

Compliance and Enforcement Division July 5, 2006 Compliance Advisory

This Advisory is provided to inform you about activities of the District which may affect your operation. It will assist you in your effort to achieve and maintain compliance with applicable air pollution rules and regulations.

ATTENTION: OPERATORS OF NATURAL GAS PRODUCTION FACILITIES (GAS WELLS)

SUBJECT: LIQUID STORAGE IN TANKS, PERMITS AND PETITIONS

To assure compliance with applicable regulations, you are reminded of the following information:

 Gas wells require a District permit: <u>Regulation 2, Rule 1</u>, (Reg. 2-1) Permits, General Requirements

Gas wells generally include a number of pieces of equipment that require a District permit, for example, <u>condensate tanks</u>, <u>water tanks</u>, <u>dehydrators and compressors</u>. If you are unsure whether the equipment at your facility needs inclusion in your permit, contact the District's Engineering Division.

Water and Condensate Tanks may require controls: <u>Regulation 8, Rule 5</u>, (Reg. 8-5),
Storage of Organic Liquids

Liquid removed from natural gas contains high levels of organic compounds and its vapor pressure is generally over 0.5 psi. Testing done to determine vapor pressure must be based on samples taken from the storage tank inlet. Tanks storing liquids with vapor pressures greater than 0.5 psi require controls in compliance with the standards in Reg. 8-5-301. Examples of controls include an approved emission control system, or, a pressure vacuum (PV) valve. If you are unsure whether the tanks at your facility need controls, contact the District's Compliance and Enforcement Division.

 Any exemption from the standards for leaking components at natural gas streams containing >90% methane requires petition approval: <u>Regulation 8, Rule 37</u>, (Reg. 8-37), Natural Gas & Crude Oil Facilities

Reg. 8-37 prohibits fugitive gas leaks greater than 10,000 ppm from gas well components. However, for gas streams containing at least 90% methane, you may petition the District for an exemption from this standard under the provisions of Reg. 8-37-404. To qualify for this exemption <u>you must submit a petition on an annual basis</u> to: MAILSTOP: PETITIONS at the address listed below.

More Information can be obtained from the following sources:

- For compliance assistance, call (415) 749-4999, the Compliance Counselor Hotline
- For a copy of the above listed rules see www.baaqmd.gov/dst/regulations
- For Compliance and Enforcement Division questions, contact Joseph Palmer, Air Quality Specialist, at (415) 749 4758 or jpalmer@baaqmd.gov
- For Engineering Division questions contact Carol Lee (415) 749 4689 or clee@baagmd.gov

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