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Kerri Timoffee
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Air Emissions Priorities
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Dear Ms. Timoffee,

Re: Invitation to comment on a proposed regulation limiting various air pollutants from major industrial sectors and equipment groups

Thank you for the opportunity to provide comments on the Multi Sector Air Pollutant Regulation (MSAPR). On behalf of the Canadian Energy Pipeline Association (CEPA), I would like to offer the following comments for consideration.

CEPA has participated extensively in the development of the equipment level Base-Level Industrial Emissions Requirements (BLIER) for reciprocating engines. As a result, these comments reflect our perception of how this overarching regulation may interact with how we understand the Stationary Spark-Ignition Gaseous-Fuel Fired Engine Regulation (hereby referred to as “the Reciprocating Engine BLIER”).

Facility Definition: The Reciprocating Engine BLIER has been drafted with less of an emphasis on facility-level regulation and more on achieving NOx reductions at an organizational level. There are options embedded within this BLIER which make allowances for a fleet wide averaging processes to determine NOx emissions. With this in mind, the MSAPR seems to have a significant shortcoming, as it appears to be more facility-centric. It would seem reasonable to provide an alternate set of administrative definitions that can be applied at an organizational or fleet level.

Definition of Responsible Person: The responsible person is defined as either “the owner or operator having charge, management, or control of a facility or equipment”. This is again inconsistent with the intent of the Reciprocating Engine BLIER, where the responsible person would be designated to be an individual at an organizational level. It would be impractical to have either the owner or operator of a facility making the decisions related to the collection and submission of data for an entire fleet of engines that may cross any number of operational boundaries. CEPA suggests more flexibility be incorporated into the definition of a “responsible person”.

Definition of “Authorized Official” – Section 4.1 (a) & (b) references the “authorized official of the responsible person”, however there is no associated definition within Section 3 to support what is intended by this particular role. Please provide a definition of this role. The Draft

BLIER regulation for Reciprocating Engine has defined this role in a way that is acceptable.

Definition of "Company-authorized Technical Authority": Within the Reciprocating Engine BLIER, there is a commitment to providing a definition for this role within the "mega regulation", however this draft does not address the definition. There is a need to define the appropriate delegation of authority between the Authorized Official, Responsible Person and the "Technical Authority".

Reciprocating Engine Definition: Under section 3, there are definitions provided for boiler, non-utility boiler, and heater, however there are no definitions for reciprocating engines. It is recommended that this definition be added into the document for the sake of completeness, and that it is consistent with the definition that is included in the draft BLIER for this particular equipment group.

If you require any clarifications on the above comments, please don't hesitate to contact me for clarification of these issues. Thank you once again for accepting comments on this regulation.

Sincerely,



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