

## **Fugitive Emissions from Oil and Gas Production**

**Table I**  
**Identification of Performance Standards**  
**Source Category: Fugitive Emissions from Oil and Gas Production**

Regulated Component	Pollutant	Rule/Measure/Date									
		RACT Determination of Fugitive Emissions of VOCs from Oil and Gas Production and Processing Facilities, Refineries, Chemical Plants, and Pipeline Transfer Stations. 12/8/93.	SCAQMD Rule 1173. Fugitive Emissions of Volatile Organic Compounds. 5/13/94.	BAAQMD Regulation 8-Organic Compounds, Rule 37-Natural Gas and Crude Oil Production Facilities. 10/17/90	SBCAPCD Rule 331. Fugitive Emissions Inspection and Maintenance. 12/10/91.  (Note: Similar to or less stringent than RACT except as noted)						
Performance Standard											
Leak Definitions:		X	Conc. of total <u>gaseous</u> hydrocarbons, including methane, measured above background, expressed as methane and measured at interface of leak source; EPA Reference Method 21 "Method 21".	X	Conc. of <u>gaseous</u> volatile organic compound, measured above background, expressed as methane and measured 1 cm or less from leak source; EPA Reference Method 21 "Method 21".	X	Conc. of total organic compounds, including methane, measured above background, expressed as methane and measured 1 cm or less from leak source; EPA Ref. Method 21 "Method 21".				
Major Gas Leak Definitions:			> 10,000 ppmv	X	> 10,000 ppmv (except PRD)	X	> 10,000 ppm				
Minor Gas Leak Definitions:			> 1,000 ppmv but ≤ 10,000 ppmv	X	> 1,000 ppmv but ≤ 10,000 ppmv (except PRD)	X	> 10,000 ppm				
Pressure Relief Device Gas Leak Definitions:				X	> 200 ppm						

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Performance Standard							
Major Liquid Leak Definitions:		X	visible mist or continuous flow of liquid.	dripping of liquid volatile organic compounds at rate of more than 3 drops per minute.	dripping of total organic compounds (TOC) at rate > 3 drops/min.	visible mist or dripping of liquid at rate > 3 drops/min.	
Minor Liquid Leak Definitions:		X	Not a major leak and drips liquid at a rate of more than 3 drops per minute.	dripping of liquid volatile organic compounds at rate of more than 3 drops per minute.	dripping of total organic compounds (TOC) at rate > 3 drops/min.	visible mist or dripping of liquid at rate > 3 drops/min.	

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Performance Standard							
<b>A. Leak Control Requirements</b>	VOC		X - Any liquid leak or gas leak > 50,000 ppm detected by District inspection constitute a violation. - Any major gas leak detected by District inspection, within any continuous 24-hour period, and numbering in excess of number of leaks allowed, constitute a violation.			No facility shall exceed # of leaks allowed for each inspection period for major gas leaks and/or liquid leaks, as determined by District or operator inspection, except for unforeseen failure or malfunction (Rule 505).	



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Performance Standard							
A2. <u>Gas leaks allowed (&gt;200 components):</u> - Valves (V) - Pumps seals (P) - Compressors seals (Cp) - Pressure Relief Valves (PRV) - Hatches - Open ended lines (OEL) - Other components		N/A					
			X	0.5% of # inspected. 1% of # inspected. 1 1		N/A	0.5% of # inspected. 1% of # inspected. 1 1
				1			1
<b>B. Components ID</b>	VOC					Not specified	
<u>B1. All components physically identified:</u>		X - major, critical		- major components		Not specified	

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Performance Standard								
B2. <u>Components identified on flow diagrams:</u>		X	- major, critical, & inaccessible except C & F.	- minor components	Not specified			
C. Operators Inspection Requirements								
C1. <u>Audio-visual insp. (RACT defn. of leak: any liquid leak, a visible or audible leak, the presence of bubbles using soap solns., or a leak identified by use of a vapor analyzer.) (Note: If vapor leak identified, measured leak according to Method 21.)</u>		X	- Every 8 hrs (P, Cp, PRV) - Daily (P, Cp, PRV, & PRSB at manned oil & gas production fields and pipeline transfer stations) - Weekly (unmanned facilities)	- Every 8 hrs (accessible P, Cp, PRV except for unmanned oil & gas production fields and unmanned pipeline transfer stations)	- Weekly (P, Cp)			

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Performance Standard										
<u>C2. Hydrocarbon analyzer Monitoring (Method 21) - Accessible components:</u>		X	- Quarterly except Threaded Connections & Flanges		- Quarterly		- None specified			
<u>C2. Hydrocarbon analyzer Monitoring (Method 21) - Threaded Connections &amp; Flanges:</u>		X	- Immediately after being installed and semi-annually thereafter				- None specified			

