



Comment Response: Enerplus Resources (USA) Corporation Draft Synthetic Minor Permit  
#SMNSR-TAT-000222-2011.001

Jacki Malone

to:

R8AirPermitting

04/20/2012 05:11 PM

Cc:

"Robert Bleil (RBleil@enerplus.com)"

Hide Details

From: Jacki Malone <jmalone@aquionix.com>

To: R8AirPermitting@EPA

Cc: "Robert Bleil (RBleil@enerplus.com)" <RBleil@enerplus.com>

History: This message has been replied to.

#### 1 Attachment



Enerplus\_Madrid-Rome\_Synthetic Minor Source Permit\_Comments\_F.pdf

To Whom It May Concern,

On behalf of Enerplus Resources (USA) Corporation, please find attached comments on the terms and/or conditions of the Enerplus Resources (USA) Corporation Draft Synthetic Minor Permit #SMNSR-TAT-000222-2011.001 for the Madrid/Rome Facility. The written comments along with the reason(s) for non-acceptance have been attached to this email.

Please can you provide a response to both myself and those copied on this email as confirmation of receipt.

Regards,

Jacki

Jacki A. Malone, PE

Aquionix, Inc  
3700 East 41st Avenue  
Denver, CO 80216  
work: 303-289-7520  
mobile: 720-339-7719  
fax: 303-289-7521  
<http://www.aquionix.com>

**Comments for the Proposed Synthetic Minor Source Permit to Construct  
Enerplus Resources (USA) Corporation  
#SMNSR-TAT-000222-2011.001  
Madrid/Rome Facility**

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Enerplus Resources (USA) Corporation is submitting these written comments in response to the Public Comment period for the Proposed Synthetic Minor Permit to Construct #SMNSR-TAT-000222-2011.001 for the Madrid/Rome Facility.

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**Section: I.A. General Information**

**Comment:** Revise the permit with the correct address for the facility location.

**Proposed Revision:** Correct the quarter location to NE  $\frac{1}{4}$  NW  $\frac{1}{4}$ .

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**Section: I.B. Construction Proposal**

**Comment:** Revise the permit with the correct equipment from the application.

**Proposed Revision:** The permit application states only two (2) 8 hp gasoline-fired recycle pump motors will be installed at the facility. The third entry in Attachment D of the permit application has a "0" entered for operating hours indicating a third engine will not be operating at the facility. Future permit applications will be revised accordingly for clarity.

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**Section: I.D.3(c) Construction and Operational Requirements**

**Comment:** Clarification that the 500 hours of allotted pit flare use does not include flow back operations.

**Proposed Revision:** Add the following sentence to provision I.D.3(c):  
"Flow back is not included in the 500 hours of pit flare operations."

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**Section: I.D.4(d) Monitoring Requirements**

**Comment:** Revise this section to be consistent with other permits.

**Proposed Revision:** Revise the first sentence of this provision as follows:  
"Facility-wide actual VOC, total HAP, and any single HAP emissions shall be calculated, in tons, and recorded by the Permittee at the end of each month, beginning with the first full calendar month that production commences."

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**Section: I.D.6(a)(ii) Recordkeeping Requirements**

**Comment:** Revise this section to be consistent with other permits and to clarify the definition of unavoidable events.

**Proposed Revision:** Revise the statement to include the following language:

“The volume of produced gas sent to a utility flare under normal operating conditions and due to sudden, infrequent, and unavoidable events (i.e. gas plant down time, pipeline capacity issues, or malfunctioning).”

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**Section:** I.E.1(c) Closed-Vent Systems

**Comment:** Strike the words “detectable emissions” from this sentence. Enerplus installs and operates equipment according to manufacturer recommendations and does not have influence over the design of these systems.

**Proposed Revision:** Revise the sentence to read as follows:  
“Each closed-vent system shall be installed and operated according to the manufacturers recommendations”.

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**Section:** I.E.1(d) Closed-Vent Systems

**Comment:** Revise this section to be consistent with other permits by adding a third provision, and to allow flexibility in bypass device operation.

**Proposed Revision:** Revise this section to include the following provision:  
“I.E.1(d)(iii): Label the bypass device valve installed at the inlet to indicate that the non-diverting position is in the correct position for normal operation. The permittee shall check the bypass device daily, or whenever an operator is on site, to ensure it is in the correct position for normal operation and the label is legible. The valve shall only be switched to the divert position during times of sudden, infrequent, and unavoidable events. If the label is illegible, the Permittee shall replace the label. ”

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**Section:** I.E.2(d)(iii) Enclosed Combustor and Utility Flares

**Comment:** Strike this section from the permit. Section I.E.2(c)(iii) already requires permittee to have an electronically controlled ignition system with a malfunction alarm and remote notification system if the pilot flame fails, so the Permittee will be able to identify when the pilot flame is not present and will be able to calculate emissions as uncontrolled as of that date/time.

**Proposed Revision:** Strike statement “If an inspection results in finding that a pilot flame is not present of the combustor is otherwise not functioning properly, then emissions from the units controlled by the combustor shall be calculated as uncontrolled since the last inspection when the combustor was observed to operating properly.”.

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**Section:** I.E.3(a)(ii) Ground Pit Flare

**Comment:** Revise this section to include a provision allowing the pit flare to be used if the enclosed combustor (tied to the tank battery) at the facility is not operational. As written, the permit does not allow flexibility for Enerplus to use the pit flare to combust tank vapors.

**Proposed Revision:** Revise the section as follows:  
"To control emissions in the event the produced hydrocarbon gas that is being recovered for sale or other beneficial purpose must be diverted to an emergency control device due to sudden, infrequent, and unavoidable events and the enclosed combustor installed at the facility is not operational."

**Section:** I.E.3(b)(iii) Ground Pit Flare

**Comment:** Clarification that the pit flare can be used for completions, but that the hours of operation during completions in which the pit flare is used is not counted towards the facility's 500 hour limit.

**Proposed Revision:** Revise the provision as follows, striking the word "completions" from the sentence:  
"Use of the ground pit flare is limited to no more than 500 hours in any twelve (12) consecutive months, for recompletions, and sudden, infrequent and unavoidable events; and..."

**Section:** I.E.3(b)(v) Ground Pit Flare

**Comment:** Strike the word "daily" from this section to be consistent with other permits and replace with the intention of inspecting "anytime" the gas is being routed to the pit flare.

**Proposed Revision:** Revise the section as follows:  
"The ground pit flare is visually inspected for the presence of a pilot flame anytime the gas is being routed to the ground pit flare."

**Section:** I.E.5(g) Recordkeeping Requirements

**Comment:** Strike the word "thermocouple" from the provision and revise with language consistent for this permit to clarify this section is referring to the enclosed combustor and not the thermocouple.

**Proposed Revision:** Replace the word "thermocouple" with the word "enclosed combustor" to clarify provision.

**Section:** N/A

**Comment:** Include a section in the permit that details the Requirements for Hydrocarbon Loading Operations. While Enerplus anticipates having a pipeline installed at this facility by the first date of production, addition of this section allows flexibility to continue production pending the pipeline installation if other factors (i.e. ROW conflicts, material shortage, construction crew timing and shortage, etc.) prevent its completion by the date of first production.

**Proposed Change:** Revise the permit to include a section addressing Requirements for Hydrocarbon Loading Operations.

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**Section:** **I.I.3 Requirements for Engines**

**Comment:** Revise the language in this section to be consistent with the equipment list in section I.B of the permit application.

**Proposed Change:** Revise paragraph 3 of this section to indicate that there will be two (2) 8 hp engines are gasoline-fired engines.