

Rule Development Handout:
Condensate Tanks in Ozone Non-attainment Area
RACT Requirements in Ozone Non-attainment Area
APEN/Permit Exemptions State-wide

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

- Secure additional VOC emission reductions from condensate tanks in ozone non-attainment area
- Changes
 - Re-organization
 - Definitions
 - New
 - Modified
 - Existing
 - Auto-igniter
 - Electronic surveillance system
 - Control first 90 days
 - Emission threshold control strategy w/ transition from system-wide
 - Monitoring
 - Auto-igniter
 - Electronic surveillance system
 - Recordkeeping & reporting

Rule Details

- Definitions
- Control first 90 days of operations control options & have auto-igniters
- All new tanks 2 tpy and greater are required to control with 98% efficiency and have auto-igniters and electronic surveillance
 - Effective 2/2009
- Tanks with controls for system-wide control strategy, keep controls on
 - Effective 5/2010
- All existing tanks greater than 2 tpy are required to control with 98% efficiency
 - >10 tpy effective 5/2010
 - >5 tpy effective 5/2011
 - >2 tpy effective 5/2012
- All existing tanks have auto igniters and electronic surveillance
 - Effective emission control effective date

RACT Requirements for New, Modified and Existing Sources (VOCs, NOx) in Ozone Non-attainment Area

- Clarify/remove conflict between Reg 3, Part A, Section II.D.2. and Reg 7 RACT thresholds
- Changes
 - Existing source RACT update
 - Existing source modifications
 - Ozone non-attainment areas RACT permit application and compliance schedules

Reminder:

Reg 3

- VOCs: RACT at 2 tpy
- NOx: RACT at 5 tpy

Reg 7

- VOCs & NOx
 - Existing sources: 100 tpy actual uncontrolled
 - New sources: any tpy

Rule Details:

- Existing source RACT: comply w/ RACT in permit
- Clarify existing sources that modify are subject to Reg 3 RACT requirements
- RACT permit application and compliance schedules for ozone non-attainment areas outside of 1-hour ozone non-attainment area
 - 1 year to submit APEN
 - 3 years to utilize RACT

APEN/Permitting Exemptions New and Modified Sources (VOCs, NOx) State-wide

- Changes
 - Remove APEN exemption, keep permit exemptions
 - Clarify or revise APEN exemption
 - Keep APEN exemption

Reminder:

VOCs: APENs at 1 tpy, permits and RACT at 2 tpy

- Effective 11/20/2007

NOx: APENs at 1 tpy, permits and RACT at 5 tpy

- Effective 11/20/2007

Rule Details:

- APEN exemptions removed, permit required
 - Condensate tanks w/ 730 bbls/yr (Part A, Section II.D.1.eeee. and Part C.II.E.3.gggg.)

- APEN exemptions removed, but Construction and T5 permit exemptions kept in place:
 - Petroleum industry flares (Part A, Section II.D.1.m.)
 - Crude oil truck loading (Part A, Section II.D.1. ee.)
 - Oil production wastewater (Part A, Section II.D.1.uu.)
 - Crude oil storage tanks (Part A, Section II.D.1.ddd.)

- APEN exemptions proposed to be removed or clarified, but kept in place as is:
 - Storage of butane, propane... (Part A, Section II.D.1.zz.)
 - O&G production activities (Part A, Section II.D.1.iii.)
 - ICE (Part A, Section II.D.1.sss.)
 - Emergency generators (Part A, Section II.D.1.ttt.)
 - Chemical storage tanks (Part A, Section II.D.1.aaaa.)
 - Venting of natural gas for safety (Part A, Section II.D.1.zzz.)

- Exemptions that are clarified:
 - Drill rigs (Part A, Section II.D.1.i.) – exception for oil and gas drill rigs
 - Surface water impoundments (Part A, Section II.D.1.uuu. and Part C, Section II.E.3.yyy.)- exception for O&G production wastewater (similar to Part A, Section II.D.1.uu.)
 - Fuel burning equipment (Part A, Section II.D.1.k., Part B, Section II.D.1.e. and Part C, Section II.E.3.k.) - exception for heater treaters, oil separators and dehy reboilers
 - Chemical storage tanks (Part C,Section II.E.3.n.) - exclude O&G production wastewater or commercial facilities ops (similar to Part A, Section II.D.1.uuu. and Part C, Section II.E.3.yyy.)
 - Fuel storage dispensing (Part A, Section II.D.1.cccc. and Part C, Section II.E.3.cccc.) - revised 1 hr O3 attainment/maintenance area to read O3 non-attainment or attainment/maintenance area