

EPA Comments for Proposed Title V Permit Renewal Evaluation for Aera Energy, Facility ID C-1121, Project # C-1062172

Comment 1:

On page 30 of the Districts evaluation several systems are evaluated for CAM (Part 64 applicability). In particular, in Sections b and e, (the text is provided below) the District determines that the systems are "inherent process equipment" and are therefore not subject to CAM requirements. EPA disagrees.

b. C-1121'-45, '-46, '-72, '-73, '-79, '-82, '-83, '-84, '-85, '-87, '-88, '-89, '-90, '91
- Fixed Roof Tanks and FWKOs with Vapor Recovery System

§64.1 defines a control device as equipment, other than inherent process equipment, that is used to destroy or remove air pollutants prior to discharge to the atmosphere. For tanks equipped with a vapor control system, the District has determined that the vapor control system is "inherent process equipment", i.e. the vapor control system is used to increase the safe and proper functioning of the tank battery. Such a vapor control system serves to reduce emission of H₂S (a toxic substance) from the tank(s) and to reduce corrosion in the tank(s) vapor space by eliminating the intrusion of ambient air. Inherent process equipment is explicitly excluded from the definition of control device as defined in 40 CFR 64.

e. e. C-1121-38, '-39, '-114, and '-116 TEOR operations served by vapor control

§64.1 defines a control device as equipment, other than inherent process equipment, that is used to destroy or remove air pollutants prior to discharge to the atmosphere. For TEOR systems, the District has determined that the vapor piping is "inherent process equipment". Such a network is an array of pipes that connect the wells and route the vapors to where they must go. The piping network is inherent to the TEOR system. Inherent process equipment is explicitly excluded from the definition of control device as defined in 40 CFR 64.

For the tanks connected to the Vapor Recovery Systems, there are three parts to this system. First there is the storage tank which is the emitting source. The control device then consists of two parts, the capture and collection system, and finally the device that condenses or destroys the captured emissions. For all these permits, the vapors are vented to a steam generator as fuel that destroys the VOC emissions.

The TEOR systems operate in a very similar manner, but the uncontrolled emissions are coming from the off-gassing of the steam enhanced wells. The control device again consists of two parts, the capture and collection system and the device that destroys the captured emissions. For these permits the emissions are vented to a flare that destroys the VOC emissions.

In both cases there is an emission unit (the tanks or steam enhanced wells) and a required capture/collection and control system. In both cases the emissions from the emission units is required to be controlled and emission control devices (which includes the capture and collection system) are installed. Thus to properly evaluate CAM applicability the District must determine the uncontrolled emission rates from the emission units and the post control emission rates from the control devices. Any fugitive emissions from the capture and control system must be included in the post control emission rates.

Please review all permits for all tanks connected to a vapor recovery system and all TEOR systems for CAM applicability using the methodology EPA has outlined above.