

LDAR and Flare Regulatory Update

LDAR/Flare Workshop
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Regulatory Overview

First Some Background - SPPD's Multipollutant Sector Approach

- Identifying key industrial sectors
- Developing a thorough understanding of these industries and their air pollution concerns
- Considering all emissions in developing standards – no stranded costs
- Clarifying and simplifying rules as appropriate
- Key component is standardizing rule requirements - uniform standards for:
 - control devices
 - storage vessels
 - wastewater
 - heat exchangers
 - equipment leaks

Uniform Standards Concept

- ▶ Refer to “regulated pollutant”
 - ▶ Air toxics
 - ▶ Criteria pollutants
- ▶ Focus on compliance
 - ▶ Specifications for equipment standards and work practices
 - ▶ Monitoring, recordkeeping, and reporting requirements
- ▶ Only triggered when referenced by a sector rule (MACT or NSPS)
 - ▶ Will be the “gold standard,” making referencing subpart more effective
 - ▶ Applicability determined by referencing sector rule
- ▶ Technology reviews designed to satisfy both MACT and NSPS 8-year reviews





Flare Regulatory Update

Development of New Requirements for Flares in Control Device Uniform Standard

- Plan to revise the flare general provision requirements in the control device uniform standard
- Requirements would be applied initially to the refining and chemical sectors in future rulemakings being proposed at the end of this year
- Changes, clarifications, and new requirements under consideration:
 - Additional monitoring, recordkeeping, and reporting requirements
 - Include all gases being supplied to the flare in the Net Heating Value calculation
 - Limit over-steaming of flares
 - Create requirements for pressure assisted flares



LDAR Regulatory Update

NSPS VV/VVa/GGG/GGGa LDAR for SOCFI and Refineries

- Request for reconsideration
 - Requirements in the final rule were not proposed
- Requirements being reconsidered
 - Process Unit Definition – battery limits, property boundaries
 - Capital Expenditure Definition – retroactively triggered applicability (1/1/06 – 11/7/06 original construction date; 11/16/07 – commencement of physical change)
 - Allocation of Shared Storage Vessels (VV and VVa)
 - Connector Monitoring Requirements (VVa) – new requirements in the final rule with no opportunity for comment
- Reconsidered requirements are stayed
- Rule Schedule:
 - Subpart VVa will be proposed with Chemical Sector Rule in November
 - Subpart GGGa will be proposed with Refinery Sector Rule in December
 - Subparts VV/GGG will be proposed in December

Alternative Work Practice for LDAR

- Rule finalized – December 22, 2008
 - Alternative to Method 21 for leak detection
 - Use of optical gas imaging instrument
 - Covers LDAR requirements in Parts 60, 63 and 65
 - Monitoring frequency options: monthly, semi-quarterly, or bi-monthly (corresponding detection sensitivity levels (g/hr))
 - Leak: any emissions imaged by the optical gas imaging instrument
- Request for reconsideration – February 20, 2009
 - Annual Method 21 requirement
 - “Unsafe-to-Repair” issues
 - Video records storage
- Reconsideration proposal December 2011

Equipment Leaks Uniform Standards

- Chemical and Refinery sector rules (MACT and NSPS) will point to the uniform standard for applicable equipment leak standards (leak definitions, monitoring frequencies, reporting and recordkeeping)
- Standards developed using a technology review and cost effectiveness
- Standards will reduce compliance burden
- Uniform standards will be proposed August 2011

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