

Montana DEQ
Air Resources Management Bureau

Air Registration Rule Change

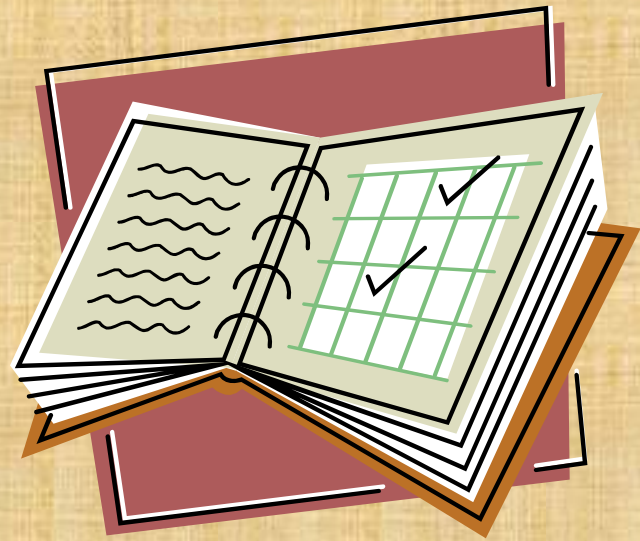
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Air Quality Registration & Permit Training
MPA and MT DEQ
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Lewistown, Montana



Outline

- Background
- Issue Statement
- Path Forward
- Focus Areas
- Questions



Background

-Emission Identification

2002-2005



- Emissions from oil and gas well facilities identified as possibly exceeding permit thresholds
- Region-wide effort by EPA, states, and industry to identify facilities/emissions and get into compliance
- Different regulatory approach was necessary → Registration

Background

-Senate Bill 95



2005

- Legislature passed SB 95
 - Allows construction/operation prior to having a final Montana Air Quality Permit (MAQP), as long as application was submitted (60-days)
 - Allows PTE to be accurately determined
 - Prevented compliance issues for operating without an MAQP for existing facilities, as long as application was submitted



Background -Subchapter 16

2005-2006

- DEQ requested rule-making to implement SB 95 provisions
- Subchapter 16
 - Allows construction/operation prior to having a final Montana Air Quality Permit (MAQP), as long as:
 - Application was submitted (1/3/06 or 60 days)
 - Emission control, inspection and repair, and recordkeeping requirements were followed

Background

-Subchapter 17



2006

- DEQ requested rule-making to register oil or gas well facilities
- Subchapter 17
 - Allows oil or gas well facilities to register in lieu of obtaining an MAQP
 - Established emission control, inspection and repair, and recordkeeping requirements (no individual analysis)

Background

-Determination Request

2008

- Industry requested determination on whether “gathering” natural gas compressor stations meet the definition of oil or gas well facility
 - Registration Eligible



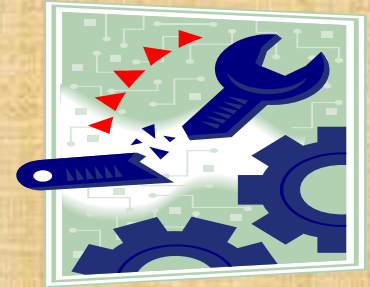
Background

-Gathering vs. Transmission



- Transmission facilities are not registration eligible
- All compressor stations are not transmission facilities
 - Gathering compressor stations may be registration eligible

Issue Statement



- Gathering compressor stations meet the definition of oil or gas well facility
 - Eligible for registration
- Does existing rule have appropriate air quality requirements?
 - Can't lose environmental protection through registration
 - Larger engines would typically have demonstrations of emission reductions (i.e. limits & testing)

Path Forward

- Stakeholder Process
 - Industry
 - EPA
 - FLM
 - Public Interest Groups
 - Etc.
- Identify & work through Issues
- Time Frame
 - Work diligently
 - Stakeholder availability
 - Multiple Rule Projects (Potential Conflicts)
 - TBD



Focus Areas for Rule Revisions

- Subchapter 17
 - Emission limits
 - Demonstration of meeting limits
 - Gathering vs. transmission demonstration
 - Clarification of oil storage tank control requirements
 - Clarify when a registration update is required
- Subchapter 16
 - Make control requirements match the control requirements contained in Subchapter 17



Questions



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