

>>> "Justin Carter" <justinc@lesair.com> 5/27/2008 2:56 PM >>>
Ms. Amoroso,

In response to the topics covered during the May 13th Ozone Stakeholder's meeting Lesair is submitting these comments on the proposed rule language for condensate storage tank controls.

Lesair strongly feels that the proposed switch from the system-wide control requirements to the threshold based control requirements puts an unnecessary strain on the oil and gas industry and does little to simplify the Division's role in tracking the placement of controls.

The current system allows for control devices to be out of service (intentionally or unintentionally) for short periods of time without it becoming a compliance issue. It has been our experience that operators are controlling emissions above and beyond the minimum requirements so that in instances of controls being out of service, the required emission reductions are still being met. The current system-wide control requirements allow industry to have operational flexibility with the installation, operation and maintenance of control devices while meeting the required emission reductions set forth by the Division.

The proposed threshold based control system requires a much more rigid approach to emission control. Under this proposed system, instances when controls are out of service (intentional or unintentional) could be considered potential sources of exposure or violations and could add an additional enforcement burden on the Division. We understand that language has been developed to address instances of control down time but the proposed approach would further complicate the reporting, recordkeeping and enforcement necessary to implement this type of requirement. The system-wide approach, having operational flexibility also has the potential to increase field-wide compliance due to the fact that industry can approach the required emission reductions in a way that best suits their business plan.

During the May 13th meeting, it was presented that one of the Division's main motivations for switching from a system-wide to a threshold based system was to ease confusion in regards to the Division knowing exactly where every control device is located in the field. There was some concern that the system-wide approach, which allows operators to move control devices around as needed can leave some question about exactly

which sites are controlled and which are not. It is unclear how the proposed changes will make the tracking of controls simpler since the installation or removal of controls is currently required to be reported monthly during the ozone season and two additional reports are required during the non-ozone season (February & November).

Reducing VOC emissions from condensate storage tanks can be achieved through many different approaches and will be most effective when there are benefits to both the Division and to industry. The current system-wide approach allows the Division to regulate emissions, remain aware of the location of control devices and can simply be modified for further emission reductions (increasing the requirement from 75%). This system also benefits industry by providing flexibility in the operation of control devices while still meeting the required emission reductions and potentially increasing field-wide compliance. As such, both the Division and industry would benefit by retaining the current system-wide emission control strategy.

Please feel free to contact me if there are any further questions or concerns in regard to this issue.

Justin Carter

Lesair Environmental, Inc.

10394 W. Chatfield Ave., Suite 100

Littleton, CO 80127

Bus: (303) 904-2525

Fax: (303) 904-7374

Ms. Amoroso,

On the behalf of Petroleum Development Corporation (PDC) Lesair is submitting these comments on the proposed rule language for condensate storage tank controls presented at the May 13th Ozone Stakeholder's meeting

The proposed move from the system-wide control requirements to the threshold based control requirements puts an unnecessary strain on the oil and gas industry and does little to simplify the Division's role in tracking the placement of controls.

The system-wide approach allows for control devices to be out of service (intentionally or unintentionally) for short periods of time without becoming a compliance issue. PDC and other operators in the industry have been controlling emissions above and beyond the minimum requirements so that in the event that controls are out of service, the required emission reductions are still being met. The current system-wide control requirements allow operational flexibility with the installation, operation and maintenance of control devices while meeting the required emission reductions set forth by the Division.

The threshold based control system being proposed requires a much more rigid approach to emission control. Under this proposed system, instances when controls are out of service (intentional or unintentional) could be considered potential sources of exposure or violations and could add an additional enforcement burden on the Division. We understand that language has been developed to address instances of control down time but the proposed approach would further complicate the reporting, recordkeeping and enforcement necessary to implement this type of requirement. The system-wide approach also has the potential to increase field-wide compliance due to the fact that industry can approach the required emission reductions in a way that best suits their business plan.

