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Rule: 2009-009-101-EN

Comments:

GREEN is pleased to see that TCEQ is proposing to allow on-site emissions reductions projects as a means of reducing or offsetting the fee payment (Equivalent Alternatives and Supplemental Environmental Projects). Because these fees may be quite large, the installation of thermal oxidizers to replace flares could now become cost-effective for many sites. If this option is chosen, this may also serve to allay many of TCEQ's and EPA's concerns about flare destruction efficiencies, which are currently being investigated by TCEQ's Flare Task Force.