

## Comments from Alan Kane

### Model General Permit Comments

#### Qualifying Criteria Document-Storage Tanks & Truck Loading (Questions 2 & 3)

- There should be no volume or vapor pressure criteria. If the tanks store more than the 8,736,000 (approx. 570 BPD) or if the vapor pressure is the limits the tanks should be controlled by a VRU if economics are favorable or a flare if the VRU is not economically feasible.

#### Qualifying Criteria Document-Engines (Questions 6 & 7)

- Stack height and property lines impacts should be determined using the EPA Screen III model including background concentrations for NOx.

### Emission Unit Terms and Conditions

#### Dehydration Systems

- c.) Operational Restrictions- Questions 4 & 5-Dehydrators that are "Area sources and minor sources less than 1 tpy of any HAP or those fitted with a condenser and combustions device should be exempt.
- d.) Monitoring and or Recordkeeping Requirements- Dehydrators that are "Area sources and minor sources less than 1 tpy of any HAP or those fitted with a condenser and combustions device should be exempt from these requirements. Compliance can be demonstrated using the GRI-Gly Calc program with a wet gas extended gas analysis, recording circulation and throughput.
- e.) Reporting Requirements- Dehydrators that are "Area sources and minor sources less than 1 tpy of any HAP or those fitted with a condenser and combustions device should be exempt.
- f.) Testing Requirements- Dehydrators that are "Area sources and minor sources less than 1 tpy of any HAP or those fitted with a condenser and combustions device should be exempt. Method 21 is difficult and like not a feasible alternative. In addition the manufacturer of the control device can guarantee a control efficiency for the unit.

(2) Emission Limitation: Applicable Compliance Method: Compliance can be demonstrated using the GRI-Gly Calc program with a wet gas extended gas analysis, recording circulation and throughput.

(3) VOC Detection: - Dehydrators that are "Area sources and minor sources less than 1 tpy of any HAP or those fitted with a condenser and combustions device should be exempt.

(4) Destruction Efficiencies: - Dehydrators that are "Area sources and minor sources less than 1 tpy of any HAP or those fitted with a condenser and combustions device should be exempt. In addition the manufacturer of the control device can guarantee a control efficiency for the unit.

(5) Performance Testing: - Dehydrators that are "Area sources and minor sources less than 1 tpy of any HAP or those fitted with a condenser and combustions device should be exempt. In addition the manufacturer of the control device can guarantee a control efficiency for the unit. Compliance can be demonstrated using the GRI-Gly Calc program with a wet gas extended gas analysis, recording circulation and throughput.

## Engines

### 2 Additional Terms and Conditions

f.) Testing Requirements-Interim compliance testing can be done using a portable analyzer with fuel metering and EPA Method 19 calculations.

Storage Tanks for water and or petroleum liquids:

a.)- Tanks fitted with a VRU and or flare along with tank truck loading should be exempt- Compliance can be demonstrated by recording flare temp. and run time, oil and water throughput and loading throughput.

### Equipment/Pipeline Leaks

#### b) Applicable Emissions Limitations and or Control Requirements

(1) Facilities should be exempt if the uncontrolled VOC emissions are less than 5 tons per year using the appropriate calculation factors (Oil and Gas Facilities).