Authorizing Alternate Operating Scenarios
Oil & Gas Operations

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Presentation Agenda

- Alternate Operating Scenarios (AOS) Overview
- AOS Examples
- Permit By Rule (PBR) and Standard Permit Options
- Submitting an Authorization

Alternate Operating Scenarios (AOS) Overview

Alternate Operating Scenarios (AOS)

- Alternate Operating Scenarios (AOS) are different modes of normal operation that can be foreseen or anticipated for a facility or group of facilities authorized under PBR or Standard Permit
- An AOS allows the site to continue to accept and process incoming product while some facilities are not operated

AOS Examples

AOS Examples

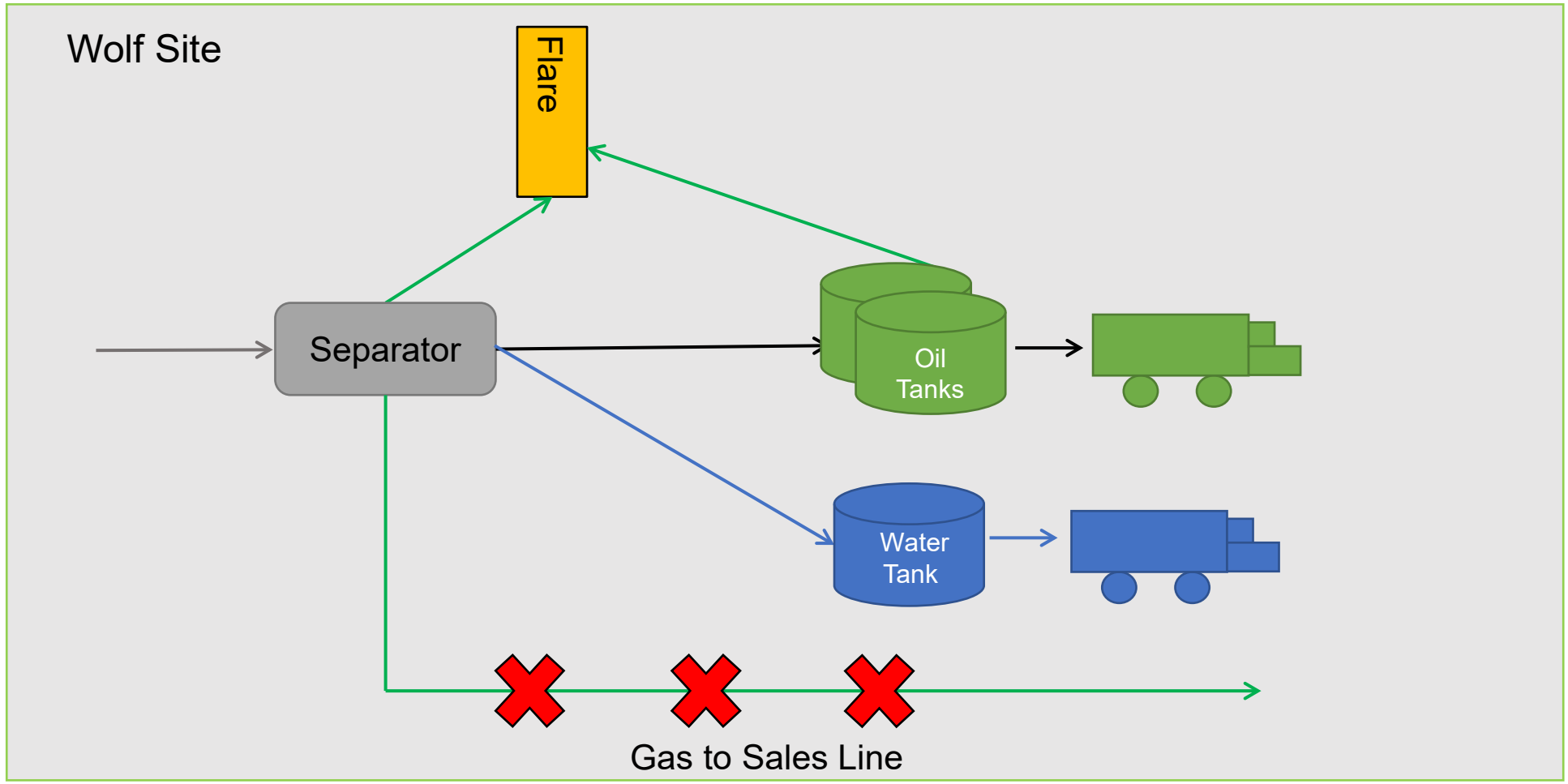
Normal Operation

- Produced gas is routed to a gas sales line

AOS

- Route to a flare when the sales line is unavailable

AOS Example 1



AOS Examples

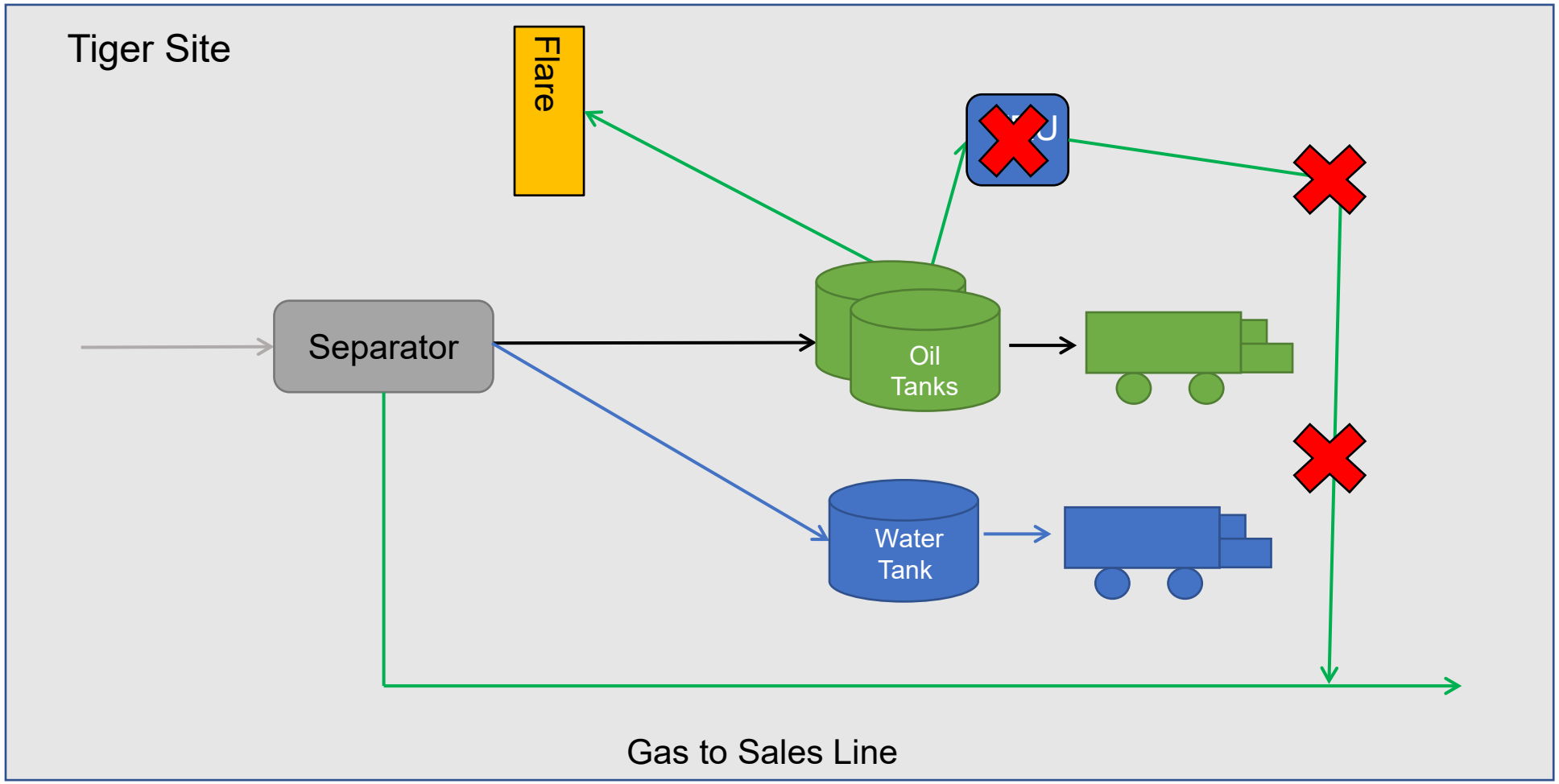
Normal Operation

- Storage tank vapors are recovered by a vapor recovery unit (VRU) and routed to sales line