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		Performance Standard					
<u>C2. Hydrocarbon analyzer Monitoring (Method 21) - Inaccessible components:</u>	X	- Yearly	- Yearly	- None specified			
<u>C2. Hydrocarbon Analyzer Monitoring (Method 21) - Unsafe to monitor components:</u>	X	- Inspection plan approved by EO		- None specified			
<u>C2. Hydrocarbon Analyzer Monitoring (Method 21) - PRV after a pressure relief:</u>	X	- W/in 3 days	- W/in 14 days	- None specified			

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		Performance Standard				
C2. Hydrocarbon Analyzer Monitoring (Method 21) - Monitoring frequency extended for good performance:		X - Yearly (all components except P, Cp, PRV, & PRSB at facility if <u>no liquid leaks and no major gas leaks &gt; 0.5%</u> of total components inspected per inspection period for 12 consecutive months.) (Note: Leaks from PRSBs are not included in total count of leaking components in the 0.5% determination.)	- Yearly (all components except P, Cp at facility if <u>no liquid leaks and no major gas leaks &gt; 0.5%</u> of total components inspected per inspection period for 5 consecutive quarters)	- None specified		

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		Performance Standard						
<u>C3. Tag all leaks detected.</u>		X	Yes - use brightly colored weatherproof tags showing date of leak detection, tag not to be removed until component is repaired and reinspected.	- None specified	- Yes			
<b>D. Maintenance Requirements</b>								

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		Performance Standard				
<u>D1. Non-Essential Components - Repair Gas Leaks Within:</u>		X	- 14 days (minor) - 5 days (major)	- 14 days (minor) - 5 days (major)	<u>Valves, Flanges, Chokes &amp; Components</u> <u>(See Comments-defn. on worksheet 1-B):</u> - 24 hours.  <u>Pumps and Compressors:</u> - within 24 hours. If spare also exceeded, repair either one within 30 days; the other may be operated until repairs completed.	- 14 days (minor) - 5 days (major)

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Performance Standard						
<u>D1. Non-Essential Components - Repair Gas Leaks &gt; 50,000 ppmv Within:</u>		- 1 day** (onshore) - 2 days (o/g production or pipeline transfer stations) - 5 days (offshore)  X (**Note: unless prohibited by Cal OSHA standards or 29 CFR 1910)	- 1 day			- 1 day** or removed from service until successfully repaired (onshore) - 2 days** or removed from service until successfully repaired (offshore)  (**Note: unless prohibited by Cal OSHA standards or 29 CFR 1910)

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Performance Standard							
<u>D1. Non-Essential Components - Repair Major Liquid Leaks Within:</u>		X - 1 day** (onshore) - 2 days (o/g production or pipeline transfer stations) - 5 days (offshore)  (**Note: unless prohibited by Cal OSHA standards or 29 CFR 1910)	- 1 day	- within 24 hours. If repair not successful, replace within 15 days ( <u>apply to all components</u> ).	- 24 hours		
<u>D1. Non-Essential Components - Repair Minor Liquid Leaks Within:</u>		X - 2 day** (onshore) - 5 days (offshore)  (**Note: unless prohibited by Cal OSHA standards or 29 CFR 1910)	- 1 day	- repair within 24 hours. If repair not successful, replace within 15 days ( <u>apply to all components</u> ).	- 24 hours		

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Performance Standard							
<u>D2. Essential Components - Minimized Leaks Within:</u>		X	- Immediately  - <i>Critical &amp; unsafe to monitor components:</i> minimized and replaced w/ BACT during shutdown or w/in 12 months, whichever occurs first.	- not specified	<u>Valves, Flanges, Chokes &amp; Components</u> <i>(See Comments-defn. on worksheet 1-B):</i> - within 24 hours. If still exceeds 10,000 ppm, repair at next scheduled turnaround but not longer than 3 months.  <u>Packed Seal Pumps and Compressors</u> - within 24 hours. If still exceeds 10,000 ppm, repair at next scheduled maintenance of the well head or within 3 months.		

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Performance Standard							
<u>D2. Chronic Leakers:</u>		- <u>Components with 5 repair actions for major gas or liquid leak within 12 months:</u> replaced with BACT.	- <u>Components with 5 repair actions for a liquid leak or a major gas leak within a continuous 12 months period:</u> replaced with BACT or BART, or vent to an approvable air pollution control device.				

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Performance Standard						
<u>D2. OEL and V Located at End of Lines:</u>		- Sealed with a blind flange, plug, cap, or a second closed valve except during <u>operations</u> . <i>(Note: Operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs.)</i>				

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Performance Standard							
<u>D2. Hatches::</u>		- Keep closed except during sampling, adding process matl., or attended maintenance operations.			- Keep all access hatches closed except during active maintenance or repairs. - No open liquid pools of crude oil or condensate in the lease area. - No open or uncovered vessels of crude material larger than 250ml kept in lease area. Keep well cellar covered.		
<u>D3. Components inspected after repair or replacement with Method 21:</u>		- Within 30 days	- Within 30 days		- Within one week.		

