



Utah Division of Air Quality (UDAQ) proposed a list of voluntary seasonal and episodic ozone actions industry could take during ozone season in the Uinta Basin. UDAQ asked for industry's input, and we agreed to provide our thoughts to UDAQ by the end of the month during a meeting at UDAQ on September 6th. The list below is our members' proposal. Because ozone episodes are unpredictable in onset timing and length, responding to individual episodes is logistically challenging for industry, so we focus on seasonal actions. We encompassed many of UDAQ's suggested equipment maintenance items in their original list into an Enhanced Inspection & Maintenance Program, which focuses on leak detection and repair prior to the ozone season. We also propose a training program for our operators in the field to impress upon them the seriousness of the ozone episodes and what they can do to help reduce emissions. It is the intent that these actions would occur across the entire basin, including state, federal, and tribal airshed.

Enhanced Inspection & Maintenance Program

- FLIR/AVO inspections
 - Pneumatic devices/pumps
 - Tanks
 - Fugitives
- Frequency
 - Production sites with Tank Controls/Compressor Stations/Gas Plants
 - ✓ FLIR inspection by the end of 2013 and at least one (1) inspection during Jan-Mar at highest priority sites based upon PTE limits considered significant to ozone formation (determined by operator)
 - ✓ AVO inspection by operators during any site visits Jan-Mar
 - Production sites with no tank controls
 - ✓ AVO inspection by the end of 2013
 - ✓ AVO inspection by operators during any site visits Jan – Mar
- Report to UDAQ
 - Number of sites at which AVO inspections and FLIR inspections done
 - Number of repairs at FLIR inspection sites
- Perform regular maintenance on pneumatic devices, dehydrators, combustors, engines and compressors
- Properly operate and maintain existing installed control equipment

Ozone Training for Operations Personnel – Operations personnel go through training prior to ozone season. Training programs should cover the following:

- Ozone – what is it and how does it decrease air quality
- Ozone formation ingredients – NO_x, VOCs, and weather conditions
- Ozone attainment status in the Uinta Basin
- Review of applicable regulations
- What can be done to prevent ozone formation – limit driving, maintain equipment, delay optional activities until after inversion, etc. Emphasize importance of proper maintenance of tank hatches, vapor combustors, and other equipment that reduces emissions.