

Proposed 20.2.50 NMAC: Oil and Gas Sector – Ozone Precursor Pollutants

The GCA's Proposed Amendments to 20.2.50.112; 20.2.50.113.B(9), C(7) and D(1) & (2); 20.2.50.114.B(5); 20.2.50.115.B(3) & (4), C(2)(d), D(2)(c) and E(2)(b); 20.2.50.117.B(4) and C(3); 20.2.50.118.B(3)(d); 20.2.50.119.B(4) and C(4); 20.2.50.122.B(6), C(4) and D(6) & (7); 20.2.50.123.B(8) and C(4); and 20.2.50.123.B(8) and C(4) NMAC

The GCA's Proposed Amendments to 20.2.50.112 NMAC:

20.2.50.112 GENERAL PROVISIONS

A. General requirements:

(1) Sources subject to emissions standards and requirements under this Part shall be operated and maintained consistent with manufacturer specifications, and good engineering and maintenance practices. The owner or operator shall keep manufacturer specifications and maintenance practices on file and make them available upon request by the department. For sources constructed prior to 1980 for which no manufacturer specifications and maintenance practices are available, the owner or operator shall develop and follow a maintenance schedule sufficient to operate and maintain such units in good working order. The owner or operator shall keep such maintenance schedules on file and make them available to the department upon request.

(2) Sources subject to emission standards or requirements under this Part shall be operated to minimize emissions of air contaminants, including VOC and NO_x.

~~(3) Within two years of the effective date of this Part, owners and operators of a source requiring an Equipment Monitoring Tag (EMT) shall physically tag each unit with an EMT, the format of which shall be either RFID, QR, or bar code such that, when scanned it provides a unique identifier of the source. This unique identifier shall act as an index to the source's record of the data required by this Part. The EMT shall be maintained by the owner or operator, and data in the EMT shall provide at a minimum, the following information:~~

- ~~(a) unique unit identification number;~~
- ~~(b) location of the source;~~
- ~~(c) type of source (e.g., tank, VRU, dehydrator, pneumatic controller, etc.);~~
- ~~(d) for each source, the VOC (and NO_x, if applicable) PTE in lbs./hr. and tpy;~~
- ~~(e) for a control device, the controlled VOC and NO_x PTE in lbs./hr. and tpy;~~
- ~~(f) make, model, and serial number; and~~
- ~~(g) a link to the manufacturer's maintenance schedule or repair recommendations.~~

~~(4) The EMT shall be installed and maintained by the owner or operator of the facility.~~

~~(5) The EMT shall be of a format scannable by an owner or operator's authorized representatives and, upon scanning, shall provide unique identifier that shall index the source's record of the data required by this Part.~~

~~(6) — The owner or operator shall manage the source's record of data in a database that is able to generate a Compliance Database Report (CDR). The CDR is an electronic report generated by the owner or operator's database and submitted to the department upon request. The format of the CDR shall be determined by the department.~~

~~(7) — The CDR is a report distinct from the owner or operator's database. The department does not require access to the owner or operator's database, only the CDR.~~

~~(8) — If read by the owner or operator's authorized representative, the EMT shall access the owner or operator's database record for that source.~~

(9) The owner or operator shall contemporaneously track each compliance event for each source subject to emission standards and monitoring under the EMT requirements of this Part, and ~~shall comply with the following:~~

~~(a) — data gathered during each monitoring or testing event shall be contemporaneously uploaded into the database as soon as practicable, but no later than three business days of each compliance event.~~

~~(b) — data required by this Part shall be maintained in the database for at least five years.~~

(10) The department may request that an owner or operator retain a third party at their own expense to verify any data or information collected, reported, or recorded pursuant to this Part, and make recommendations to correct or improve the collection of data or information. The owner or operator shall submit a report of the verification and any recommendations made by the third party to the department by a date specified and implement the recommendations in the manner approved by the department.

B. Monitoring requirements:

(1) Sources subject to emission standards and monitoring (e.g. inspection, testing, parametric monitoring) requirements under this Part shall be inspected monthly to ensure proper maintenance and operation, unless a different schedule is specified in the Section applicable to that source type. If the equipment is shut down at the time of required periodic testing, monitoring, or inspection, the owner or operator shall not be required to restart the unit for the sole purpose of performing the testing, monitoring, or inspection, but shall note the shut down in the records kept for that equipment for that monitoring event.

