

## - M E M O R A N D U M -

**DATE:** February 24, 2011

**TO:** Michael Gange, City of Fort Worth

**FROM:** Mike Pring, Eastern Research Group (ERG)  
David Ranum, Sage Environmental Consulting LP

**RE:** **INTERIM POINT SOURCE REPORT ADDENDUM**

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On February 10, 2011, ERG provided the City of Fort Worth with an interim report presenting preliminary results from Phase I of the point source survey effort (August 30, 2010 to October 22, 2010). Subsequent to submittal of the interim report, additional quality assurance (QA) activities have been conducted for the two sites that were shown to have preliminary emissions greater than 25 tons per year of Volatile Organic Compounds (VOC). These sites were site 192 (2299 Mercado Dr), and site 86 (11398 West FWY).

As a result of this additional QA activity, the following information is being revised through this addendum:

- A “B” flag has been added to site 192 (2299 Mercado Dr.) to reflect that preliminary emissions for this site were based on a single canister sample; and
- The preliminary VOC estimate for site 192 (2299 Mercado Dr.) has been revised from 103.78 (tons/yr) to 0.353 (tons/yr) due to a correction made in the calculation for one of the 18 emission points tested at the site.

No change has been made to the preliminary data for site 86 (11398 West FWY) at this time. Again, these results, and those previously provided in the Interim Point Source Report, are preliminary and are subject to change.



## MEMORANDUM

Date: February 28, 2011

To: The Honorable Mayor and Members of the City Council  
Tom Higgins, Interim City Manager

From: Michael A. Gange, Assistant Director  
Transportation and Public Works Department

Subject: Calculation Error in the Natural Gas Air Quality Study – Interim Report

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Mayor, per your request, this memorandum summarizes the calculation error in the Natural Gas Air Quality Study – Interim Report prepared by Eastern Research Group, Inc. (ERG). To be clear, all data within the Interim Report is preliminary and as such may be subject to change.

ERG has discovered an error in the emission calculation for the 2299 Mercado Drive site. The Interim Report incorrectly showed this site as having the largest emissions found, when in fact the site's emissions are well below the lowest air permit level.

Gas well sites producing less than 25 tons per year of Volatile Organic Compounds (VOC) would qualify for the Permit by Rule (PBR), the state's lowest level of air permit. Based on the corrected calculation, the Mercado site's emissions were measured to be less than a half a ton per year (0.353 tons/year) of VOC rather than the initial reported emissions of more than 100 tons per year (103.78 tons/year). This corrected result puts the site well within the limits for the PBR. Gas well sites producing more than 25 tons per year of VOC emissions must apply for the next level of air permit, the Standard Permit.

According to ERG, this error was found among a multitude of calculations used to derive the annual emissions. Corrective actions have been taken by ERG to prevent such errors in the future.

The Final Report will contain field data, laboratory data, emission calculations, and other detailed Point Source Emission data to thoroughly document the process, provide accurate calculations, and provide comprehensive conclusions about air quality impacts from gas drilling and production. ERG is currently processing all the data from the almost 400 point source emission site visits.

Throughout this unprecedented process, the Gas Well Operators have worked with ERG to allow open and unannounced access to their operations. We greatly appreciate their continued cooperation on this important study that will surely be a model for other communities across the nation.

The Final Report is due to the City of Fort Worth on June 30, 2011.

Please contact me at 817.392.6569 with questions you may have regarding this information.

Cc: Fernando Costa, Assistant City Manager  
Greg Simmons, P.E., Acting TPW Director