Summary of 40 CFR part 60, subpart OOOO

40 CFR part 60, subpart OOOO Affected Facilities

The requirements under this subpart affect oil & gas production facilities which are constructed, modified, or reconstructed after August 23, 2011.

Reduced emissions completions (REC or "green" completions) and completion combustion devices will be required on all new hydraulically fractured **GAS** wells after January 1, 2015. (A gas well is defined as an onshore well drilled principally for the production of natural gas. Oil wells are not subject to this rule.) REC will not be required where it is not feasible as specified in the rule. REC or "green" completions allow operators to route gas that is recovered during the completion/flowback process to a sales pipeline by utilizing specialized 4-phase separation equipment which can filter out any sands or solids that flow back with the gas. By implementing this practice, the gas can be sold rather than flared.

All pneumatic controllers at O&G production facilities must be low/no bleed devices with the low bleed limit set at 6 standard cubic feet per hour (scfh).

All individual storage vessels in the O&G production segment and natural gas processing, transmission and storage segments with emissions equal to or greater than 6 tons per year (tpy) must achieve at least 95 percent reduction in VOC emissions.

40 CFR part 60, subpart OOOO Affected Facilities, cont.

All pneumatic controllers at gas processing plants must be zero bleed devices.

Reciprocating compressors located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment must change rod packing every 26,000 hours or 36 months.

Centrifugal compressors using wet seals located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment must reduce VOC emissions by 95%.

Reduced Emission Completion (REC)
"Green Completion"

Wyoming Requirements

REC ("Green Completions") are required on all O&G production facilities in the Jonah Pinedale Development Area (JPDA) and Concentrated Development Area (CDA) which consists of Uinta, Lincoln, Sublette, Sweetwater, Fremont, Carbon and Natrona Counties. Operators are required to submit an application and receive a "green" completions permit which outlines the notification, recordkeeping, and reporting requirements.

Subpart OOOO

After January 1, 2015 REC will be required on all hydraulically fractured **GAS** wells only under this subpart.

Low/No Bleed Pneumatic Controllers and Devices

Wyoming Requirements

These devices are required at all well facilities constructed or modified after August 1, 2010.

Subpart OOOO

These devices will be required at all well facilities constructed or modified after August 23, 2011.

Tank Emissions

Wyoming Requirements

JPDA – tanks controlled on startup of the facility, regardless of emissions.

CDA – tanks controlled on startup of the facility at multiple well (PAD) locations regardless of emissions. At new single wells if total projected tank emissions are greater than 8 tpy, controls (98%) must be installed within 60 days of startup.

Statewide Area – If total projected tank emissions are greater than 10 tpy, controls (98%) must be installed within 60 days of startup.

Subpart OOOO

Emission controls for tanks are required if emissions are greater than 6 tpy. This is applied on a per tank basis, not total facility tank emissions.

40 CFR part 60, subpart OOOO updates to NSPS

For facilities constructed after January 20, 1984 and prior to August 23, 2011, emission limits under 40 CFR part 60, subparts KKK and LLL remain in effect until the facility is modified.

For facilities constructed or modified after August 23, 2011 –

This subpart updates the LDAR requirements under 40 CFR part 60, subpart KKK and incorporates the requirements under subpart OOOO for onshore natural gas processing plants to reflect the leak thresholds established by 40 CFR part 60, subpart VVa by lowering the leak definition for valves from 10,000 ppm to 500 ppm and requires monitoring of connectors, pumps pressure relief devices and open-ended valves or lines.

This subpart also revises the sulfur reduction efficiency at natural gas processing plants under 40 CFR part 60, subpart LLL by increasing the SO_2 emission reduction standard from the subpart LLL requirement of 99.8% to 99.9% for units with a sulfur production rate of at least 5 long tons per day.

40 CFR part 60, subpart OOOO updates to NESHAPS

40 CFR, part 63 subpart HH revisions –

This subpart establishes MACT standards for small glycol dehydration units at major sources by setting emission limits for BTEX.

Updates definition of a leak under the LDAR programs for **valves** at 500 ppm.

Eliminates exemption from compliance during periods of startup, shutdown and malfunction.

40 CFR, part 63 subpart HHH revisions –

This subpart establishes MACT standards for small glycol dehydration units at major sources by setting emission limits for BTEX.

Eliminates exemption from compliance during periods of startup, shutdown and malfunction.

40 CFR part 60, subpart OOOO Reconsiderations

Storage tank affected facilities

- Control device removal – 4 tons per year VOC
- Group 1 storage vessels (constructed after August 23, 2011 and on or before April 12, 2013) must meet emissions control compliance deadline of April 15, 2015.
- Group 2 storage vessels (constructed after April 12, 2013) must meet emission control compliance deadline by April 15, 2014, or 60-days after startup, whichever is later.

Streamlined Compliance Monitoring Provisions – EPA is evaluating comments related to the compliance monitoring requirements under OOOO and intends to complete reconsiderations by the end of 2014.