

**Stakeholder Meeting on Draft Standard Permit and
Permit by Rule for Oil and Gas Production Facilities
April 8, 2010
9:00 a.m. – 4:00 p.m.
TCEQ Building E, Room 201S, Austin
TCEQ, Dallas/Ft. Worth, and Tyler Regional Offices**

I. Opening Remarks.....Steve Hagle, P.E.

Air Permits Division Director, Steve Hagle, P.E. gave opening remarks. Mr. Hagle said if comments cannot be addressed by the 30th of April, those comments may be submitted and will be addressed during the formal public comment period once the rule is proposed. Mr. Hagle emphasized this rulemaking has been on the horizon and has been sped up about 2 to 3 months. The Barnett Shale (Ft. Worth area) was not the primary driver for these new proposed oil and gas rules. Mr. Hagle said the primary drivers are maintenance, startup, and shutdown (MSS) to prevent case-by-case reviews, protection of human health, and Title V permits can no longer be considered insignificant sources. For example, not being able to justify how an oil and gas site with 1,000 tons per year (tpy) of nitrogen oxides (NOx) emissions under only permit by rules (PBRs), standard permit, and a federal operating permit is really an insignificant source.

NOTE – April 13, 2010- COMMENT PERIOD EXTENDED UNTIL APRIL 30, 2010

II. Discussion Topics.....Anne Inman, P.E.

Anne Inman, P.E. emphasized that this rule attempts to balance keeping a critical industry operating in the state, while being protective of human health and welfare. She then walked the group through each section of the permit by rule and took comments/questions from Austin, Dallas, and Tyler after each discussion.

Draft of Revisions to §106.352, Oil and Gas Production Facilities, Permit by Rule

Permit by Rule Sections (a) Applicability and (b) Definitions were discussed.

- **References to other rules need to be more specific. Are the requirements in this draft PBR compatible with federal rules and which would apply where one rule is more stringent than the other?** If more than one set of rules apply to a specific facility, operation, or situation, the more stringent rules will apply.
- **The definition of receptor was discussed.** The receptor definition is mainly based on previous resolutions for rock crushers. The language about leaseholders is unique to the oil and gas rules.
- **Concerning the definition of “receptor” - the phrase “building was in use” should be “is in use” why is it not?** It is correctly worded to indicate who is there first.

- **Measuring for purposes of the receptor definition is not defined clearly.** Ms. Inman said this will be looked at again.
- **The definition of “site” looks like it will result in a daisy-chain effect.** The site definitions are written to not create an infinite daisy-chain. Plants within ¼ mile of each other will be considered the same site.
- **More clarification was requested on the daisy-chain effect.** Wells with only fugitives may have to be aggregated into one site if a company determines this is necessary.
- **What about three plants, with one < ¼ mile to two, two < ¼ mile from three, BUT one > ½ mile from three, is this one site?** Yes this is potentially one site. Each plant is located less than ¼ mile from any plant. The federal definition for site includes consideration of SIC code.
- **Stakeholders asked about engines authorized under PBR §106.512, Stationary Engines and Turbines; will these be part of a site?** The engines are included one way or another if the engines are supporting oil and gas operations.
- **Stakeholders questioned the use of PBR §106.511, Portable and Emergency Engines and Turbines for electrical/diesel emergency generator/engine and if the authorized generator should be considered part of the site.** Language may need to be added to the draft §106.352 to include facilities so authorized as part of the site.
- **Are non-stationary sources included?** The rule does not apply to mobile sources. This can easily be addressed by adding some language to the new draft rules.
- **Is surface coating included?** This will be a different PBR from the oil and gas PBR.
- **Stakeholders requested an explanation of modeling procedures.** Modeling was described, as well as how the concentrations level out at great distances. Modeling will be described in detail in future documents.
- **Will a new wellhead need separate authorization under a new source review (NSR) permit at an existing site under an existing, active NSR permit?** Ms. Inman asked to please provide comment about this, and the rule team will consider.
- **When does TCEQ break the site change at distances less than ¼ mile, can sites cross county boundaries?** Ms. Inman said it is a judgment call based on factors such as attainment status. The modeling has shown that there are cumulative effects from rolling operations in the field justifying the linking of sites within ¼ mile of each other.
- **For existing sites, what if changes are made at one plant of ten plants linked as a site?** All the plants will be affected and subject to the new rules, and as Mr. Hagle has already indicated, we cannot determine if such sites are insignificant without examining

the combined effect. This will discourage inefficiencies at sites. Ms. Inman requested comments about how the language is being interpreted by stakeholders.

