

MEMORANDUM

TO: Ozone Contingency Plan Participants

FROM: Zachary Mangin, Natural Resources Program Principal, AQD Planning Section

SUBJECT: Instructions for Completing the Standardized Ozone Contingency Plan Checklist

DATE: October 27, 2014

During previous winter seasons, the Wyoming Department of Environmental Quality, Air Quality Division requested that oil and gas operators in the Upper Green River Basin participate in an Ozone Contingency Plan (OCP) program. The aim of the OCP program was to reduce the amount of ozone precursor emissions released to ambient air on days when weather conditions were forecasted to be conducive to elevated ozone formation. Consistent completion of standardized checklists was anticipated to bring greater insight and planning capabilities to the Air Quality Department (AQD) by helping to illustrate how contingency plan activities may be mitigating ozone levels.

The AQD would like to thank all those who have participated in the OCP program in the past for their ozone precursor emission reduction activities and disclosure of those measures to the AQD. For the upcoming 2015 winter ozone season, the AQD is promoting the development and implementation of OCPs for all stakeholders throughout the ozone nonattainment area. The AQD would like to encourage OCP participants to be as specific as possible in the disclosure of ozone precursor emission reduction activities on the “Annual OCP” and “Event Summary” documents. Increased knowledge of how ozone precursor emissions are mitigated in the Upper Green River Basin will lead to effective planning by the AQD.

Similar to the last several years, the Ozone Contingency Plan checklists are standardized with the “Annual OCP” and “Event Summary” checklist differing from each other. The “Annual OCP” will indicate measures *anticipated to be completed* should an Ozone Action Day be issued by the AQD and is requested to be submitted with updated contact information to the AQD by **Monday December 1, 2014**. There will be a test of the auto-call and e-mail systems on **Wednesday, December 17** to make sure that the AQD has the proper contact information for all 2015 OCP participants. An Ozone Action Day will be issued by the AQD when weather conditions are forecasted to be conducive to the formation of elevated ozone. Should an Ozone Action Day be issued by the AQD, the Division requests that OCP participants fill out “Event Summary” checklists indicating the emission reduction activities that *were employed on that specific Ozone Action Day*. “Event Summary” checklists are to be submitted to the AQD within **10 days** of the Ozone Action Day.

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ANNUAL OCP:

The “Annual OCP” format is the same as last year. Figure 1 shows the header of the “Annual OCP”:

ANNUAL OCP	COMPANY NAME:	<input type="text"/>
Annual OCP due date:	COMPANY REPRESENTATIVE:	<input type="text"/>
December 1, 2014	DATE OF SUBMISSION:	<input type="text"/>

Figure 1. Example of “Annual OCP” form header.

The AQD requests that OCP participants submit a completed “Annual OCP” to the AQD by **Monday December 1, 2014**. The information provided to the AQD on the “Annual OCP” represents actions *anticipated to be completed* during or prior to the 2015 winter season. It is the expectation of the AQD that the majority of emissions reduction actions indicated will be completed upon the declaration of an Ozone Action Day. However, the AQD is aware that not all OCP participants may be able to initiate all measures indicated on their submitted “Annual OCP”.

The format of the “Annual OCP” is to help OCP participants describe their emission reduction actions in greater detail. Figure 2 shows an example of how an OCP participant planning on implementing an emission reduction action listed on the “Annual OCP” can give the AQD greater detail about their emission reduction practices.

ACTIONS: WDEQ-AQD is cognizant that not all companies can or will initiate all measures listed.	YES	NO	N / A	Comment Boxes:
12. Will your company and affiliated service companies commit to defer/postpone liquid hauling into and out of the field?	X			If this action was not considered, please discuss why. Likely activity in Sector 9 where we still haul liquids via trucks. Our company should be able to defer at least 6 if not all 12 daily hauls given 24 hrs. notice by Wyoming DEQ-AQD that the next day will be an Ozone Action Day. We will document all hauls postponed due to the Ozone Action Day in the appropriate "Event Summary".
12a. On average, how many liquid hauling trips occur per day in relation to your operations?	12			
***if this question is not applicable (N/A) to your company or operations, please explain why in the comment section provided to the right.				

Figure 2. Example of a detailed response to an item in the “Annual OCP.”

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Figure 3 shows an example of how an OCP participant not planning on implementing an emission reduction action can give the AQD greater insight on why they may be limited in the ability to implement the action.

ACTIONS: WDEQ-AQD is cognizant that not all companies can or will initiate all measures listed.	YES	NO	N / A	Comment Boxes:
5. Will your company and affiliated service companies commit to defer truck & equipment refueling to evening hours? ***If this question is not applicable (N/A) to your company or operations, please explain why in the comment section provided to the right.		X		If this action was not considered, please discuss why. Company A must refuel vehicles at all times of day because there are not enough fuel pumps to refuel all vehicles during evening hours. Therefore, Company A will not defer truck and equipment refueling to evening hours.

