

Oil and Gas Production Facility Air Quality Compliance Checklist

Company Name:	Inspection Date:
Facility Name:	
Current Permit Number:	
AI Number:	

1	General	Yes	No	N/A	Comments
1.a	Does the facility have an air permit? LAC 33:III.501.C.2				
1.b	If 1.a is “No”, has the facility applied for an air permit?				
1.c	If permitted, is the air permit current (not expired)? LAC 33:III.501.C.8				Expiration date:
1.d	List type of permit. (SOGA, Minor Source, Minor Source General, Title V, Other)				
1.e	Does the facility have a hard copy of the current air permit on-site?				
1.f	Does the process description match the permit (or application)? If not, list differences or changes. LAC 33:III.501.C.4				
1.g	Are all of the emission sources located onsite listed in the air permit? List any emission sources at the facility that are not listed in the permit. LAC 33:III.501.C.4				
1.h	Are oil and natural gas throughput rates and equipment runtime hours below the limits listed in the permit? LAC 33:III.501.C.4				
1.i	If “no” to questions 1.c through 1.g has a modification or notification been submitted to LDEQ? List date of submittal in comment section. LAC 33:III.501.C.4				
1.j	Have there been any unauthorized emissions that exceed a reportable quantity (RQ) from the facility in the past twelve months? LAC 33:III.501.C.4				
1.k	If yes to question 1.j, is there a copy of documentation proving that the unauthorized emissions were reported to the Department of Public Safety (DPS) and or SPOC? LAC 33:I.3915 or 3917				
1.l	Is the facility required to submit annual emissions inventory reports (ERIC reports)? If yes, list most recent submittal date. LAC 33:III.501.C.4				
1.m	Is the facility required to submit Title V Annual Certifications and Semiannual Monitoring Reports? If yes, list most recent submittal date. LAC 33:III.501.C.4				
1.n	Is there any smoke being emitted from fuel burning equipment at the facility? LAC 33:III.1101.B				
1.o	Does the facility process sour gas (sour gas has a concentration greater than 24 ppmv of H ₂ S)?				
1.p	Does the facility have a written housekeeping plan that addresses all the elements of LAC 33:III.2113?				
1.q	Is facility complying with the housekeeping plan? LAC 33:III.2113				

2	Engines	Yes	No	N/A	Comments
2.a	Are there any engines at the facility over 500 HP?				
2.b	Is stack testing (initial and semiannual) being performed for engines over 500 HP as required by LDEQ policy?				
2.c	Are any engines equipped with catalytic converter control devices? If yes, list these engines in the comment section.				
2.d	Is stack testing (initial and annual) being performed for engines over 500 HP equipped with catalytic converters as required by LDEQ policy? Review current stack test report.				
2.e	If stack test results are not within permit limits as per LDEQ policy, has a modification or notification been submitted to LDEQ?				
2.f	Are any natural gas engines located at the facility applicable to 40 CFR Part 60 Subpart JJJJ? LAC 33:III.501.C.5				
2.g	If yes to question 2.f., are sources applicable to 40 CFR Part 60 Subpart JJJJ certified engines operating in a certified manner?				
2.h	If no to question 2.g., is testing being performed on applicable engines?				
2.i	Are any diesel-fired engines located at the facility applicable to 40 CFR Part 60 Subpart IIII?				
2.j	If yes to question 2.i., are sources applicable to 40 CFR Part 60 Subpart IIII certified engines operating in a certified manner?				
2.k	If no to question 2.j., is testing being performed on applicable engines?				
2.l	Are engines compliant with requirements of 40 CFR Part 63 Subpart ZZZZ, if applicable?				
	For engines applicable to 40 CFR Part 63 Subpart ZZZZ, are appropriate emission controls in place?				
2.m	For engines applicable to 40 CFR Part 63 Subpart ZZZZ, is the appropriate testing being performed?				
2.n	Are the stack test results (whether state or federal testing is required) within permitted limits? LAC 33:III.501.C.4				
2.o	Is the testing company LELAP accredited? LAC 33:I.4719.A				
3	Glycol Dehydration Units	Yes	No	N/A	Comments
3.a	Are there any glycol dehydrators located at the facility? If yes, specify type. (TEG, DEG, EG)				
3.b	If yes to 3.a., are uncontrolled emissions from each still column vent(s) less than 9 tons per year (tpy)?				
3.c	If uncontrolled emissions are greater than 9 tpy, is a condenser control device being used on the unit?				