- **Are two plants about ½ mile apart considered one site?** Would have to see the details to decide.
- **Are existing facilities that are not authorized by PBR and located between authorized facilities included in a site?** Ms. Inman said we would not necessarily include the existing facilities not under PBR (unless changes to these facilities are made)
- **Stakeholders are still unclear as to what must be authorized - the whole site or just parts and what portions of the proposed PBR apply - the whole PBR or just certain parts (i.e. just impacts).** The rule team will examine ways to clarify the rule language.
- **Please explain if other PBRs can be used with §106.352, Oil and Gas Production Facilities.** No other PBRs can be used for oil and gas site authorization. Other PBRs can be used for non-oil and gas operations.

Permit by Rule Sections (c) Authorized Facilities, Changes, and Activities and (d) Facilities, Changes, and Activities Not Authorized were discussed.

- **Can PBRs §106.351, Salt Water Disposal (Petroleum) and §106.352, be used together?** Yes.
- **Will blowdown emissions greater than 0.1 tpy VOC trigger applicability of rule?** The 0.1 tpy limit does not apply for blowdowns (considered MSS), but MSS is retroactive and must meet the emission limits as determined through use of the emission table in subsection (I).
- **Is a case-by-case permit amendment needed to make changes at a site?** §106.352 cannot be used, but sites can still use §106.261, Facilities (Emissions Limitations), §106.262, Facilities (Emissions and Distance Limitations), and §106.512 or other applicable PBRs instead of amending an existing permit.
- **Why are there staggered compliance dates in regards to MSS?** The Chapter 101, General Rule drive the applicability dates for MSS. Mr. Hagle added that the Chapter 101 rules do not provide details about submittal of information for MSS, and the purpose of the Chapter 101 rules for MSS was to provide staggered dates due to the large amount of MSS that must be addressed.
- **Do changes have to be claimed under §106.352 if another PBR can be used?** Other PBR's may be used for specific and applicable changes, however, the emissions

resulting from the change must conform with the site-wide emission limitations in §106.352.

- **What about replacement of a storage tank under an old standard exemption?** This tank would need to meet the requirements of the replacement portion of the PBR.
- **The 0.1 tpy limit is too strict, why not match up with limits in §§106.261 and 106.262?** These do not match up because §§106.261 and 106.262 are old rules. Please provide comments if you believe other emissions limits (with justification) could be used instead of 0.1 tpy.
- **Why exclude methane and ethane from regulation, and why not regulate all VOCs?** Methane and ethane are not VOCs, and we look at VOCs in more detail using appropriate effects screening level (ESLs).
- **There is no ESL for natural gas where did we get it?** Ms. Inman said please provide comment and we will review the ESL determination.
- **The stakeholders had several questions about engines.** Ms. Inman said that this will be discussed under the standard permit, and eventually PBR §106.512 will also be updated.

Permit by Rule Section (e) Best Management Practices (BMP) was discussed.

Ms. Inman discussed subsection (e) concerning BMPs. Ms. Inman talked about concentrated clouds of emissions and impressed upon the stakeholders that the TCEQ wants oil and gas site personnel to walk around the plants and observe operations to meet subsection (e). Comments are being considered about credits for subsection (e).

- **Stakeholders asked about the applicability of the rule to storm water tanks; what emissions trigger requirements?** TCEQ does not normally expect storm water to trigger the requirements of this proposed PBR. Emissions are expected from produced water.
- **Stakeholder commented that this PBR will overlap with less stringent storm water requirements.** The Air Permits Division has focused on produced water emissions, but must also address storm water, and will consider less stringent requirements for storm water storage.
- **Stakeholders commented that manufacture specs for use of equipment (under best management practices) are almost always for warranty purposes.** Ms. Inman said please provide examples of these differences.
- **Stakeholders stated that TCEQ needs to clarify mandatory and voluntary aspects of the rule.** Please provide us comments for specific application of those terms.