During the May 13th meeting, it was presented that one of the Division's main motivations for switching from a system-wide to a threshold based system was to ease confusion in regards to the Division knowing exactly where every control device is located in the field. There was some concern that the system-wide approach, which allows operators to move control devices around as needed can leave some question about exactly which sites are controlled and which are not. It is unclear how the proposed changes will make the tracking of controls simpler since the installation or removal of controls is currently required to be reported monthly during the ozone season and two additional reports are required

during the non-ozone season (February & November).

VOC emission reductions from condensate storage tanks can be achieved through many different approaches and will be most effective when there are benefits to both the Division and to industry. The current system-wide approach allows the Division to regulate emissions, remain aware of the location of control devices and can simply be modified for further emission reductions (increasing the requirement from 75%). This system also benefits industry by providing flexibility in the operation of control devices while still meeting the required emission reductions and potentially increasing field-wide compliance. As such, both the Division and industry would benefit by retaining the current system-wide emission control strategy.

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Littleton, CO 80127

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>>> <Fiedler.Kerri@epamail.epa.gov> 5/13/2008 6:56 AM >>>

Dena, thank you for your email regarding questions on Colorado's Reg. 7.

Section II.C.1. We understand this requirement is for pre-1989 sources (existing sources). The language currently states these sources "shall utilize RACT." We believe this language should remain in the SIP. The language should require existing sources to continue to operate RACT in accordance with their permits.

Sections XII.A.2.a. - g. We note these requirements only appear in the system wide approach option for Reg. 7. We disagree that Section XII.A.2.h supersedes Sections XII.A.2.a. - g. because Section XII.A.2.h. does not cover the summertime ozone season (May 1 - September 30), and the time frames for Section XII.A.2.c (2007-2011) and Section XII.A.2.d. (2012 and beyond) have not expired. In addition, even for those provisions for which the compliance dates have passed, we believe it is premature to remove these requirements because the compliance dates were relatively recent. We believe we may still be within the time frame where compliance with these requirements could be relevant.

Finally, I would like to thank you for sending your questions to me via email. In order to facilitate the SIP process, it is important to allow other EPA programs (outside the Air Planning Program) such as counsel, enforcement and headquarters an opportunity to review and provide comment on draft language as necessary. This has helped with EPA's approval of Reg. 7 in the past. Please let me know if you have any questions or need further clarification. Thanks, Kerri

>>> <Fiedler.Kerri@epamail.epa.gov> 6/2/2008 1:21 PM >>>

Theresa, this is the first email of 2 on additional comments for Reg. 7. Also, please note the additional comments in bold on my previous comments. Please call me if you have any questions. Thanks, Kerri

Reg. 7:

1. In APCD's proposal, Section I.B.2.a of Reg. 7 would be changed to provide that existing sources shall comply with any RACT requirements incorporated into their permit. Probably should be "permits."

While I think we understand and agree with the concept, this language may be insufficient to achieve the goal. The basic question I have is, how will an inspector and state/EPA/public permit reviewers know whether a requirement in a permit is a RACT requirement? This is essentially an anti-backsliding provision. There has to be sufficient specificity so

that EPA and others can enforce it and to have a basis to object if a source seeks to change a RACT limit in a permit. I haven't seen an actual permit, so I don't know whether the RACT requirements were specifically identified. We should ask the state. If RACT requirements weren't specifically identified in the permits, we need to discuss how to deal with this fundamental issue.

2. The draft of Reg. 7 retains language in I.C that alludes to the potential for limiting emissions to avoid RACT. However, APCD is proposing to delete various provisions in II.C that pertain to taking synthetic minor limits to avoid RACT. It's not clear how these changes and non-changes marry up or whether they make sense.

3. It would be helpful to have APCD explain the draft changes in II.C, including the geographic restrictions - i.e., "sources in the 1-hour ozone non-attainment area," "area previously designated as a 1-hour ozone nonattainment area," "any ozone nonattainment area that was not previously part of the 1-hour ozone nonattainment area."

