

Mike Gardner

To: COGCC Field Inspection Personnel
Subject: Enclosed Combustors - Temporarily Out of Service

The Colorado Air Pollution Control Division (APCD) currently requires the use of air pollution control equipment (e.g., enclosed combustors) on all produced water and condensate storage tanks with ≥ 2 tpy uncontrolled VOC emissions. TEP utilizes enclosed combustors (ECDs) to comply with this regulation. When uncontrolled emissions fall below the 2 tpy threshold, TEP will often disconnect the ECD from the tank battery. However, due to the potential of a future increase in the facility emissions or a future reduction of the control threshold, TEP will often elect to leave the ECD in place. An ECD in this status is not “unused equipment”, it is temporarily out of service.

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