholder meetings

Largest Emitting Facilities: Ozone NAA

- Suncor Energy
 - 1,035 tpy APEN vs. 339 tpy actual
 - Storage tank/fugitive controls
- Coors Brewing
 - 494 tpy
 - Bottle/can filling controls (route to VOC duct/burner)
- Metal Container Corp.
 - 246 tpy
 - Can coating operation control (thermal oxidizer)
- Anheuser Busch
 - 196 tpy
 - Can filling & possibly other operations' controls (similar to Coors' VOC duct/burner)
- CEMEX, Inc
 - 147 tpy APEN
 - Currently assessing actual emissions and potential control options
- Insulfoam LLC
 - 145 tpy
 - Resin storage controls (carbon filtration)

Next Steps

- Refine Largest Emitting Facilities Strategy
- Outline Regulatory Concepts per Strategy
- Develop Draft Rule Text
 - Oil and Gas Strategies (from following presentation)
 - Regulation 3 exemptions
 - Regulation 7 expansion
 - Regulation 3 & 7 RACT applicability
 - Presumptive RACT for minor sources/categories
 - Largest Emitting Facilities