



■ Threshold Strategy for Condensate Tanks



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Currently – System-wide Approach

- Developed as part of Early Action Compact to avoid ozone Non-Attainment designation
- Does not apply to tanks less than 730 barrels (5 TPY) which are APEN/Permit Exempt
- Regulation 7 set control requirements on a system wide basis per company
 - Stringency phased in over time
 - Stringency differed during ozone season compared to non-ozone season

System-wide has posed challenges to the Division and Sources

- Administratively complex
- Resource intensive
- New companies will have have to set up system-wide (another learning curve)
- Would need to be increased to achieve similar reductions to threshold approach

A solid black horizontal line is positioned near the top of the slide. Below it, a small square graphic is divided into four quadrants: top-left is black, top-right is teal, bottom-left is black, and bottom-right is teal. A second horizontal line, composed of alternating black and teal segments, is located below the square graphic.

Things Have Changed...

The area is now in Non-Attainment for
Ozone.

Multiple Benefits of Threshold Approach

- Equity
 - Tanks greater than 1 ton/year in NAA will need an APEN
 - Tanks greater than 2 ton/year in NAA to be controlled

- Simplistic – less resource intensive for industry and the Division
 - In the NAA
 - Control all tanks over 2 TPY
 - Reduced Recordkeeping (no spreadsheets)
 - Statewide
 - Control all NEW tanks over 5 TPY