

TCEQ HRVOC Stakeholder Group
Meeting Topic: FLARES
January 9, 2004
9:00 AM
TCEQ Bldg. F, Room 2210, Austin, Texas

Summary of Issues / Comments -

General Concerns

- Concern was expressed by EPA regarding the exclusion and exemption of maintenance, startup and shutdown emissions in the rule.
- Snapshot tests - are they representative of the normal operation of the flare to be used in lieu of monitoring?

Temporary Service & Emergency Flares

- A couple of participants requested consideration for analyzer exemptions for temporary use flares; would like the TCEQ to consider other alternatives for analyzers.
- A participant suggested that in situations where there is no physical restriction to prevent emissions from being routed to the flare, that a baseline measurement of flow and composition be made to establish baseline emissions. A flow meter would be used to flag increases in flow that may indicate an increase in emissions above the baseline. This would trigger measurements to determine what changes occurred in emissions. Finally, a corrective action plan would be utilized to take care of baseline deviations.
- A participant suggested a rule be written that would define a temporary flare based on operational time and de minimus trigger on a mass basis.
- A participant suggested clarification language for temporary portable flares in §117.725(e)(2)(b) to specify that the intent is to address temporary portable flares in *HRVOC service*.

Pipeline Flares

- A participant requested consideration for analyzer exemptions for pipeline flares and would like us to consider other alternatives for analyzers, such as calculations. Some of the issues with measurement stem from the fact that pipeline flares will have both liquid and gas flows.
- A statement was made that flares in pipeline service have difficulty meeting 40 CFR 60.18 at the end of the line cleaning activity but the claim is that the emissions would be low during this time.

Low Flow/No Flow Flares

- A participant suggested that salt dome operations should be exempt.
- Discussion on salt dome “degassing” flares and the need for technical information to demonstrate the claim of “no emissions” from these flares (except in extreme conditions) so they may qualify as emergency flares. A meeting participant has provided a report to the TCEQ that requires further evaluation. Staff requested more technical support documentation to demonstrate that the testing was representative and under no operation, except emergencies, will there be emissions.

- A participant suggested a de minimus level be established for flow.

Multi-Account/Shared Flares

- A participant suggested clarification of the responsible party for multi-account/shared flares or who should the enforcement action should be imposed upon in cases of violations of HRVOC caps and general requirements.
- A participant requested consideration for alternate monitoring methods for flares in series with a physical restriction (e.g. water seal) preventing any gas flow to the emergency flare (normally). Composition measurement on a normal flare would represent composition on an emergency flare when being used.
- TCEQ staff stated that multi-account/shared flares have the potential to cause problems for enforcement, monitoring, and cap compliance and staff requested feedback from participants to see how prevalent this issue is.

General Rule Language Suggestions

- Several participants suggested incorporation of rule language to define the 10 tpy of HRVOC as a default cap if an account is not listed.
- Several participants suggested incorporation of rule language to define “account” as it is intended for HRVOC emissions.
- A participant suggested incorporation of rule language to ensure that executive director approval for alternate means of determining the flare flow rate in 117.725(d)(1) applies only to normal operation flares; relocate the alternate means of determining the flare flow rate provision, and incorporate additional provisions for emergency flares and other eligible flare operations.
- A participant suggested incorporation of rule language to define low flow flare and state whether it could be considered an emergency flare.
- A participant suggested incorporation of rule language to exempt companies from the metering and monitoring requirements if they shut down before 04/01/06.
- A participant suggested incorporation of rule language to define, ‘pipeline flare’ as it could be interpreted as a temporary flare.

Action Items

- TCEQ staff to review Emission Inventory to determine how companies report emissions in cases of multi-account/shared flares.
- Interested parties to provide technical information to support the need for changes that they described in the meeting (especially pipelines, salt domes and N2 baseline measurements).
- TCEQ staff to coordinate a future stakeholder meeting for the discussion of HRVOC site-wide caps.
- TCEQ staff to post the Quality Assurance Plan (QAP) template on the SIP website.