- **Is TCEQ sure about regulating emissions from produced water?** Yes. Examples of emission measurements were provided.
- **The stakeholders asked about allowing time for the building of new tanks to comply?** Ms. Inman said please provide comments about specific operational needs.
- **Are facilities associated with the actual drilling operations included under the draft rule?** Ms. Inman said please provide comments about specific equipment so TCEQ can make a determination.
- **Would a vapor recovery unit (VRU) with emissions less than 0.1 tpy be subject to this PBR ?** This unit would not be subject to the PBR requirements.
- **What about an engine that supports this VRU?** Ms. Inman said please provide comments, and we will see if this should be included in the rules.
- **Will a professional engineer need to sign site plans?** No.

Permit by Rule Section (f) General Requirements was discussed.

Section (f), General Requirements was discussed. Ms. Inman said please provide comments on engines that cannot be retrofitted or that cannot meet the requirements with retrofitting and the amount of time that will be needed for retrofitting. The TCEQ does realize that retrofitting is a large capital cost expense. Please note that federal rules for engines may be more restrictive. The TCEQ has found that “hot” color tanks have more emissions than reflective, light colored tanks. Ms. Inman requested comments about tank color. Most of the flare requirements are consistent with what is in §106.492, Flares. Thermal oxidizer requirements have been around for two decades. Ms. Inman discussed why vapor combustors are not in the draft new rule and requested comments on inclusion of vapor combustors.

- **Is TCEQ aware of thousands of contract agreements with landowners for green tanks?** TCEQ is aware of this and believes that such landowners will be agreeable with changes to light, reflective colors once aware of reduced emissions. Please provide comments on how to re-phrase the rules to account for such written contracts.
- **Stakeholders expressed further concerns about painting tanks.** Ms. Inman requested comments about percentage of surface on existing tanks that are already white and comments about when a tank should not have to be white considering what is being stored and existing controls on tanks that contain VOCs or hydrogen sulfide.
- **Did the TCEQ look at the dollar/ton cost for the tanks color requirements, and if no, why not?** TCEQ did examine costs for individual tanks but a total cost is unavailable because of unreliable site inventory information.

- **Stakeholders questioned if there would be any restrictions to account for the tremendous heat and noise from flares?** Ms. Inman said the way the questions were phrased it sounds like it would not be a problem where the Field Operations Division would have jurisdiction. Ms. Inman also said please provide comments concerning velocity testing for research.
- **Stakeholders questioned protectiveness review.** Not all types of possible facilities are listed because TCEQ does not have enough information concerning all types of facilities that may be present. For those facilities in the draft PBR, requirements and details have been clearly determined in the past.
- **In response to discussion, the stakeholders requested comments on how oil and gas operators can address retroactive proof of determining who was there first in regards to receptor distance limitation.** Ms. Inman requested language recommendations to help identify a specific time. She mentioned that property tax records could be used.
- **When will existing facilities be subject to all the new requirements?** If adopted, the new permit by rule would be effective 20 calendar days after filing with the Secretary of State. A standard permit can be effective anytime after commission approval.
- **Why are federal rules referenced for engines?** Federal rules may be more stringent than state rules in some instances and Texas has several counties in nonattainment areas.
- **Will small compressor engines be included in the draft rule?** Ms. Inman said please provide comments about facilities not yet addressed.
- **Stakeholders requested alternatives to the required percentage of control for amine units. The proposed control requirements are sometimes not possible.** Ms. Inman said please provide comments with specific examples.
- **Stakeholders commented that lean-burn engines cannot meet the 0.5 g NO_x/hp-hr limit.** Ms. Inman said please provide specific comments for such situations and the rule team would consult with the TCEQ permitting section for combustion sources.
- **Stakeholders commented that engines actually do run on sour gas at some sites.** Ms. Inman said please provide specific comments for engine models.
- **Why is 24 parts per million the hydrogen sulfide emission limit?** Ms. Inman stated that this was based on protectiveness of human health and requested comments and justification for a higher limit.
- **Stakeholders questioned justification on VRU emission limits.** Established technology, including VRUs, is used in PBRs. In specific instances, this established technology may be equivalent to best available control technology. The use of VRUs is

well-established, but the calculation of emissions and site use consideration is new. Specific comments about VRUs was requested.