AOS

- Route to a flare when VRU is unavailable

AOS Example 2



AOS Examples

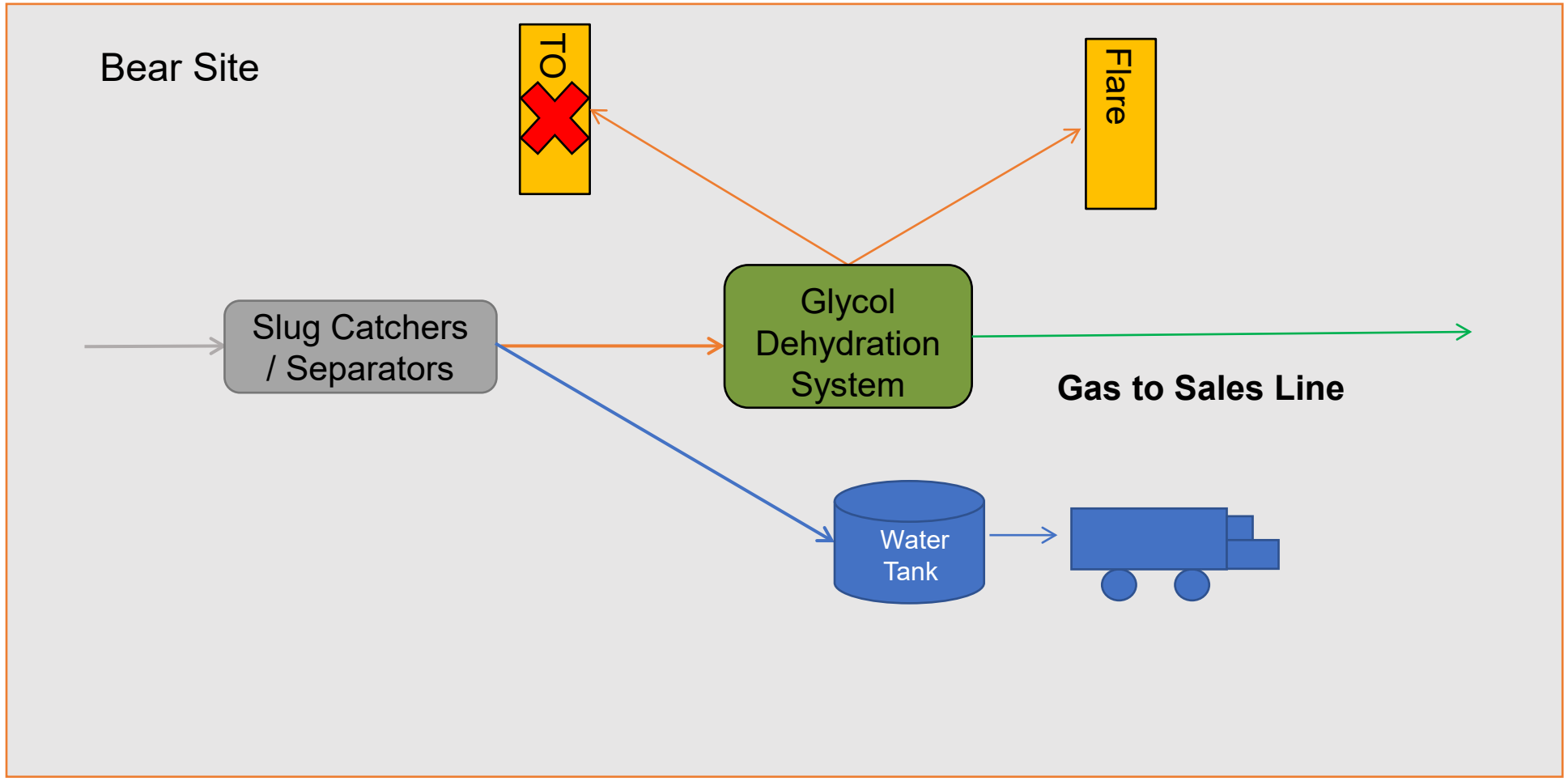
Normal Operation

- Glycol Dehydration system at a gas processing plant is routed to a thermal oxidizer (TO) for control