(2) An owner or operator may submit for the department's review and approval an equally effective, enforceable, and equivalent alternative monitoring strategy. Such requests shall be made on an application form provided by the department. The department shall issue a letter approving or denying the requested alternative monitoring strategy within a reasonable time not more than 90 days after receipt of the request. An owner or operator shall comply with the default monitoring requirements required under the applicable Section and shall not operate under an alternative monitoring strategy until it has been approved by the department.

~~(3) — Each monitoring event (e.g. testing, inspection, parametric monitoring) shall be initiated by an initial scanning of the EMT, the results of which shall then be directly uploaded into the database or temporarily into the handheld or other device. Upon completion of the monitoring event, a final scanning of the EMT shall terminate the monitoring event. At a minimum, the uploaded data shall include:~~

~~(a) date and time of the testing, monitoring, or inspection event;~~

~~(b) name of the personnel conducting the testing, monitoring, or inspection;~~

- ~~(c) identification number and type of unit;~~
- ~~(d) a description of any maintenance or repair activity conducted; and~~
- ~~(e) results of testing, monitoring, or inspection as required under this Part.~~

C. Recordkeeping requirements:

(1) Within three business days of a monitoring event, an electronic record shall be made of the monitoring event and shall include the following data:

- (a) date and time of the testing, monitoring, or inspection event;
- (b) name of the personnel conducting the testing, monitoring, or inspection;
- (c) identification number and type of unit;
- (d) a description of any maintenance or repair activity conducted; and
- (e) results of any testing, monitoring, or inspections required under this Part.

(2) The owner or operator shall keep an electronic record required by this Part for five years. The department may treat loss of data or failure to maintain a record, including failure to transfer a record upon sale or transfer of ownership or operating authority, as a failure to collect the data.

(3) Before the transfer of ownership of equipment subject to this Part, the current owner or operator shall conduct and document a full compliance evaluation of such equipment. The documentation shall include a certification by a responsible official as to whether the equipment is in compliance with the requirements of this Part. The compliance determination shall be conducted no earlier than three months before the transfer of ownership. The owner or operator shall keep the full compliance evaluation and certification by the responsible official for ~~for~~ five years.

D. Reporting requirements: Within ~~three business days~~ 24 hours of a request by the department, the owner or operator shall for each unit subject to the request, provide the requested information ~~to the department, either by electronically submitting a CDR to the department's Secure Extranet Portal (SEP), or by other means and formats specified by the department in its request.~~

The GCA's Proposed Amendments to 20.2.50.113.B(9), C(7) and D(1) & (2) NMAC:

20.2.50.113 ENGINES AND TURBINES

B. Emission standards:

~~(9) — The owner or operator of an engine or turbine shall install an EMT on the engine or turbine in accordance with 20.2.50.112 NMAC.~~

C. Monitoring requirements:

~~(7) Prior to monitoring, testing, inspection, or maintenance of an engine or turbine, the owner or operator shall scan the EMT, and the The monitoring data entry~~

shall be ~~made electronically captured~~ in accordance with the requirements of 20.2.50.112 NMAC.

D. Recordkeeping requirements:

(1) The owner or operator of a spark ignition engine, compression ignition engine, or stationary combustion turbine shall maintain a record in accordance with 20.2.50.112 NMAC for the engine or turbine. The record shall include:

(a) the make, model, serial number, ~~and EMT~~ for the engine or turbine;

(2) The owner or operator of a spark ignition engine, compression ignition engine, or stationary combustion turbine shall maintain records of initial and annual emissions testing for the engine or turbine. The records shall include:

(a) the make, model, serial number, ~~and EMT~~ for the tested engine or turbine;

The GCA's Proposed Amendments to 20.2.50.114.B(5) NMAC:

20.2.50.114 COMPRESSOR SEALS

B. Emission standards:

~~(5) —The owner or operator of a centrifugal or reciprocating compressor shall install an EMT on the compressor in accordance with 20.2.50.112 NMAC.~~

The GCA's Proposed Amendments to 20.2.50.115.B(3) & (4), C(2)(d), D(2)(c) and E(2)(b) NMAC:

20.2.50.115 CONTROL DEVICES

B. General requirements:

~~(3) —The owner or operator of a control device used to comply with the emission standards in this Part shall install an EMT on the control device in accordance with 20.2.50.112 NMAC.~~

(4) The owner or operator shall inspect control devices used to comply with this Part at least monthly to ensure proper maintenance and operation. ~~Prior to an inspection or monitoring event, the owner or operator shall scan the EMT and the~~The required monitoring data shall be electronically captured in accordance with this Part.

