

Ozone Reduction Strategies
Rule Development Stakeholder Meeting #2
May 28, 2008

Rule Development Handout:
Pneumatic Devices in Ozone Non-attainment Area

Pneumatics – New, Modified and Existing Sources (VOCs) in Ozone Non-attainment Area

- Secure additional VOC emission reductions from pneumatics in ozone non-attainment area

- Sections
 - o Organization
 - o Definitions
 - Existing
 - Low-bleed
 - o Emission Reduction Requirements
 - o Monitoring
 - o Recordkeeping & Reporting

- Discussion

XIII.I. NATURAL GAS-ACTUATED PNEUMATIC DEVICES ASSOCIATED WITH OIL AND GAS OPERATIONS

XIII.I.1. APPLICABILITY

THIS SECTION APPLIES TO PNEUMATIC DEVICES LOCATED AT EXPLORATION AND PRODUCTION (E&P) AND MID-STREAM FACILITIES LOCATED WITHIN AN OZONE NON-ATTAINMENT AREA.

XIII.I.2. DEFINITIONS

XIII.I.2.A. *ENHANCED MAINTENANCE* SHALL INCLUDE CLEANING, TUNING, AND REPAIRING LEAKING GASKETS, TUBING FITTINGS, AND SEALS, AND INCLUDES TUNING TO OPERATE OVER A BROADER RANGE OF PROPORTIONAL BAND; AND ELIMINATING UNNECESSARY VALVE POSITIONERS.

XIII.I.2.B. *EXISTING PNEUMATIC DEVICE* SHALL MEAN A PNEUMATIC DEVICE INSTALLED BEFORE FEBRUARY 1, 2009.

XIII.I.2.C. *HIGH-BLEED DEVICE* SHALL MEAN PNEUMATIC DEVICES THAT EMIT IN EXCESS OF 6 STANDARD CUBIC FEET OF GAS PER HOUR (SCFH) TO THE ATMOSPHERE.

XIII.I.2.D. *MODIFIED PNEUMATIC DEVICE* SHALL MEAN A DEVICE MODIFIED ON OR AFTER FEBRUARY 1, 2009.

XIII.I.2.E. *NEW PNEUMATIC DEVICE* SHALL MEAN A PNEUMATIC DEVICE INSTALLED ON OR AFTER FEBRUARY 1, 2009.

XIII.I.2.F. *NO-BLEED DEVICE* SHALL MEAN A PNEUMATIC DEVICE THAT DOES NOT EMIT ANY GAS TO THE ATMOSPHERE.

XIII.I.2.G. *PNEUMATIC DEVICE* SHALL MEAN AN INSTRUMENT THAT IS ACTUATED USING NATURAL GAS PRESSURE AND USED TO CONTROL OR MONITOR PROCESS PARAMETERS SUCH AS LIQUID LEVEL, GAS LEVEL, PRESSURE, VALVE POSITION, LIQUID FLOW, GAS FLOW AND TEMPERATURE.

XIII.I.3. EMISSION REDUCTION REQUIREMENTS

THE OWNERS AND OPERATORS OF AFFECTED OPERATIONS SHALL REDUCE EMISSIONS OF VOLATILE ORGANIC COMPOUNDS FROM PNEUMATIC DEVICES ASSOCIATED WITH AFFECTED OPERATIONS BY THE DATES LISTED BELOW. EMISSION REDUCTIONS

SHALL BE REQUIRED FOR NEW, MODIFIED AND EXISTING PNEUMATIC DEVICES AS FOLLOWS:

- XIII.I.3.A. EXISTING HIGH-BLEED PNEUMATIC DEVICES SHALL BE REPLACED WITH NO-BLEED DEVICES OR CONVERTED SUCH THAT THEY DO NOT PRODUCE VOC EMISSIONS (EXAMPLES INCLUDE USING SOLAR POWER OR COMPRESSED AIR TO OPERATE A DEVICE) BY MAY 1, 2009, UNLESS SUBJECT TO XIII.I.3.D.
- XIII.I.3.B. NEW PNEUMATIC DEVICES SHALL BE NO-BLEED DEVICES OR CONVERTED SUCH THAT THEY DO NOT PRODUCE VOC EMISSIONS (EXAMPLES INCLUDE USING SOLAR POWER OR COMPRESSED AIR TO OPERATE A DEVICE), UNLESS SUBJECT TO XIII.I.3.D.
- XIII.I.3.C. MODIFIED HIGH-BLEED PNEUMATIC DEVICES SHALL BE REPLACED WITH NO-BLEED DEVICES OR CONVERTED SUCH THAT THEY DO NOT PRODUCE VOC EMISSIONS (EXAMPLES INCLUDE USING SOLAR POWER OR COMPRESSED AIR TO OPERATE A DEVICE) BY FEBRUARY 1, 2009, OR UPON START-UP, WHICHEVER COMES FIRST, UNLESS SUBJECT TO XIII.I.3.D.
- XIII.I.3.D. HIGH-BLEED OR LOW-BLEED PNEUMATIC DEVICES MAY REMAIN IN SERVICE IF WARRANTED BY SAFETY OR PROCESS PURPOSES, HOWEVER THOSE SOURCES MUST COMPLY WITH SECTION XIII.I.4. AND XIII.I.5.

XIII.I.4. MONITORING

- XIII.I.4.A. EACH HIGH-BLEED PNEUMATIC DEVICE SUBJECT TO XIII.I.3.D. SHALL BE PHYSICALLY TAGGED IDENTIFYING IT WITH A UNIQUE HIGH-BLEED PNEUMATIC DEVICE NUMBER EFFECTIVE MAY 1, 2009.
- XIII.I.4.B. ENHANCED MAINTENANCE SHALL BE REQUIRED ON A MONTHLY BASIS FOR ALL HIGH-BLEED PNEUMATIC DEVICES SUBJECT TO XIII.I.3.D. EFFECTIVE MAY 1, 2009.

XIII.I.5. RECORDKEEPING

- XIII.I.5.A. THE OWNER OR OPERATOR SHALL MAINTAIN A LOG OF THE TOTAL NUMBER OF HIGH-BLEED PNEUMATIC DEVICES PER FACILITY, THE TOTAL NUMBER OF HIGH-BLEED PNEUMATIC DEVICES PER COMPANY AND THE ASSOCIATED REASONING THAT THE HIGH-BLEED PNEUMATIC DEVICES MUST BE USED PURSUANT

TO SECTION XIII.I.3.D. THE LOG SHALL BE UPDATED AS APPLICABLE ON A MONTHLY BASIS.

XIII.I.5.B. RECORDS OF ENHANCED MAINTENANCE SHALL INCLUDE, AT A MINIMUM, THE DATE OF THE MAINTENANCE ACTIVITY, HIGH-BLEED PNEUMATIC DEVICE NUMBER, DESCRIPTION OF THE MAINTENANCE PERFORMED, RESULTS AND DATE OF ANY CORRECTIVE ACTION TAKEN, AND THE SIGNATURE OF THE INDIVIDUAL PERFORMING THE MAINTENANCE.

XIII.I.5.C. RECORDS OF ENHANCED MAINTENANCE OF PNEUMATIC DEVICES SHALL BE MAINTAINED FOR A MINIMUM OF THREE YEARS AND READILY MADE AVAILABLE TO THE DIVISION UPON REQUEST.