Figure 3. Non-implementation example response to an item in the “Annual OCP.”

The AQD understands that each OCP participant is unique and some items may not be applicable. Figure 4 shows an example of how an emission reduction action that is not applicable and can give the AQD greater insight on why the action is not applicable.

ACTIONS: WDEQ-AQD is cognizant that not all companies can or will initiate all measures listed.	YES	NO	N / A	Comment Boxes:
23. Will your company and affiliated service companies commit to delay the charging of desiccant dehydration units? ***If this question is not applicable (N/A) to your company or operations, please explain why in the comment section provided to the right.			X	If this action was not considered, please discuss why. Our Company does not operate desiccant dehydration units.

Figure 4. Not applicable example response to an item in the “Annual OCP.”

The AQD understands that each OCP participant operates in a unique fashion. The items listed on the “Annual OCP” may not fully describe your emissions reduction practices. To accommodate this, comment boxes have been provided next to all of the items on the “Annual OCP” to allow description in greater detail the nature of their specific emissions reducing actions. An example of this is shown in Figure 5.

ACTIONS: WDEQ-AQD is cognizant that not all companies can or will initiate all measures listed.	YES	NO	N / A	Comment Boxes:
11. Will your company and affiliated service companies commit to utilizing various leak detection techniques to prevent/fix the venting of gas? 11a. List the type of activity that will be used to detect equipment leaks and timetables for inspection. ***If this question is not applicable (N/A) to your company or operations, please explain why in the comment section provided to the right.	X			If this action was not considered, please discuss why. Company B performs FLIR camera leak detection on all equipment at every production site once a year. On a daily basis, Company B employees perform an audio and visual check of equipment for leaks and other problems.

Figure 5. Example of how comment boxes in the “Annual OCP” can be utilized to further describe the emission reducing efforts implemented.

EVENT SUMMARY:

During the winter months (January – March) of 2015 the AQD may notify OCP participants that the 24 hour weather forecast is conducive to the formation of elevated ozone and will issue an Ozone Action Day for the following day. On these days, the AQD requests that OCP participants put their OCPs into action. The header of the “Event Summary” checklist is shown below in Figure 6.

Wyoming air Quality Division: STANDARDIZED OZONE CONTINGENCY PLAN (OCP)	
EVENT SUMMARY	COMPANY NAME:
<small>include DATE of OZONE ACTION DAY for Event Summary</small>	COMPANY REPRESENTATIVE:
	DATE OF SUBMISSION:

Figure 6. Heading of the “Event Summary” form to be filled out on **Ozone Action Days**.

The information you provide to the AQD on the “Event Summary” represents activities you *completed on a specific Ozone Action Day*. Please submit an individual “Event Summary” checklist for each and all Ozone Action Days that occur. The AQD requests that each OCP participant fill out and submit an “Event Summary” to the AQD within **10 days** following the Ozone Action Day.

The format of the “Event Summary” checklist is to help OCP participants communicate greater specificity when describing Ozone Action Day emission reduction activities. Please note that several items on the “Event Summary” form require a response with regard to “all aspects of energy recovery and production.” This includes: drilling, completion, production, construction, maintenance, and general activities. An example of this type is shown below in Figure 7.

EVENT SUMMARY for				ACTION IMPLEMENTATION	COMMENTS
ACTIONS: WDEQ-AQD is cognizant that not all companies can or will initiate all measures listed.	YES	NO	N/A		
20. Did your company and affiliated service companies postpone blowdown actions tied to all aspects of energy recovery and production?	X			Use the comment box to LIST the number of blowdowns postponed. →	If this activity was not implemented, please discuss why.
***If this question is not applicable (N/A) to your company or operations, please explain why in the comment section provided to the right.					General Activities: Company G postponed 2 of 4 planned blowdowns on this day. Drilling: Company G does not perform any Drilling operations. Completion: Company G does not perform any Completions. Production: Company G planned no Production blowdowns on this day. Construction: Company G did not perform any Construction on this day. Maintenance: Company G postponed 2 of 4 Maintenance blowdowns on this day.

Figure 7. Example response to an item regarding “all aspects of energy recovery and production” on the “Event Summary.”

The AQD recognizes that each OCP participant operates in a unique fashion that may vary from day to day. To assist OCP participants in adequately describing Ozone Action Day emissions reducing activities, the AQD has supplied a comment box next to each emission reduction measure listed on the “Event Summary”. An example of this is shown in Figure 8.