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3.d	Does the control efficiency of the condenser meet the requirements of LAC 33.III.2116.D? (70% or greater for units constructed before October 20, 1994 and 85% or greater for units constructed on or after October 20, 1994)				
3.e	If the glycol dehydrator was constructed prior to October 20, 1994, are records of condenser exit temperatures being kept? LAC 33:III.2116.F.3				
3.f	Does the type of emission control installed and operating correspond to how it is listed in the permit? (controlled by a condenser or uncontrolled, emissions from the unit piped to burner/reboiler or flare, etc.) LAC 33:III.501.C.4				
3.g	Does the design capacity (MMBTU/HR) of the burner/reboiler for the unit correspond to what is listed in the permit? LAC 33:III.501.C.4				
3.h	If exemptions are being claimed, are records of the daily gas processing rate and glycol circulation rate being kept? LAC 33:III.2116.F.4				
3.i	Are the actual gas processing rates and glycol circulation rates below the permitted rates used in a GLYCalc or other simulation program?				
3.j	If the amount of gas processed by the unit is greater than 3 MMSCFD, are benzene emissions from the unit below 1 TPY as per 40 CFR Part 63 Subpart HH?				
3.k	Is the dehydrator compliant with all of the requirements of 40 CFR Part 63 Subpart HH?				
4	Storage Tanks	Yes	No	N/A	Comments
4.a	Are there any crude oil/condensate and/or water storage tanks located at the facility?				
4.b	Does the capacity of each storage tank correspond to its permitted capacity? LAC 33:III.501.C.4				
4.c	Are records of the oil and/or water throughputs being processed being kept?				
4.d	Are the actual oil and/or water throughput rates below the limits listed in the permit?				
4.e	If the storage tanks are permitted with emission controls, are the control devices in operation? List type of control device used.				
4.f	Are records of control device downtime being kept? List reasons for downtime.				
4.g	Are the storage tanks store crude oil/condensate considered to be "prior to custody lease transfer" as referenced in LAC 33.III.2103?				

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4.h	Are the storage tanks equipped with a submerged fill pipe if required by LAC 33.III.2103?				
4.i	Are the sizes of the storage tanks less than 10,000 BBLs?				
4.j	Are all storage tanks exempt from 40 CFR Part 60 Subparts K, Ka and Kb? If no, list applicable tanks.				
4.k	If storage tanks are required to meet 40 CFR Part 60, Subparts K, Ka or Kb, what method is used for compliance?				
4.l	Does flash gas from the storage tanks exceed the VOC limits of LAC 33.III.2104 causing the storage tanks to require controls?				
5	Crude Oil/Condensate Loading Operations	Yes	No	N/A	Comments
5.a	Specify the type of volatile organic compounds (VOCs) are loaded (crude oil, condensate, diesel, methanol, other - specify).				
5.b	What is the vapor pressure in psia of the product loaded?				
5.c	For crude oil/condensate loading operations used by the facility specify the method used: (pipeline, tank truck, barge, ship, other - specify)				
5.d	Is the type of loading listed in the air permit the actual type of loading used for the facility? LAC 33:III.501.C.4				
5.e	Is the amount of crude oil/condensate loaded annually below the limits listed in the air permit?				
5.f	If required by the air permit, are annual crude oil/condensate loadout reports being prepared and submitted?				
5.g	Does the facility load volatile organic compounds (VOCs) that are not exempt from VOC loading rules in LAC 33:III.2107?				
5.h	Are loading operations for nonexempt VOCs in compliance with LAC33:III.2107?				
5.i	Are there any marine loading operations on location?				
5.j	If yes to Item 5.c is the facility required to comply with control requirements in LAC 33:III.2108.Marine Vapor Recovery?				
5.k	If yes to Item 5.d, is the facility complying with control requirements in LAC 33:III.2108.Marine Vapor Recovery?				
5.l	Are any emission control methods being used for loading operations? Specify methods used. (flare, vapor balance, other - specify)				
6	Flares	Yes	No	N/A	Comments
6.a	Is there a flare operating at the facility that is designed to combust natural gas from the facility?				
6.b	Is the flare being used for emergency upsets or is it routinely combusting gas? List emission sources routed to the flare.				

