

Summary of Changes to 28VHP Condition

- **Equipment/components**
 - that do not contain VOC such as water and air lines,
 - are in vacuum service, or
 - in systems where the VOC is vented to atmosphere such atmospheric storage tanks and process cooling water systems,are exempted from the condition because there is no real potential for air emissions from these components.
- Components in pipeline quality sweet natural gas service are clearly exempted from instrument monitoring which reflects past practice. Instrumentation systems are not subject to instrument monitoring but require weekly AVO monitoring. These systems have not been specifically addressed in the past and this will ensure consistent treatment. The method of treating instrument lines is consistent with EPA rules.
- Consolidated the new and reworked equipment/component requirements into part B of the condition.
- Generalized the open-ended line maintenance exemption and added recordkeeping.
- Added part E to specifically highlight the inspection requirements for the components not subject to instrument monitoring.
- Allowed for the use of a representative composition of the process fluid rather than require that every VOC in the stream be included in determining the process stream response factor in part F.
- Consolidated repair and retest requirements in part I. Retest of components must be completed promptly and be consistent with monitoring requirements for the component. Added a 1000 pound de minimis to delay of repair notification requirement and specified that the Executive Director as the person that can require an early shutdown.
- Renamed condition from 28VHP to 28BACT, since these are the requirements considered for BACT for fugitives.