Schwartz, Colin

From: Charlie Barker <cbarker@ltenv.com>
Sent: Friday, April 17, 2020 12:24 PM
To: Schwartz, Colin
Cc: Josh Logan
Subject: RE: KGH Bonanza Creek 20-15H SMNSR
Attachments: ATT00001.txt; KGH Net Change.pdf

Hi Colin,
Perhaps this will help.

With the application, two engines are being removed from the permit: ENG-02 the 162HP Waukesha Jet Pump and ENG-03 the 195HP Caterpillar Compressor Driver. In addition the glycol dehydrator and reboiler are being added.

In regard to uncontrolled emissions

- The removal of the two engines should result In a reduction 78.01 tons NOx, 1.86 tons VOC, and 3.29 tons CO.
- The addition of the dehy and reboiler would contribute and increase 0.07 tons NOx, 36.15 tons VOC, and 0.06 tons CO
- The net change would be a decrease of 77.94 tons NOx, an increase of 34.29 tons VOC, and a decrease of 3.23 tons CO

In regard to controlled emissions

- The removal of the two engines should result In a reduction 36.24 tons NOx, 1.86 tons VOC, and 3.29 tons CO.
    - ENG-03 has a catalyst for control resulting in a lower actual decrease of emissions
- The addition of the dehy and reboiler would contribute and increase 0.07 tons NOx, 36.15 tons VOC, and 0.06 tons CO
- Also note that since the 2 Phase Separator, Produced Water Storage, and Crude Oil Storage are controlled by the high and low pressure flare tips that they are contributing PM, NOx, and CO emissions as well
- The net change would be a decrease of 36.17 tons NOx, 0.05 tons VOC, and 3.23 tons CO

Charles Barker
Air Quality Manager/Project Air Quality Scientist
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During these unprecedented COVID-19 restrictions which are in place I will be most responsive from 6:30 AM to 2:30 PM (MST). If you have an urgent need to communicate please text to my cell so that I may be able to respond to your concern in an appropriate manner.

From: Schwartz, Colin <Schwartz.Colin@epa.gov>
Sent: Thursday, April 16, 2020 3:49 PM
To: Charlie Barker <cbarker@ltenv.com>

Cc: Josh Logan <JLogan@ltenv.com>
Subject: RE: KGH Bonanza Creek 20-15H SMNSR

Sorry for the multiple emails, but can you explain where the reduction in PM and NOX is coming from here? I'm looking at Table E(ii) in the updated pdf that was sent over and there is a substantial reduction in NOX.

Also, the CO emissions are still unclear. Is the 2.57 typ of CO listed as a reduction of emissions for removing the engine? If this were the case wouldn't the post-change allowable emissions be 6.70 tpy?

Colin C. Schwartz
Air and Radiation Division
U.S. Environmental Protection Agency, Region 8
303-312-6043

From: Charlie Barker <cbarker@ltenv.com>
Sent: Tuesday, April 14, 2020 11:49 AM
To: Schwartz, Colin <Schwartz.Colin@epa.gov>
Cc: Josh Logan <JLogan@ltenv.com>
Subject: RE: KGH Bonanza Creek 20-15H SMNSR

Colin,
Let me verify. I believe it would be sent to the low pressure portion of the Steffes but I will verify.

A proud member of WSP

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From: Schwartz, Colin <Schwartz.Colin@epa.gov>
Sent: Monday, April 13, 2020 3:26 PM
To: Charlie Barker <cbarker@ltenv.com>
Cc: Josh Logan <JLogan@ltenv.com>
Subject: RE: KGH Bonanza Creek 20-15H SMNSR

Charlie,

Will the emergency flare (FLR-01-L) be the primary control device for the Dehy? Or will the tank vapor flare (FL-01-H) be the control device? Will the flares be renamed?

Colin C. Schwartz
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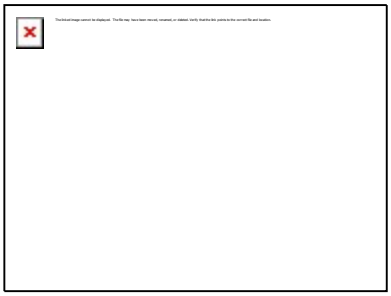
303-312-6043

From: Charlie Barker <cbarker@ltenv.com>
Sent: Thursday, April 9, 2020 11:59 AM
To: Schwartz, Colin <Schwartz.Colin@epa.gov>
Cc: Josh Logan <JLogan@ltenv.com>
Subject: RE: KGH Bonanza Creek 20-15H SMNSR

Hi Colin,
I wanted to give you the updated process flow diagram.

You will notice that the erroneous reference to ENG-2 has been removed. In addition, the still vent vapors from the dehy are represented in a separate color than other vapor flows. The still vent vapors are to be routed to the existing dual pressure flare.

Please see additional responses in red below.



