

Updating the EAC's Ozone Action Plan

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Periodic Assessment

- The Division is required to periodically assess the underlying assumptions of the Ozone Action Plan
 - The overarching goal is to maintain the integrity of the EAC and avoid a nonattainment designation
 - EPA's next scheduled date to defer the nonattainment designation is Sept 2006

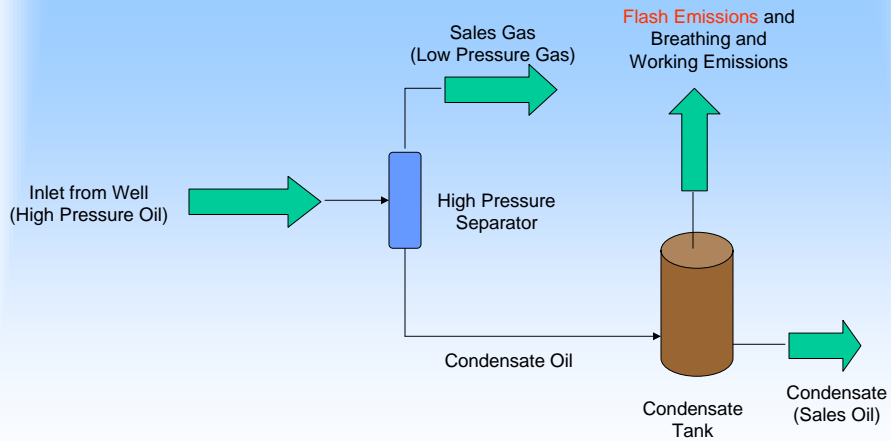
Periodic Assessment

- Two items require an update to the Plan
 - The greater than anticipated growth in “flash” emissions from the oil/gas industry
 - The Governor’s request to terminate/modify the enhanced I/M program
- Oil/gas compliance is also a concern and enforcement will be stepped up

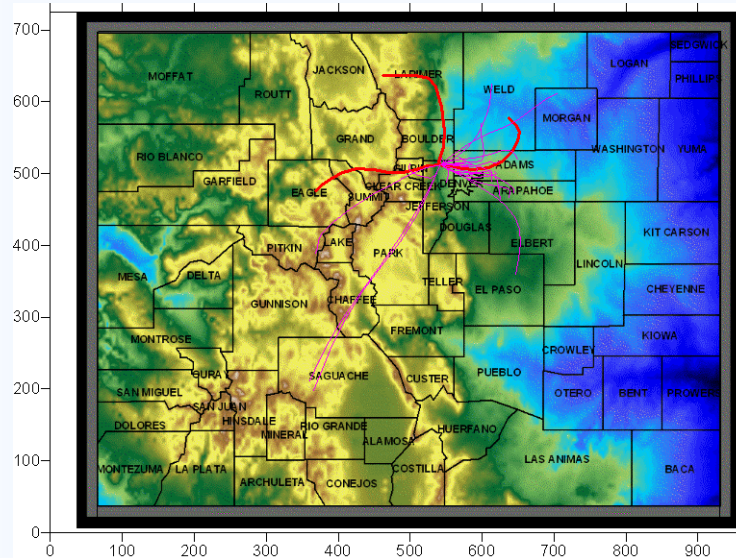
Flash Emissions

- Uncontrolled flash emissions (VOCs) were projected to be 146 tons/day in 2007
- Regulation No. 7 requires a 47.5% reduction in flash emissions to achieve a 91 tons/day controlled VOC emissions cap
 - For 2003, uncontrolled reported flash emission were 163 tons/day
 - For 2004, uncontrolled reported flash emission were 176 tons/day
 - For 2007, the uncontrolled flash emission will likely approach or exceed 200 tons/day
 - More stringent VOC emission controls will be necessary to preserve the 91 tons/day controlled emissions cap
 - If we preserve this emission cap, no ozone photochemical modeling will be necessary

Oil/Gas Production Tank System



Trajectory Analysis Demonstrating that Oil/Gas Emissions Contribute to Front Range Ozone Problems



Composite 10-hour trajectory analysis showing source areas contributing to Rocky Flats North ozone levels for days over 85 ppb.

Compliance w/ Current Requirements Must be Improved

- There are 22 companies reporting flash emissions to the Division
 - The Division has asked all companies to provide compliance information - only 10 have responded
 - 6 of these 10 show some degree of compliance
 - Compliance rates are in the order of 33% - needed 37.5% last summer
 - 4 have not met the requirements or did not even control emissions during the summer of 2005
- 20 to 30 additional companies on the Oil and Gas Commission website are recovering some gas as well as oil and have not filed APEN's for any condensate emissions
 - They are likely not controlling emissions either
- There are also noncompliance issues for some engines in the area

Options for Addressing the O/G Issues

- For Flash Emissions:
 - Ratchet up the required emission reductions or implement a more traditional control program for condensate tanks and other sources
 - This will be proposed by August
- For Compliance:
 - There will be a concentrated effort by the Division to dramatically improve compliance
 - The April reporting deadline is extremely important