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EVENT SUMMARY for:					
ACTIONS: WDEQ-AQD is cognizant that not all companies can or will initiate all measures listed.	YES	NO	N/A	ACTION IMPLEMENTATION	COMMENTS
10. Did your company and affiliated service companies minimize vehicle traffic and miles traveled? ***If this question is not applicable (N/A) to your company or operations, please explain why in the comment section provided to the right.	X			Use comment box to LIST: 1. How much vehicle traffic was minimized. 2. Total number of less miles traveled. 	If this activity was not implemented, please discuss why. Company F planned 53 light duty vehicle trips and 12 heavy duty vehicle trips on this day. All 12 heavy duty vehicle trips were postponed amounting to 115 less miles traveled by heavy duty vehicles. 30 light duty vehicle trips were postponed amounting to 600 less miles traveled on this day. 432 miles were traveled by light duty vehicles on this day.

Figure 8. Example of a detailed response to an item on the “Event Summary.”

Comment boxes should also be used to address why or why not an Ozone Action Day activity indicated for implementation on the “Annual OCP” may or may not have been completed and included on an “Event Summary” checklist. An example of this is displayed in Figure 9.

EVENT SUMMARY for:					
ACTIONS: WDEQ-AQD is cognizant that not all companies can or will initiate all measures listed.	YES	NO	N/A	ACTION IMPLEMENTATION	COMMENTS
22. Did your company and affiliated service companies delay line pigging? ***If this question is not applicable (N/A) to your company or operations, please explain why in the comment section provided to the right.		X		Use the comment box to LIST the number of planned lines to be pigged for the date of the Ozone Action Day and the number delayed. 	If this activity was not implemented, please discuss why. Though Pipeline H Co. committed to delaying line pigging in its “Annual OCP”, Pipeline H Co. had to pig 1 to 4 planned lines on this Ozone Action Day. The 1 pigged line was pigged because that particular pipeline was deemed a safety hazard until pigged.

Figure 9. Example response to item in the “Event Summary” that was not initiated on an Ozone Action Day though it was indicated for implementation on the “Annual OCP.”

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The “N/A” (not applicable) column and comment box should be used to address why an activity may not be applicable on a specific Ozone Action Day. Figure 10 shows an example of a not applicable response in the “Event Summary” checklist.

EVENT SUMMARY for:					
ACTIONS: WDEQ-AQD is cognizant that not all companies can or will initiate all measures listed.	YES	NO	N/A	ACTION IMPLEMENTATION	COMMENTS
23. Did your company and affiliated service companies delay the charging of desiccant dehydration units? ***if this question is not applicable (N/A) to your company or operations, please explain why in the comment section provided to the right.			X	Use the comment box to LIST the number of desiccant dehydration units in operation and the amount included in reduction action. 	If this activity was not implemented, please discuss why. Our Company does not operate desiccant dehydration units. See Annual OCP.

Figure 10. Not applicable example response to an item in the “Event Summary”.

ADDITIONAL OZONE PRECURSOR EMISSIONS REDUCTION ACTIVITIES:

The AQD recognizes that the lists of emissions reducing activities in the “Annual OCP” and “Event Summary” checklists are by no means exhaustive. If you would like to add an emissions reducing activity to either of the documents, please do so using the boxes provided at the end of the “Annual OCP” and “Event Summary”. Figure 11 shows an example of how to add an emission reducing activities to the “Annual OCP” and Figure 12 shows an example of how to do so on the “Event Summary.”

29. List any year-round emission reduction activities your company employs: Company C busses all employees to work sites every day in order to reduce emissions from vehicle traffic.
30. List any “winter season” emission reduction activities implemented regardless of Ozone Action Day status: (include listed and unlisted activities) Company D plans to decrease the glycol circulation in dehydration units by half during the winter months.
31. List anticipated future emission reduction activities or ideas: (i.e., operational procedures & equipment changes that help minimize emissions) Company E plans to replace all diesel generators with solar power and wind turbines. 10% of diesel generators will be replaced by January 2012, 50% by January 2015, and 100% by January 2020.
<i>WDEQ-AQD is cognizant that not all companies can or will initiate all measures listed.</i>

Figure 11. Example of how to add an ozone precursor emissions reducing activity to the “Annual OCP.”

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29. List Ozone Action Day specific emission reduction activities not listed.
(List any and all emission reduction activities your company and associated service companies do that are not listed)
Company 1 postponed 2 condensate hot oil jobs.

WDEQ-AQD is cognizant that not all companies can or will initiate all measures listed.

Figure 12. Example of how to add an ozone precursor emissions reducing activity to the “Event Summary.”

Individual template forms of the “Annual OCP” and “Event Summary” documents will be provided by and can be obtained from the AQD as well as online at:

<http://deq.state.wy.us/aqd/Ozone%20Contingency%20Plans.asp>

Thank you once again for your cooperation with the Ozone Contingency Plan program. If you have any more questions concerning these two documents please do not hesitate to contact Zachary Mangin.

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