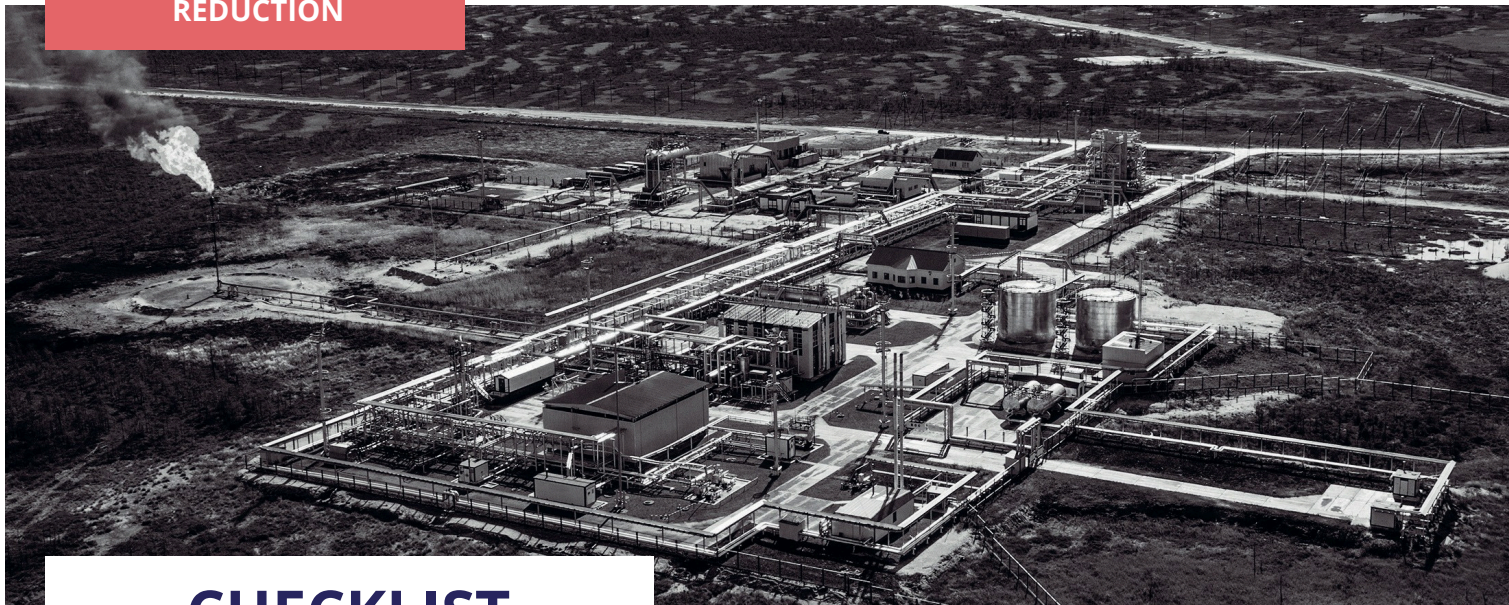


**EMISSIONS
REDUCTION**



CHECKLIST

CLOSED VENT SYSTEM COMPLIANCE

COMPLIANCE CERTIFICATION CHECKLIST FOR OOOO(a/b/c)



CANUSAEPC.COM

SUMMARY

EPA 40 CFR Part 60 establishes emission reduction standards for the control of methane and other VOCs emitted from onshore facilities. Subpart OOOOa, b, and c of EPA 40 CFR Part 60 detail measures for proper Closed Vent System (CVS) design.

CANUSA EPC is here to help with code interpretation, requirement clarification, compliance evaluation, and certification. Enclosed is a framework detailing steps to prepare for a OOOO(a/b/c) Closed Vent System Compliance Evaluation.

DO YOU REQUIRE A CLOSED VENT CERTIFICATION?

Storage vessel facilities with a PTE equal to or greater than 6tpy of VOCs are required to reduce emissions by 95% under OOOO via a control device. This can be by means of recapture (VRUs) or flaring. Applicability to subpart OOOO, OOOOa, OOOOb, or OOOOc is determined by site construction or modification date, according to the table inside.

CONNECT

CAN: 403-723-4256
USA: 833-744-4887
info@canusaepc.com
LinkedIn.com/company/CANUSAEPC

INSTRUMENT GAS ALTERNATIVES COMPARISON



Applicability to subpart OOOO, OOOO(a), OOOO(b), or OOOO(c) is determined by site construction or modification date, according to the following table:

Table 1. OOOO Applicability Dates

SUBPART	APPLICABLE DATES
40 CFR 60, Subpart OOOO	After 8-23-2011 and on or before 9-18-2015
40 CFR 60, Subpart OOOOa	After 9-18-2015 and on or before 12-6-2022
40 CFR 60, Subpart OOOOb	After 12-6-2022
40 CFR 60, Subpart OOOOc	Before 12-6-2022

Required Information for Certification

	Required Data	Possible Sources
Process Flow Information	☐ Process Summary/Configuration	• PFD • P&IDs
	☐ Major + Minor CVS Contributors	• P&IDs
	Operating Conditions ☐ Temperatures ☐ Pressures ☐ Flow Rates	• Historical Meter Data
	Stream Compositions ☐ Gas ☐ Oil ☐ Water	• Natural Gas Analyses • Oil/Water Flash Liberation Analyses
	☐ Atmospheric Pressure ☐ Max. Temperature at Site	
Closed Vent System Specifications	☐ Tank/Header Configuration	• PFD • P&IDs
	Pipe Geometry ☐ Diameter/Schedule ☐ Lengths ☐ Fitting Count ☐ Elevation Change	• P&IDs • Isometric Drawings • Photographs • CANUSA EPC Walk-Down
	Equipment Specifications ☐ Relief Device Set Pressures ☐ Dump Valves ☐ Pneumatic Controllers ☐ Emission Control Devices	• Vendor Documentation • Data Sheets • Nameplates
Documentation	☐ Site-Specific CVS Monitoring Plan	

If the above documents are not available, CANUSA EPC can produce as-built packages as an additional service to OOOO compliance project scope.



Completing the Certification Process

Following information gathering and a potential walkdown, CANUSA EPC will simulate the process, evaluate system and equipment performance, and determine compliance.

CANUSA EPC will provide a PE stamped closed vent system memo stating compliance with the specified code. The memo is a formal document that is stamped by a professionally licensed engineer of our organization. This document provides confirmation that the closed vent system and control device can handle all emissions from the specified facility without venting VOCs during normal operation.

Along with the certification of the closed vent system, operation of the system requires inspection for leaks and must occur based on the [OOOO regulations](#) on startup. This is commonly done with an optical camera for leak detection or a sensor that is used to inspect the leak points of the system.

External Sources: <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-OOOO#60.5411>

CAN: 403-723-4256 USA: 833-744-4887
info@canusaepc.com
[Linkedin.com/company/CANUSAEPCC](https://www.linkedin.com/company/CANUSAEPCC)

[CANUSAEPCC.COM](https://canusaepc.com)