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From: Schwartz, Colin <Schwartz.Colin@epa.gov>
Sent: Wednesday, April 8, 2020 2:42 PM
To: Charlie Barker <cbarker@ltenv.com>
Cc: Josh Logan <JLogan@ltenv.com>
Subject: RE: KGH Bonanza Creek 20-15H SMNSR

Charlie,

I've been reviewing your request for a synthetic Minor NSR permit and had a few questions.

You selected "Other – Modification of Application on File for an Un-issued Permit" – However we issued a permit for this facility on September 27, 2019 (Docket #EPA-R08-OAR-2018-0342). In Section B. PREVIOUS PERMIT ACTIONS, you only reference a Part 2 registration for Permit Number. We are seeing if you might be unaware that the facility is subject to and should be operating under an active SMNSR permit? We will be sending an updated form NEW that references permit SMNSR-UO-007088-2018.002

You filled out both tables for Proposed New Source (E(i)) and Proposed New Construction at an Existing Source or Modification of an Existing Source (E(ii)), so that's confusing as well. We will be sending an updated form NEW that removes values in this table. Assuming this is the same source we have permitted (it's the same lat/long), we can ignore the information in Table E(i) and focus on Table E(ii), which indicates there would be a decrease from Current Allowable Emissions to Post-Change Allowable Emissions (approximately 0.06 tpy); however, Post-Change Potential Emissions are listed as, for instance 236.37 tpy VOC, so I think that is confusing, too, as you are subject to an active SMNSR (docket listed above) that appears to be accounted for in the Current Allowable Emissions. I am looking into this further and may reach out for clarification.

Based on what we might be able to assume from the application, it appears that the net emissions increase from the Current Allowable Emissions (tpy) to the Post-Change Allowable Emissions (tpy) may result in a decrease of 0.06 tpy VOC; however, what is listed in table E(ii) as the Current Actual Emissions is greater than what is listed as the Current Allowable Emissions, which doesn't make sense, so we are unable to verify the net emissions increase using the actual-to-projected actual test using this application (to determine a modification according to 49.153(a)(1)(ii)). I am looking into this further in conjunction with above and may reach out for clarification.

The active SMNSR permit covers two 195 hp engines. Their size would indicate they are pump jack engines, but the permit lists them as compressor engines. The client indicated that the 195 hp engines are for compression into either the well for gas lift or into a sales line. After construction they were able to determine that the additional horsepower from the second compressor was not needed so construction did not commence. The application to add the dehy is also to remove engines that are not required. The Legend of the PFD in the application shows 2 engines (ENG-1 and ENG-2), but the diagram itself only shows ENG-1. The attached flow diagram makes this correction be eliminating the erroneous engine Just to clarify: is KGH removing the Waukesha engine (ENG-2)? Yes, the engine is not needed and is being removed from site-wide emissions. The diagram also does not show any control device connected to the dehy, but the applications lists a lower VOC number for Post-Change Allowable Emissions for the dehy than Post-Change Potential Emissions. Is KGH proposing to control the dehy using one of the existing flares (tank vapor flare or "emergency" flare) or a new flare dedicated to the dehy? The attached flow diagram makes this correction be connecting the still vent vapors of the dehy to the existing dual pressure flare

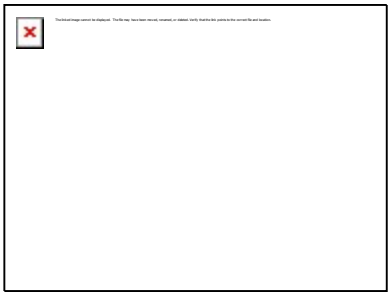
Thanks for your help on this, if you have further questions please feel free to reach out.

Regards,

Colin C. Schwartz
Air and Radiation Division
U.S. Environmental Protection Agency, Region 8
303-312-6043

From: Charlie Barker <cbarker@ltenv.com>
Sent: Tuesday, March 24, 2020 1:26 PM
To: Schwartz, Colin <Schwartz.Colin@epa.gov>
Cc: Josh Logan <JLogan@ltenv.com>
Subject: RE: KGH Bonanza Creek 20-15H SMNSR

Colin,
Find the attached packet as requested.



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From: Schwartz, Colin <Schwartz.Colin@epa.gov>
Sent: Tuesday, March 24, 2020 10:40 AM
To: Charlie Barker <cbarker@ltenv.com>
Subject: KGH Bonanza Creek 20-15H SMNSR

Charlie,

I received a cover letter for the KGH Bonanza Creek 20-15H SMNSR request however we are not capable of accessing hard copies in the office due to COVID-19. We are all teleworking right now and trying to get a handle on the incoming requests.

Could you please send a pdf if available for this request to me at this email address to begin processing? If you have any questions please call or email me.

Thank you,

Colin C. Schwartz
Air and Radiation Division
U.S. Environmental Protection Agency, Region 8
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