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December 4, 2006

San Joaquin Valley APCD
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Jon

ATTN: Mr. ~~Dave~~ Warner

SUBJECT: Comments on Draft Policy COM 2045 - Rule 2020 (Permit Exemptions)

Section 6.13 of the subject policy reads as follows:

6.13 Under normal situations, unvented pressure vessels associated with a unit that is permit-exempt, are also permit exempt, because their configuration doesn't allow venting of VOC's.

This wording still leaves Section 6.13 open to interpretation because pressure vessels can be "vented" to a closed piping system and still not be a significant source of VOC emissions. It should be clarified that "unvented" means the vessel is not vented to atmosphere.

Aera proposes this alternate language:

6.13 Unvented pressure vessels (i.e. not vented to atmosphere) associated with a unit that is permit-exempt, are also permit-exempt, because the vessel's intrinsic design does not allow venting of VOC's. Also, a vessel is not considered "vented" if it can only vent through an associated emergency relief device.

Thank you for the opportunity to comment on this draft policy. Should you have any questions, please contact me at (661) 665-4363 or e-mail btwinn@aeraenergy.com.

Sincerely,

Brent Winn
Environmental Engineer – Belridge

cc: EHS File (s)