One question is whether the intent behind II.C.1.a is to lock sources in to either meet existing RACT requirements or meet existing synthetic minor requirements in their permits. In other words, with the elimination of the existing language on synthetic minor limits, would sources now be prohibited from taking a syn. minor limit to get out of RACT? This is relevant to the question regarding section I.C, above.

The same question posed in number 1 also pertains here: how will we or others know whether a limit is a RACT limit or a limit taken to avoid RACT?

4. II.C.2 applies to existing sources in a nonattainment area not previously part of the 1-hour ozone nonattainment area. This doesn't fit with the general heading for section II.C, which says, "for sources in the 1-hour ozone nonattainment area." Either II.C.2 has to be changed to II.D or the overall heading for II.C has to change.

5. II.C.2.B requires existing sources to use RACT pursuant to Reg. 3. The cross-reference should be to Section III.D.2, not II.D.2.

The logic behind the alternate deadlines for compliance is not clear. Is it a potential problem that the later deadline could be longer than 3 years after the nonattainment designation? How does the state intend to factor this requirement into attainment modeling?

6. II.C.2.a should be "II.C.3.a or A. Again, the cross-reference for the RACT requirement should be to Section III.D.2, not II.D.2.

One question we may want to ask Colorado is why they don't switch to a BACT requirement instead of RACT. Other Region 8 states have done this, and it may result in more stringent limits, etc., which may make sense if the area will have difficulty attaining the NAAQS. Theresa - did I hear correctly at the stakeholder meeting that BACT is RACT in this case?

7. XII.A.1.c ties applicability to APEN reporting thresholds in Reg. 3. I can't recall whether Reg. 3 APEN stuff is part of the SIP. If it isn't then I think we should insist that the thresholds be spelled out right in Reg. 7, so they can't be changed without our approval. Even if Reg. 3 APEN stuff is part of the SIP, I think it would be much easier to work with this Reg. 7 if the thresholds were spelled out right in Reg. 7. It's inconvenient to have to look to another Reg. to see whether a source is subject to the requirements.

Also, I'm concerned that the applicability provisions may be too vague. Is an inspector going to know which tanks to consider?

Also, what is the reason for the change in language? The current reg. reads,

"for which the owner or operator
filed, or was required to file, an
APEN pursuant to Regulation No. 3."

The draft language reads, "for which uncontrolled actual VOC emissions from the atmospheric condensate storage tanks are equal to or greater than APEN reporting thresholds in Regulation 3, Part A."

So now, applicability keys off the condensate tank uncontrolled emissions. Isn't that potentially shrinking the universe of operations subject to the requirements? And won't applicability be harder to establish?

8. XII.B.7 and XII.B.9, what's the reason for choice of February 1, 2009 as the cutoff date between existing and new?

9. XII.B.10, the choice of 5% increase to define modification is troublesome. This will make enforcement very difficult because the number will differ for every source. Also, see Cindy B.'s comments.

10. XII.D., there's something missing after the word "affected" in the last line. I think it should say "affected operations" since that's the defined term.

11. XII.D.1, I find this a little odd. Is it really the condensate storage tanks that are new or modified? Seems like it's the oil and gas exploration and production operations, or maybe just the wells at such operations.

12. XII.D.1.A: Says shall collect and route emissions; should specify emissions from what - presumably the condensate storage tank. Also, later in this section, the source gets to decide on the methodology for determining VOC emissions and whether they're below the threshold. Why should this be an acceptable approach? To ensure replicability and

enforceability, the rule should specify the method to be used.

13. XII.D.1.B: How will the 98% reduction requirement be monitored and enforced? I don't think the rule has an adequate method for doing so.

