

Based on our review of the technical specifications, Kimray believes that the pneumatic devices addressed in the following letter do not fall under the definition of continuous or intermittent bleed pneumatic devices as defined at 40 CFR 98 Subpart W.

Kimray, Inc. is a manufacturer of valves and control devices that have been identified to be a potential source of emissions when greenhouse gases (GHG) are the controlled media or used as motive force for actuation. Emissions are classified into three categories: fugitive, continuous bleed and intermittent vent.

- Fugitive emissions are typically unintended and are not considered necessary for proper operation of equipment. Sources of fugitive emissions include stem packing, flange connections, cover joint connections, and other joints that present a potential leak path to atmosphere. Due to their unintentional nature and variable extent of causation, these emissions are difficult to predict and quantify for reporting purposes. Typically, fugitive emissions are very low in comparison to other sources.
- GHG emissions from a continuous bleed-type controller are an intentional bypass of media from source pressure to atmosphere in order to provide a constant downstream reference pressure for controlling purposes. The media is passed through a fixed orifice at a critical level that is predictable. The defining characteristic of a bleed-type controller is the direct connection of supply pressure to atmosphere. These emissions are predictable and quantifiable to a reasonable level of accuracy. Bleed-type controllers may be classified as highbleed, low-bleed or intermittent-bleed.
- Intermittent vent controllers open and close pilot valves sequentially in order to manipulate a control valve or end device. The sequential operation of pilot valves allows the proper amount of gas to be directed to and from the control device, and ensures that the supply gas is never directly connected to the atmospheric vent port. Intermittent vent controllers vent gas to atmosphere only when the controlled device requires a change in position.

In comparison, intermittent vent controllers have a lower rate of emissions than that of any of the bleed-type controllers. Since the same amount of motive force gas is required for actuation of any controlled device regardless of the controller, the bleedtype controller will vent that amount plus the sum of the bleed gas between actuation cycles.

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Kimray, Inc. control devices utilize a three-way pilot valve with three operating positions: supply to device, blocked condition, and device to vent. The inherent design characteristics of the three-way pilot valve do not allow the device to bleed any amount of supply gas, and can therefore be classified as a non-bleed device. The sources of GHG emissions for Kimray, Inc. controllers include only fugitive emissions and motive force gas required to operate an end device.

EPA has defined continuous and intermittent bleed pneumatic devices at 40 CFR 98 Subpart W. Based on our review of the technical specifications, Kimray believes that the pneumatic devices addressed in our letter do not fall under the definition of continuous or intermittent bleed pneumatic devices as defined at 40 CFR 98 Subpart W.



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