
From: Joe Selgrath [mailto:selgrath@ix.netcom.com]
Sent: Monday, February 22, 2010 1:04 PM
To: 'Dolores Gough'
Subject: RE: BPS for Oil and Gas

Hi Dolores,

My comments follow:

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- 1) Establishment of Best Performance Standards for the Oil and Gas sector is a daunting task. There are multiple types of equipment, facility design, and operational characteristics that make establishment of a "BPS" for the oil and gas sector difficult. We recommend that the District structure BPS following the existing categories and organization of the District's BACT guidelines.
 - 2) BPS is already in effect for new sources through the District's BACT guidelines. BACT standards achieve reductions in VOC from crude oil operations, and consequently, achieve reductions in methane through these same controls. BPS should be equivalent to BACT for that category and type of source.
 - 3) BPS needs to provide exemptions for small sources small sources of GHG emissions. EPA is proposing a threshold of 25,000 MT CO₂e, and a similar threshold should be part of any BPS determination.

Thanks

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