

A general comment – there are a lot of incorrect references to other sections of the regulation.

XII .B.5 Should this read “Condensate **Tank** shall mean...?”

XII.D.1.b I read this as meaning all tanks that emit 1 or more tons per year need to be controlled. I thought the new goal was to control all tanks emitting 2 or more tons per year.

XII.D.2 My analysis here makes the following assumptions:

This regulation is in effect as of May 1, 2008.
There is no 730 barrel per year production exemption.
There is no 30 ton per year per operator aggregate emission exemption.

The way I interpret this section “Existing Condensate Tanks” and using the above assumptions, the following would occur:

On May 1, 2008, aggregate uncontrolled emissions (per operator) from all tanks emitting 1 or more tons per year would need to be reduced by 75%.

On May 1, 2009, aggregate uncontrolled emissions (per operator) from all tanks emitting 1 or more tons per year would need to be reduced by 80%.

On May 1, 2010, all of the tanks controlled over the past 2 years would still need to be controlled, and would continue to need controls until they dropped below 1 tpy.

On May 1, 2010, any tank that is uncontrolled, but emits 10 or more tons per year would need to be controlled at 98%,

On May 1, 2011, any tank that is uncontrolled, but emits 5 or more tons per year would need to be controlled at 98%.

On May 1, 2012, any tank that is uncontrolled, but emits 2 or more tons per year would need to be controlled at 98%.

I thought the goal was to phase in regulations that resulted in all tanks emitting 2 or more tons per year being controlled. Under this language, there could be plenty of tanks emitting between 1 and 2 tons that need to be controlled. I don't see any phase out language for the 1-2 ton per year emitters that have controls via the system-wide approach.