



**pennsylvania**  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



Office of Waste, Air, Radiation & Remediation

# **Category No. 38 Exemption Criteria Implementation Issues – Regional Perspective**

Bureau of Air Quality

July 22, 2015

Tom Wolf, Governor

John Quigley, Secretary

# Overview

- Updated Guidance
- Definitions
- Compliance Demonstration Reports (CDRs)
  - Due Dates
  - CDR Content
  - Common Deficiencies
  - Good Examples
  - Submittal Formatting
- Exemption 38 Inspections


# ▶ June 1, 2015 Guidance Clarification

- The guidance document has the following changes for CDR Submittals:
  - Non-road engines will not require a statement or certification of compliance with 40 CFR Part 89.
  - LDAR will be required 60 days after *production*.

# Definitions

- Production
  - Gas flowing continuously into a sales line or to a storage vessel
  - LDAR survey due 60 days after production
- Completion
  - Flowback or source installation (As defined in 40 CFR Part 60, Subpart OOOO)
  - CDR due 180 days from completion

# Department CDR Review

 <b>pennsylvania</b> DEPARTMENT OF ENVIRONMENTAL PROTECTION		<b><u>Exemption 38: Compliance Demonstration Report</u></b>		Commonwealth of Pennsylvania Northcentral Regional Office Bureau of Air Quality	
Company Name:		Site Name:			
County:		Municipality:			
Reviewer:		Date Reviewed:			
<b>Report Information</b>					
Date Received	Postmark Date	Well Completion Date	Within 180 Days?		
			<input type="checkbox"/> Yes <input type="checkbox"/> No		

- Well completion dates/Source installation dates
- Locational information for wells and/or sources

# Department CDR Review

Storage Vessels $\geq$ 6 tons/year VOCs	<input type="checkbox"/> Applicable	<input type="checkbox"/> N/A
Identification of each affected unit	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Location of each unit (Lat./Long. using NAD)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
VOC emissions rate	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Method Used:		
Results of performance tests (if applicable)	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A

- VOC emissions for all sources
- Calculation methods
- Some information only required for units with PTE >6 tpy

Other Equipment	<input type="checkbox"/> Applicable	<input type="checkbox"/> N/A
Identification of each affected unit	<input type="checkbox"/> Yes	<input type="checkbox"/> No
VOC emissions rate	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Method Used:		
Results of performance tests (if applicable)	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A

Tanker Truck Load-Out	<input type="checkbox"/> Applicable	<input type="checkbox"/> N/A
Identification of each affected unit	<input type="checkbox"/> Yes	<input type="checkbox"/> No
VOC emissions rate	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Method Used:		
Results of performance tests (if applicable)	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A

# Department CDR Review

## VOC/HAP Emissions

Excluding sources that are permitted or meet the exemption criteria in (d) i., ii., and iv. of Ex. 38  
Including tanks < 6 tons/year VOCs, and all other sources at the facility

VOC and HAP emissions calculations	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Method Used:		

	Reported Data	Limit
VOCs		<i>2.7 tons in any 12-cmp</i>
Single HAP		<i>1000 lb in any 12-cmp</i>
Combined HAPs		<i>1 ton in any 12-cmp</i>

<b>NO<sub>x</sub> Emissions (Stationary Internal Combustion Engines)</b>	<input type="checkbox"/> Applicable	<input type="checkbox"/> N/A
NO <sub>x</sub> emissions calculations	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A
Method Used:		

	Reported Data	Limit
NO <sub>x</sub>		<i>100 lb/hr</i>
		<i>1000 lb/day</i>
		<i>2.75 tons/ozone season</i>
		<i>6.6 tons in any 12-cmp</i>

- Emissions compared to limits
- NOx emissions for all sources

# Department CDR Review

<b>Permanent Flares</b>	<input type="checkbox"/> <b>Applicable</b>	<input type="checkbox"/> <b>N/A</b>
Permanent flares are enclosed	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A
Designed in accordance with 40 CFR § 60.18	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A

- Statement of applicability
- 40 CFR §60.18 compliance demonstration

<b>40 CFR Part 60 Subpart OOOO Flowback Notification</b>	
Flowback notification received with CDR	<input type="checkbox"/> Yes <input type="checkbox"/> No

- Inclusion of 24-hour advance notifications



# Department CDR Review

<b>Reduced Emissions Completion</b>	<input type="checkbox"/> <b>Applicable</b>	<input type="checkbox"/> <b>N/A</b>
Information demonstrating compliance with REC requirements	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>N/A</b>

- REC information should include
  - API well number;
  - Duration of flowback;
  - Duration of recovery to the flow line;
  - Duration of combustion;
  - Duration of venting;
  - Reasons for venting,
  - Documentation for exceptions

# Department CDR Review

Leak Detection and Repair Program			
LDAR completed within 60 days of production	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Equipment, date, detection method, and measurement data/visual image	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Method Used:			
Number of repairs not completed within 15 days and equipment on “Delay of Repair” list, date put on list, reason, and schedule repair date	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Number of equipment/components that could not be repaired and reason	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A

- Video footage is not required for CDR
- Production dates to verify timeliness
- Equipment type, LDAR methods

# Common CDR Deficiencies

- Common CDR deficiencies include:
  - 24-hour advance flowback notifications
  - API numbers and associated completion dates
  - NOx data for all equipment
  - Equipment used in FLIR surveys

# Common CDR Deficiencies

- Common deficiencies, continued
  - Reduced emission completion dates
  - Production dates for LDAR compliance
  - Emission calculation methods

# Good CDR Examples

- Good examples of CDRs have included
  - Emissions information in tables for the site
  - List of all wells in the report
  - Completion/Installation dates

# CDR Formatting for Submittals

- Preferred CDR formatting includes:
  - Separate reports by county
  - Double-sided hardcopy reports
  - DEP Regional CDR contacts on e-mailed submittals (provided on final slide)

# Well Pad Inspections

- Inspections for compliance with the Category No. 38 Exemption Criteria include the following:
  - Verification of reported equipment
    - Determine whether all sources were identified in CDR
  - Verification of well API numbers and labels
  - Review of required records, including LDAR
  - Recording of operating parameters for sources
  - Testing/LDAR observations



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# Questions?





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