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Performance Standard							
D4. Operator management plan:		N/A	N/A	N/A			

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Exemptions	<u>Visual Inspection Exemption:</u> - PRV, P & Cp equipped with closed-vent system capable of capturing and transporting any leak to vapor control system.				

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<u>Inspection Exemption:</u> - Components exclusively handling commercial natural gas. - Components buried below ground. - Components, except those at gas processing plants, exclusively handling fluids with a VOC concentration of 10% by wt. or less, as determined by appropriate test methods; or components exclusively handling liquid, if the wt% evaporated is 10% or less at 150 °C (302 °F), as determined by appropriate test methods. - **Components at oil and gas production facilities, or pipeline transfer stations, handling liquid of less than or equal to 20° API gravity after point of primary separation.					

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<u>Inspection Exemption con't.:</u> - **Components at oil and gas production facilities, or pipeline transfer stations, handling liquid between 20 and 30° API gravity which are located either: 1)downstream of a wellhead equipped with a casing vapor recovery system, provided that the vapor recovery is at a pressure of less than 10 psig; or 2)after the point of primary separation of oil and gas, provided the separation vessel is equipped with a vapor recovery system and is operated at a pressure less than 25 psig.					

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	<p><i>Inspection Exemption con't.:</i>            (**Note: (1)Components located at <u>offshore oil platforms</u> shall be visually inspected on a quarterly basis. If leak detected, measure according to Method 21. Quarterly visual inspection may be changed to annual, except P, Cp, PRV, &amp; PRSB, if no liquid leaks and no major gas leaks &gt; 0.5% of total components inspected per inspection period for 12 consecutive months. Leaks from PRSB not included in total count of leaking components. (2)Components located at <u>onshore facilities</u> shall either be subject to (1) or that any leak, from components not subject to an inspection program that are detected by the District, may constitute a violation.)</p>				

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	<u>Rule Exemption:</u> - one-half inch and smaller fittings which have been demonstrated to the APCO to be leak-free based on an initial inspection in accordance with Method 21.	<u>Rule Exemption:</u> (Similar to what RACT exempts for inspection only.)	<u>Rule Exemption:</u> - natural gas distribution, transportation and storage facilities, including underground storage and associated processing facilities. Written petition must be submitted to APCO. - natural gas streams which contain more than or equal to 90% methane by volume. Written petition must be submitted to APCO. - liquid streams with a water content in excess of 90 % by volume. Written petition must be submitted to APCO.		

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Applicability	Components including but not limited to valves (V), flanges (F), fittings (C), pumps (P), compressors (Cp), pressure relief devices (PRV), diaphragms, hatches, sight-glasses, and meters at refineries, chemical plants, oil & gas processing plants including offshore platforms, and pipeline transfer stations.	Valves, fittings, pumps, compressors, pressure relief devices, diaphragms, hatches, sight-glasses, and meters at refineries, chemical plants, oil and gas production fields, natural gas processing plants, and pipeline transfer stations.	Valves, flanges, chokes, stuffing boxes, pumps, compressors, pressure relief valves, threaded connections, hatches, sight glasses, fittings liquid pools, open vessels, and spills at natural gas and crude oil production facilities.	Components in liquid or gaseous hydrocarbon service at refineries, chemical plants, oil and gas production fields, oil and gas processing plants, and pipeline transfer stations.	
Comments	RACT has the most comprehensive exemptions and applicability category.				

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<u>Comp. classifications:</u> - Major: $\geq 4$ " V, $\geq 5$ -hp P, any Cp, and $\geq 4$ " PRV. - Minor: not a major. - Critical: require unit shutdown if component taken out of service. - Inaccessible: $>15'$ above ground when access required from ground; $>6'$ away from platform when access required from platform. - Unsafe: as defined by OSHA standards or in provisions for worker safety found in 29 CFR 1910.					

**Table II**  
**Identification of Performance Standards**  
**Source Category: Fugitive Emissions from Oil and Gas Production**

<b>Rule/Measure</b>	<b>Rule/Measure</b>				
	<p>RACT Determination of Fugitive Emissions of VOCs from Oil and Gas Production and Processing Facilities, Refineries, Chemical Plants, and Pipeline Transfer Stations. 12/8/93.</p>	<p>SCAQMD Rule 1173. Fugitive Emissions of Volatile Organic Compounds. 5/13/94.</p>	<p>BAAQMD Regulation 8-Organic Compounds, Rule 37-Natural Gas and Crude Oil production Facilities. 10/17/90.</p>	<p>SBCAPCD Rule 331. Fugitive Emissions Inspection and Maintenance. 12/10/91.  <b>(Note: Similar to or less stringent than RACT except as noted)</b></p>	
<p><u>Definitions:</u>                      - Unmanned Facility: remote facility which has no permanent sited personnel and is greater than 5 miles from the closest manned facility.</p>					