

# Bulletin 2009-44

December 16, 2009

## Reminder of the January 1, 2010, Fugitive Emissions Program Effective Date

The Energy Resources Conservation Board (ERCB) *Directive 060: Upstream Petroleum Industry Flaring, Incinerating, and Venting* (November 2006) contains the requirements for fugitive emissions management in Section 8.7. These requirements resulted from the work of a Clean Air Strategic Alliance (CASA) multistakeholder team in 2004.

The ERCB will be ensuring compliance with the requirements in Section 8.7 of *Directive 060* effective January 1, 2010. These requirements will be interpreted as follows:

### Enforcement Items

Section 8.7: Fugitive Emissions Management reads:

- 1) Operators must develop and implement a program to detect and repair leaks.

Noncompliance with this requirement is assessed as **High Risk**: Failure of the operator to develop and implement a fugitive emissions program to detect and repair leaks.

To be considered a “program,” the following must be met:

- The program must be implemented at the facility to detect and repair leaks. “Facility” includes all facilities requiring a licence under *Directive 056: Energy Development Applications and Schedules*.
- The program must address leak repairs within the timeframe required. Simple repairs must be done in 45 days; repairs requiring a major shutdown (complex repairs) must be done during the next shutdown.
- Repairs that meet the economic test in the Canadian Association of Petroleum Producers (CAPP) *Best Management Practice for Fugitive Emissions Management* must be made.

Section 8.7 item (1) further states:

- a) These programs must meet or exceed the CAPP *Best Management Practice for Fugitive Emissions Management*.

Noncompliance with 1(a) is assessed as **Low Risk**: Failure of the fugitive emissions program to meet the CAPP *Best Management Practice for Fugitive Emissions Management*:

- Components are not being monitored with the minimum frequency provided in Appendix 1 of the CAPP *Best Management Practice for Fugitive Emissions Management* or the company is unable to show that based on historical data at the facility, including surveys or other credible facility-specific operating data, a lower or higher frequency is warranted.

- Leaking components have not been identified and/or record keeping does not meet minimum information recommended in Appendix 3 of the CAPP document. This would include records of repairs of leaking components, including leak repair frequency.

#### **Further Information**

*Directive 060* is available from ERCB Information Services, 640 – 5 Avenue SW, main floor; telephone: 403-297-8311; fax: 403-297-7040; e-mail: [infoservices@ercb.ca](mailto:infoservices@ercb.ca). The directive is also available on the ERCB Web site [www.ercb.ca](http://www.ercb.ca).

CAPP's *Best Management Practice for Fugitive Emissions Management* is available at [www.capp.ca](http://www.capp.ca) under Library & Statistics : Publications : Policy and Regulatory.

If you have any questions regarding this bulletin, you may contact Al Duben at 403-588-2272 or Jim Spangelo at 403-297-3566 or send an e-mail to [fugitives@ercb.ca](mailto:fugitives@ercb.ca).

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