14. XII.D.2: It's not clear how the ongoing system-wide approach for existing tanks will mesh with the tank-specific requirements for new and modified tanks. For example, in XII.D.2.A, 4th line from the bottom, the rule references "all the atmospheric storage tanks associated with the affected operations." Does this then include the new and modified storage tanks too? And now, even though it's a system wide reduction requirement, the rule only looks at storage tanks that exceed the APEN reporting thresholds? Before, for operators with total system emissions over 30 tons, weren't all tanks included, or am I remembering this wrong?

15. XII.D.2.A: Instead of saying "to be phased out by May 1, 2010," it should say "to be phased out as of May 1, 2010," or "to end as of May 1, 2010."

16. XII.D.2.B: Same basic comment: instead of "phased in by 2012" it should say "phased in beginning May 1, 2010" or "starting May 1, 2010."

Generally, the subsections under this heading are confusing. They should be edited/clarified.

Section XII.D.2.B(I) should be edited/clarified. Recommend a heading: "Existing condensate storage tanks equipped with Air Pollution Control Equipment as of April 30, 2010." Then maybe something like, "Owners and operators of existing condensate storage tanks equipped with Air Pollution Control Equipment as of April 30, 2010 shall continue to operate such equipment. Beginning May 1, 2010, such owners and operators shall achieve a 98% reduction of uncontrolled actual VOC emissions using such equipment on such tanks, based on a rolling twelve month average. Beginning May 1, 2010, such owners and operators shall comply with the monitoring, recordkeeping, and reporting requirements contained in sections" [Not clear this meets concerns regarding means to measure the 98% reduction requirement.]

Section XII.D.2.B.(II) should be edited/clarified along the following lines: Heading: "Existing condensate storage tanks, uncontrolled as of April 30, 2010, with actual emissions equal to or greater than 10 tons per year." Text: [[Note: It's very important that the language "by May 1, 2010 be changed." Need to indicate an ongoing requirement, which this language does not do.]] "Beginning May 1, 2010, existing condensate storage tanks, uncontrolled as of April 30, 2010, with actual emissions equal to or greater than 10 tons per year shall be equipped with air pollution control equipment and shall use such equipment to achieve a 98% reduction of uncontrolled actual VOC emissions from such tanks, based on a rolling twelve month average." Need to specify monitoring, recordkeeping and reporting requirements.

Section XII.D.2.B.(III) should be edited/clarified along the following

lines: Heading: "Existing condensate storage tanks, uncontrolled as of April 30, 2010, with actual emissions less than 10 tons per year but equal to or greater than 5 tons per year." Text: [[Note: It's very important that the language "by May 1, 2011 be changed." Need to indicate an ongoing requirement, which this language does not do.]] "Beginning May 1, 2011, existing condensate storage tanks, uncontrolled as of April 30, 2010, with actual emissions less than 10 tons per year but equal to or greater than 5 tons per year shall be equipped with air pollution control equipment and shall use such equipment to achieve a 98% reduction of uncontrolled actual VOC emissions from such tanks, based on a rolling twelve month average." Need to specify monitoring, recordkeeping and reporting requirements.

Section XII.D.2.B.(IV). Same approach as above.

17. XII.D.3: How will the control efficiency be monitored/confirmed?

18. XII.E.: The reference to XII.E doesn't seem appropriate. Should be referencing the prior sections that impose controls.

19. XII.F.5: This specifies recordkeeping for the threshold control strategy. It doesn't seem specific enough to ensure the necessary info will be available to inspectors. In particular, XII.F.5.A doesn't indicate the info the spreadsheet must include.

20. Where's the recordkeeping for sources subject to XII.D.1, "New and Modified Condensate Tanks?"

21. Section XII.F gets pretty hard to follow. Recommend separating recordkeeping and reporting into two sections.

22. There are a number of other errors in cross-references and missing words. Whole draft needs to be carefully reviewed.

