

Well Operator Perspectives on Proposed Alternatives for Condensate Tank Controls

Presentation to the Regional Air
Quality Council and NFRMPO

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State's Alternate Proposal for Condensate Tank Controls

- Retain “system-wide” approach and increase control percentages
 - 81% system-wide control (tanks ≥ 2 tpy) in 2010
 - 90% system-wide control (tanks ≥ 2 tpy) in 2011
 - 95% system-wide control in 2011 in 2012
- Require Electronic Surveillance on tanks with uncontrolled VOC emissions ≥ 100 tpy
 - Temp. readings each hour, data collected weekly

Concerns with the Proposed 95% System-wide Control in 2012

- 95% system-wide control is essentially the “threshold” approach by another name
 - **Every** > 2 tpy tank will need to be controlled
 - 95% Control Efficiency x 100% of > 2 tpy tanks = 95% control
- Loss of flexibility and the incentive to overcontrol
- GHG disbenefit not adequately considered
- Diminishing Returns
 - Costs of Controlling 1-2 tpy tanks quite high

Well Operators' Alternate Proposal

- Retain “system-wide” approach and increase control percentages
 - 85% system-wide control (tanks > 1 tpy) in 2010
 - This is a greater emission reduction by 2010 than other proposed alternatives
- Support Surveillance of Tanks > 100 tpy
- Oppose the Rigid “Electronic” Surveillance Requirement

Potential Compromise on Tank Controls

- Retain “system-wide” approach and increase control percentages:
 - 85% system-wide control (tanks \geq 2 tpy) in 2010
 - 90% system-wide control (tanks \geq 2 tpy) in 2012
- The Local Government Coalition endorsed this approach in their Rebuttal Statement.
- The Well Operators are also willing to support this approach

Potential Compromise on Surveillance Requirements

- Allow either electronic OR daily human surveillance at tanks with uncontrolled VOC emissions ≥ 100 tpy

Statewide RICE

- Propose this be Deferred for Consideration in 2009
- New Federal Engine Standards will Deliver Benefits in the Interim
- Deferral Would Allow for a Better Fit with Requirements of the Engine NSPSs
- Still Exploring a Possible Compromise on RICE Controls



Questions?