

# Regulatory Update (Suncor & Oil & Gas)

City Council Meeting, May 6, 2024 Dr. Rosemarie Russo

## Industrial Pollution Prevention (GEMMs 2) HB 24-1339 (Rep Weissman)

- AFLCIO and Commerce City Chamber Opposed
- Health Advocates Support
- AQCC Composition
- GEMMs and Environmental Justice Standards

Did not pass Committee



Media

Date	Impact	Location/Unit	Summary	Permit Limit	Exceedance	Impact
3/8/2024	Air	Plant 1 – Main Flare	The Hydrogen Sulfide (H2S) concentration in the Plant 1 Main Flare increased as a result of the startup of the Hydrogen Unit	Title V Operating Permit 960PAD120, Condition 29.9: Plant 1 flare gas shall not exceed <b>162 ppmv</b> H2S averaged over a 3-hour period.	319 ppmv	CCNDAM - NOT TRIGGERED
3/5/2024	Air	Plant 1 – Main Flare	The hydrogen sulfide (H2S) concentration in the Plant 1 Main Flare increased as a result of a planned shutdown.	Title V Operating Permit 960PAD120, Condition 29.9: Plant 1 flare gas shall not exceed <b>162 ppmv</b> H2S averaged over a 3-hour period.	308 ppmv	CCNDAM - NOT TRIGGERED

Suncor Air Exceedance Reports

Community

The No. 1 Sulfur Recovery Unit

Date	Impact	Location/Unit	Summary	Permit Limit	Exceedance	Impact

lbs/hr.

Title V Operating Permit

960PAD120, Section II,

shall not exceed 15.68

Condition 20.1 – SO2 from

the tail gas incinerator (H25)

33.00 lbs/hr

**CCNDAM** -

TRIGGERED

NOT

Suncor Air Exceedance Reports

(SRU) closed due to a malfunction. The malfunction resulted in increased sulfur Plant 1 – Tail dioxide (SO2) concentrations in the Plant 1 Tail Gas Incinerator Gas 2/26/2024 (H-25). Air Incinerator (SRU) closed due to a Plant 1 – Tail Gas 25) (H-25). Air

The No. 1 Sulfur Recovery Unit Title V Operating Permit 960PAD120, Section II, malfunction. The malfunction Condition 20.1 – SO2 from resulted in increased sulfur the tail gas incinerator (H25) dioxide (SO2) concentrations in **CCNDAM** shall not exceed 15.68 incinerator (H- the Plant 1 Tail Gas Incinerator NOT lbs/hr. 19.11 lbs/hr **TRIGGERED** 2/25/2024 On February 25, 2024 at approximately 7:15 a.m., the net Maintain the net heating value heating value in the combustion in the combustion zone Maintain the net heating value in zone of the Plant 1 Main Plant the combustion zone (NHVcz) of (NHVcz) of the Plant 1 Main Plant 1 - Main Flare dropped below 270 Btu/scf Plant Flare above 270 the Plant 1 Main Plant Flare below NOT

CCNDAM -

#### Media Location/Unit Summary **Permit Limit** Impact

An increase in the H2 flow to the Title V Operating Permit flare header and exceeded the capacity of the Flare Gas 96OPAD120, Condition 29.9: Recovery Unit (FGRU), which in Plant 1 flare gas shall not

Date

2/11/2024

2/11/2024

Air

Air

Flare

Flare

turn caused hydrogen sulfide Plant 1 - Main (H2S) rich gases to be routed to averaged over a 3-hour the Plant 1 Main Flare

capacity of the Flare Gas

the Plant 1 Main Flare

turn caused hydrogen sulfide

An increase in the H2 flow to the

flare header and exceeded the

turn caused hydrogen sulfide

capacity of the Flare Gas

the Dient 1 Main Flore

Plant 1 - Main (H2S) rich gases to be routed to averaged over a 3-hour

Plant 1 - Main (H2S) rich gases to be routed to averaged over a 3-hour

Suncor Air Exceedance Reports

exceed 162 ppmv H2S period.

An increase in the H2 flow to the Title V Operating Permit flare header and exceeded the

Recovery Unit (FGRU), which in Plant 1 flare gas shall not

Recovery Unit (FGRU), which in Plant 1 flare gas shall not

period.

exceed 162 ppmv H2S

Title V Operating Permit

exceed 162 ppmv H2S

96OPAD120, Condition 29.9:

320 ppmv - 3 hrs 960PAD120, Condition 29.9: hrs

Exceedance

Maximum H2S was 320 ppmv - 3 NOT

Maximum H2S was 320 ppmv - 3 NOT

**CCNDAM** -TRIGGERED

CCNDAM -

Community

**CCNDAM** -

**TRIGGERED** 

NOT

**Impact** 

			Suncor A	ir Exceedance Reports		
Date	Media Impact	Location/Unit	Summary	Permit Limit	Exceedance	Community Impact
			·			
1/31/2024	Water		Water in Lagoon No. 2, which is upstream of Outfall 002B, was found to have an elevated benzene concentration. Internal outfall exceeded limit - next day Outfall was tested - under limit.	Applicable daily maximum permit limit of 5 ug/L.	7 ug/L	Unknown
1/19/2024	Air		The No. 1 Crude Unit and the No. 2 HDS maintenance activity caused a release of hydrogen sulfide (H2S).	Title V Operating Permit 960PAD120, Condition 29.9: Plant 1 flare gas shall not exceed 162 ppmv H2S averaged over a 3-hour period.	292 ppmv	CCNDAM - NOT TRIGGERED

1/19/2024	Air	Plant 1 - Main Plant Flare	The No. 1 Crude Unit and the No. 2 HDS maintenance activity caused a release of hydrogen sulfide (H2S).	Title V Operating Permit 96OPAD120, Condition 29.9: Plant 1 flare gas shall not exceed <b>162 ppmv</b> H2S averaged over a 3-hour period.	292 ppmv	CCNDAM - NOT TRIGGERED
			Hazardous waste (F038) was released to soil . Remediation completed by January 22, 2024. All waste generated as a result of the release (including exceptated)			

completed by January 22, 2024.
All waste generated as a result of the release (including excavated soil and decontamination materials) was managed and
Plant 1 – Tank disposed of as hazardous waste

1/18/2024 Soil 60 six days later. 16 ounces CERCLA limit 5,376 oz Unknown



#### Oil and Gas Update

#### SB: Exemption from Forced Pooling (3/13/24)

- (1) Exempt government-owned minerals;
- (2) Ensure that evidence of the 45% mineral threshold for forced pooling is supported by real evidence; and
- (3) Ensure that forced pooling happens before wells are drilled and/or minerals are extracted.

www2.leg.state.co.us/CLICS/CLICS2024A/commsumm.ns f/signIn.xsp



### Thank-you!

rrusso@c3gov.com