AOS

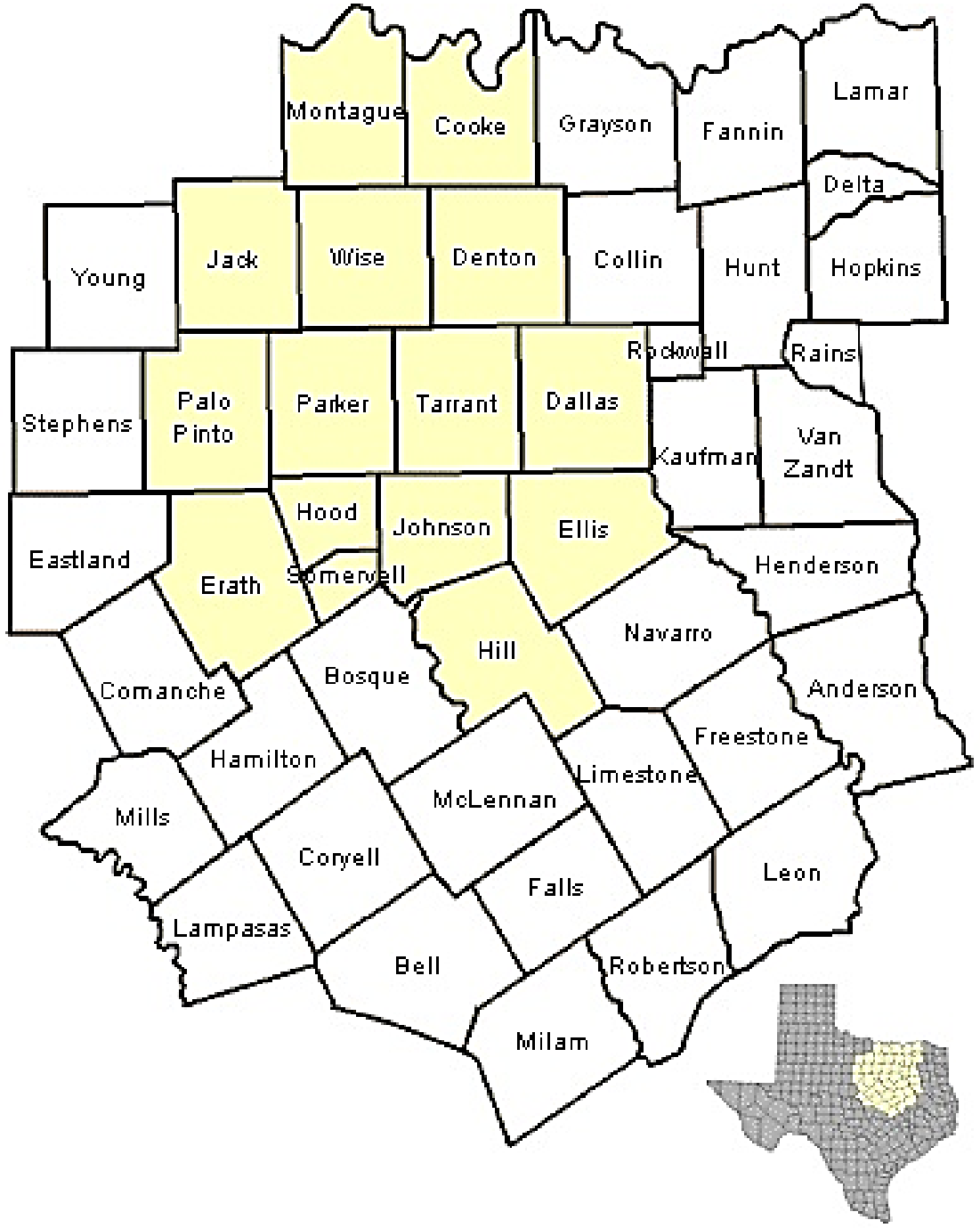
- Route to a flare when TO is unavailable

AOS Example 3



PBR and Standard Permit Options

Barnett Shale Counties



Authorization Options

- In Barnett Shale counties:
  - PBR – 30 TAC §106.352(a)-(k)
  - Standard Permit – Air Quality Standard Permit for Oil and Gas Handling and Production Facilities (Non-Rule Standard Permit)
- Not in Barnett Shale counties:
  - PBR – 30 TAC §106.352(l); May voluntarily register under §106.352 (a)-(k)
  - Standard Permit – 30 TAC §116.620; May voluntarily register under Non-Rule Standard Permit

Submitting an Authorization

Obtaining PBR Authorization

- Claiming:
  - Maintaining records to demonstrate compliance
- Registering:
  - Submittal of a PI-7 / STEERS registration to formally represent authorization
- Certifying Representations:
  - Making federally enforceable emission rates through authorization representations
  - Certification is established through the STEERS submittal; Hardcopy PI-7-CERT is no longer required.