- **Stakeholders requested offsets for VRUs** Ms. Inman said we would not provide offsets, and because VRUs recover product, they are typically cheaper to run than other types of controls.
- **Stakeholders questioned why there was no allowance for permitting upset emissions.** It is already well established that the TCEQ does not permit upset emissions.
- **A stakeholder said he sees maps where sour gas is piped to sites, but companies are actually basing emissions on being sweet gas sites; the stakeholder said Freestone County is an example.** Ms. Inman said some sites actually use LPG from pressurized tanks for such sites. Sulfur dioxide is the concern for engine emissions, not hydrogen sulfide. Ms. Inman said we would have to look back in TCEQ records to see if we could find sour gas being used for fuel for engines. Some sites use electrically driven compressors.
- **How does the draft rule address 33,500 tpy of NOx emissions from a particular area?** Ms. Inman said that air permitting does not look at cumulative background emissions, and air permitting examines cumulative emissions from a site. Others at the TCEQ look at and evaluate cumulative background for regional areas.
- **Power plant emissions need to be considered in cumulative effects under the oil and gas permits.** This comment will be passed on to the state implementation group, and allowable emissions database group.
- **Why does TCEQ include a permit condition for something TCEQ does not permit such as upset conditions?** This condition states that upset conditions are not permitted and should be addressed through TCEQ Chapter 101, General Rules.
- **Are engine limitations meant to affect engines used in “like-kind” replacement?** No.
- **What does “containment” mean when used in regard to storage tanks?** The term “containment” will be clarified.
- **What would be the maximum emissions from glycol units/amine units that would not require controls?** This is currently being considered by the TCEQ based on a best available control technology assessment.
- **Do amine unit emissions need to be routed to a destruction device when they are at a level where further destruction is not economical?** The rule team will examine amine unit control options. The owner/operator would be responsible for meeting any control requirement.

Permit by Rule Sections (g) Level 1 Notification and (h) Level 2 Registration were discussed.

Ms. Inman discussed section (g) for Level 1 notification and section (h), Level 2 registration. Ms. Inman discussed how the new draft rule requires that you let us know what exists by at least notification and that you follow up later with new information for sites that started as new sites. What will be required for sites with compliance problems was also discussed.

- **A stakeholder stated that the PBR needs a requirement for individual use public notice/comment.** PBRs, by statute, do not require public notice for each individual use of the authorization.
- **Does TCEQ expect a log-jam with all the submittals that would result from these new oil and gas rules and will this proposal affect permitting costs?** The Air Permits Division will not be reviewing all the submittals and will make use of E-permitting. No delays or fee increase are expected.
- **A stakeholder commented that using VRUs twice the size as necessary actually causes other emissions such as NO_x to actually increase.** Ms. Inman said please submit comments for such operational problems, as manufacturers recommend larger units for proper operation.
- **Can the language be clarified for notifications, registrations, certifications, and for when construction can actually begin?** Yes
- **Will this be a SIP revision for submittal to the EPA?** The TCEQ does not yet know.
- **The EPA does not like PBRs, so what if companies spend a lot of money to meet the new rules that is moot due to later objections from the EPA?** The TCEQ understands the concern, and the TCEQ is currently discussing the new oil and gas rules in great detail with EPA Region 6.
- **Can a site use emergency flares?** A site can have emergency flares.
- **What emissions need to be looked at for Level 1 and Level 2 impacts demonstration?** Ms. Inman specifically read out what emissions have to be addressed under Level 1 and Level 2 of the draft PBR. Level 1 registration would be subject to section (g)(3), (benzene, formaldehyde, and NO_x). Level 2 would be subject to section (h)(2), crude oil, condensate, benzene, formaldehyde, hydrogen sulfide, sulfur dioxide, and NO_x
- **Would the 50 foot separation distance apply to other types of occupied buildings in consideration of the term “receptor”?** Ms. Inman said please provide comments if you believe other buildings should be considered receptors.

- **Are treatment chemicals regulated under this rule?** Degassing, truck loading, treatment chemicals, and used sand were not addressed under these new oil and gas rules. The EPA is looking at used sand.
- **What are the proposed fees?** We do not have a firm feeling for the fees yet. Tentatively, we may not propose a fee for submission of basic core data. TCEQ does not want to make this requirement burdensome or make compliance difficult.
- **What will be the standard permit fee?** Fee will stay at \$900.
- **After paperwork is submitted, can construction begin that day or must it wait until the TCEQ responds with a confirmation of the claim?** Level 1 registration requires submission of paperwork within 6 months after beginning operation. Level 2 registration and registration under the standard permit require written confirmation of registration from TCEQ before start of construction.
- **Why does the rule allow a delay in the submission of Level 1 registration?** The small emission increases under Level 1 requirements do not have a measurable effect on air quality of health effects.
- **What about compliance issues unrelated to emissions such as recordkeeping?** Ms. Inman will consult with the personnel who helped write the relevant sections.

