February 18, 1999

Dear Sir or Madam:

Enclosed is the final "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities" (guidelines document). The guidelines document represents a multi-year effort on the part of industry, the California Air Pollution Control Officers Association (CAPCOA), and the Air Resources Board (ARB), to provide a consistent approach for purposes of estimating fugitive emissions from equipment components used in the California petroleum industry.

The guidelines document was prepared by the CAPCOA Engineering Managers Fugitive Hydrocarbon Emissions Subcommittee and the ARB staff. The document contains recommendations that can be applied uniformly to all California districts, as well as recommendations which each district may use at its own discretion. The guidelines document will facilitate the development of emission estimation protocols between industry and the local air districts.

If you have questions about the guidelines document, please contact Ms. Kim Nguyen, Air Resources Engineer, Industrial Section, Criteria Pollutants Branch at (916) 327-1513, or Mr. Gary M. Yee, Manager, Industrial Section, Criteria Pollutants Branch at (916) 327-5986.

Sincerely,

[Signature]
Dean C. Simeroth, Chief
Criteria Pollutants Branch

Enclosure

cc: California Air Pollution Control Officers Association Engineering Managers Fugitive Hydrocarbon Emissions Subcommittee Members

Gary M. Yee
Industrial Section

Kim Nguyen,
Industrial Section