April 29, 2003

APPLICABILITY TABLE - Major Source MACTs

40 CFR 63, Subpart HH (Oil and Natural Gas Production Facilities) & 40 CFR 63, Subpart HHH (Natural Gas Transmission and Storage Facilities)

Location [1]	Potential MACT/ Regulated as	Units affected by MACT	HAP PTE Estimate Basis	Fugitive Emissions in PTE
Facility is Upstream of Natural Gas Processing Plant	Subpart HH/ Natural Gas Production Field Facility	• Dehydration units • Storage vessels with flash emission potential	Not all HAPs are aggregated - **only** HAPs from glycol dehydration units and storage vessels with flash emission potential are included for a major source determination of PTE for applicability to MACT Subpart HH. Compressor emissions are **not** included in PTE estimate. However, if any *individual* compressor has HAP PTE greater than or equal to the 10 tpy single HAP/25 tpy aggregated HAPs threshold, then the entire facility (production field facility) is major, and subject to MACT Subpart HH.	Fugitive HAP emissions are not included in PTE estimate
Facility is At Natural Gas Processing Plant	Subpart HH/ Natural Gas Processing Plant	• Equipment leaks (LDAR) from ancillary equipment & compressors that contain or contact liquid or gas with volatile HAP (VHAP) content $\geq$ 10wt%.	All HAP emissions from all emission units (including emissions from compressors) are aggregated in HAP PTE estimate to determine whether facility is a major source of HAPs.	Fugitive HAP emissions are included in PTE estimate
Facility is Downstream of Natural Gas Processing Plant	Subpart HHH/ Natural Gas Transmission and Storage Facility	• Dehydration units	All HAP emissions from all emission units (including emissions from compressors) are aggregated in HAP PTE estimate to determine whether facility is a major source of HAPs.	Fugitive HAP emissions are included in PTE estimate

[1] For purposes of determining a major source of HAPs under MACT Subparts HH and HHH, collections of emission points and emissions in each of these 3 scenarios are reviewed separately (and as described above) to compare with the 10 tpy of a single HAP or 25 tpy of aggregated HAPs thresholds.

Custody Transfer - Compressors, dehydration units, and storage vessels with flash emission potential located BEFORE a Natural Gas Processing Plant -or- AFTER a Natural Gas Processing Plant are considered separate sources in determining a major source under MACT Subparts HH and HHH. This is regardless of whether emission points are in a contiguous area or under common control.

For the purposes of MACT Subpart HH, **oil production** is defined as hydrocarbon liquids production from the wellhead to the point of custody transfer (i.e., the sales point); after custody transfer, hydrocarbon liquids are covered by the organic liquids distribution (OLD) MACT category. **Gas production** is defined as from the wellhead up to and including the gas processing plant; after the processing plant, the natural gas is considered to be in the transmission and storage (T&S) MACT Subpart HHH category. If no processing plant is present, then the gas enters the T&S category after lease custody transfer.

40 CFR 63, Subpart HH,
"National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities,"

applies to

owners and operators of facilities that are oil or natural gas production facilities or natural gas processing plants, that are major sources of HAPs as defined in 40 CFR 63.761.

and regulates

- Oil Production Field Facility - facility that that processes, upgrades, or stores hydrocarbon liquids from the wellhead to the point of custody transfer.

- Natural Gas Production Field Facility - compressors, dehydration units, and storage vessels with flash emission potential PRIOR to a point of custody transfer to a 'Natural Gas Processing Plant.'

- Natural Gas Processing Plant - Site engaged in the extraction of natural gas liquids from field gas, or the fractionation of mixed NGL to natural gas products, or a combination of both.

Production well means any hole drilled in the earth from which crude oil, condensate, or field natural gas is extracted (40 CFR 63.761).

Facility means any grouping of equipment where hydrocarbon liquids are processed, upgraded (i.e., remove impurities or other constituents to meet contract specifications), or stored prior to the point of custody transfer; or where natural gas is processed, upgraded, or stored prior to entering the natural gas transmission and storage source category.... **EXAMPLES** of facilities in the oil and natural gas production source category include, but are not limited to, well sites, satellite tank batteries, central tank batteries, a compressor station that transports natural gas to a natural gas processing plant, and natural gas processing plants. (40 CFR 63.761)

40 CFR 63, Subpart HHH, "National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities,"

applies to

owners and operators of facilities that store natural gas or facilities that transport and store natural gas prior to entering the pipeline to a local distribution company or to a final end user (if there is no local distribution company), and are major sources of HAP emissions as defined by 45 CSR 63.1271.

and regulates

- Natural Gas Transmission and Storage Facility - compressors, dehydration units, and storage vessels with flash emission potential AFTER to a point of custody transfer from a 'Natural Gas Processing Plant;'

Facility means any grouping of equipment where natural gas is processed, compressed, or stored prior to entering a pipeline to a local distribution company or (if there is no local distribution company) to a final end user. **EXAMPLES** of a facility for this source category are: an underground natural gas storage operation; or a natural gas compressor station that receives natural gas via pipeline, from an underground natural gas storage operation, or from a natural gas processing plant. The emission points associated with these phases include, but are not limited to, process vents. Processes that may have vents include, but are not limited to, dehydration and compressor station engines.

Other MACT Resources:

- Colorado Department of Public Health and Environment's website has lots of information on these rules and even an extensive inspection checklists:
  - Oil & Natural Gas Production MACT - http://www.cdphe.state.co.us/ap/onglinks.html
  - Transmission & Storage MACT - http://www.cdphe.state.co.us/ap/tandslinks.html
- Texas Natural Resource Conservation Commission's MACT applicability website:
  http://www.tceq.state.tx.us/permitting/air/rules/federal/63/63hmpg.html
- Don't forget to read the MACT regulations!