Permit by Rule Section (i) Planned Maintenance, Start-ups, and Shutdowns (MSS) was discussed.

- **Can the option be added for companies to speciate emission in order to meet emission limits?** Yes, speciation is fine.

Permit by Rule Section (j) Records, Sampling, and Monitoring was discussed.

Ms. Inman discussed Section (j), Records, Sampling, and Monitoring. Accurately accounting for some emissions, e.g. formaldehyde from engines, has been hit or miss in the past. TCEQ does not intend to be redundant and requests comments concerning redundant records.

- **Will monitoring of tank emissions be required?** No, and only testing of samples will be required (as part of demonstrating compliance).
- **Why keep records of engine oil changes does testing not already account for proper operation?** Testing represents a point in time, records of ongoing maintenance are an indicator of good operating condition and lower emissions.
- **Can stakeholders use equivalent test methods for engines?** Ms. Inman requested specific comments on alternative methods.

Permit by Rule Section (k) Emission Table Uses Based on Impacts Evaluation was discussed.

Ms. Inman discussed section (k), Emissions Table Uses. Stakeholders were provided with two examples and encouraged to comment. The NO₂ 1-hr standard, H₂S, and benzene will be the primary drivers for addressing emissions. The rule team will try to develop spreadsheets and more examples.

- **Why no stack height requirements?** A minimum stack height requirement is no longer needed as stack heights may vary according to distance to receptors and emission rates. The tables specify the stack heights, where applicable. It is possible that companies will use reverse-engineering for determining stack heights.
- **Can detailed modeling (as opposed to Screen3 modeling) be used for determining dispersions at sites?** TCEQ will propose such but do not believe the EPA will approve.
- **The calculation approach using emission tables is conservative and abbreviated. Have we considered doing a more comprehensive dispersion modeling analysis approach?** The rule team is seeking to balance the flexibility of the authorizations with the complexity of their use while maintaining protection of human health. The rule team requests comments on alternative methods.

Ms. Inman said the draft PBR and standard permit requirements do not apply to engines for drilling rigs. Within very narrow boundaries, site-specific modeling to demonstrate compliance may be added to the new draft rules. There would be no allowance for case-by-case review.

- **Why not just reference §106.512 and §106.492, Flares?** Ms. Inman said these PBRs are outdated for oil and gas applications.
- **Then, why not open §106.512 and §106.492 to update also?** Ms. Inman said we have tight deadlines and do not have the time to update these PBRs as part of this project.
- **Is the intent of the draft rule that leak detection and repair (LDAR) apply to all sites?** Best management practices, including LDAR would apply to all sites as indicated in the rules.
- **Stakeholders asked about application of the draft PBR following engine upgrades.** Ms. Inman requested specific comments on operational examples. Additionally, the new NO₂ 1-hr standard will most likely drive emission limits more than what is specified in the new rules.

- **The stakeholders questioned periodic monitoring requirement for repaired or overhauled engines.** Ms. Inman said please submit comments for the combustion permitting engineers to evaluate.
- **How do you interpolate from the tables?** Ms. Inman explained briefly and also said that the lower and upper boundaries of the table cannot be exceeded.
- **What is the purpose of the term “72 hours” in the definition of facility?** After 72 hours, a well test becomes a stationary source and needs an air authorization.
- **How are oil and gas operators supposed to know 30 days in advance when worst case testing conditions will be?** This will be further clarified in the rules.
- **Monitoring of flares is very expensive. Can owners/operators have other options?** The rule team is certainly open to other options for flares for the monitoring, and please submit comments and suggestions.
- **The stakeholders commented that other states have different options other than IR cameras for leak and emission detection.** Ms. Inman said please submit comments and suggestions.
- **Stakeholders asked if monitoring requirements be more specific and something more reasonable than continuous monitoring?** Ms. Inman requested comments on specific and equivalent alternatives.