23. XII.F.6.B: The cross-referencing is messed up. Also, is the intent that the exemption only apply for the system-wide requirements? It's not clear from the text, and the heading may not settle the matter if a dispute arises. In fact, it appears that other stuff under the heading of XII.F.6 isn't related to "Reporting for tanks subject of the system-wide control strategy..." For instance, alternative emissions control equipment under XII.F.6.C. XII.F.6.C.(II) through (VI) should be changed to subheadings under XII.F.6.C.(I).

24. XII.F.7 cross-references the wrong section.

XII.F.7.C: What's the justification for the 100-hour exemption from shutdown reporting? Also, it's not clear that the language beginning with the second sentence belongs in the same section.

There appears to be language missing in subsection XII.F.7.C(III).

-----Kerri Fiedler/P2/R8/USEPA/US wrote: -----

Subject: Request Comments by Friday, 5/23

Colorado is revising Reg. 7 and Reg. 3. Could you please review the attachments and provide me with any comments you may have by Friday, 5/23? I appreciate your help. Please note I will be out of the office from May 16 - May 26. Thanks, Kerri

Following are my comments on the draft language for your reference:

Reg 3 Exemptions:
No comments.

Case-by-case RACT:

1. Page 3, II.C.2. Why is there a delineation between the 1-hour ozone nonattainment area and any ozone nonattainment area?
2. Page 3, II.C.2.A. The language, "after an EPA publication in the Federal Register" should be changed to "from the EPA effective date". Kerri, I don't think we care if their trigger for a RACT analysis and permit mod is publication in the FR. As far as I can tell, this is not something dictated by the CAA.
3. Page 3, II.C.2.B. The language, "after an EPA publication in the Federal Register" should be changed to "from the EPA effective date". Same comment.

Condensate Tank Threshold:

Please note there is not a redline/strikeout version as the entire regulation has been reformatted and reorganized.

Also, please note the division is moving from a system wide emission approach to a tank by tank emission rate.

1. Page 1, XII.A.3. Delete "only" as Section XII.G. refers to Sections XII.H. and XVI. They may want to say only subject section XII.G, XII.H, AND XVI.
2. Page 1, XII.B.2. Cindy - Is the definition of "Air Pollution Control Equipment" capture all equipment? Should the definition include flares? Are there other types of equipment out there?
3. Page 1, XII.B.2. The reference to Section XII.A.9 is not correct.
4. Page 2, XII.C.2.C. The language, "approved by the division" should be removed, or add "and EPA". Cindy - are there "other convenient means" out there?
5. Page 3, XII.C.3.B. The reference to Section XII.B.3.B.II should be Section XII.C.3.B.II. I think the same cross-reference problem occurs in XII.C.3.B(I).
6. Page 3, XII.C.3.B.II. The reference to Section XII.B.3.B.I should be Section XII.C.3.B.I.
7. Page 4, XII.D.1.A. The reference to Section XII.C.2.B is incorrect. Is the referenced threshold limits equal to the APEN limits

of 1 ton per year in the nonattainment area and 2 tons per year statewide? I'm thinking they meant XII.D.2.B, but since that section contains various thresholds, it's hard to know what they intend. Needs to be clarified.

8. Page 5, XII.E.1., XII.E.2., XII.E.3.B. Delete the language "or other means approved by the division," or add "and EPA". Cindy - are there "other means" out there?

9. Page 5, XII.E.3.A. The reference to Section XII.D.2.B is incorrect. Or if it is correct, it's too imprecise to be understood.

10. Page 7, XII.F.4.j. The reference to Section XII.C.3. should be XII.E.

11. Page 8, XII.F.6.A.II. The reference to Section XII.B.3 should be XII.C.3.

12. Page 10, XII.F.7. The reference to Section XII.C.3.B should be XII.D.2.B. Actually, I think it should be to XII.D.1.A, or maybe XII.D.1; it's a little hard to tell.