C. Requirements for open flares:

(2) Monitoring requirements:

(d) ~~prior to an inspection or monitoring event, the EMT on the flare shall be scanned and the~~ The required monitoring data shall be electronically captured during the event in accordance with the monitoring requirements of 20.2.50.112 NMAC; and

D. Requirements for enclosed combustion devices (ECD) and thermal oxidizers (TO):

(2) Monitoring requirements:

(c) ~~prior to an inspection or monitoring event, the EMT on the unit shall be scanned and the~~ The required monitoring data shall be electronically captured during the monitoring event in accordance with the monitoring requirements of 20.2.50.112 NMAC.

E. Requirements for vapor recovery units (VRU):

(2) Monitoring Requirements:

(b) ~~prior to a VRU inspection or monitoring event, the EMT on the unit shall be scanned and the~~ The required monitoring data shall be electronically captured during the monitoring event in accordance with the monitoring requirements of 20.2.50.112 NMAC.

The GCA's Proposed Amendments to 20.2.50.117.B(4) and C(3) NMAC:

20.2.50.117 NATURAL GAS WELL LIQUID UNLOADING

B. Emission standards:

~~(4) — The owner or operator of a natural gas well shall install an EMT on the natural gas well in accordance with 20.2.50.112 NMAC.~~

C. Monitoring requirements:

(3) A liquid unloading event shall include the ~~scanning of the EMT and~~ monitoring data entry in accordance with the requirements of 20.2.50.112 NMAC.

The GCA's Proposed Amendments to 20.2.50.118.B(3)(d) NMAC:

20.2.50.118 GLYCOL DEHYDRATORS

B. Emission standards:

~~(d) — the owner or operator of a glycol dehydrator shall install an EMT on the glycol dehydrator in accordance with 20.2.50.112 NMAC.~~

The GCA's Proposed Amendments to 20.2.50.119.B(4) and C(4) NMAC:

20.2.50.119 HEATERS

B. Emission standards:

~~(4) — The owner or operator of a natural gas-fired heater shall install an EMT on the heater in accordance with 20.2.50.112 NMAC.~~

C. Monitoring requirements:

~~(4) Prior to a monitoring, inspection, maintenance, or repair event, the owner or operator shall scan the EMT and the~~ The required monitoring data shall be captured in accordance with this Part.

The GCA's Proposed Amendments to 20.2.50.122.B(6), C(4) and D(6) & (7) NMAC:

20.2.50.122 PNEUMATIC CONTROLLERS AND PUMPS

B. Emission standards:

~~(6) — The owner or operator of a pneumatic controller or pump shall install an EMT on the controller or pump in accordance with 20.2.50.112 NMAC.~~

C. Monitoring requirements:

~~(4) The EMT shall be linked to~~ The owner or operator of a pneumatic controller shall maintain a database that contains the following:

- (a) pneumatic controller identification number;
- (b) type of controller (continuous or intermittent);
- (c) if continuous, design continuous bleed rate in standard cubic feet per hour;
- (d) if intermittent, bleed volume per intermittent bleed in standard cubic feet; and
- (e) if continuous, design annual bleed in standard cubic feet per year.

D. Recordkeeping requirements:

(6) The owner or operator of a natural gas-driven pneumatic controller with a bleed rate greater than six standard cubic feet per hour shall maintain a record ~~in the EMT database~~ of the pneumatic controller documenting why a bleed rate greater than six scf/hr is necessary, as required in Subsection B of 20.2.50.122 NMAC.

(7) The owner or operator shall maintain a record ~~in the EMT database~~ for a natural gas-driven pneumatic pump with an emission rate greater than zero and the associated pump number at the facility. The record shall include:

The GCA's Proposed Amendments to 20.2.50.123.B(8) and C(4) NMAC:

20.2.50.123 STORAGE VESSELS

B. Emission standards:

~~(8) — The owner or operator of a new or existing storage vessel shall install an EMT on the storage vessel in accordance with 20.2.50.112 NMAC.~~

C. Monitoring requirements:

(4) ~~scan the EMT and enter~~ create a record of the required monitoring data in accordance with the requirements of 20.2.50.112 NMAC;