

Questions and Comments for LDAR Alternative Work Practices Rulemaking Project

1. (Demonstrate Equivalency) One of the initiatives that were stated in the outline is to make sure that the AWP does not demonstrate any backsliding under the Federal Clean Air Act.

If the camera is not able to identify as many leaks as Method 21, is this not considered backsliding? If the camera does not allow a technician to identify all leaks, not just ones leaking over a certain threshold or limit, how does this practice improve our environment through the Federal Clean Air Act?

2. Ways to ensure gas imaging technology is used effectively to find fugitive emissions leaks.

The traditional way that the camera is currently being used is by scanning areas and looking at many components at one time not monitoring each component.

Since we now have the capability of auditing how much time a technician monitors each component depending on the size of the component, technicians are consistently finding more leaks. It is our opinion that the amount of time spent properly performing method 21 does directly affect the number of leaks that are found. Therefore, is the camera technician going to be required to spend equal amount of time on each size component. How do you effectively audit this process?

3. Can the camera identify 500ppm on a consistent basis?

We have used the camera since 2005 on a 40 hour a week basis. We believe that the camera has a difficult time identifying leaks below 2500 ppm with any consistency. The current Method 21 method for leak detection consistently identifies more leaks than the gas imaging technology. With elements that hinder the technician's ability to visually identify leaks (outside temperature, wind, sun or cloudiness), how can anyone positively agree that this is a better method to accurately identify leaks.

4. There are many important and valuable uses for the gas imaging technology; identifying large leaks quicker, identifying untraditional leaks, etc. Since the leak threshold is not comparable to other gas detection technologies (it does not have the capability of quantifying, it can only see limited leak rates, and it cannot identify all VOCs), gas imaging technology is better suited to supplement a successful LDAR program.