6.c	Is the amount of gas that is routed to the flare being metered?				
6.d	Are the sources that are permitted as being routed to the flare actually piped to the flare? List sources piped to flare.				
6.e	Is the flare being monitored for the presence of a flame? Specify method used to detect the presence of a flame. (automatic re-ignition device, heat sensing device or visual check)				
6.f	Has a corrective action plan for re-lighting the flare been developed and is it ready for immediate implementation in the event the flare needs to be re-lit?				
6.g	Is smoke being emitted from the flare?				
	Is the flare required to meet the New Source Performance Standard (NSPS) requirements in 40 CFR 60.18?				
6.h	Has an annual gas analysis been performed to ensure that the heat content of the flare is greater than 300 BTU/scf?				
7	Gas Sweetening Units	Yes	No	N/A	Comments
7.a	Are there any gas sweetening units located at the facility?				
7.b	Is the facility located onshore at a gas processing plant?				
7.c	Is the gas sweetening unit located at an onshore gas processing plant with a design capacity of the unit less than 2 long tons per day (1016 kgs per day) of H ₂ S expressed as sulfur as per 40 CFR Part 60 Subpart LLL?				
7.d	Does the gas sweetening unit qualify as a new source under 40 CFR Part 60 Subpart LLL?				
7.e	Does the design of the unit correspond to how it is permitted? (e.g., inlet gas H ₂ S content, emission controls, operating parameters)				
7.f	Describe the type of emission control (if any) used to reduce emissions from the gas sweetening unit regenerator. (sulfur recovery unit, flare, thermal oxidizer, other - specify)				
8	Natural Gas Processing Plants	Yes	No	N/A	Comments
8.a	Is the facility considered a gas processing plant (SIC Code = 1321; NAICS Code = 211112)?				
8.b	Are there any Joule-Thomson (JT units) or refrigeration units used for natural gas liquids extraction operating at the facility?				
8.c	Does 40 CFR Part 60 Subpart KKK apply to the facility?				
8.d	If yes to 8.c, is facility compliant with monitoring requirements in 40 CFR Part 60 Subpart KKK?				
8.e	Does LAC 33:III.2121 Fugitive Emission Control apply to the facility?				

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8.f	If yes to 8.e, is facility compliant with monitoring requirements in LAC 33:III.2121?				
9	Turbines	Yes	No	N/A	Comments
9.a	Are there any turbines operating at the facility?				
9.b	What type of fuel is being used by each turbine operating at the facility? (natural gas, diesel, dual-fuel)				
9.c	Has an initial stack test been performed on the turbine(s) according to LDEQ policy?				
9.d	If yes, does the turbine have a heat input at peak load greater than or equal to 10 MMBTU/HR?				
9.e	Was the turbine constructed, modified or reconstructed after October 3, 1977, which would make it subject to the requirements of 40 CFR Part 60 Subpart GG?				
9.f	If applicable to the requirements of 40 CFR Part 60 Subpart GG, are the turbines compliant with the operational standards, emissions testing and fuel gas monitoring of this subpart?				
9.g	Was the turbine constructed, modified or reconstructed after February 18, 2005, which would make it subject to the requirements of 40 CFR Part 60 Subpart KKKK?				
9.h	If applicable to the requirements of 40 CFR Part 60 Subpart KKKK, are the turbines compliant with the operational standards, emissions testing and fuel gas monitoring of this subpart?				
10	Flash Gas Sources	Yes	No	N/A	Comments
10.a	List all flash gas sources at the facility that are venting to atmosphere. (heater treaters, separators, tanks, other - specify)				
10.b	Do any flash gas sources require controls according to LAC 33.III.2104.Crude Oil and Condensate?				
10.c	Are all flash gas sources that are permitted as controlled operating with permitted controls?				
11	Fugitive Emissions	Yes	No	N/A	Comments
11.a	For facilities applicable to 40 CFR Part 60 Subparts VV or KKK, are pumps, compressors, pressure relief devices, valves and sampling systems being monitored for leaks as specified in 40 CFR 60.882-2?				
11.b	Are there any visible signs or sounds of leaks of oil and/or gas at the facility? If yes, specify the source(s) of the leak(s).				
12	Compressor Seals	Yes	No	N/A	Comments
12.a	Are there compressors located at the facility? If yes, specify type. (centrifugal or reciprocating)				
12.b	For reciprocating engines, are the rod packing systems being replaced after every 26,000 hours of operation?				

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12.c	Are any centrifugal compressors equipped with dry seal systems?				
13	Pneumatic Devices	Yes	No	N/A	Comments
13.a	Are there any pneumatic pumps or controllers that use natural gas on site?				
13.b	Are these pneumatic devices accounted for in the permit as fugitive emissions or as specific sources?				
14	Atmospheric Vents	Yes	No	N/A	Comments
14.a	Are there any atmospheric vents located at the facility that release directly to atmosphere? If yes, specify whether the vents are used for emergency or routine releases.				
14.b	List equipment routed to the atmospheric vent.				
14.c	Are vent volumes released being tracked? If so, specify tracking method. (meter, calculation based on throughput, other - specify)				
15	Line Heaters, Heater Treaters, Reboilers	Yes	No	N/A	Comments
15.a	Is there any smoke or visual soot emitted from onsite line heaters, heater treaters or reboilers?				
15.b	Is heater treater flash gas vented to atmosphere, burned in flare or routed back to system? Specify.				
15.c	If heater treater flash gas is vented to atmosphere or flare, is this reflected in the air permit?				
16	Corrective Actions	Yes	No	N/A	Comments
16.a	Are there any corrective actions needed to comply with air quality regulations? Use separate sheet if necessary to document corrective actions needed.				