>>> <Fiedler.Kerri@epamail.epa.gov> 6/2/2008 1:25 PM >>>

Theresa, here is the second email on comments to Reg. 7. Please note the comments in bold are to previous comments sent on May 28. As before, please call me if you have any questions. Thanks, Kerri

Subject: Re: Request Comments by Friday, 5/23

Kerri -

Here are my comments (would have been easier to mark-up a Word document):

1. Pg 1, XII.A.1 there is no Section XII.F.2.b
2. Pg 1, XII.A.1.b ... to "That are located upstream of a natural gas plant", I would add "or delivery to a gas sales transmission Pipeline (I have seen some compressor stations that feed directly into a sales P/L without going through a gas plant)
3. Pg 1, XII.A.4 ... is this saying that ALL glycol dehydrators within the ozone non-attainment area are applicable?
4. Pg 1, XII.B.2 ... add "Flare, " in front of "Combustion device" (that would be consistent with how this is phrased in XII.C.2 and XII.C.2.c). Also, there is no XII.A.9.
5. Pg 1, XII.B.3 ... do you want to leave open for possible inclusion of produced water tanks in the future (I ask because in some places you refer just to "Atmospheric Storage Tanks", e.g. XII.B.12, XII.D, XII.D.2.a)?
6. Pg 1, XII.B.4 ... needs an open quote sign before Auto-Igniter
7. Pg 1, XII.B.5 ... "tank" should be inserted after Condensate and

- both words together should be quoted (to be consistent with format of other definitions) ... do you need to define "condensate" with respect to the API gravity?
8. Pg 2, XII.B.7 ... you should put quotes around Existing (to be consistent with format of other definitions)
 9. Pg 2, XII.B.9 ... you should put quotes around New (to be consistent with format of other definitions)
 10. Pg 2, XII.B.10 ... you should put quotes around Modified and around Modification (to be consistent with format of other definitions). Does the 5% increase refer to "actual" emissions or the potential to emit of the modification?
 11. Pg 2, XII.B.12 should "condensate" be in between "atmospheric" and "storage tanks" or did you mean to leave open for produced water tanks?
 12. Pg 2, XII.C.2 ...per the definition in XII.B.2, flares and combustion devices ARE air pollution control equipment so redundant to mention both?
 13. Pg 2, XII.C.2.a ... "shall be operated and maintained consistent with manufacturer specifications ..." ... should we add something that ties the manufacturer's guarantee of 98% emission reduction to actual operating conditions, e.g. max/min volume, pressure and composition of emission stream? Or have the Operator have that manufacturer emission reduction warranty with criteria available upon request?
 14. [[I've made some hard to see changes in this one.]]Pg 2, XII.C.2.a ... last sentence add " , or when the well is recompleted, re-fractured or otherwise stimulated , " after " the separator dumps into the tank " (then you'll be consistent with XII.D.1.a)
 15. Pg 2, XII.C.2.c for "continuous monitoring device" do you mean a device which continuously monitors the presence of a pilot flame? Does "operating properly" mean whether the pilot flame is lit or not, or more than that?
 16. Pg 3, XII.C.3.a ... "uncontrolled" should be inserted between "default" and "emission factor"
 17. Pg 3, XII.C.3.b ... insert "condensate" between "atmospheric" and "storage tanks" (unless you were leaving it open for water tanks). Is a "gas-condensate-glycol separator" part of the dehydrator, like a flash tank? What were the emission factors developed for those and how were they developed? Should this be included with the Glycol Dehydrator section? Reference should be to XII.C.3.b.ii rather than XII.B.3.b.ii
 18. Pg 3, XII.C.3.b.i ... Reference should be to XII.C.3.b.ii rather than XII.B.3.b.ii
 19. Pg 3, XII.C.3.b ... Reference should be to XII.C.3.b.i rather than XII.B.3.b.i
 20. Pg 3, XII.D ... insert "condensate" between "atmospheric" and "storage tanks" twice (unless you were leaving it open for water tanks).
 21. Pg 3, XII.D.1 ... add "Storage" between "Condensate" and "Tanks"
 22. Pg 4, XII.D.1.a ... XII.C.2.b is wrong reference APEN? XII.D.2.b?