Reasons to Certify

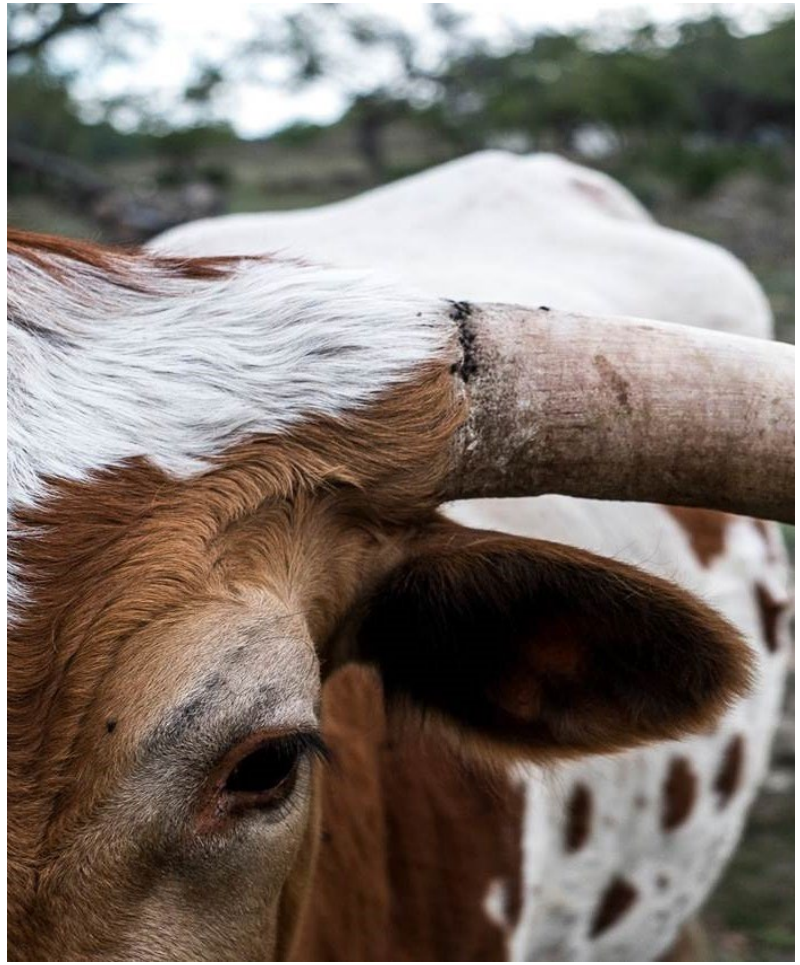
- Emission thresholds for Title V applicability
- Federal and State applicability
- Control/destruction efficiency claims
- Limiting operating hours
  - Authorized annual emissions based on limited AOS hours should be certified

Obtaining Standard Permit Authorization

- Registration:
  - Submittal of a PI-1S / STEERS registration to formally represent authorization
- Certification:
  - 30 TAC §116.615(2)
- Recordkeeping:
  - 30 TAC § 116.615(8)

Submittal of Registration

- Submit documentation through STEERS
- Pay fee
- Maintain records



Submitting AOS

- Indicate the reason for the AOS
- Specify annual hours for both the primary operating scenario and the AOS
- Provide details for each scenario if there are multiple alternate operating scenarios
- Specify whether any operating scenarios can occur in the same hour

Documentation Submittal

- Introduction
- Process Flow Diagram
- Process Description
- Summary of Emissions / Emission Calculations
- Impact Analysis / NAAQS
- Forms / Checklists
- Rule Compliance Demonstrations
- Supporting Documentation
- Workbooks (if applicable)

AOS should be defined and included here

Contact

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