

Pneumatics Comments from Stakeholders

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Simplify the Regulation – omit new/modified/existing.

- ◆ The Division has incorporated this comment in the most recent revision.

Is there a way to determine how many valves are out there and how much gas is vented daily/annually?

- ◆ The Division is requesting this information from stakeholders. IPAMs data provided did not include the number of valves or how much gas is vented daily per valve.

Define the Terms “Affected Operations”, “Exploration and Production Facilities”, and “Mid-stream Facilities”.

- ◆ The Division is considering incorporating these revisions.

What is the purpose of the parenthetical in XIII.I.3.A and XIII.I.3C – examples of what?

- ◆ Although the Division encourages the use of true “no-bleed” pneumatic devices, those actuated by air, the reference to these devices has been removed for clarity. Only natural gas actuated pneumatic devices are subject to this regulation.

Who is going to decide if a device is warranted by safety and/or process purposes?

- ◆ The Division has incorporated this comment in the most recent revision. The Division will make the determination if the high-bleed device is warranted by safety purposes.

What is enhanced maintenance (Section XIII.I.4.B.)?

- ◆ Enhanced maintenance is defined in section XIII.I.2 and uses the definition from EPA Gas STAR.

Should the Division include language about requiring the replacement of valves with repeat problems?

- ◆ Maintenance is only required on high bleed devices that are warranted by safety purposes, therefore requiring replacement could cause a safety concern.