The TCEQ held two stakeholder meetings for the Supplemental Leak Detection Advisory Group. A brief overview of the concept memo was provided at each meeting and the floor was opened for comment. The following comments and questions were presented by attendees:

1. Why doesn't the rulemaking include use of the camera as an alternative means of leak detection? If you can't lighten the load of LDAR what's the use? We're running around measuring non-leakers. Why can't we use the camera to reduce the frequency of looking at non-leakers.
2. Suggests that the camera should be used for more mature (long-term) programs.
3. The repair time under the ethylene MACT is 45 days, with two 30-day extensions; could the repair time be lengthened?
4. Would a petition for rulemaking be necessary for use of the camera as an alternative means of leak detection?
5. TCEQ needs to consider a provision that allows owners/operators to ask for an extension of the pre-determined "reasonable time period."
6. Is reporting under the emissions inventory requirements still required?
7. Suggest that TCEQ and company have a mutual agreement as to timing and difficulty for plans for finding leaks on equipment for which there is no prior leak-detection experience.
8. Is reporting under existing LDAR requirements still required?
9. Because the camera is easier to use and leaks will be found more quickly, it should be used on LDAR components (on a more frequent basis than quarterly), and TCEQ should offer incentives for finding and fixing leaks faster.
10. For leaks that are found earlier than required, those leaks should not be counted toward a leak rate; that is an incentive that could be offered.
11. For covered, non-scheduled components, entities still have to use Method 21. All leaks should be measured rather than be a guess.
12. Because a benefit of using the camera is being able to use it where Method 21 won't work, the program should not be too restrictive.
13. Incentives should be offered for use of the camera in startup periods (before monitoring requirements begin), and possibly also for shutdowns.
14. Because the Alternative Work Practice was pending at EPA during the 2007 legislative session, the basis for HB 1526 was to provide incentives to (a) those already using the camera to use it more, and (b) those who were not using it to start using it. The incentives were intended as rewards for using the camera.
15. Met with Rep. Smith during the initiation of this bill. Smith wanted to reward the people that want to use the camera above and beyond any requirements.
16. What changes could be made to a permit if an entity agreed to have a camera?
17. The camera is equivalent to Method 21 and is an alternative to Method 21.
18. Has TCEQ considered anything more stringent?
19. The camera responds to mass emissions, and Method 21 responds to concentration. The use of the camera is targeted to finding environmental harm.
20. Wants TCEQ to rely on studies performed over nine years and asked if those can be used for any Alternate Means of Control (AMOC) options in Chapter 115 or any other relief from requirements in Chapter 115.

21. Wants TCEQ to focus on alternative work practice, not HB 1526. Give industry the tool, and the benefits will accrue; they don't need any other incentive. They have the Audit Privilege Act to provide all the incentives needed.
22. HB 1526 may be more of an impediment and a disincentive. We can do this now under the Audit Privilege Act. Find and fix and get enforcement discretion.
23. Can any change be made to the statute in the current legislative session to change the word "supplemental" to "alternative"?
24. Is there any constraint, time-wise, on TCEQ to work on both Alternative Work Practice before or at the same time as implementing HB 1526?
25. Can incentives for non-traditional components be developed first?
26. Has TCEQ considered the calculation of FCAA Section 185 fees as an incentive?
27. What incentive would be available if a leak on a non-LDAR component is found?
28. Want to use both the Audit Privilege Act and the Voluntary Pollution Program (which is not allowed today) as one of the incentives. In other words, be eligible for penalty reduction under both.
29. Questions were included what is a leak and whether the leaks are violations or required to be reported under Title V deviation requirements.
30. Would want credits as an incentive.
31. Can a greater percentage reduction (over the established reduction allowed by the TCEQ) be claimed for a 28VHP or similar leak program as an incentive for finding and fixing leaks?
32. Asked if Field Operations Division will use cameras more in the future, and if this is an opportunity for industry to use the camera sooner to detect leaks.
33. Asked if camera is used to issue violations for non-traditional components.
34. Asked if the camera would be used as a targeting tool prior to an investigation.