23. Pg 4, XIID.1.b ... add citation to APEN reporting threshold, Reg 3, Part A, Section II.D ???
24. Pg 4, XII.D.2 ... ????????
25. Pg 4, XII.D.2.a ... add "Condensate" between "Atmospheric" and "Storage" twice (unless you meant to leave it open for water tanks). Add "by Operator" after "based on overall reductions ..."
26. Pg 4, XII.D.2.b.i ... "rolliing" to "rolling"
27. Pg 5, XII.D.3 ... add "flare or" between "Each" and "combustion device" (to be consistent with XII.C.2). Should we add a sentence in this subsection that says the Division could require testing to verify the 98% reduction?
28. Pg 5, XII.E.1 ... Is it assumed that new or modified tanks would install a flare or combustion device rather than a VRU? If not, then add "that have flare or other combustion device" after "subject to XII.D.1.a". Is the option to have an auto-igniter OR continuously lit pilot flame? Is the Electronic Surveillance needed for both (so added here)?
29. Pg 5, XII.E.2 ... add "flare or" between "installed" and "combustion devices" (to be consistent with XII.C.2). How do you check if an auto-igniter is properly functioning (as a compliance person I'd need to know)?
30. Pg 5, XII.E.3 ... add "flare or" between "installed" and "combustion devices" (to be consistent with XII.C.2).
31. Pg 5, XII.E.4 ... should we add a subsection that says all emissions from the tanks shall routed to the control device, i.e. no leaking gaskets or fittings, no stuck open pressure relief valves, etc. sounds like a good comment to me
32. Pg 5, XII.E.4.A and if an operator sees smoke then what?
33. Pg 6, XII.E.4.b, c, and d ... add "Storage" between "condensate" and "tank"
34. Pg 6, XII.F.3 ... whether for existing, new, or modified?
35. Pg 6, XII.F.3.a ... besides the most recent measurement of such production, should the spreadsheet capture a history of the last 12-months of production in order to do rolling twelve-month averages? (per XII.D.1.b and XII.D.2.b)
36. Pg 7, XII.F.4.f ... should we add that the Division could request testing to verify the claimed 98% emission reduction?
37. Pg 7, XII.F.5.a ... should February 1, 2009 be May 1, 2010 (per XII.D.2.b)? I think I assumed they meant to cite to XII.D.1. Please check my comments.
38. Pg 8, XII.F.6 ... should you add "Between Jan 1 - April 30 and Sep 30 - Dec31 of Each Year" at the end of this title to differentiate from XII.F.4? The two sections serve different purposes. One deals with the spreadsheet, the other deals with the reporting. No need to change.
39. Pg 8, XII.F.6.a.ii ... should be Section XII.C.3 rather than XII.B.3
40. Pg 9, XII.F.6.a.xi, delete "Division" at the end.
41. Pg 10, XII.F.6.b ... change "this" to "these". Don't you still want a small business Operator to do the Recordkeeping provisions of XII.F.4 to verify that they are < 30TPY? I think there are also some mistakes in the cross-references.

42. Pg 10, XII.F.7 ... should February 1, 2009 be May 1, 2010 (per XII.D.2.b)? I think the state may have been addressing sources subject to XII.D.1, in which case, February 1, 2009 makes sense. And reference to XII.C.3.b should be XII.D.2.b I think?
43. Pg 12, XII.H ... Are you saying if VOC \geq 15 TPY from glycol dehydrators within a fence line or site or from each glycol dehydrator must be \geq 15 TPY. Is that what "grouping" means?. Do we need to define how to estimate those emissions, i.e maximum glycol circulation pump throughput should be used, etc.