

BEST AVAILABLE CONTROL TECHNOLOGY (BACT) GUIDELINE 1.3.1

| Equipment Category: Fixed Roof Tanks in Oil and Gas Service | | | |
|---|---------------|--|--|
| Revision: | 1.2 | | |
| Date: | June 14, 2017 | | |

| Pollutant | BACT Requirement | BACT Technology | Performance Standard | AIP/TF |
|-----------|---------------------|---|--|--------|
| ROC | 1 | Vented to properly sized vapor recovery system (VRS) | 95% short term and long term VRS efficiency | AIP |
| | 2 | Equipped with pressure safety valve (PSV) | Set to within 10% of maximum allowable tank operational pressure | AIP |
| | 3 | PSV vented to VRS or closed vent system routed to control device ⁴ | 95% short term and long term VRS efficiency | AIP |
| | 4.a | PSV uses soft seat design ⁵ | 100 ppmv leak detection and repair rate (LDAR) | AIP |
| | 4.b | PSV Release Minimization Plan ⁵ | Corrective action required after 3 PSV releases within 1 year | AIP |
| | 5 | New/replaced components meet BACT as defined by BACT Guideline 1.2 | See BACT Guideline 1.2 | AIP |

Notes:

- 1. AIP means Achieved in Practice. TF means Technologically Feasible.
- 2. BACT is the most stringent control technique for the emissions unit and equipment category that is either achieved in practice or technologically feasible/cost effective.
- 3. BACT determinations are subject to periodic updates without advanced notice.
- 4. BACT Requirement 3 is not required if deemed technically infeasible due to source configuration or safety concerns.
- 5. BACT Requirements 4.a and 4.b only apply if BACT Requirement 3 is deemed technically infeasible due to source configuration or safety concerns.