

# Bulletin 2009-18

May 21, 2009

## Clarification for the July 1, 2009, Annual Dehydrator Benzene Inventory List Submission of 2008 Operating Year Information

RE: ERCB *Directive 039: Revised Program to Reduce Benzene Emissions from Glycol Dehydrators*

The Annual Dehydrator Benzene Inventory Submission for the 2008 operating year is due July 1, 2009, as outlined in Section 4 of ERCB *Directive 039: Revised Program to Reduce Benzene Emissions from Glycol Dehydrators*. Due to some data quality and completeness issues in past submissions, the Energy Resources Conservation Board (ERCB) is issuing this bulletin to provide further clarification and direction for companies that owned a glycol dehydrator in the province of Alberta in 2008 and are required to submit the Annual Dehydrator Benzene Inventory List in 2009.

**Note that the requirements in *Directive 039* have not changed. This bulletin is to redirect e-mail submissions to the new e-mail address at the ERCB and for clarification purposes only.**

- 1) **E-mail address change:** The e-mail address for submissions has changed. All 2009 Annual Dehydrator Benzene Inventory List submissions must be sent electronically to [BenzeneD39@ercb.ca](mailto:BenzeneD39@ercb.ca). The licensee is still required to send the submission to the ERCB as outlined in *Directive 039*, Section 4, but this year the submissions must be sent directly to the ERCB mailbox as noted above. This information will be incorporated into future revisions of *Directive 039*.
- 2) **Compliance assessment and enforcement:** ERCB compliance assessment and any related enforcement will be based upon the information provided in the annual inventory. Please ensure that you review the data for accuracy, quality, and completeness prior to submission to the ERCB. Also, be aware that information submitted to the ERCB may be subject to audit for compliance assessment purposes and enforcement may result, in accordance with *Directive 019: ERCB Compliance Assurance—Enforcement*.
- 3) **No dehydrators for the 2008 operating year but one or more in 2007:** If your company submitted information for glycol dehydrators on the 2007 inventory list but you do not have any dehydrators in 2008, you must confirm this. Please send an e-mail to [BenzeneD39@ercb.ca](mailto:BenzeneD39@ercb.ca) indicating that you did not have any dehydrator(s) in the 2008 operating year. If this information is not provided, the ERCB will be contacting you.
- 4) **Format of submissions:** Submissions must be electronic and must be in Excel spreadsheet format (not PDF), as the data are merged for provincial analysis.
- 5) **Date of submission:** In accordance with *Directive 039*, Section 4, the inventory is due no later than **July 1, 2009**. Failure to submit the inventory by July 1, 2009, may result in enforcement action in accordance with *Directive 019*.

- 6) **Inventory data completeness:** All applicable data fields must be completed for the submission to be accepted on the date of transmittal. Failure to complete all applicable data fields will result in the submission being assessed as incomplete, and it may be subject to enforcement in accordance with *Directive 019*.
- 7) **Inventory form data:** The following data problems were noted in the past on annual inventory forms completed as required in *Directive 039*, Attachment 2. The ERCB requests that you pay special attention to these fields to ensure that the data can be accepted and processed appropriately:
- a) The top row of the Excel spreadsheet specifies the **units and data type** (text or number) required. Only insert text in text fields and numbers in number fields. Do not include units in the number fields, and ensure that the number is reported in the appropriate units, as specified at the top of each column.
  - b) In **Column N, “Operating Status,”** ensure that the status is entered only as one of the types listed in the column heading.

If the dehydrator status for any portion of 2008 was “operating” as a dehydrator, the remainder of the data fields must be completed. If the unit was shut in, decommissioned, bypassed, and/or operating as a separator for all of 2008, the remainder of the data fields for this dehydrator unit can be left blank.

- c) **Column Y, “Emission Control Method,”** must be completed and must be consistent with the accepted benzene emission control rate allowed. The following benzene emissions control rates are accepted: Flare = 90%, Incinerator = 95%, Condensers and/or tanks = 0%, unless manufacturer’s specifications indicate otherwise for the operation of the unit or end-of-pipe testing is completed to verify the efficiency of the unit in the given service. See the ERCB Frequently Asked Questions (FAQs) on the ERCB Web site [www.ercb.ca](http://www.ercb.ca); follow the links to the *Directive 039* Web page to find the FAQs items 20 and 21. If a condenser tank is assigned recovery efficiency other than 0%, it may be subject to audit.
- d) **Column AA, “Installation Details, Date of Installation/Relocation, if known,”** must be completed with a year only. Do not enter the day and month in this column. If the dehydrator was installed prior to January 1, 1999, the 1998 year can be entered as a default if no further information is available.
- e) **Column AH, “Distance to Closest Residence,”** must be completed with the **actual distance** to the nearest residence **or** with “<750” metres (m) or “>750” m as appropriate. Please remember, do not put the units in this column, and ensure that the distance entered is in metres.
- f) **Column AI, “Were residents contacted?”** The licensee is not required to contact the same residents year after year, but is required to ensure that within 12 months any new residents within 750 m are notified of the dehydrator and regulatory status of the unit, in accordance with the Canadian Association of Petroleum Producers (CAPP) document *Best Management Practices for Control of Benzene Emissions from Glycol Dehydrators*, Section 11. If all residents within 750 m of the unit have been notified, in accordance with *Directive 039*, Section 1, **in 2008 or an earlier year**, the licensee must enter “Yes” in this column.

Complete this column with “Yes” or “No” only (do not use “NA,” “not required,” etc.). This column may be left blank only in accordance with item (b) above (operating status), if the

dehydrator was shut in, decommissioned, bypassed, and/or operating as a separator for the entire 2008 operating year.

For additional information, please see the ERCB FAQs on the ERCB Web site [www.ercb.ca](http://www.ercb.ca); follow the links to the *Directive 039* Web page to find the FAQs. You may also contact Catherine Thistlethwaite directly at 403-297-6918 or via e-mail at [Benzened39@ercb.ca](mailto:Benzened39@ercb.ca) if you have questions regarding this bulletin or *Directive 039* requirements.

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