

## **Title 40 CFR Part 63, Subpart HH: Oil and Natural Gas Production Area Source Applicability**

### **Major Source/Area Source**

1. Ten tons of any single HAP or 25 tons of any combination of HAP (10/25) constitutes a major source.
2. All other sources are area sources.
3. Area sources of HAP are not required by Subpart HH to obtain a Title V permit, if the source is not otherwise subject to the Federal Operating Permit program.

### **Area Source Applicability - General**

1. Area sources became subject to Subpart HH on January 3, 2007.
2. The affected source is each triethylene glycol (TEG) dehydration unit located at the area source.
3. All area sources, with TEG dehydration units, will have some requirements under the rule.
4. Not all area sources will be required to control benzene emissions from TEG units.
5. Area sources subject to the emission reduction requirements of Subpart HH (see Area Source Applicability - Specific) must submit initial notifications by January 3, 2008.
6. Area sources with Title V permits
  - a. Applicants/permit holders should take steps to recognize these requirements in permits no later than the compliance dates in the rule.
  - b. SOP holders may submit minor revisions or, if appropriate, OP-NOTIFY form to recognize these requirements and address them at renewal.
  - c. GOP holders should submit provisional requirements on form OP-REQ3 to recognize the requirements.
  - d. When GOP tables for Subpart HH dehydration units are updated, GOP holders should revise their applications to incorporate the appropriate GOP index number.

### **Area Source Applicability - Specific**

1. Sources with throughput less than 85,000 scm/day (3,000,000 scf/day) or with benzene emissions less than 0.90 Mg/yr (1.0 tpy) are subject to limited requirements. The 0.90 Mg/yr (1.0 tpy) limit for benzene emission may be evaluated prior to controls OR after federally enforceable controls for purposes of this exemption. EPA determined that GACT for these sources is no control or, if benzene emissions are evaluated after federally enforceable controls, no additional control.
  - a. These sources are subject to the following requirements under the rule.
    - i. § 63.764(e)(1) - exemption from control requirements for either throughput (§63.764(e)(1)(i)) or benzene concentration (§ 63.764(e)(1)(ii)).
    - ii. § 63.772(b) - determination of natural gas flowrate (§ 63.772(b)(1)) and/or determination of benzene emissions (§ 63.772(b)(2))
    - iii. § 63.774(d)(1) - maintenance of records to support the determination of

exemption. § 63.774(d)(1)(i), for the throughput exemption, and § 63.774(d)(1)(ii), for the actual average benzene emissions exemption.

2. Sources with throughput of 85,000 scm/day (3,000,000 scf/day) or greater and benzene emissions of 0.90 Mg/yr (1.0 tpy) or greater are subject to emission reduction requirements of the rule. This does not necessarily mean control.
  - a. Sources **not** located in an urbanized area plus offset (UA plus offset) or urban cluster (UC) with a population of 10,000 or greater.
    - i. These sources are **not** required to control emissions using a control device or routing emissions to a natural gas process line.
    - ii. These sources **are** required to optimize the glycol circulation rate for the TEG unit.
    - iii. These sources are subject to the following requirements under the rule.
      1. § 63.764(d) - general requirement to comply
      2. § 63.764(d)(2)(i) - determination of the optimum glycol circulation rate for the TEG unit.
      3. § 63.764(d)(2)(ii) - requirement to operate such that the actual glycol circulation rate does not exceed the calculated optimum or determine and document an alternate circulation rate, also not to be exceeded.
      4. § 63.764(d)(2)(iii) - maintain a record of the alternate determination of § 63.764(d)(2)(ii).
      5. § 63.774(f) - maintain a record of calculations used to determine the optimum glycol circulation rate determined under §§ 63.764(d)(2)(i) or (ii), as appropriate.
      6. §§ 63.775(c), (c)(1) & (c)(7) - initial notification/reporting requirements.  
**Submit no later than January, 3, 2008**
    - iv. Compliance dates.
      1. Located in an Urban-1 county (contains a part of a Metropolitan Statistical Area of 250,000 population or greater)
        - a. commenced construction before February 6, 1998, comply by January 5, 2009
        - b. commenced construction after February 6, 1998, complies by January 3, 2007 or on initial startup.
      2. Not located in an Urban-1 county
        - a. commenced construction before July 8, 2005, complies by January 5, 2009.
        - b. commenced construction after July 8, 2005, complies by January 3, 2007 or on initial startup.
  - b. Sources located in a UA plus offset or UC with a population of 10,000 or greater.
    - i. These sources are required to control emissions through use of a control device or by routing to a process natural gas line.
    - ii. These sources are subject, under § 63.764(d)(1), to the control, monitoring, testing, recordkeeping and reporting requirements of Subpart HH.

- iii. The glycol dehydration portion of the Subpart HH flowchart for currently available for major sources can be used to determine requirements.
- iv. Compliance dates.
  - 1. Located in an [Urban-1 county](#) (contains a part of a Metropolitan Statistical Area of 250,000 population or greater)
    - a. commenced construction before February 6, 1998, comply by January 4, 2010
    - b. commenced construction after February 6, 1998, complies by January 3, 2007 or on initial startup.
  - 2. Not located in an [Urban-1 county](#)
    - a. commenced construction before July 8, 2005, complies by January 4, 2010.
    - b. commenced construction after July 8, 2005, complies by January 3, 2007 or on initial startup.