PBR Table 6 Monitoring and Records Demonstration

- **What are the options regarding fuel use monitors? Could sites measure fuel use on a site basis?** It depends on the situation, such as one fuel use monitor for five identical engines may be acceptable. In general, each facility needs its own fuel use monitoring.
- **Why so many run meters/fuel use meters?** Ms. Inman requested comments for alternatives.
- **How will the rule address a situation where a maximum achievable control technology (MACT) standard that has different continuous emission monitoring requirements?** Ms. Inman requested specific comments for any conflicts, and the rule team will consider matching the rules language with MACT standards.
- **How do owners and operators group facility changes (per project), and can owners and operators use §106.261 and §106.262?** Ms. Inman requested comments for grouping suggestions, and stated that §§106.261 and 106.262 cannot be used with either §106.352 or the standard permit for oil and gas sites.

- **Can calibration timelines be specified?** Ms. Inman requested comments on practically enforceable calibration schedules for engine and fugitive leak detection and repair instruments.

Draft of new Air Quality Standard Permit for Oil and Gas Production Facilities

Ms. Inman said sections (a) and (b) of the standard permit are essentially the same as the PBR.

- **There are LDAR calibration requirements. How often?** Ms. Inman said we will determine and add the language.

Standard Permit Section (c) concerning authorized facilities, changes and activities was discussed.

Ms. Inman said section (c) is essentially the same as the PBR. She requested comments about what is the appropriate time frame for meeting BACT; renewal is required every ten years. The rule team needs comments about time/cost/location/availability concerning retroactive applicability of PBR requirements

- **Please explain the hierarchy of air authorizations** Ms. Inman explained the hierarchy including de minimis, permit by rule, standard permit, case-by-case new source review (NSR) permit, plant-wide applicability limits, prevention of significant deterioration, nonattainment new source review, and the federal operating permit program.

Standard Permit Section (d) facilities, changes, and activities not authorized and section (e) Best Management Practices (BMP) were discussed.

Ms. Inman said sections (d) and (e) are essentially the same as the PBR.

Standard Permit Section (f) General Requirements was discussed.

Ms. Inman requested comments about the current requirements specified for glycol units in Table 7, BACT and Control Device Requirements. Table 7, Table 8, Control Device and BACT, and Table 9, Fugitive Component LDAR and BACT were discussed. Ms. Inman requested comments if more reasonable requirements can be in the standard permit to limit the number of sites that would have to get case-by-case NSR permits instead.

- **This LDAR in the standard permit is more stringent than federal New Source Performance Standards.** Ms. Inman said yes it is, and has always been that way. The rule team will consult with the chemical permitting section for confirmation.

Standard Permit Sections (g) and (h) were discussed.

Ms. Inman said sections (g) and (h) are essentially the same as the PBR.

Standard Permit Section (i) planned MSS, was discussed.

Ms. Inman stated that section (i) is essentially the same as the PBR. She also stated that the major differences between the draft standard permit and PBR are the existence of universal registration requirements for the standard permit, the necessity for BACT in the standard permit, and sites authorized under the standard permit can use §106.261 and §106.262.

- **Is there a chance for reduced standard permit fees?** Ms. Inman requested specific comments on cases for reduction and the rule team will consider them.
- **Please explain impacts?** The site's emissions need to be limited or adequately dispersed to protect human health based on cumulative emissions from the entire site. Sometimes it is only necessary to examine changes in emissions.
- **What if a site is not meeting limits?** Ms. Inman said permitting does not look at this. Regional offices will verify compliance.
- **What is field gas?** This is gas that is produced at the site, treated if necessary, and used at the site.
- **What about field gas testing?** Field gas will need to be tested as required in the rules.
- **Why is flare monitoring not always required?** Correctness and clarity of the wording will be checked.
- **Is it necessary to require testing of engines less than 500 hp?** The rule team is evaluating the need for this monitoring.

III. Closing Remarks/Action Items.....Anne Inman

Ms. Inman thanked everyone for coming. Submit comments by April 16 for items affecting the feasibility of this rule and standard permit. Comments may continued to be submitted after April 16, however if comments are submitted before the start of the formal comment period and are not incorporated in subsequent rule drafts, then please RESUBMIT your comments in writing during the formal comment period, and they will be addressed. Continue to send comments in by fax or e-mail to Ms. Inman.

NOTE – April 13, 2010- COMMENT PERIOD EXTENDED UNTIL APRIL 30, 2010